

Form No. S12A
表格第 S12A 號

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

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

此文件在 2021年 9月 15日 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。 15 SEP 2021

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

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/YL-MP/6
	Date Received 收到日期	15 SEP 2021

- The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board (the Board), 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申請人須把填妥的申請表格及其他支持申請的文件 (倘有), 送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會(下稱「委員會」)秘書收。
- Please read the "Guidance Notes" carefully before you fill in this form. The document can be downloaded from the Board's website at <http://www.info.gov.hk/tpb/>. It can also be obtained from the Secretariat of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong (Tel: 2231 4810 or 2231 4835), and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories).
請先細閱《申請須知》的資料單張, 然後填寫此表格。該份文件可從委員會的網頁下載 (網址: <http://www.info.gov.hk/tpb/>), 亦可向委員會秘書處 (香港北角渣華道 333 號北角政府合署 15 樓 - 電話: 2231 4810 或 2231 4835) 及規劃署的規劃資料查詢處(熱線: 2231 5000) (香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓)索取。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters. The processing of the application may be refused if the required information or the required copies are incomplete.
此表格可從委員會的網頁下載, 亦可向委員會秘書處及規劃署的規劃資料查詢處索取。申請人須以打印方式或以正楷填寫表格。如果申請人所提交的資料或文件副本不齊全, 委員會可拒絕處理有關申請。

1. Name of Applicant 申請人姓名/名稱
(<input type="checkbox"/> Mr. 先生 / <input type="checkbox"/> Mrs. 夫人 / <input type="checkbox"/> Miss 小姐 / <input type="checkbox"/> Ms. 女士 / <input checked="" type="checkbox"/> Company 公司 / <input type="checkbox"/> Organisation 機構)
Capital Chance Limited

2. Name of Authorised Agent (if applicable) 獲授權代理人姓名/名稱 (如適用)
(<input type="checkbox"/> Mr. 先生 / <input type="checkbox"/> Mrs. 夫人 / <input type="checkbox"/> Miss 小姐 / <input type="checkbox"/> Ms. 女士 / <input checked="" type="checkbox"/> Company 公司 / <input type="checkbox"/> Organisation 機構)
KTA Planning Limited

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 <input checked="" type="checkbox"/> No 否 <input type="checkbox"/> (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)	3054 S.A RP, 3098 RP, 3100 RP, 3108 RP, 3109 RP, 3110, 3111, 3112, 3113, 3114, 3115 RP, 3119 RP, 3122 RP, 3123, 3124, 3126, 3131 RP, 3131 S.B RP, 3131 S.C, 3131 S.D, 3132 RP, 3146, 3148, 3147 RP, 3150 RP, 3152, 3153 RP, 3156 RP, 3156 S.B, 3158 RP, 3162, 3163, 3164 RP, 3164 S.A, 3167, 3168, 3171, 3173, 3176, 3177, 3178, 3179, 3180 RP, 3181 RP, 3182 RP, 3189 RP, 3190, 3191, 3192 RP, 3193 RP, 3194 RP in DD 104 and the adjoining Government Land on Kam Pok Road, Yuen Long
(c) Site Area 申請地點面積	65,690 sq.m 平方米 <input checked="" type="checkbox"/> About 約

(d) Area of Government land included (if any) 所包括的政府土地面積 (倘有)	8,830 sq.m 平方米 <input checked="" type="checkbox"/> About 約
(e) Current use(s) 現時用途	Vacant (If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)

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

The applicant 申請人 -

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

5. Statement on Owner's Consent/Notification

就土地擁有人的同意/通知土地擁有人的陳述

- (a) According to the record(s) of the Land Registry as at (DD/MM/YYYY), this application involves a total of "current land owner(s)"[#].
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」[#]。

(b) The applicant 申請人 -

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

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

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

- ☐ has notified "current land owner(s)"[#]
已通知 名「現行土地擁有人」[#]。

Details of the "current land owner(s)"[#] notified 已獲通知「現行土地擁有人」[#]的詳細資料

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

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

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

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

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

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

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

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	Approved Mai Po & Fairview Park Outline Zoning Plan No. S/YL-MP/6
(b) Land use zone(s) involved (if applicable) 涉及的土地用途地帶(如適用)	"Residential (Group D)"

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 type="checkbox"/> Comprehensive Development Area []
綜合發展區 [] | <input type="checkbox"/> Commercial [] 商業 [] |
| <input checked="" type="checkbox"/> Residential (Group <input type="checkbox"/> A/ <input type="checkbox"/> B/ <input checked="" type="checkbox"/> C/ <input type="checkbox"/> D/ <input type="checkbox"/> E) [1]
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"/> Village Type Development []
鄉村式發展 [] |
| <input type="checkbox"/> Agriculture [] 農業 [] | <input type="checkbox"/> Industrial [] 工業 [] |
| <input type="checkbox"/> Industrial (Group D) [] 工業 (丁類) [] | <input type="checkbox"/> Open Storage [] 露天貯物 [] |
| <input type="checkbox"/> Government, Institution or Community []
政府、機構或社區 [] | <input type="checkbox"/> Open Space [] 休憩用地 [] |
| <input type="checkbox"/> Recreation [] 康樂 [] | <input type="checkbox"/> Green Belt [] 綠化地帶 [] |
| <input type="checkbox"/> Country Park [] 郊野公園 [] | <input type="checkbox"/> Coastal Protection Area []
海岸保護區 [] |
| <input type="checkbox"/> Conservation Area [] 自然保育區 [] | <input type="checkbox"/> Site of Special Scientific Interest []
具特殊科學價值地點 [] |
| <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"/> Others (please specify _____)
其他 (請註明: _____) |

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

- ☒ Proposed Notes of Schedule of Uses of the zone attached
已夾附對土地用途地帶的《註釋》的擬議修訂

(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.....

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。

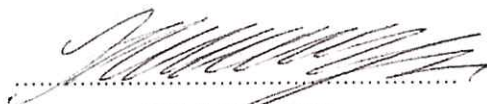
Please refer to the Supporting Planning Statement.....

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

Signature
簽署



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

KENNETH TO

Name in Block Letters

姓名（請以正楷填寫）

Managing Director

Position (if applicable)

職位（如適用）

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

專業資格

☒ HKIP 香港規劃師學會 /

☐ HKIA 香港建築師學會 /

☐ HKIS 香港測量師學會 /

☐ HKIE 香港工程師學會 /

☐ HKILA 香港園境師學會 /

☐ HKIUD 香港城市設計學會

☐ RPP 註冊專業規劃師

Others 其他

on behalf of
代表

KTA Planning Limited

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



Date 日期

24/08/2021

(DD/MM/YYYY 日/月/年)

Remark 備註

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

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

Warning 警告

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

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

Statement on Personal Data 個人資料的聲明

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

委員會就這宗申請所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：

- (a) the processing of this application which includes making available the name of the applicant for public inspection when making available this application for public inspection; and
處理這宗申請，包括公布這宗申請供公眾查閱，同時公布申請人的姓名供公眾查閱；以及
(b) facilitating communication between the applicant and the Secretary of the Board/Government departments.
方便申請人與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the applicant in this application may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.
申請人就這宗申請提供的個人資料，或亦會向其他人士披露，以作上述第 1 段提及的用途。

3. An applicant has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
根據《個人資料(私隱)條例》(第 486 章)的規定，申請人有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道 333 號北角政府合署 15 樓。

**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)

*The total/non-domestic GFA does not include the social welfare facilities (i.e. about 1,354m² NOFA for a 100-place RCHE and about 303m² NOFA for a Neighbourhood Elderly Centre) and the transport layby (i.e. about 1,858m²)

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	134,665*	sq.m. 平方米	<input checked="" type="checkbox"/> About 約
<input checked="" type="checkbox"/> Proposed plot ratio 擬議地積比率	2.05*		<input checked="" type="checkbox"/> About 約
<input checked="" type="checkbox"/> Proposed site coverage 擬議上蓋面積	25%	%	<input checked="" type="checkbox"/> About 約
<input checked="" type="checkbox"/> Proposed number of blocks 擬議座數	14 Residential + 3 Commercial/GIC + 3 Clubhouse Blocks		
<input checked="" type="checkbox"/> Proposed number of storeys of each block 每座建築物的擬議層數	V1 - V3 & V5: 3-5 storeys (about 15.3-21.9mPD/9.9m-16.5m) T1 - T3 & T5: 16 storeys (about 57.85mPD/52.45m) T6 - T11: 23 storeys (about 79.9mPD/74.5m) Commercial/GIC: 2-3 storeys (about 15.4-18.4mPD/10-13m) Clubhouse: 1 storey (about 10.4mPD/5m) [PLUS 1 level basement car park/ E&M/ Detention tank]		
<input checked="" type="checkbox"/> Proposed building height of each block 每座建築物的擬議高度			
 <input checked="" type="checkbox"/> Domestic part 住用部分			
GFA 總樓面面積	131,380	sq.m. 平方米	<input checked="" type="checkbox"/> About 約
number of units 單位數目	3,090		
average unit size 單位平均面積	42.52	sq.m. 平方米	<input checked="" type="checkbox"/> About 約
estimated number of residents 估計住客數目	Approx. 8,343		
 <input checked="" type="checkbox"/> Non-domestic part 非住用部分			
<input type="checkbox"/> hotel 酒店	3,285*	sq.m. 平方米	<input checked="" type="checkbox"/> About 約
		sq.m. 平方米	<input type="checkbox"/> About 約
	(please specify the number of rooms 請註明房間數目:		
<input type="checkbox"/> office 辦公室		sq.m. 平方米	<input type="checkbox"/> About 約
<input checked="" type="checkbox"/> shop and services/eating place 商店及服務行業/食肆	2,356	sq.m. 平方米	<input checked="" 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) 6-classroom kindergarten - 929sqm 100-place Residential Care Home for the Elderly - 1,354sqm NOFA* Neighbourhood Elderly Centre - 303sqm NOFA* (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) Covered transport lay-by - 1,858sqm*		
<input checked="" type="checkbox"/> other(s)其他			
 <input checked="" type="checkbox"/> Open space 休憩用地			
	(please specify land area(s)) (請註明面積)		
<input checked="" type="checkbox"/> private open space 私人休憩用地	Exclusive use by residents: Not less than 6,243sqm		
<input type="checkbox"/> public open space 公共休憩用地	Private open space open to the public: 2,100sqm		

☒ 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 562
Motorcycle Parking Spaces 電單車車位 33
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) Private light bus : 2

☒ 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 10
Coach Spaces 旅遊巴車位 5
Light Goods Vehicle Spaces 輕型貨車車位 2
Medium Goods Vehicle Spaces 中型貨車車位
Heavy Goods Vehicle Spaces 重型貨車車位 15
Others (Please Specify) 其他 (請列明)

☒ 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)

Layby for ambulance and private light bus : 1

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

[Block number] [座數]	[Floor(s)] [層數]	[Proposed use(s)] [擬議用途]
V1 - V3 & V5:	G/F - 5/F (4/F omitted)	Residential
T1 - T3 & T5:	G/F	Lobby/Residential
	1/F - 18/F (4/F & 14/F omitted)	Residential
T6 - T11:	G/F	Lobby/Residential
	1/F - 25/F (4/F & 14/F omitted)	Residential
Commercial/GIC:	G/F	Shop/Eating Places/Transport Lay-by/Kindergarten
	1/F - 2/F	Shop/Eating Places/GIC Uses
Clubhouse:	G/F	Residential Clubhouse
	Common B/F	Car Park/E&M/Detention Tank

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

Landscape Area, Landscape Pond, Private Open Space.....

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))

Kam Pok Road, Ha Chuk Yuen Road.....

☐ 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。

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，請另頁表示可盡量減少可能出現不良影響的措施，否則請提供理據/理由。

11

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[@]

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

在龕位內最多可安放骨灰的數量

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

在非龕位的範圍內最多可安放骨灰的數量

Total number of niches 龕位總數

Total number of single niches

單人龕位總數

Number of single niches (sold and occupied)

單人龕位數目 (已售並佔用)

Number of single niches (sold but unoccupied)

單人龕位數目 (已售但未佔用)

Number of single niches (residual for sale)

單人龕位數目 (待售)

Total number of double niches

雙人龕位總數

Number of double niches (sold and fully occupied)

雙人龕位數目 (已售並全部佔用)

Number of double niches (sold and partially occupied)

雙人龕位數目 (已售並部分佔用)

Number of double niches (sold but unoccupied)

雙人龕位數目 (已售但未佔用)

Number of double niches (residual for sale)

雙人龕位數目 (待售)

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

除單人及雙人龕位外的其他龕位總數 (請列明類別)

Number of niches (sold and fully occupied)

龕位數目 (已售並全部佔用)

Number of niches (sold and partially occupied)

龕位數目 (已售並部分佔用)

Number of niches (sold but unoccupied)

龕位數目 (已售但未佔用)

Number of niches (residual for sale)

龕位數目 (待售)

Proposed operating hours 擬議營運時間

[@] Ash interment capacity in relation to a columbarium means –

就靈灰安置所而言，骨灰安放容量指：

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

Gist of Application 申請摘要			
(Please provide details in both English and Chinese <u>as far as possible</u> . This part will be circulated to relevant consultees, uploaded to the Town Planning Board's Website for browsing and free downloading by the public and deposited at the Planning Enquiry Counters of the Planning Department for general information.) (請盡量以英文及中文填寫。此部分將會發送予相關諮詢人士、上載至城市規劃委員會網頁供公眾免費瀏覽及下載及存放於規劃署規劃資料查詢處以供一般參閱。)			
Application No. 申請編號	(For Official Use Only) (請勿填寫此欄)		
Location/address 位置/地址	3054 S.A RP, 3098 RP, 3100 RP, 3108 RP, 3109 RP, 3110, 3111, 3112, 3113, 3114, 3115 RP, 3119 RP, 3122 RP, 3123, 3124, 3126, 3131 RP, 3131 S.B RP, 3131 S.C, 3131 S.D, 3132 RP, 3146, 3148, 3147 RP, 3150 RP, 3152, 3153 RP, 3156 RP, 3156 S.B, 3158 RP, 3162, 3163, 3164 RP, 3164 S.A, 3167, 3168, 3171, 3173, 3176, 3177, 3178, 3179, 3180 RP, 3181 RP, 3182 RP, 3189 RP, 3190, 3191, 3192 RP, 3193 RP, 3194 RP in DD 104 and the adjoining Government Land on Kam Pok Road, Yuen Long		
Site area 地盤面積	65,690 sq. m 平方米 <input checked="" type="checkbox"/> About 約 (includes Government land of 包括政府土地 8,830 sq. m 平方米 <input checked="" type="checkbox"/> About 約)		
Plan 圖則	Approved Mai Po & Fairview Park Outline Zoning Plan No. S/YL-MP/6		
Zoning 地帶	"Residential (Group D)"		
Proposed Amendment(s) 擬議修訂	<input type="checkbox"/> Amend the Covering Notes of the Plan 修訂圖則《註釋》的說明頁 <input type="checkbox"/> 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》 <input checked="" type="checkbox"/> Rezone the application site from "Residential (Group D)" to "Residential (Group C)1" 把申請地點由_____地帶改劃為_____		
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	131,380 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	2.0 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
	Non-domestic 非住用	3,285* <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	0.05* <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
(ii) No. of block 幢數	Domestic 住用	14	*The total/non-domestic GFA does not include the social welfare facilities (i.e. about 1,354m ² NOFA for a 100-place RCHE and about 303m ² NOFA for a Neighbourhood Elderly Centre) and the transport layby (i.e. about 1,858m ²)
	Non-domestic 非住用	Commercial/GIC - 3 Clubhouse - 3	
	Composite 綜合用途		

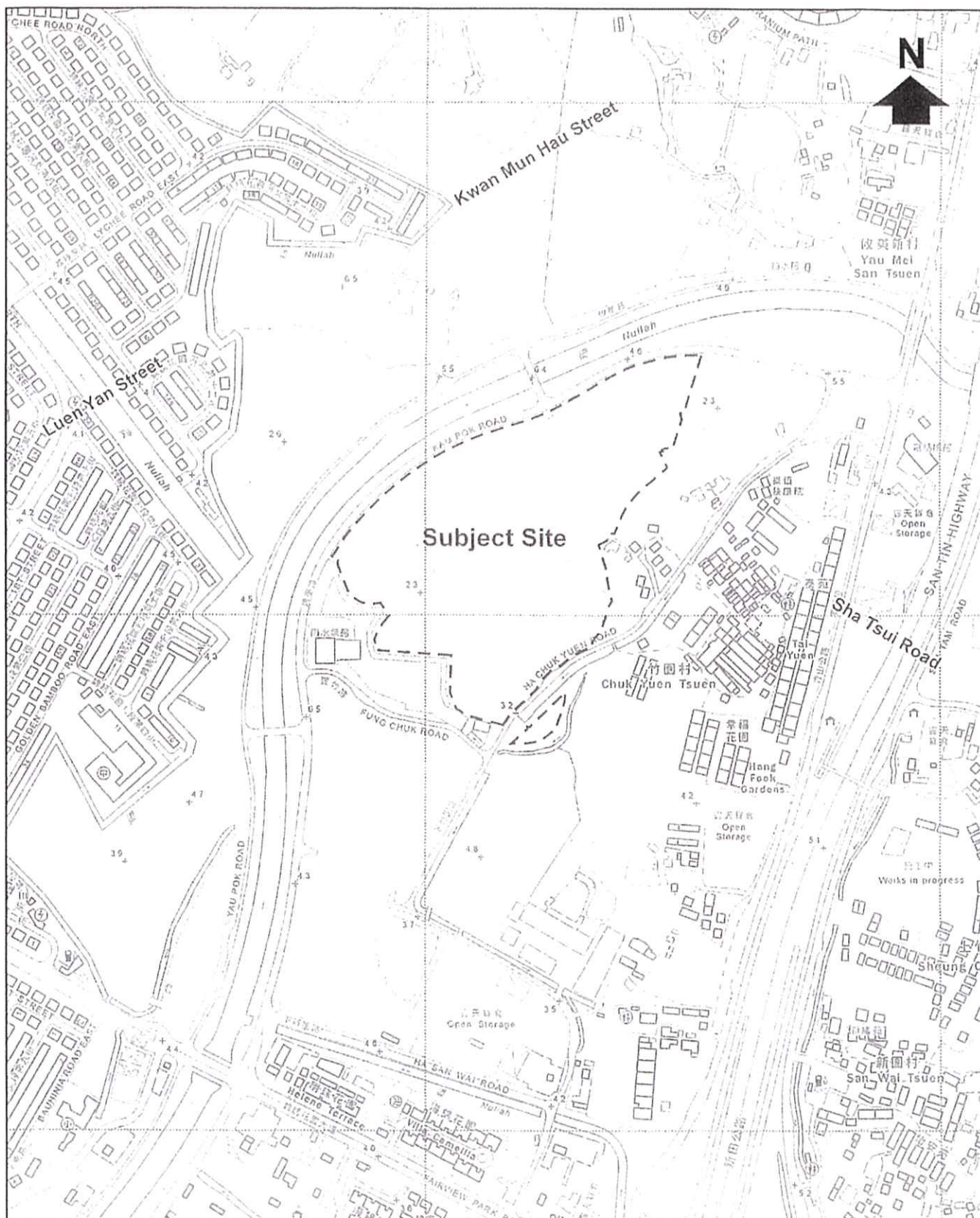
(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	V1 - V3 & V5: about 39.9-16.5m T1 - T3 & T5: about 52.45m T6 - T11 : about 74.5m
		V1 - V3 & V5: about 15.3-21.9mPD T1 - T3 & T5: about 57.85mPD T6 - T11 : about 79.90mPD
		V1 - V3 & V5: 3-5 storeys T1 - T3 & T5: 16 storeys T6 - T11 : 23 storeys PLUS 1 level basement car park/ E&M/ Detention Tank
	Non-domestic 非住用	Commercial/GIC : about 10-13m Clubhouse : about 5m <input type="checkbox"/> (Not more than 不多於) m 米
		Commercial/GIC : about 15.4-18.4mPD Clubhouse : about 10.4mPD
		Commercial/GIC : 2-3 storeys Clubhouse : 1 storey [PLUS 1 level basement car park/ E&M/ Detention Tank]
	Composite 綜合用途	<input type="checkbox"/> (Not more than 不多於) m 米
		<input type="checkbox"/> (Not more than 不多於) mPD 米(主水平基準上)
		<input type="checkbox"/> (Not more than 不多於) Storeys(s) 層 (<input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
(iv) Site coverage 上蓋面積	25 % <input checked="" type="checkbox"/> About 約	
(v) No. of units 單位數目	3,090	
(vi) Open space 休憩用地	Private 私人	Exclusive use by residents: Not less than 6,243sqm Private open space open to the public: 2,100sqm
	Public 公眾	sq.m 平方米 <input type="checkbox"/> Not less than 不少於

(vii) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數	
	Private Car Parking Spaces 私家車車位 Motorcycle Parking Spaces 電單車車位 Light Goods Vehicle Parking Spaces 輕型貨車泊車位 Medium Goods Vehicle Parking Spaces 中型貨車泊車位 Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 Others (Please Specify) 其他 (請列明) Private light bus	562 33 2
	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數	
	Taxi Spaces 的士車位 Coach Spaces 旅遊巴車位 Light Goods Vehicle Spaces 輕型貨車車位 Medium Goods Vehicle Spaces 中型貨車位 Heavy Goods Vehicle Spaces 重型貨車車位 Others (Please Specify) 其他 (請列明)	10 5 2 15

Submitted Plans, Drawings and Documents 提交的圖則、繪圖及文件		
	Chinese 中文	English 英文
Plans and Drawings 圖則及繪圖		
Master layout plan(s)/Layout plan(s) 總綱發展藍圖／布局設計圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Block plan(s) 樓宇位置圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Floor plan(s) 樓宇平面圖	<input type="checkbox"/>	<input 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"/>
Reports 報告書		
Planning Statement/Justifications 規劃綱領/理據	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental assessment (noise, air and/or water pollutions) 環境評估 (噪音、空氣及／或水的污染)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on vehicles) 就車輛的交通影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on pedestrians) 就行人的交通影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Visual impact assessment 視覺影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Landscape impact assessment 景觀影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tree Survey 樹木調查	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Geotechnical impact assessment 土力影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Drainage impact assessment 排水影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sewerage impact assessment 排污影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Risk Assessment 風險評估	<input type="checkbox"/>	<input type="checkbox"/>
Others (please specify) 其他 (請註明)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Ecological Impact Assessment, Water Supply Impact Assessment		
Note: May insert more than one '✓'. 註：可在多於一個方格內加上「✓」號		

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

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



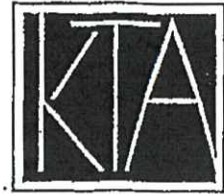
PLANNING LIMITED
規劃顧問有限公司

LOCATION PLAN

Scale 1:1,000

REZONING FROM "RESIDENTIAL
(GROUP D)" TO "RESIDENTIAL
(GROUP C) 1" ZONE
FOR A PROPOSED RESIDENTIAL
DEVELOPMENT
AT VARIOUS LOTS IN D.D. 104
AND THE ADJOINING
GOVERNMENT LAND
IN YUEN LONG, N.T.

Date: 23 August 2021



PLANNING LIMITED
規劃顧問有限公司

By Email and By Hand

Our Ref: S1290/KPR/16/015Lg

18 April 2023

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



電話TEL
傳真FAX
電郵EMAIL

Dear Sir/ Madam,

**Rezoning from "Residential (Group D)" to "Residential (Group C) 1" Zone
For a Proposed Residential Development at Various Lots in D.D. 104 and
the Adjoining Government Land in Yuen Long, N.T.
S12A Amendment of Plan Application**

TPB Ref. Y/YL-MP/6

- Submission of Consolidated Supporting Planning Statement -

Reference is made to the captioned S12A Amendment of Plan Application submitted to the Town Planning Board ("TPB"/the "BOARD") on 24 August 2021.

The Applicant has been making an endeavour to deliver a development scheme that is able to contribute to increasing housing supply within the capacity of various infrastructures. We understand that relevant Government departments have no major comment on the Indicative Development Scheme.

We hereby submit 70 hard copies of the Consolidated Supporting Planning Statement ("Consolidated SPS") which is prepared with reference to the Town Planning Board Guidelines on Submission of Further Information in Relation to Applications for Amendment of Plan, Planning Permission and Review made under the Town Planning Ordinance (TPB PG-No. 32A). The Consolidated SPS only contains further information that have been submitted and accepted by TPB without any new information. We understand that, as per TPB PG-No. 32A, the Consolidated SPS would generally be exempted from the publication and recounting requirements; in other words, the captioned application will be considered by the Board at the scheduled Rural and New Town Planning Committee Meeting on 5 May 2023.

For the avoidance of doubt, the attached Consolidated SPS shall supersede the Supporting Planning Statement submitted on 24 August 2021 and all subsequent submissions of Further Information.



Our Ref: S1290/KPR/16/015Lg
Date: 18 April 2023



PLANNING LIMITED
規劃顧問有限公司

Should you have any queries in relation to the above, please do not hesitate to contact Mr Kenneth To or the undersigned at

Thank you for your kind attention.

Yours faithfully
For and on behalf of
KTA PLANNING LIMITED

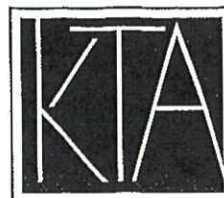
A handwritten signature in black ink, appearing to be 'Gladys Ng', written over a horizontal line.

Gladys Ng

Encl. (70 hard copies)

cc. DPO/FSS&YLE – Ms Alice Cheung (by Email)
the Applicant & Team

KT/GN /vy



PLANNING LIMITED
規劃顧問有限公司

By Email

Our Ref: S1290/KPR/16/016Lg

28 April 2023

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

Dear Sir/ Madam,

**Rezoning from "Residential (Group D)" to "Residential (Group C) 1" Zone
For a Proposed Residential Development at Various Lots in D.D. 104 and
the Adjoining Government Land in Yuen Long, N.T.
S12A Amendment of Plan Application
TPB Ref. Y/YL-MP/6**

Reference is made to the captioned S12A Amendment of Plan Application submitted to the Town Planning Board ("TPB"/the "BOARD") on 24 August 2021.

Please see below some clarifications on the implementation programme and arrangements for reference by TPB:

- i) *Implementation of the proposed development* – Based on an assumption that the current rezoning application will be approved in mid-2023, gazettal of draft OZP and the subsequent plan-making procedures, land exchange application and submission and approval of EIA shall take place in late 2023 to 2025. Then, construction may commence in late 2025 for a targeted completion by 2028.
- ii) *Construction and maintenance responsibilities of the proposed sewerage arrangement* – The Applicant will construct the twin rising mains and communal gravity sewers and hand-over the communal gravity sewers to the relevant department for maintenance. These shall be completed before occupation of the proposed development. We understand that an appropriate arrangement shall be discussed, confirmed and listed in the land lease for the upgrading works required.
- iii) *Construction and maintenance responsibilities of the proposed junction improvement works and transport layby/public transport interchange* – The Applicant will implement the junction improvement works at Fairview Park Interchange and the junction of Castle Peak Road/ Kam Pok Road and hand over to the relevant Government department for maintenance. These works shall be completed before occupation of the proposed development. The Applicant will also implement and the commercial and/or residential portions of the proposed development will manage and maintain the proposed transport





layby/public transport interchange. We understand that an appropriate arrangement shall be discussed, confirmed and listed in the land lease for all upgrading works required.

- iv) *Implementation arrangement of the social welfare facilities (i.e. RCHE and NEC)* – The Applicant will construct the low-rise commercial & GIC blocks and the future operator shall carry out the fitting out works for the RCHE and NEC. The proposed social welfare facilities shall run on a subsidized basis and details shall be further discussed, confirmed and listed in the land lease.
- v) *Implementation arrangement of the kindergarten* – The Applicant will construct the low-rise commercial & GIC blocks and the future operator shall carry out the fitting out works for the kindergarten. Details shall be further discussed, confirmed and listed in the land lease.
- vi) *Implementation arrangement of the private open space for public use* – The Applicant will implement the open space for public use. The private open space to be opened for public use will be managed and maintained by the commercial portion of the proposed development. Details shall be further discussed, confirmed and listed in the land lease.
- vii) *Implementation of the proposed building design, layout and setback* – Although the proposed zoning will only control the maximum plot ratio (PR1.88 max.) and building height (a stepped height from 5 storeys to 19 storeys), the proposed development is required to go through the statutory Environment Impact Assessment process under the Environmental Impact Assessment Ordinance. Whilst the proposed development is a Designated Project under EIAO, the potential environmental impact of the master layout (including building disposition, layout, height, setback and etc.) will be reassessed and re-examined under EIAO to a state that an Environmental Permit can be issued. The proponent will then have to implement the development scheme in accordance with the Environmental Permit obtained.

The Applicant would like to reiterate the latest comment received from the Environmental Protection Department on 24 April 2023, which states *"the EA and SIA have demonstrated that with implementation of mitigation measures, the proposed development will unlikely cause/subject to adverse environmental impacts... The implementation of mitigation measures proposed by the applicant can be enforced under the EP to be issued under the EIAO"*.

We received comments from the Environmental Protection Department on 26 April 2023 regarding the assessment that shows the peak flow of the communal sewer and its preliminary design. The attached hydraulic calculation demonstrated the twin DN675 sewer with smooth PE material will be adequate to convey the design flow of 15,500m³/d recommended by EPD. A conservative roughness value has been adopted and the 1 in 400 pipe gradient can achieve optimal flow velocity above 1m/s for self-cleansing. The communal sewer is subject to detailed design in later stage as this requires various surveys and study. As mentioned in item ii) above, this shall be discussed, confirmed and listed in the land lease. Please kindly note that the attached hydraulic calculation sheet only supplements to the assessment result submitted on 6 April 2023 WITHOUT any new and/or revised assessment, thus should be exempted from the recount and republish procedures.



As stated in para. 2.2.4 of the Traffic Impact Assessment ("TIA") and as shown in Figure 2.2 of the same, there will be directional signs near the vehicular access within the Site to guide drivers to route via Kam Pok Road Northbound and Castle Peak Road – Tam Mei Southbound to access to Fairview Park Roundable. In other words, no development traffic will use Fairview Park Boulevard.

With regard to land registration, please be kindly confirmed that in view of the execution of land lease, subject lots that are involved in the current application have been renamed to Lots 4805, 3152, 3153 RP, 3156 s.B. in DD 104 and the adjoining Government Land. The total site area remains 65,690m², yet the area of Government Land has been significantly reduced to just about 92.3m² (which is equivalent to only about 0.14% of the total site area).

Lastly, please find attached the Indicative Basement Layout Plan, an updated drawing showing the Open Space Provision and an A4 size of Figure 5.1 of the Supporting Planning Statement as well as the final Technical Schedule repeated below for the avoidance of doubt:

Proposed Residential Development	
Site Area	about 65,690m ²
Total Plot Ratio	not more than 1.88 ^[1]
Domestic Plot Ratio (about)	1.8
Domestic GFA	about 118,242m ²
Non-domestic GFA	about 5,150m ² ^[1]
- Commercial GFA ^[2] (including kindergarten, commercial uses)	about 3,292m ²
- Transport Layby GFA	about 1,858m ²
Building Height	V1 - V3 & V5: 3-5 storeys (about 15.30-21.90mPD) T3 & T5: 17 storeys (about 61.0mPD) T1 – T2 & T6 - T7 : 18 storeys (about 64.15mPD) T8 – T11: 19 storeys (about 67.3mPD) PLUS 1 level of basement car park / E&M / Detention Tank
No. of Units	2,771
Average Flat Size	42.7m ²
Designed Population	Approximately 7,482
Provision of Open Space	
Private Open Space for Exclusive use of residents	Not less than 7,482m ²
Private Open Space open to Public	2,100m ²
Internal Transport Provision for Residential Portion	
Private Car Parking Space (including accessible space)	602
Visitors' Car Parking Space (including 1 accessible space)	70
Motorcycle Parking Space	28



Bicycle Parking Space	92
Loading/Unloading Bay	14
Internal Transport Provision for Commercial Portion	
Private Car Parking Space (including accessible space)	16
Motorcycle Parking Space	2
Loading/Unloading Bay	3
Internal Transport Provision for 6-classroom Kindergarten (up to 180 pupils)	
Private Car Parking Space (including accessible space)	1
Taxi/Private Cars lay-by	10
Small Coaches lay-by	5
Internal Transport Provision for Social Welfare Facilities	
Private Light Bus/Coach Parking Spaces	2
Loading/Unloading Bay (for Ambulance & Private Light Bus)	1

^[1] The proposed PR & GFA do not include the social welfare facilities of a 100-place Residential Care Home for the Elderly (RCHE) (i.e. about 1,354m² NOFA or 2,708m² GFA) and a Neighbourhood Elderly Centre (NEC) (i.e. about 303m² NOFA or 666m² GFA)

Should you have any queries in relation to the above, please do not hesitate to contact Mr Kenneth To or the undersigned at

Thank you for your kind attention.

Yours faithfully
For and on behalf of
KTA PLANNING LIMITED

Gladys Ng

cc. DPO/FSS&YLE – Ms Alice Cheung (by Email)
EPD – Ms Jolitta Chan (by Email)
DSD – Mr K M Tang (by Email)
the Applicant & Team

KT/GN /vy

Hydraulic Assessment of Proposed Gravity Sewer (Twin DN675)

V of water = 0.000001 m²/s 20°C

Manhole No.		Pipe													
U/S	D/S	Nominal Outside Diameter (OD)	Nominal Diameter (ID)	Hydraulic Radius	Flow Area	Pipe Gradient	Pipe Velocity	Capacity (Twin Pipe)	Roughness ⁽³⁾	Accumulated ADWF	Contributing Population ⁽¹⁾	Peaking Factor	Estimated Peak Discharge	Capacity Check	Remark
		mm	mm	m	m ²	(1 in)	m/s	m ³ /s	mm	m ³ /d			m ³ /s	%	
Conversion Chamber	FSH1001886	800	675	0.152	0.36	400	1.40	1.00	0.15	15,500.00	57,408	3.98	0.713	71	2 x 675 sewer with 10% area reduction account for siltation

Note:

1. Contributing population = Projected Flow + Flow from Development (ADWF in m³/day) / 0.27 (m³/person/day).
2. The proposed communal gravity is designed to convey sewage from the Application Site and other developments to the existing NSWSPS and ultimately to YLEPP.
3. PE material gravity sewers adopted a conservative roughness of 0.15mm. (DSD Sewerage Manual suggested 0.003mm for smooth pipe material, i.e. Alkathene)
4. Base on EPD initial estimation, the communal gravity sewer need to cater for design sewage flow of at least 15,500 m³/d.
5. The communal gravity sewer is subject to detailed design, the hydraulic calculation demonstrate the feasibility in terms of proposed pipe size and gradient

B.D. REF. :		
F.S.D. REF. :		
REVISIONS:		
NO.	DESCRIPTION	DATE

NOTE:
DETAIL DESIGN INCLUDING
BARRIER FREE ACCESS,
F.S. REQUIREMENT,
STRUCTURAL REQUIREMENT,
ETC. TO BE DETERMINED
IN GBP STAGE.

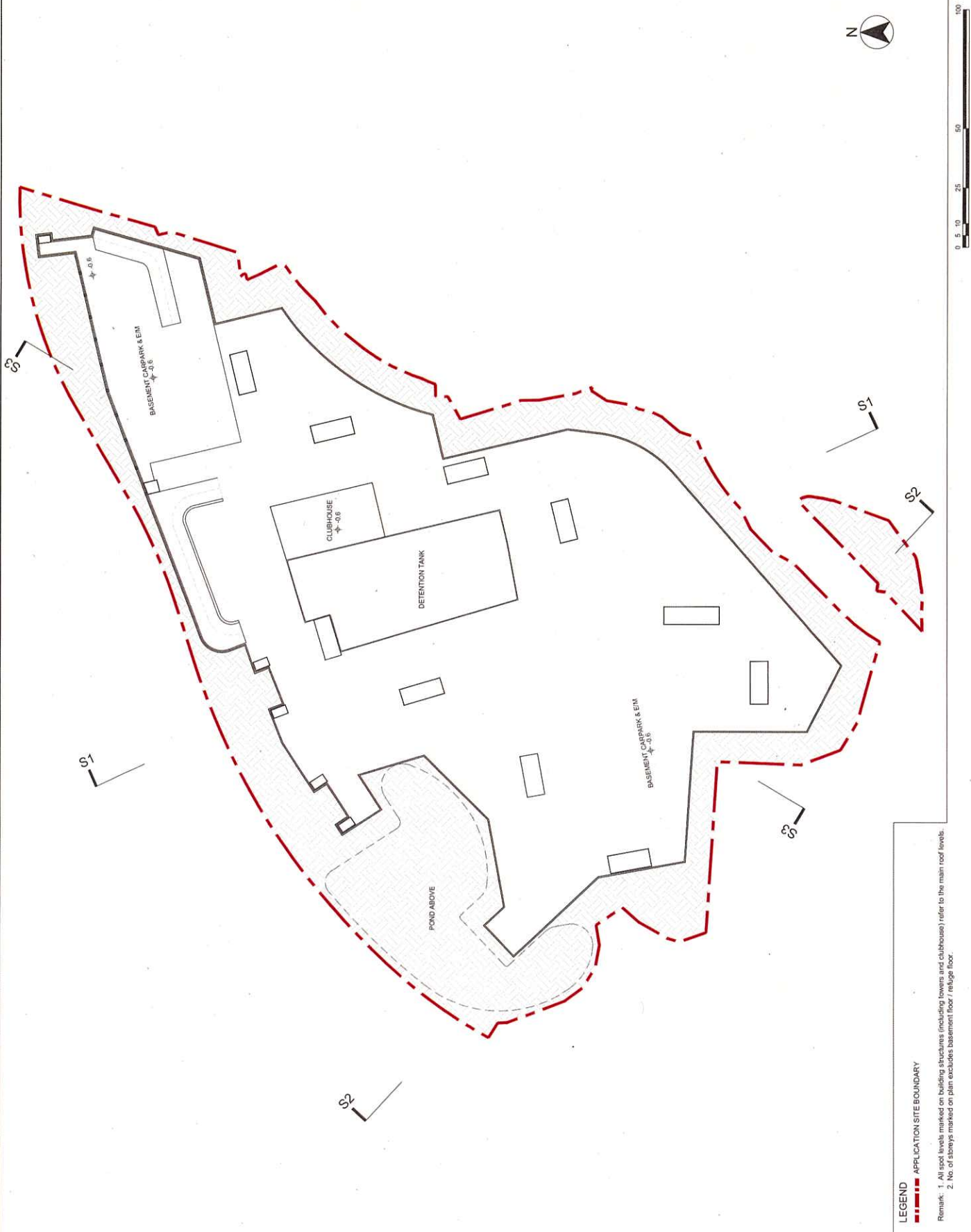
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PROJECT :
SECTION 12A PLANNING APPLICATION
FOR REZONING FROM 'RESIDENTIAL
(GROUP 1)' TO 'RESIDENTIAL (GROUP
C) 1' ZONE FOR A PROPOSED
RESIDENTIAL DEVELOPMENT AT
VARIOUS LOTS IN D.D. 104 AND THE
ADJOINING GOVERNMENT LAND IN
KUEI LONG, THE NEW TERRITORIES

DRAWING TITLE :
INDICATIVE
BASEMENT LAYOUT PLAN

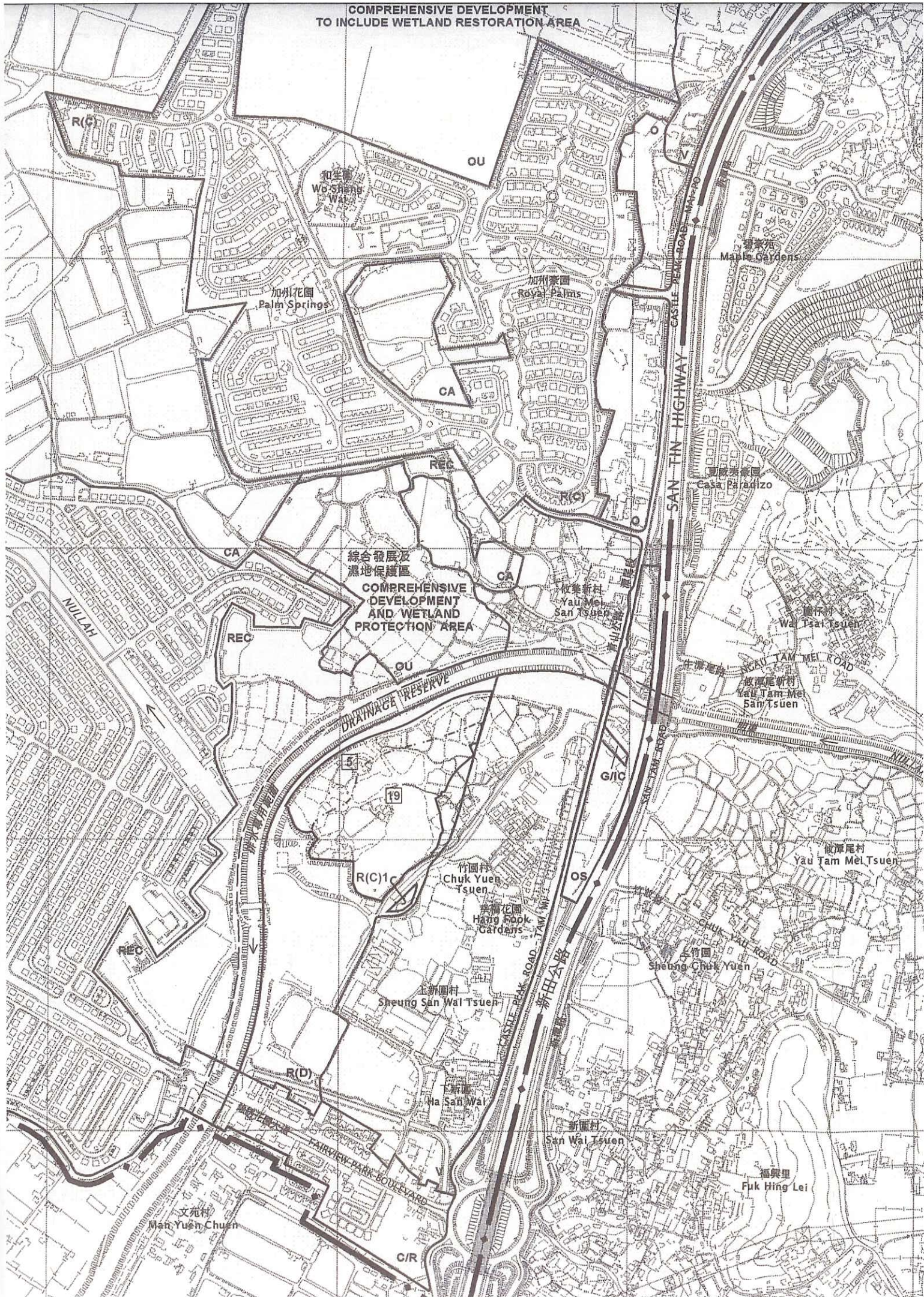
DATE: FEB 2020	PAPER SIZE: A3
SCALE: 1:1500	DRAWN: AIL
PROJECT NO.: 767	
DWG NO.: (767)S16-A-04	





	TITLE: OPEN SPACE PROVISION	ANNEX: C.6
	PROJECT: S.12A Planning Application on the Approved Mai Po and Fairview Park OZP No. SYL-MP/6 - Rezoning from "Residential (Group D)" to "Residential (Group C) 1"	REVISION: A
	Zone for a Proposed Residential Development at Various Lots in D.D. 104 and the Adjoining Government Land, Yuen Long, N.T.	DATE: APR 2023

COMPREHENSIVE DEVELOPMENT
TO INCLUDE WETLAND RESTORATION AREA



RESIDENTIAL (GROUP C) 1

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

RESIDENTIAL (GROUP C) I (cont'd)

Planning Intention

This zone is intended primarily for *low- to medium-rise*, low-density residential developments where commercial uses serving the residential neighbourhood *are permitted*.

Remarks

- (a) *No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 1.88 amongst which not less than 5,150m² for non-domestic uses and a maximum building height in terms of number of storeys as stipulated on the Plan, excluding basement level(s), or the plot ratio, site coverage and height of the building which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater.*
- (b) *In determining the maximum plot ratio for the purposes of paragraph (a) above, any floor space that is constructed or intended for use solely as public transport facilities and GIC facilities, as required by the Government, may be disregarded.*
- (c) In determining the maximum plot ratio for the purposes of paragraph (a) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room, caretaker's office and caretaker's quarters, or 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.
- (d) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio and building height restrictions stated in *paragraph (a)* above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

Proposed Explanatory Statement for "Residential (Group C)" Zone

9. LAND-USE ZONINGS

9.2 Residential (Group C) ("R(C)") (Total Area 159.09 ha)

9.2.1 This zone is intended primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board.

9.2.2 Under this zoning, *on land designated "R(C)"*, residential developments are restricted to a maximum plot ratio of 0.4 and a maximum building height of 3 storeys (9m) including car park. All commercial developments within this zone are subject to the approval of the Board under the planning permission system. Development will be in accordance with an approved planning brief to ensure that the nature and scale of new development will be in keeping with the natural landscape of Inner Deep Bay Area and that the effluent and waste disposal will have no adverse impact on the water quality of the Inner Deep Bay Area. To provide flexibility for innovative design adapted to the characteristics of particular sites, minor relaxation of the above restrictions may be considered by the Board through the planning permission system. Each proposal will be considered on its individual planning merits.

9.2.3 Residential sites within this zone are located in the southern and eastern parts of the Area. They are the existing Fairview Park, Palm Springs and Royal Palms.

9.2.4 *"R(C)1" zone is intended primarily for low- to medium-rise, low-density residential developments where commercial uses serving the residential neighbourhood are permitted.*

9.2.5 *On land designated "R(C)1", residential developments are restricted to a maximum plot ratio of 1.88 amongst which 5,150m² are for non-domestic uses and a maximum building height in terms of number of storeys as stipulated on the Plan, excluding basement level(s). To provide flexibility for building design adapted to the characteristics of particular sites, minor relaxation of the above restrictions may be considered by the Board through the planning permission system. Each proposal will be considered on its individual planning merits.*

Previous s.16 Applications covering the Application Site

Approved Applications

No.	Application No.	Use(s)/ Development(s)	Date of Consideration (RNTPC/TPB/D of Plan)
1.	A/YL-MP/110	Proposed Residential Development	17.1.2003 (<i>RNTPC</i>) “R(D)” zone on OZP No. S/YL-MP/4
2.	A/YL-MP/132	Proposed Residential Development	25.6.2004 (<i>RNTPC</i>) “R(D)” zone on OZP No. S/YL-MP/5
	A/YL-MP/132-1	(Extension of time limit for commencement for the proposed development)	4.7.2008 (<i>D of Plan</i>) (valid until 25.6.2010)
	A/YL-MP/132-2	(Extension of time limit for commencement for the proposed development)	25.6.2010 (<i>D of Plan</i>) (valid until 25.6.2012)
3.	A/YL-MP/146	Proposed Residential Development (Amendment to an Approved Scheme and Minor Relaxation of Building Height Restriction)	25.11.2005 (<i>RNTPC</i>) “R(D)” zone on OZP No. S/YL-MP/5
	A/YL-MP/146-1	(Extension of time limit for commencement for the proposed development)	24.11.2009 (<i>D of Plan</i>) (valid until 25.11.2013)
4.	A/YL-MP/193	Proposed House Development, Minor Relaxation of Building Height Restriction, and Filling and Excavation of Land for Site Formation Only	24.2.2012 (<i>RNTPC</i>)
5.	A/YL-MP/205	Proposed House Development, Minor Relaxation of Building Height Restriction and Filling and Excavation of Land for Site Formation Only (Proposed Amendments to an Approved Scheme)	21.6.2013 (<i>RNTPC</i>)
	A/YL-MP/205-1	(Extension of time limit for commencement for the proposed development)	24.11.2009 (<i>D of Plan</i>) (Validity extended to 21.6.2021) (Commenced)

Rejected Application

No.	Application No.	Use(s)/ Development(s)	Date of Consideration (RNTPC/TPB)	Rejection Reason(s)
1.	A/YL-MP/104	Proposed Low Density Residential Development with Relaxation of Plot Ratio	1.3.2002 (RNTPC)	(1), (2), (3) & (4)

Rejection Reason(s):

- (1) There were no strong justification and design merits in the submission to merit a relaxation of the plot ratio restriction of the "Residential (Group D)" ("R(D)") zone for the proposed development.
- (2) The proposed development did not comply with the TPB Guidelines for "Applications for Development within Deep Bay Area" in that there was insufficient information to demonstrate that the development would not have negative off-site disturbance impact on the ecological value of the fish ponds and wetlands in the Deep Bay Wetland Conservation Area.
- (3) The proposed vehicular access arrangement was not desirable from road safety point of view.
- (4) Approval of the proposed development would set an undesirable precedent for other similar applications within the "R(D)" zone. The cumulative effect of approving such similar applications with excessive development intensity would have adverse impacts on the existing and planned traffic and infrastructural provision of the area.

Detailed Government Departments

1. Fire Safety

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

- (a) He has no objection in principle to the captioned proposal subject to water supplies for firefighting and fire service installations being provided to his satisfaction and that the height restriction as stipulated in relevant regulations governing the proposed social welfare facilities being observed. Detailed fire safety requirements will be formulated upon receipt of formal submission of general building.
- (b) Furthermore, the EVA provision in the captioned site shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011 under the Building (Planning) Regulations (B(P)R) 41D which is administered by the Buildings Department (BD).
- (c) The applicant is also advised to consult Social Welfare Department on the proposed development and should be reminded that licensing requirements will be formulated upon receipt of formal application via the Licensing Authority.

2. Building Matters

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

- (a) If the existing structures (not being a New Territories Exempted House) are erected on leased land without the approval of the BA, they are unauthorised building works (UBW) under the Buildings Ordinance (BO) and should not be designated for any proposed use under the captioned application.
- (b) For UBW erected on leased land, enforcement action may be taken by BD to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the Site under BO.
- (c) Before any new building works (including containers / open sheds as temporary buildings, demolition and land filling, etc) are to be carried out on the Site, prior approval and consent of the Building Authority (BA) should be obtained, otherwise they are UBW. An Authorised Person should be appointed as the co-ordinator for the proposed buildings works in accordance with BO.
- (d) The Site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of B(P)R respectively.
- (e) If the Site does not abut on a specified street of not less than 4.5m wide, its permitted development intensity shall be determined under Regulation 19(3) of B(P)R at the building plan submission stage.

- (f) Any parking spaces to be disregarded from GFA calculation under the Regulation 23(3)(b) of B(P)R shall be subject to the requirements laid down in Appendix C of PNAP APP-2.
- (g) For features applied to be excluded from the calculation of the total GFA, it shall be subject to compliance with the requirements laid down in the relevant Joint Practice Notes and Practice Notes for Authorised Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP). For example, the requirements of building set back, building separation and site coverage of greenery as stipulated in PNAP APP-152.
- (h) Noting that there is a proposed clubhouse, it is accountable for GFA (unless exempted) and SC calculation under BO.
- (i) Detailed checking will be carried out during building plan submission stage.

3. Social Welfare Provision

Comments of the Secretary for Education (SED):

SoA (Schedule of Accommodation) and GFA for the proposed KG

- (a) The “SoA for KG premises” has been revised to improve the learning environment by increasing the indoor floor area for each student by 20%. The revised recommended SoA for a 6-classroom KG has come into effect from October 2017 which is recommended for reserving space in developing new KGs as far as practicable, and is available for reference in Appendix 3 of the “Operation Manual for Pre-primary Institutions” (OM). The total area for all items excluding toilet and outdoor play area as stated in the revised SoA for a 6-classroom KG is 551m², and the applicant should ensure that the toilet and sanitary facilities for students and staff should be adequately provided and outdoor play area should be provided whenever possible in the proposed KG. For reference, for some KG premises recently marked in GIC sites, the GFA for 6-classroom KG is approximate 900m². It is noted that the GFA of the proposed 6-classroom KG would be about 929m². He has no comment on the SoA and GFA for the proposed KG as long as the requirements in the above mentioned revised SoA could be met as far as practicable.

Safety concerns on loading/unloading (L/UL) spaces for KG school buses

- (b) For reference, the applicant may refer to the Table 11, Section 2 of Chapter 8 “Internal Transport Facilities” of the relevant HKPSG requirements. The applicant is also advised to note the following safety concerns on L/UL space in respect of the KG students’ use:
 - (i) designated L/UL period for KG school buses so as to avoid possible danger to KG students owing to the clash in using the space with other users; and
 - (ii) the safety of KG students walking between the L/UL spaces to the KG premises should be ensured at all time.

- (c) The applicant should ascertain the premises for the proposed KG(s) can meet the various requirements laid down in:
- (i) the Education Ordinance, Education Regulations and relevant statutory requirements; and
 - (ii) “Operation Manual for Pre-primary Institutions”.
(Relevant link:
https://www.edb.gov.hk/attachment/en/edu-system/preprimary-kindergarten/about-preprimary-kindergarten/Operation_Manual_eng.pdf)

4. Other Departments

The following government departments have no objection to or no comment on the application:

- (a) Chief Engineer/Railway Development 2-2, Railway Development Office, Highways Department;
- (b) Project Manager (West), West Development Office, Civil Engineering and Development Department (CEDD);
- (c) Head of Geotechnical Engineering Office, CEDD; and
- (d) Commissioner of Police.

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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/YL-MP/6

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人支持這個項目，用中密度住宅發展，提供3090伙供應，
可配合政府政策增加房屋供應來緩解現時香港居民的
住屋需求符合地區規劃。區內公共設施齊全完善，包
括有長者鄰舍中心，綠化休憩空間。可提升該區居民的
居住質素，改善該區環境衛生。

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

陳吉和

簽署 Signature

陳吉和

日期 Date

1 / 10 / 21



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

37

To: Secretary, Town Planning Board

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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/YL-MP/6

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人贊成及支持這個住宅發展項目Y/YL-MP/6。這個住宅項目以中密度發展，不高於23層高的樓宇設計高度，在基建、環境、視覺及空氣流通各方面都不會對附近環境造成負面影響，反而因應這個項目的興建能大大改善現時的环境衛生，提高該區內居民的生活質素，有利該區的長遠發展。

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

簽署 Signature kin

日期 Date

30/9/21



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

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

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

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

該項目符合香港現存的屋宇需求，地盡其用，中區
度屋宇發展，不高於23層高的設計，在各方面均不產生
負面影響，配合政府將來的交通政策，附近會有北
環線的鐵路接駁，出入市區十分方便，因此我十分支持
該項目的發展。

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

簽署 Signature

日期 Date

叶玲玲

1 / 10 / 21



致城市規劃委員會秘書：

57

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

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

有關的規劃申請編號 The application no. to which the comment relates Y1YL-MP16

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人支持城市規劃申請編號 Y1YL-MP16，把申請地點由住宅（丁類），地帶改劃為住宅（丙類），就因為住戶的需求，項目發展中密度住宅，符合市民需求。而本身荒地能發展使土地資源得以好好利用。這是非常可行的項目，故希望城規能通過此項申請，能建更多的房屋，好使市民都有居住。

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

簽署 Signature [Signature] 日期 Date 2-10-21



寄件者: [REDACTED]
寄件日期: 2021年10月15日星期五 16:35
收件者: Tpbpd
主旨: Y/YL-MP/6

Dear sirs,

Please find our comment re the above planning application.

Regards
Sheung Chuk Yuen Tsuen

城市規劃委員會
香港北角渣華道 333 號
北角政府合署 15 樓
(傳真號碼 27070245 或 25228426)

2021 年 10 月 15 日

敬啟者：

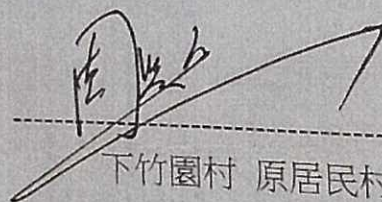
錦學路住宅發展 (申請編號: Y/YL-MP/6)

本人得悉有發展商將上址地盤由低密度的住宅，申請加高建築密度，至可發展成可提供 3,090 個住宅單位的發展項目。

政府現正全力加快土地開發，提供更多住宅給有需要的市民。本人十分認同土地應該地盡其用。上址地盤用作低密度的住宅發展已不合時宜，本人十分贊成將該地盤興建成可提供更多的住宅單位，全力配合政府的政策。

本人亦得悉發展項目包括在鄰近本村的下竹園路旁，興建公共休憩空間，開放給附近的居民使用。這項目也同時會興建幼稚園、小型商場、老人日間護理中心等項目，亦對附近的居民提供日常生活的方便。

基於以上原因，本人十分支持這計劃。政府應該加快審批程序，讓項目早日落，配合政府施政。


下竹園村 原居民村代表

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

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

Y/YL-MP/6

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

配合政府政策以增加房屋供應，不高於 19 層高的設計中密度住宅發展，提供 2,771 伙供應，在基建，環境，視覺，綠化及空氣流通各方面均不會造成負面影響。配合政府政策將來交通及北環線鐵路站接駁，進出市區十分方便。設施有配套小商場及公共交通站，提供幼稚園及安老院，為區內居民提供服務。本人贊成發展計劃。

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

吳大雄

簽署 Signature

雄

日期 Date

14-3-2023



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

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有關的規劃申請編號 The application no. to which the comment relates Y/YL-MP/6

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持發展住宅項目！若申請通過，將可美化當區環境，同時選址的發展對當地自然生態影響甚微，亦能配合政府發展北部都會區，增加香港房屋供應的發展大綱。未來該選址附近亦會設有北環線鐵路站，交通機能不錯，適合住宅項目發展。

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

簽署 Signature *Vian Hsu* 日期 Date 9 March, 2023



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

參考編號

Reference Number:

210925-140942-85621

提交限期

Deadline for submission:

15/10/2021

提交日期及時間

Date and time of submission:

25/09/2021 14:09:42

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Michael Ip

意見詳情

Details of the Comment :

錦墾路鄰近錦繡花園和加州花園，人口數以萬計，大部份住戶以私家車代步，現時該區馬路以單線雙程為主，容量已達飽和狀況，假日更經常出現塞車，如果增加地積比，導致人口驟升，該區塞車情況勢必加劇，不但耗費交通時間，引起民怨，而且汽車廢氣增多，空氣質素下降，影響居民健康。為了維持現有居民生活質素，保育鄉郊清幽環境，本人強烈反對Y/YL-MP/6之申請。

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

參考編號

Reference Number:

210926-101348-60625

提交限期

Deadline for submission:

15/10/2021

提交日期及時間

Date and time of submission:

26/09/2021 10:13:48

有關的規劃申請編號

The application no. to which the comment relates: Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Charles Ho

意見詳情

Details of the Comment :

23層,79.9米高的樓宇高度嚴重破壞米埔自然環境的天際線,擬建樓宇高度與週邊現有建築和大自然環境不相符。建議降低建築高度和密度,增加社區設施,單車徑,與該區大自然環境再融合設計。

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

參考編號

211002-141927-11488

Reference Number:

提交限期

15/10/2021

Deadline for submission:

提交日期及時間

02/10/2021 14:19:27

Date and time of submission:

有關的規劃申請編號

Y/YL-MP/6

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Ron Lo

Name of person making this comment:

意見詳情

Details of the Comment :

本人反對是次申請：

首先，錦壘路鄰近錦繡花園和加州花園，居民數以萬計，大部份住戶以私家車代步，現時該區馬路主要是單線雙程，容量已達飽和，假日更經常出現塞車，如果增加地積比，導致人口驟升，該區塞車情況勢必加劇，不但耗費交通時間，引起民怨，而且汽車廢氣增多，空氣質素下降，影響居民健康和附近環境。本人反對此申請，應維持現有居民生活質素，以及保育綠色地帶，保持鄉郊清幽環境。

其次，是次申請較16年前舊方案的伙數增加42倍，時代向前，在全球暖化下本應以環保為趨勢，是次申請增加伙數實為倒行逆施，一大退步。

因此本人強烈反對Y/YL-MP/6之申請。

寄件者: [REDACTED]
 寄件日期: 2021年10月15日星期五 23:10
 收件者: tpbpd
 主旨: Y/YL-MP/6 DD 104 Kam Pok Road, Mai Po SHK

Y/YL-MP/6 . SHK

Lots 3054 S.A RP, 3098 RP, 3100 RP, 3108 RP, 3109 RP, 3110, 3111, 3112, 3113, 3114, 3115 RP, 3119 RP, 3122 RP, 3123, 3124, 3126, 3131 RP, 3131 S.B RP, 3131 S.C, 3131 S.D, 3132 RP, 3146, 3147 RP, 3148, 3150 RP, 3152, 3153 RP, 3156 RP, 3156 S.B, 3158 RP, 3162, 3163, 3164 RP, 3164 S.A, 3167, 3168, 3171, 3173, 3176, 3177, 3178, 3179, 3180 RP, 3181 RP, 3182 RP, 3189 RP, 3190, 3191, 3192 RP, 3193 RP, 3194 RP in D.D. 104 and Adjoining Government Land, Kam Pok Road, Mai Po, Yuen Long

Site area : About 約 65,690sq.m Includes Government Land of about 8,830sq.m

Zoning : "Res (Group D)"

Proposed Amendment: Rezone "Res (Group C) / 16 Blocks – 3,090 Units / 80mPD / 4 Blocks Retail - + 100 bed RCHE / OS 6,243sq.m / 596 Vehicle Parking

Dear TPB Members,

Strong objections. Since the previous application was approved almost a decade ago the level of concern with regard to the impact of global warming and changing weather patterns has become more acute.

Application 205 approved in 2013 –

Site area : About 65,915.00m² Includes Government Land of about 7,970.00sq.m

71 Houses / 1 Club House / 119 Vehicle Parking

But instead of considering the impact of large developments on such a sensitive wetland area, SHK forges ahead with a radical plan to increase the intensity of the development from 71 houses to a development of over 3,000 units that would not be out of place in MKK.

Current TPB members were not yet appointed in 2013 so they should go back to the 205 plans and note the content of the minutes.

The site fell within the Wetland Buffer Area of Deep Bay. The proposed development was in line with the TPB PG-No. 12B regarding the requirements on ecological impact assessment submission, no net increase in pollution load to Deep Bay, and provision of visual buffer to the Wetland Conservation Area

SHK acknowledged this and in that plan the villas were set well back from Kam Pok Road. The new plan has buildings bordering the road. This is despite

According to the applicant, mitigation measures including a landscaped buffer area between Kam Pok Road and the proposed houses were also proposed. DAFC had no objection to the application and did not envisage insurmountable problem in complying with the approval condition although he still observed a number of insufficiencies in the revised EcolA

The impact of the excavation for and weight of large towers on what was wetlands and the possibility of flooding of the site during inclement weather has been ignored.

The visual impact would affect the panorama as can be seen from the View from Ngau Tam Mei Hill. The towers are completely out of dimension vis a vis the surrounding developments. That they would cause considerable light pollution and disturbance to the wildlife goes without saying.

This application is obscene in the level of greed and exploitation on display. Almost 9,000sq.m of the site is government land and should not be used for development that is against the community interests.

Members must reject outright the proposed rezoning.

Mary Mulvihill

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

參考編號

Reference Number:

211216-110939-99001

提交限期

Deadline for submission:

17/12/2021

提交日期及時間

Date and time of submission:

16/12/2021 11:09:39

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. 許

意見詳情

Details of the Comment :

1. 有關申請之土地近米埔自然保護區，周邊為低密度住宅，有關申請作23層高之樓宇，與邊環境格格不入，並會嚴重破壞米埔整體生態環境，阻礙候鳥航道。

米埔及內後濕地位於香港西北面，佔地約1,500公頃，並於1995年獲《拉姆薩爾公約》劃為「國際重要濕地」。米埔位處每年有五千萬隻遷徙水鳥使用的東亞---澳大拉西亞飛行航道上(全球九主要飛行航道之一)，是水鳥遷徙重要中途站及越冬地。在這片地停留的遷飛候鳥每年多達10萬隻，其中包括黑臉琵鷺、黑咀鷗和小青腳鵝等世界性危品種。例如瀕危的黑臉琵鷺由1989年香港只有50隻，透過保育在2017年上升至375隻。擬議的安老院地盤位於「濕地緩衝區(Wetland Buffer Area)」，改建為23層高的建築物於該地區，恐防會阻礙候鳥航道，影響生態環境，令保育的成果付諸流水。

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

參考編號

211216-111053-97838

Reference Number:

提交限期

17/12/2021

Deadline for submission:

提交日期及時間

16/12/2021 11:10:53

Date and time of submission:

有關的規劃申請編號

Y/YL-MP/6

The application no. to which the comment relates:

「提意見人」姓名/名稱

小姐 Miss 陳

Name of person making this comment:

意見詳情

Details of the Comment :

增加3090個住宅單位及100個安老院床位會大大增加人流，包括住戶和訪客，對附近交通帶來巨大負荷。暫時現行交通配套不足，只有3輛小巴各自從元朗站(76號)、上水站(76K號)和落馬洲站(75號)到牛潭尾下車再步行到擬議的地盤；惟小巴的載客量有限，加上最疏的班次為30分鐘一班，想必住宅和安老院落成後小巴會增加班次，以應付居民、每日上下班的工作人員和訪客。在沒有大型基建及良善公共運輸交通網絡下，加上住戶則大多數駕駛私人車，可想而知，這對附近交通造成嚴重負擔。現時洋葵徑(二號通道)為政府公眾道路，惟需由加州豪園及加州花園共同承擔保養維修責任，現時街道的照明系統及路面維修的費用均由兩邨居民承擔。而是次申請約有400個床位的私營老人院，規模甚大，根據《安老院規例》附表1訂明各類安老院的最低人手要求，安老院涉及多種工種，例如：主管，助理員，護理員，保健院和護士等。保守估計398個床位，最少需要約170名員工，加上病人和探訪者，相信該安老院最終會容納近千人。現行交通配套不足，只有3輛小巴各自從元朗站(76號)、上水站(76K號)和落馬洲站(75號)到牛潭尾下車再步行到擬議的地盤。唯小巴的載客量有限，加上原本最疏的班次為30分鐘一班，想必安老院落成後小巴會增加班次，以應付每日上下班的工作人員和探訪者。可想而知，這對附近交通造成負擔，恐怕會導致車水馬龍的景象。定會增加使用本邨二號通道的私人車輛數目，加速有關道路的損耗，引致維修成本增加。此外，於建築期間亦會有大量泥頭車或重型車輛出入，嚴重損害道路，增加小業主維修開支。若政府一意孤行盲目批准上述申請，將徹底改變有關道路的原有使用狀況

321

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/YL-MP/6 Received on 12/11/2021

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

反對規劃申請，因對本村村民交通造成嚴重擠塞，
 影響正常生活，影響鄉村原有凌靜、景觀環境，
 造成各方面矛盾。

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

陳冠盛

簽署 Signature



日期 Date

15-12-2021

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

參考編號
Reference Number: 220602-091219-73310

提交限期
Deadline for submission: 17/06/2022

提交日期及時間
Date and time of submission: 02/06/2022 09:12:19

有關的規劃申請編號
The application no. to which the comment relates: Y/YL-MP/6

「提意見人」姓名/名稱
Name of person making this comment: Ir Aaron Bok 卜國明工程師

意見詳情
Details of the Comment :

致城規會

我是一個住在錦綉花園超過25年的市民。
現特致函強烈反對三份申請項目Y/YL-MP/6, Y/YL-MP/7 及Y/YL-MP/8。

MP/7及MP/8的反對意見，我已經昨天分別提出了。
當時沒有發覺原來去年九月起，已經有這個MP/6的申請。
這個MP/6 建議的改劃規模比MP/7 及MP/8 更大，興建14幢 達23層高的構築物，3090 單位。對錦繡居民來說，破壞更大！
所以必須強烈反對這MP/6 有關之申請。

我不是反對任何發展項目或任何房屋發展項目，不是 NIMBY (Not In My Back Yard)反應。
但我強烈反對上述三項發展商申請的理由及其不可接受的發展規模（看申請書的內容，似乎是同一發展商）。
三個項目加起來合共增加人口約15,000人。對區內設施增加的壓力，不言而喻。是不可能承受的！

發展商取巧地將「滿足市民住房需求」跟「花園式洋房發展模式」對立起來，然後建議興建多幢高達16層高（57米多）的大樓（MP/7及8）或十多幢23層高（MP/6；74.5米高）的巨型構築物。
這是完全不尊重香港城市規劃；不尊重分區計劃大綱圖(Outline Zoning Plan, OZP)的規劃意願；不尊重社區發展需要多元化（香港城市發展密度超高，市民是渴望有多些生活空間，低層洋房發展是社會上一個十分重要的單元）；不尊重「不同地區，有不同城市規劃需要，必須跟周邊環境互相配合，互相尊重」的原則；不尊重城市規劃的宗旨須兼顧「促進健康、安全及便利的社區發展」；不尊重原有居住該區的居民感受。
發展商現在建議改劃合共30多幢高達16或23層高的建築物，正正是「無序的都市擴展插入式發展」！

發展項目建議的龐然巨大結構物會完全破壞該區天際線，破壞該區的低密度發展模式，是完全不符合周邊天然自然環境，和整個附近一般均是低層發展（三至四層左右）絕對不協調。

上述發展項目一旦獲得批准，它將為該地區的高層建築打開極壞先例，為這區帶來世世代代、深遠破壞性的影響。

單單就着MP/6 的詳細反對理由如下：-

A. 我強烈要求需保留已經政府批准的 OZP 中的原有規劃地帶，即「丁類房屋發展」用途。丁類發展項目，應該是低密度的，對區內設施不構成過度負荷。我不反對適量增加發展規模，以作為提供安老設施等用途的誘因。

B. MP/6 申請建議的地積比率為 2 的“R(C)”。這是不可以接受！！與毗鄰的發展密度絕不相容。錦繡花園大約只是 0.4（加州花園及附近的明珠花園相類似）。

C. 74.5 米的 23 層建築是完全不可接受的混凝土屏風牆，破壞了該地區的自然環境和低層建築。除了阻礙空氣流通外，景觀的影響根本不可能接受。

D. 撮要中似乎並沒有提供環評報告，讓公眾參考。我們不得知道這發展項目對自然生態、水質等的環境影響評估；特別是景觀影響評估。單從申請書提供的電腦模擬圖片，在廣闊的平地中，突然屹立了多幢 70 多米石屎屏風牆，23 層高建築物跟周邊三四層高的發展完全顯得格格不入），不單止是錦繡居民不可以接受，我相信在新建單車徑上的遊人也會覺得兀突。另外申請書亦沒有空氣通風評估，對候鳥遷徙影響的評估。

E. MP/6 申請項目建議的 3090 個單位只提供 562 個私家車車位。這只會引起區內道路嚴重非法違泊情況。當然，提供更多的車位，又將引致交通擠塞問題。因此這區，根本不可能接受這樣的密度發展。

F. 三個發展項目合共 5567 個單位。大部分均將使用錦繡花園大道出入迴旋處，將令這條錦繡大道不勝負荷。

G. 建議的住宅項目缺乏基本社區設施（未察覺有包括居民巴士），這將引致該等住戶使用錦繡花園的設施。引致居民間的磨擦。不利建立和諧社區。

謝謝

卜國明

2022年6月2日

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



Re: Y/YL-MP/6 DD 104 Kam Pok Road, Mai Po SHK

15/06/2022 02:42

From:

To:

File Ref:

tpbpd <tpbpd@pland.gov.hk>

Dear TPB Members,

Strong objections that large developers like SHK are not obliged to provide a soft copy of materials so that members of the community have access to information.

Have govt depts objected to the paucity of community facilities, one small RCHE is certainly not sufficient bank for bucks when the site includes so much public land. Moreover the GIC is shared with retail instead of being a stand alone facility, after all it is GFA exempt.

Previous objections upheld.

Mary Mulvihill

From

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

Date: Friday, 15 October 2021 11:09 PM CST

Subject: Y/YL-MP/6 DD 104 Kam Pok Road, Mai Po SHK

Y/YL-MP/6 SHK

Lots 3054 S.A RP, 3098 RP, 3100 RP, 3108 RP, 3109 RP, 3110, 3111, 3112, 3113, 3114, 3115 RP, 3119 RP, 3122 RP, 3123, 3124, 3126, 3131 RP, 3131 S.B RP, 3131 S.C, 3131 S.D, 3132 RP, 3146, 3147 RP, 3148, 3150 RP, 3152, 3153 RP, 3156 RP, 3156 S.B, 3158 RP, 3162, 3163, 3164 RP, 3164 S.A, 3167, 3168, 3171, 3173, 3176, 3177, 3178, 3179, 3180 RP, 3181 RP, 3182 RP, 3189 RP, 3190, 3191, 3192 RP, 3193 RP, 3194 RP in D.D. 104 and Adjoining Government Land, Kam Pok Road, Mai Po, Yuen Long

Site area : About 約 65,690sq.m Includes Government Land of about 8,830sq.m

Zoning : "Res (Group D)"

Proposed Amendment: Rezone "Res (Group C) / 16 Blocks – 3,090 Units / 80mPD / 4 Blocks Retail - + 100 bed RCHE / OS 6,243sq.m / 596 Vehicle Parking

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Strong objections. Since the previous application was approved almost a decade ago the level of concern with regard to the impact of global warming and changing weather patterns has become more acute.

Application 205 approved in 2013 –

Site area : About 65,915.00m² Includes Government Land of about 7,970.00sq.m
71 Houses / 1 Club House / 119 Vehicle Parking

But instead of considering the impact of large developments on such a sensitive wetland area, SHK forges ahead with a radical plan to increase the intensity of the development from 71 houses to a development of over 3,000 units that would not be out of place in MKK.

Current TPB members were not yet appointed in 2013 so they should go back to the 205 plans and note the content of the minutes.

The site fell within the Wetland Buffer Area of Deep Bay. The proposed development was in line with the TPB PG-No. 12B regarding the requirements on ecological impact assessment submission, no net increase in pollution load to Deep Bay, and provision of visual buffer to the Wetland Conservation Area SHK acknowledged this and in that plan the villas were set well back from Kam Pok Road. The new plan has buildings bordering the road. This is despite

According to the applicant, mitigation measures including a landscaped buffer area between Kam Pok Road and the proposed houses were also proposed. DAFC had no objection to the application and did not envisage insurmountable problem in complying with the approval condition although he still observed a number of insufficiencies in the revised EcolA

The impact of the excavation for and weight of large towers on what was wetlands and the possibility of flooding of the site during inclement weather has been ignored.

The visual impact would affect the panorama as can be seen from the View from Ngau Tam Mei Hill. The towers are completely out of dimension vis a vis the surrounding developments. That they would cause considerable light pollution and disturbance to the wildlife goes without saying.

This application is obscene in the level of greed and exploitation on display. Almost 9,000sq.m of the site is government land and should not be used for development that is against the community interests.

Members must reject outright the proposed rezoning.

Mary Mulvihill

410

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

參考編號

Reference Number:

220616-133015-39370

提交限期

Deadline for submission:

17/06/2022

提交日期及時間

Date and time of submission:

16/06/2022 13:30:15

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

夫人 Mrs. Shek Lai Ching

意見詳情

Details of the Comment :

反對改變土地用途：

這一帶一直都沒有康樂設施，居民一直等待這一區可以有康樂設施去舒展身心，一直沒有實踐

反對興建高樓

這一帶夏天非常焗熱，如同焗爐，所以通風非常重要，反對建設高樓大廈，破壞空氣質素，而整個景觀亦完全破壞。

渠道去水問題

周邊興建低密度住宅或高樓，會否引起水倒灌入附近已興建的屋苑？有優良的解決方案？

嚴重影響附近濕地生態：

附近濕地生態完全受影響，附近的米埔、濕地棲息的鳥類和生物亦受到不可挽回的影響請保留一片歇息的空間

引起交通嚴重擠塞問題：

現在由這一區去元朗或經各方由迴旋處入錦綉花園、加州花園一帶已交通已完全不勝負荷，短短一段路，由以往五分鐘，到現在常要半小時或以上才去到元朗，已不能忍受，居民返工返學只是出元朗再轉車已經用上半小時，然後再轉各交通工具去港島或九龍，每天變得很勞累，生活質素降低了。原本住新界區路途遙遠亦可理解，但不可接受再加長工返學交通時間。

這是因規劃出錯，城規會要負上責任。

411

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

參考編號

Reference Number:

220615-030810-73163

提交限期

Deadline for submission:

17/06/2022

提交日期及時間

Date and time of submission:

15/06/2022 03:08:10

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Melody Fu

意見詳情

Details of the Comment :

致城規會

本人現寫信反對MP6、7、8 三個地帶改劃申請，及強烈要求該三個地帶維持原有地帶用途—康樂及住宅（丁類）。

首當其衝，該地帶鄰近國際知名的米埔及南生圍等極具生態價值的濕地，該申請會為生態帶來不可逆轉的破壞。申請人刻意誤導城規會和市民，未在MP6及MP8的申請中提及該地帶位於濕地緩衝區。「濕地緩衝區」的規劃原意是保護「濕地保育區」內的魚塘和濕地的生態完整，並禁止進行對「濕地保育區」內的魚塘的生態價值帶來負面干擾影響的發展。大量開發濕地緩衝區會為「濕地保育區」帶來負面生態影響，如影響雀鳥飛行路線、削減冬候鳥覓食空間、打擾鷺鳥繁殖等。話雖如此，濕地緩衝區允許適度發展及修復，但MP6、7、8並不是『適度發展』。為了不打擾候鳥棲息，緩衝區一般限制地積比為0.4及樓高三層，發展商卻建議起30多幢樓高16—23層(50—75米)的屏風樓，地積比為1.2及2，大規模拋離限制!! 發展商亦未有在設計上保留大量大自然/花園等等供候鳥作棲息地，更沒有提供生態報告確認該住宅發展不會減少雀鳥數目及確保雀鳥使用魚塘模式不變（如會否影響雀鳥飛行路線）。雖然只是個人觀察，本人常常看見濕地雀鳥（如小白鷺等）到MP8草地棲息，如發展該地帶無疑會令雀鳥失去另一塊寶貴的棲息地。所以我認為該三個申請必然會破壞后海灣濕地的完整性及相連性，從而對環境和生態造成嚴重干擾和污染。

此外MP6、7、8 申請沒有提供足夠配套設施，亦會造成嚴重交通和民生問題。申請地帶位於錦壘路和攸壘路，申請並沒有提及新增道路設施，可想而知申請建議增加的5567戶人會使用錦繡大道和迴旋處出入。現在錦繡大道和迴旋處返工放工時間已經迫爆，不可能負荷更多，必定會造成交通擠塞。申請人建議增加5567戶，但只提供1000多個車位亦沒有提及提供穿梭巴士及其他康樂設施，新增的15000人口必會湧入鄰近錦繡花園使用居民設施（如穿梭巴士，超級市場，兒童遊樂場等）令整個社區充滿怨氣和拗撬和加深附近違泊問題。另外錦繡大道屬於私家路，申請人方便新增的15000人每天免費使用錦繡大道，但維修費用卻要錦繡花園居民全盤負擔，實屬不公。

該三個申請亦與該區的低密度發展模式格格不入，完全不符合周邊天然自然環境，除了造成景觀破壞，亦會造成不可接受的光污染和空氣流通問題。政府最近亦在攸壘路新建一條單車徑，如果錦壘路 攸壘路一帶發展屏風樓，除了破壞僅有生態美景，也會剝奪喜歡到南生圍附近享受郊野康樂設施市民的公民權利，令新建的單車徑顯得無調和令政府顯得浪費公帑。

MP6申請附帶安老院舍，聲稱為了服務該區市民，但安老院舍只有100個床位，只是虛有其表。

申請人聲稱『花園式洋房極為佔地』及『浪費珍貴土地資源』，但這些建於濕地緩衝區的低層洋房及『被浪費的』土地正正維護后濕地緩衝區功能及保護海灣濕地（米埔及南生圍）生態，平衡發展與生態環境。申請人粗暴地建議在低密度發展社區建3棟龐大的屏風樓才是申請人所講的『無序的都市擴展插入式發展』。懇請城規會尊重該區居民和濕地雀鳥使用及享受香港僅有的大自然的權利、尊重該區城市規劃需要、不要放寬該地帶及其他濕地緩衝區的地積比和層數限制、不要損害濕地緩衝作用、和否決MP6、7、8的申請保留原有地帶用途（康樂及住宅丁類）。謝謝。

一名市民上

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

參考編號

Reference Number:

220616-153142-44548

提交限期

Deadline for submission:

17/06/2022

提交日期及時間

Date and time of submission:

16/06/2022 15:31:42

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

加州豪園A期業主委員會

意見詳情

Details of the Comment :

本會為新界元朗和生圍加州豪園A期業主委員會，就有關Y-YL-MP/6之申請出強烈反對，謹請 貴會細閱我方下列反對意見：

現時的交通設施配套未能配合大量增加的人口，不宜發展高樓大廈。由[住宅(丁類)]地帶改為[住宅(丙類)]，大大增加入住人口。隨著政府宣佈北部發展項目，鄰近地段的持分者陸續改變土地用途，近日接獲多個改變土地用途的諮詢，如Y-YL-NTM-5; Y/YL-MP/7; Y/YL-MP/8，分別為增加大量過渡性房屋，改變住宅用途或將康樂用地改為住宅等，惟鄰近錦繡花園及本苑一帶之配套設施只適合現時的低密度住宅，如盲目批准，會引致許多預期的問題，大大影響現時居民的日常生活。

1) 增加有關道路的交通負荷，引致交通擠塞。

現時於錦繡迴旋處交通非常繁忙，對附近交通造成嚴重負擔。在沒有大型基建及良善公共運輸交通網絡下，鄰近居民則大多數駕駛私家車，引致道路負載量超出負荷；尤其現時錦繡花園迴旋處已經常擠塞，引致倒灌，會導致高速公路塞車情況。若有關申請成功獲批，必會增加的交通負荷，引致交通擠塞。

2) 大型的基建，對鄰近居民造成滋擾。

有關申請單位數目增加至3000多個單位，於基建時造成嚴重的噪音；另外，建

3) 有關申請用途複雜，擔心鄰近影響治安。

有關申請除大幅增加單位數目，更有100個安老院舍床位、旅遊巴車位及輕型及重型貨車車位，申請用途複雜，擔心鄰近影響治安。

4) 嚴重破壞米埔生態環境，阻礙候鳥航道，更造成屏風效應，不宜發展高樓大廈。

有關申請之土地鄰近米埔自然保護區，周邊為低密度住宅，有關申請地點改建為高達23層高之樓宇，與周邊環境格格不入，並會嚴重破壞米埔整體生態環境，更阻礙候鳥航道；再者，密集的建築物阻擋光線及令風速減慢，造成屏風效應，居民用電加大，產生熱氣，造成惡性循環，長遠而言，此舉影響附近居民健康。

5) 沒有提交「視覺影響評估」及「景觀影響評估」。

惟申請人提交的報告書中，並沒有就有關申請提交「視覺影響評估」及「景觀影響評估」兩份報告供參考，以評估有關申請對周邊環境的影響。興建高層樓宇使道路使用者的視線減少，增加交通意外風險；亦嚴重影響鄰近景觀，申請需有詳盡報告。

區內已規劃可發展為高樓大廈的地段有凹頭站(逢吉鄉)及新田站，貴會應考慮先發展有

關地段，而非盲目批准有關申請，而影響周邊的環境及鄰近居民的生活作息。

加州豪園A期業主委員會謹啟

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

參考編號

220616-153629-98347

Reference Number:

提交限期

17/06/2022

Deadline for submission:

提交日期及時間

16/06/2022 15:36:29

Date and time of submission:

有關的規劃申請編號

Y/YL-MP/6

The application no. to which the comment relates:

「提意見人」姓名/名稱

加州豪園B期業主委員會

Name of person making this comment:

意見詳情

Details of the Comment :

會為新界元朗和生圍加州豪園B期業主委員會，就有關Y-YL-MP/6之申請出強烈反對，謹請 貴會細閱我方下列反對意見：

現時的交通設施配套未能配合大量增加的人口，不宜發展高樓大廈。由 [住宅(丁類)] 地帶改為[住宅(丙類)]，大大增加入住人口。隨著政府宣佈北部發展項目，鄰近地段的持份者陸續改變土地用途，近日接獲多個改變土地用途的諮詢，如Y-YL-NTM-5; Y/YL-MP/7; Y/YL-MP/8，分別為增加大量過渡性房屋，改變住宅用途或將康樂用地改為住宅等，惟鄰近錦繡花園及本苑一帶之配套設施只適合現時的低密度住宅，如盲目批准，會引致許多預期的問題，大大影響現時居民的日常生活。

1) 增加有關道路的交通負荷，引致交通擠塞。

現時於錦繡迴旋處交通非常繁忙，對附近交通造成嚴重負擔。在沒有大型基建及良善公共運輸交通網絡下，鄰近居民則大多數駕駛私家車，引致道路負載量超出負荷；尤其現時錦繡花園迴旋處已經常擠塞，引致倒灌，會導致高速公路塞車情況。若有關申請成功獲批，必會增加的交通負荷，引致交通擠塞。

2) 大型的基建，對鄰近居民造成滋擾。

有關申請單位數目增加至3000多個單位，於基建時造成嚴重的噪音；另外，建築時期，有大量重型車輛出入，對鄰近道路使用者安全構成威脅。

3) 有關申請用途複雜，擔心鄰近影響治安。

有關申請除大幅增加單位數目，更有100個安老院舍床位、旅遊巴車位及輕型及重型貨車車位，申請用途複雜，擔心鄰近影響治安。

4) 嚴重破壞米埔生態環境，阻礙候鳥航道，更造成屏風效應，不宜發展高樓大廈。

有關申請之土地鄰近米埔自然保護區，周邊為低密度住宅，有關申請地點改建為高達23層高之樓宇，與周邊環境格格不入，並會嚴重破壞米埔整體生態環境，更阻礙候鳥航道；再者，密集的建築物阻擋光線及令風速減慢，造成屏風效應，居民用電加大，產生熱氣，造成惡性循環，長遠而言，此舉影響附近居民健康。

5) 沒有提交「視覺影響評估」及「景觀影響評估」。

惟申請人提交的報告書中，並沒有就有關申請提交「視覺影響評估」及「景觀影響評估」兩份報告供參考，以評估有關申請對周邊環境的影響。興建高層樓宇使道路使用者的視線減少，增加交通意外風險；亦嚴重影響鄰近景觀，申請需有詳盡報告。

6) 區內已有部份規劃可發展為高樓大廈的地段，如凹頭站 (逢吉鄉)及新田站，貴會應考慮先發展有關地段，而非盲目批准有關申請，而影響周邊的環境及鄰近居民的生活作息。

加州豪園B期業主委員會謹啟

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

參考編號

220617-012821-43743

Reference Number:

提交限期

17/06/2022

Deadline for submission:

提交日期及時間

17/06/2022 01:28:21

Date and time of submission:

有關的規劃申請編號

Y/YL-MP/6

The application no. to which the comment relates:

「提意見人」姓名/名稱

元朗加州花園偉仕居業主委員會

Name of person making this comment:

意見詳情

Details of the Comment :

致：元朗民政事務處 阮方晴專員
粉嶺、上水、元朗東規劃處 城市規劃師 張玉儀女士

敬啟者：

就 貴處之檔案編號(5) in HADYLC&D 17-45/45/01/232 Pt14, (15) in HADYLC&D 17-45/45/01/315, (17) in HADYLC&D 17-45/45/01/315, (74) in HADYLC&D 17-45/45/13/03向本村提出收集意見，因受最近疫情及限聚令等原因影響，敝會於收到 貴處來信後，並未能於 貴處來信之收集意見限期前，進行任何聚眾之常規村務會議，以對 貴處之來信作出常規討論及意見收集。由於 貴處信件發出到意見收集之期限只有區區十數天，在沒有足夠時間準備下敝會只能以一般村務WHATSAPP群組等對 貴處之要求收集一些初步意見，雖收集到之意見因未能舉行常規會議作深入討論，但有發表意見之居民大多數都持反對及懷疑態度，其意見包括該些發展將對區內治安及交通流量等有極深遠影響。

由於 貴處以上各信件之限期將近，為避免 貴處誤以為敝村居民沒有任何意見需要表達，故此現特來信說明，敝會謹代表敝村居民反對以上各檔案編號之申請，反對之原因及詳情將於敝會成功舉行村務會議後收集整理好再來信加以說明。

最後敝會希望 貴處對收集居民意見一事能從善如流，順應民意，盡量避免出現諮詢時間不足之情況出現，以減低居民對 貴處之懷疑，如蒙傾聽不勝感激。

此致

元朗民政事務處

粉嶺、上水、元朗東規劃處

加州花園 偉仕居業主委員會主席

梁敏慧謹啟

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

參考編號

220617-112022-09052

Reference Number:

提交限期

17/06/2022

Deadline for submission:

提交日期及時間

17/06/2022 11:20:22

Date and time of submission:

有關的規劃申請編號

Y/YL-MP/6

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Lei Lok Tin

Name of person making this comment:

意見詳情

Details of the Comment :

強烈反對改變土地用途：

元朗已沒有什麼讓人休憩的地方，居民一直等待這一區可以有康樂設施去舒展身心，一幅草地平原已買少見少，不要改變土地用途。

反對興建高樓

這一帶夏天非常焗熱，如同焗爐，所以通風非常重要，反對建設高樓大廈及任何住宅，破壞空氣質素，而整個景觀亦完全破壞。

渠道去水問題

周邊興建低密度住宅或高樓，會否引起水倒灌入附近已興建的屋苑？是否已有優良的解決方案？

嚴重影響附近濕地生態：

附近濕地生態完全受影響，附近的米埔、濕地棲息的鳥類和生物亦受到不可挽回的影響，請保留人類和小白鷺一片歇息的空間。

引起交通嚴重擠塞問題：

由元朗去錦繡花園或加州花園等，現有的Park Yoho 紅綠燈及大量車輛行經博愛迴旋處和錦繡迴旋處，已不能負荷。

現在由這一區去元朗或經各方由迴旋處入錦繡花園、加州花園一帶已交通已完全不勝負荷，短短一段路，由以往五分鐘，到現在常要半小時或以上才去到元朗，已不能忍受，居民返工返學只是出元朗再轉車已經用上半小時，然後再轉各交通工具去港島或九龍，每天變得很勞累，生活質素降低了。原本住新界區路途遙遠亦可理解，但不可接受再加長工返學交通時間。這是因規劃出錯，城規會要負上責任。

請保留元朗平原及米埔的特色，讓居民有休憩的地方，請保留人類和小白鷺一片歇息的空間。

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

參考編號

220617-160907-23739

Reference Number:

提交限期

17/06/2022

Deadline for submission:

提交日期及時間

17/06/2022 16:09:07

Date and time of submission:

有關的規劃申請編號

Y/YL-MP/6

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Caroline

Name of person making this comment:

意見詳情

Details of the Comment :

To whom it may concerns,

The development will be a "Block" to Fairview Park, which is against the original use of land resources. Most importantly, this new development will definitely damage the Mai Po's natural reserve area, where this area is one of the most valuable resources. Located on the northwestern corner of Hong Kong "paradise for birds and a beautiful, irreplaceable piece of China's wetland kaleidoscope."

There is no way that the reserve land can be recovered if the new development is approved. The Mai Po Natural reserve land is home to a thousand of waterbirds. The development would only be further damage the last piece of wetlands in the northwest area.

I here to urge TPB NOT to approve the use of land for development and continue to protect this last piece of wetland for our natural.

Thank you for your time.

Yours,
Caroline

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

參考編號

Reference Number:

220617-161921-93322

提交限期

Deadline for submission:

17/06/2022

提交日期及時間

Date and time of submission:

17/06/2022 16:19:21

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. clifford ross

意見詳情

Details of the Comment :

I strong object to the application of private developers for the conversion of residential units with 8, 16 and 23 storeys totalling 5,567 immediate close to residence of Fairview Park residence and other residence nearby (i.e. MP6, MP7, MP8). The number of stories is excessive compared to nearby developments

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

參考編號

220617-233701-87955

Reference Number:

提交限期

17/06/2022

Deadline for submission:

提交日期及時間

17/06/2022 23:37:01

Date and time of submission:

有關的規劃申請編號

Y/YL-MP/6

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Wong

Name of person making this comment:

意見詳情

Details of the Comment :

As a homeowner in Fairview Park, I strongly object to the three adjacent development proposals MP6, MP7, and MP8.

The land has been reserved for low density Recreational and Residential (Group D) according to Outline Zoning Plans, which should be honoured.

If the proposed development with a plot ratio of 1.2/2.0 is to be granted, a staggering 15,000 additional people are going to move to the area, putting tremendous pressure on the roads, transport, as well as all other types of communal facilities.

The most outrageous part is the number and height of the proposed buildings:

Not only is it going to worsen the already significant heat island effect observed by scientists, blocking natural air flow and increasing the temperature and humidity, which are detrimental to our health;

But also cause irreversible damage to the delicate ecosystem as the forest of high-rise blocks stand in the way of migratory birds, many of which will not be able to distinguish between open air and glass windows, and consequently suffer fatally injuries;

Besides, not just current residents but also cyclists and hikers who visit the area will agree that such tall and densely-built structures are going to be a huge eyesore and ruin the views of the beautifully blue sky and luscious hills.

I sincerely hope the authorities take the above into account and deny these unrealistic, unsightly, and environmentally-destructive development plans.

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

參考編號
Reference Number: 220617-235553-34104

提交限期
Deadline for submission: 17/06/2022

提交日期及時間
Date and time of submission: 17/06/2022 23:55:53

有關的規劃申請編號
The application no. to which the comment relates: Y/YL-MP/6

「提意見人」姓名/名稱
Name of person making this comment: 小姐 Miss Wong Hoi Kei

意見詳情
Details of the Comment :

作為建議發展地段附近居民提出建議如下:

有鑑於現在三個地段(申請編號Y/YL-MP/6、Y/YL-MP/7及 Y/YL-MP/8)的發展商同期向城規會(TPB)申請要共建5667個單位、34幢物業和1400個停車位，還要在當刻具有一定生態價值濕地的「康樂」地帶(申請編號 Y/YL-MP/7及 Y/YL-MP/8建議發展地段)之上申請蓋房，去掉及移除臨近自然保育區(Conservation Area Zone)的原有濕地，並失去原有規劃意向康樂活動和旅遊/生態旅遊的發展，並且超出最高建築物高度限制6米(2層)，現在提出52.45米的物業超出7.7倍(46.45米)高度，大大破壞附近同分區的野生生物提供棲身之所之米埔濕地的季候鳥飛行路線。

在申請編號Y/YL-MP/6 建議發展地段，原有規劃可建低密度建築住宅(丁類) (“R”(D)Zone) 2層(高度限制6米)變成建至23層(74.6米)高度，超出11.4倍高度，大大破壞附近同分區的野生生物提供棲身之所之米埔濕地的季候鳥飛行路線。

申請編號Y/YL-MP/6、Y/YL-MP/7及 Y/YL-MP/8建議發展地段，大家共用同一錦里路、錦繡花園大道、迴旋處往各公路方向，特別加重了錦繡花園大道的交通流量，建設錦繡花園大道原意是承擔錦繡花園只有5,024個單位的居住人流及車流量，現在三個地段申請編號Y/YL-MP/6、Y/YL-MP/7及 Y/YL-MP/8 建議發展5667個單位，超出1.13倍流量及負擔，帶來可預料的交通擠塞影響，作為其一當地居民日常工作生活提出反對。

另外，建築施工期以及運作期，可以預料帶來極多建築和交通廢氣及嘈音，當中平地工程會帶來生態及綠色資源破壞，不單破壞附近原有濕地緩衝區，甚至奪取原有綠色生態及綠色植物，帶來的視覺及景觀破壞，增加空氣、嘈音及環境，使附近居民白白承受空氣及環境質素被迫下降。

強烈建議發展需要尊重本區以及米埔及錦繡花園分區計劃大綱(核准圖編號S/YL-MP/6)上的最高建築物高度限制6米 要求，以保護過去數十年的米埔濕地的季候鳥飛行路線，即世界九條遷飛路線的東亞—澳大拉西亞遷飛路線(EAAF)，嚴重超出6米高度限制，會使維持數十年受威脅品種受重大影響。

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

參考編號

Reference Number:

220902-190535-07923

提交限期

Deadline for submission:

02/09/2022

提交日期及時間

Date and time of submission:

02/09/2022 19:05:35

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Melody

意見詳情

Details of the Comment :

儘管發展商在網上並無提供進一步資料，但我們在審視發展商在八月份提交的進一步資料後，發現Y/YL-MP 6/7/8 號申請的發展項目基本上跟5月的沒有改變。因此我堅定維持反對！希望城規會能否決有關之申請。

就着「進一步資料」，我有以下意見：-

后海灣一帶早已獲國際鳥盟肯定，當中內后海灣和深圳集水區均被認可為一個重點鳥區，涵蓋大部份濕地保育區和緩衝區，亦即該區的生態價值達到國際級認可的水平。后海灣一帶的濕地保育區魚塘十分工整，極具生態價值；保育區界外，即濕地緩衝區的魚塘狀態亦不差，甚至可以媲美濕地保育區。（香港01報道）。可惜，發展商依然刻意淡化MP6 和 MP8 位於濕地緩衝區的事實，嘗試蒙混過關。就着眾多環保團體的反對及對自然生態影響破壞的關注，特別是雀鳥生態及侵入了濕地緩衝區的關注，發展商依舊全無回應。城規會若批准上述三項發展項目，是對米埔濕地，包括濕地緩衝區，將開了一個造成永遠無法補救的破壞——會令候鳥失去喘息空間，國際知名的濕地保育區毀於一旦，而濕地只會變成有錢人的後花園。

另外，雖然三個發展項目計劃增加15000多人及只提供1215個車位，申請人竟然預計早上繁忙時間只輕微增加85架車輛出迴旋處，傍晚只增加80車次由迴旋處進入錦繡大道，令人費解。現時錦繡大道及迴旋處已經塞爆，實在不可能再承受多15000人使用。

發展商亦未有回應高樓大廈與周邊低密度建築（一般是三層）不配合的關注，繼續並刻意錯誤引用北部都會區發展將令區內變天為藉口，借用北環綫車站周邊高密度發展群來蒙混過關。就算最近的擬建牛潭尾車站，相信亦應有2至3公里距離，且在環迴公路的東面，與在西面的錦綉花園、加州花園、米埔保育區或濕地緩衝區，根本風馬牛不相及。發展商亦沒有如實反映發展項目對附近居民做成完全不可能接受的景觀影響，仍然是刻意用一些有利角度，來淡化建築羣的惡劣景觀、環境影響。

希望城規會就上述原因 反對申請人的申請，謝謝。

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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:

220902-192016-42547

提交限期

Deadline for submission:

02/09/2022

提交日期及時間

Date and time of submission:

02/09/2022 19:20:16

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Aaron BOK

意見詳情

Details of the Comment :

對新鴻基發展項目提交的進一步資料的回應

就著上述的改變土地用途申請，儘管發展商在網上並無提供進一步資料，但我們在審視發展商在八月份提交的進一步資料後，發現Y/YL-MP 6/7/8 號申請的發展項目基本上跟5月的沒有改變。

因此我們堅定維持我們原有的反對！

希望城規會能否決有關之申請。

就着「進一步資料」，我們有以下的觀察/意見：-

1。基本上補充資料沒有就着錦繡居民關注的事項作出任何回應。我們感到極度失望。補充資料內發展商還說「... undertake great care to devise a development scheme which respect both present and future Planning context for subject site and surroundings」。可真諷刺。

2。就着眾多環保團體的反對及對自然生態影響破壞的關注，特別是雀鳥生態及侵入了濕地緩衝區的關注，發展商完全沒有詳細、對題及/或科學客觀性的回應。我們重申，城規會若批准上述三項發展項目，是對米埔濕地，包括濕地緩衝區，將開了一個非常惡劣的先例，造成永遠無法補救的破壞！Irreversible Damages!

3。就着規劃署對項目發展龐然巨物（16至23層）與週邊低密度建築（一般是三層）不配合，特別是景觀的關注，發展商只是繼續用偷換概念來作回應。並刻意錯誤引用北部都會區發展將令區內變天為藉口，借用新田科學城、及北環綫車站周邊高密度發展群來蒙混過關。城規會委員一定知道上述的較高密度發展，距離Y/YL-MP 6/7/8 的發展項目有着極大距離！就算最近的擬建牛潭尾車站，相信亦應有2至3公里距離，且在環迴公路的東面，與在西面的錦綉花園、加州花園、米埔保育區或濕地緩衝區，根本是兩碼子事，風馬牛不相及。

4。發展商亦沒有如實反映發展項目對附近居民做成完全不可能接受的景觀影響，仍然是刻意用一些有利角度，來淡化建築羣的惡劣景觀、環境影響。

5. 奇怪竟然補充資料並無「修改」的交通影響評估的回應。相信可能運輸署是對發展項目沒有意見，這個是極度錯誤的。詳細閱讀報告，發展商竟然只是預計三個發展項目在增加5567戶，15,000多人情況下，錦繡大道（我們錦繡居民的唯一出入口）在早上繁忙時間只輕微增加85架車輛出迴旋處，傍晚只增加80車次由迴旋處進入！簡直難以置信！事實上，單從發展商報告得知，在我們這區錦綉花園，5000多戶加上鄰近社區的低密度屋苑，2019年早上從錦繡大道出迴旋處，已達950車次（但根據我們的觀察，實質數目應不只這個），居民現在已每天忍受著塞車情況。報告明顯低估發展項目對當區交通負荷壓力。當然，相信報告是根據調低了的私家車泊位數目（5567戶只提供1215個私家車泊位），運輸署及發展商明顯是不理會我們的預告，這區未來必將出現的嚴重違例泊車，報告的交通評估應該將這些車流也計算在內。我們預期，若項目獲得通過，錦繡大道必定出現 Grid lock 情況（即車龍由迴旋處塞至錦堡路交通燈，並伸延至錦繡大閘內）。

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

參考編號

Reference Number:

221209-143301-10396

提交限期

Deadline for submission:

23/12/2022

提交日期及時間

Date and time of submission:

09/12/2022 14:33:01

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. WAI HUNG CHAN

意見詳情

Details of the Comment :

Dear TPB Contact,

I am very worried about the impact on Kam Pok Road, Fairview Boulevard and Castle Peak Road overloading of this newly applied site during construction or occupancy. Meanwhile, the lack of public transport facilities and essential stores may affect the residents of Fairview Park.

In addition, noise and light pollution have a great impact on surrounding residents.

Based on the above, I sincerely request that you consider not changing the site plan for Residential Group D to Residential Group C.

Thanks for your consideration in advance and looking forward for your feedback.

Best regards,

Chan Wai Hung



FAIRVIEW PARK PROPERTY MANAGEMENT LTD.
錦 綉 花 園 物 業 管 理 有 限 公 司

Appendix V-c of RNTPC 13
Paper No. Y/YL-MP/6A

本司檔案編號：FAIV/21/GM/L033

郵寄及傳真 (2877 0245)

敬啟者：

規劃申請編號 Y/YL-MP/6

本司，錦綉花園物業管理有限公司，為錦綉花園（「本屋苑」）物業管理人，現就以上編號為 Y/YL-MP/6 的規劃申請，提出強烈反對並表達以下意見：

1. 有關發展項目臨近錦綉大道，該道路交通繁忙，尤其是在平日繁忙時段及公眾假期經常出現交通擠塞情況，工程期間將有大量泥頭車進出地盤，定必導致交通情況更為惡劣。有關屋苑落成後，將有大量私家車駛經附近的道路及錦綉大道，使交通更為繁忙，對本屋苑居民造成不便和滋擾。
2. 大量車輛往來將加速路面耗損，雖屬私家道路，但有關維修費用卻須由本屋苑業戶承擔，做成不公情況，業戶對此亦多次表示不滿。

因此，為解決以上問題，我們建議政府按新批地（號碼：2265）內一般條款第4條收回該條原屬私家道路，但實際上卻用作公共道路的錦綉大道，或於興建該項目前落實新的道路安排以代替行經該道路。

此致

城市規劃委員會秘書
香港北角渣華道 333 號
北角政府合署 15 樓)

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

2021 年 10 月 6 日

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致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣甸道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

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

By Fax : 2877 0245 or 2522 8426

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

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

Y/YL-MP/6 Received on 12/11/2021

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

詳見附件

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

簽署 Signature

日期 Date

郵寄及傳真(號碼: 2877 0245)

敬啟者：

本會為新界元朗和生園加州豪園 A 期業主委員會，就有關 Y/YL-MP/6 之申請出強烈反對，謹請 貴會細閱我方下列反對意見：

1) 嚴重破壞米埔生態環境，阻礙候鳥航道，更造成屏風效應。

有關申請之土地鄰近米埔自然保護區，周邊為低密度住宅，有關申請地點改建為高達 23 層高之樓宇，與周邊環境格格不入，並會嚴重破壞米埔整體生態環境，更阻礙候鳥航道；再者，密集的建築物阻擋光線及令風速減慢，造成屏風效應，居民用電加大，產生熱氣，造成惡性循環，長遠而言，此舉影響附近居民健康，

2) 沒有提交「視覺影響評估」及「景觀影響評估」。

惟申請人提交的報告書中，並沒有就有關申請提交「視覺影響評估」及「景觀影響評估」兩份報告供參考，以評估有關申請對周邊環境的影響。興建高層樓宇使道路使用者的視線減少，而申請地點會途經轉入錦繡花園馬路迴旋處，除了其業戶車輛出入外，經常有大型貨車及附近商舖車輛進出，倘若增設高層樓宇，道路使用者視線必定受阻，增加交通意外風險，因此，申請需有詳盡報告。

3) 增設大型住宅和安老院加重附近一帶交通負荷。

增加 3090 個住宅單位及 100 個安老院床位會大大增加人流，包括住戶和訪客，對附近交通帶來巨大負荷。暫時現行交通配套不足，只有 3 輛小巴各自從元朗站(76 號)、上水站(76K 號)和落馬洲站(75 號)到牛潭尾下車再步行到擬議的地盤；惟小巴的載客量有限，加上最疏的班次為 30 分鐘一班，想必住宅和安老院落成後小巴會增加班次，以應付居民、每日上下班的工作人員和訪客。在沒有大型基建及良善公共運輸交通網絡下，加上住戶則大多數駕駛私人車，可想而知，這對附近交通造成嚴重負擔。

再者，根據《安老院規例》附表 1 列明各類安老院的最低人手要求，安老院涉及多種工種，例如：主管，助理員，護理員，保健院和護士等，加上病人和探訪者，相信該安老院最終會容納許多使用者。因此，在沒有良好配套下，相關申請則恐怕會導致道路擠塞和車水馬龍的現象。

如有任何查詢，請致電

與服務處物業及設施經理卓文輝先生聯絡。

此致

城市規劃委員會秘書

香港北角渣華道 333 號

北角政府合署 15 樓

加州豪園 A 期屋邨業主委員會謹啟

二零二一年十二月十五日

副本抄送：加州豪園服務處



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

本司檔案編號：FAIV/22/GM/L013

郵寄及傳真 (2877 0245)

敬啟者：

規劃申請編號 Y/YL-MP/6

本司、錦綉花園物業管理有限公司，為錦綉花園（「本屋苑」）物業管理人，現就以上編號為 Y/YL-MP/6 的規劃申請，提出強烈反對。

眾所周知，該發展項目與錦綉大道息息相關，所以我們首先在此強調指出：錦綉大道於 70 年代建成通車，當時僅僅是提供給錦綉花園必要的交通配套設施，所以道路設計上並非應付繁重的車輛穿梭；但隨著 40 多年的演變，錦綉大道周邊興建了許多合法及非法的物流場地，令錦綉大道額外增加了許多重型車輛使用；而最近更有眾多的圍繞錦綉大道樓宇發展項目推出，這無疑將會令已十分繁重的道路負荷百上加斤，從而加速路面耗損，變相令私家道路扮演公共交通的角色，但有關維修費用卻須由本屋苑業戶承擔，做成極之不公情況，業戶們對此亦多次表示強烈不滿。另外，亦增加交通意外機會，噪音困擾亦難免。

除此之外就 Y/YL-MP/6 的規劃申請而言也存在下列問題：

1. 新發展項目的落成也會對本屋苑現有開闊的周邊環境帶來屏風效應。嚴重影響錦綉花園現有的居住環境。
2. 該發展乃至周邊附近都沒有完善的生活配套設施，屋苑落成後將對錦綉居民生活設施造成極大負荷。
3. 工程期間將有大量泥頭車進出地盤，定必影響錦綉花園環境衛生。
4. 工程期間將造成嚴重噪音滋擾，從而影響錦綉花園居民的寧靜生活。

基於上述原因，我們藉此一併建議政府按新批地（號碼：2265）內一般條款第 4 條收回該條原屬私家道路，但實際上卻用作公共道路的錦綉大道，事實上對這些新增的交通負荷所需的配套設施而言，政府責無旁貸。

此致

城市規劃委員會秘書
香港北角渣華道 333 號
北角政府合署 15 樓

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

副本抄送：第十一屆錦綉花園管理諮詢委員會
2022 年 6 月 9 日

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



強烈反對規劃申請項目YYL-MP/6、YYL-MP/7 及YYL-MP/8
10/06/2022 22:44

From: "The Owner's Association of Fairview Park Ltd. [REDACTED]"

To: "tpbpd@pland.gov.hk" [REDACTED]

File Ref:

Please respond to "The Owner's Association of Fairview Park Ltd."

1 attachment



Letter to 城規會 dd 06.2022 REV 2.pdf

致：城市規劃委員會秘書

我們不是反對錦綉花園附近有任何發展項目，包括房屋發展，我們反對的是發展項目無規範，詳見附件。

The Owner's Association of Fairview Park Ltd.

Tel: [REDACTED]

Email: [REDACTED]



錦綉花園業主聯會

The Owner's Association of Fairview Park

郵寄及電郵 (tpbpd@pland.gov.hk)

敬啟者：

強烈反對規劃申請項目 Y/YL-MP/6、Y/YL-MP/7 及 Y/YL-MP/8

我們不是反對錦綉花園附近有任何發展項目，包括房屋發展，我們反對的是發展項目無規範。

今次三個發展項目合計人口將增加約 1-2 萬人，車輛增多約 3000 部，對區內現有設施所增加的壓力真是不可承受的。而我們亦曾於本年 1 月 31 日書面表達相關項目對本區交通及破壞鄉郊一致景觀等，現再特此函表達我們反對的理由，如下：-

1. 交通方面：上述三個項目共 5000 多個單位，大部分均會使用錦綉花園大道迴旋處出入，該區交通將不勝負荷，尤以錦綉大道為甚！
2. 建築物高度方面：該項目共建大約 30 多棟 16 至 23 層高的建築物，與附近方圓幾公里內的鄉郊建築，格格不入！且可一便可再，如這些項目一旦批准，便會為鄉郊可建高層建築物開了先例，為鄉郊區格局帶來長遠破壞的影響。
3. 環評方面：該區鄰近便是保育地域，每年有很多候鳥聚居，且有每年增多趨勢，該項目我們看不到環評報告對區內自然生態、水質的評估影響，尤其是對候鳥的影響。
4. 社區睦鄰方面：該三個項目將區內增加了 1-2 萬人、3000 多部車輛，但該區的基本社區設施非常缺乏，食肆、車位不足，無可避免地，這新區的住戶便會使用鄰近，即錦綉花園的設施，這少不免會引起居民相互的磨擦及糾紛，對地區和諧不利。

我們及錦綉花園居民強烈要求城規會否決該三份項目申請。

此致

香港 北角 渣華道 333 號
北角政府合署 17 樓
城市規劃委員會秘書

錦綉花園業主聯會

主席：邱帶娣

2022 年 6 月 10 日

副本抄送：元朗民政事務處 (傳真：2449 4653)

(Your Ref.: (5) in HAD YL C&D 17-45 /45/01/232 Pt.14)

(Your Ref.: (15) in HAD YL C&D 17-45 /45/01/315)

(Your Ref.: (17) in HAD YL C&D 17-45 /45/01/315)

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規劃署署長: 反對申請項目Y/YL-MP/6, Y/YL-MP/7 及Y/YL-MP/8
11/06/2022 09:43

From: [REDACTED]
To: 致規劃署署長 <tspd@pland.gov.hk>
Cc: 城市規劃委員會 <tpbpd@pland.gov.hk>, 環境保護署署長 <hotline_s@epd.gov.hk>; 環境保護署署長 <ecfc@epd.gov.hk>, 元朗民政事務處民政專員 <doyl@had.gov.hk>, 漁農自然護理處處長 <mailbox@afcd.gov.hk>, 世界自然(香港)基金會 <wwf@wwf.org.hk>, 長春

File Ref:

6 attachments



規劃署署長.pdf 大道-G段.jpg 河北11街.jpg 傍邊.jpg 開口.jpg 2樓外望.jpg

致規劃署署長

鍾文傑先生, JP

城規條例下之規劃申請項目Y/YL-MP/6, Y/YL-MP/7 及Y/YL-MP/8

要求規劃署署長拒絕接納有關之規劃申請

請參閱附件

第十一屆錦綉花園管理諮詢委員會

主席 黃楚銘 [REDACTED]

2022年6月11日

副本抄送

城市規劃委員會

環境保護署署長

元朗民政事務處民政專員

漁農自然護理署署長

世界自然(香港)基金會

長春社

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

致規劃署署長
鍾文傑先生, JP

城規條例下之規劃申請項目 Y/YL-MP/6, Y/YL-MP/7 及 Y/YL-MP/8

要求規劃署署長拒絕接納有關之規劃申請

我們是一羣住在錦綉花園的市民。有由 3、40 年前這區一無所有搬來這裏開荒牛的，也有近幾年為了避開繁囂都市搬進這個舒適、寧靜環境社區的小市民。近日驚見這裏附近有同一發展商，三個規劃申請興建合共約 30 多幢高達 16 至 23 層高的大樓；5500 多單位，嚴重破壞這區的環境及基建負荷。我們強烈反對上列三份申請項目。

我們不是反對鄰近任何發展項目或任何房屋發展項目，不是 NIMBY (Not In My Back Yard) 式反應。但我們強烈反對上述三項發展商申請的理由及其不可接受的發展規模。三個項目加起來，地盤面積只有 15.4 公頃（是錦繡的大約 10 份一），但卻興建 5567 單位（比錦繡還要多），合共增加人口約 15,000 多人。地積比率為 1.2 或 2.0。對區內環境及設施增加的壓力，特別是交通及運輸壓力，不言而喻。是不可能承受的！建議的建築密度及高度一旦獲得批准，它將為后海灣濕地緩衝區的整體規劃及保育作用打開不能逆轉的缺口。日後鄰近的地方，包括法定濕地保護區，勢將承受更大的高密度發展壓力，緩衝區的緩沖作用蕩然無存！為這區帶來世代代、深遠破壞性的影響。

發展商取巧地將「滿足市民住房需求」跟「花園式洋房發展模式」對立起來，然後建議興建 30 多幢高達 23 層高（74.5 米）的巨型構築物。這是偷換概念。這是完全不尊重香港城市規劃；不尊重分區計劃大綱圖 (Outline Zoning Plan, OZP) 的規劃意願；不尊重社區發展需要多元化（香港城市發展密度超高，市民是渴望有多些生活空間，低層洋房發展是社會上一個十分重要的單元，特別是在生態重要的區域，例如濕地保育區及其周邊緩衝區），不尊重「不同地區，有不同城市規劃需要，必須跟周邊環境互相配合，互相尊重」的原則；不尊重城市規劃的宗旨須兼顧「促進健康、安全及便利的社區發展」；不尊重原有居住該區的居民感受。

發展商建議改劃合共 30 多幢 16 或 23 層高的建築物，地積比率達 1.2 或 2.0。我們沒有看見發展商有做三個項目加上附近 concurrent projects 的綜合環評，沒看見綜合交通研究，對其他基礎設施的影響亦只陳述個別項目的影響。這正是「無序的都市擴展插入式發展」！勢將嚴重破壞環境生態及引致地區交通擠塞等規劃問題。我們亦沒看見三個發展項目有提供足夠的配套設施，新增的 15,000 多人口，勢將進入並佔用錦繡花園的設施，例如居民巴士。這會增加居民間的磨擦，嚴重破壞居民間的生活。

更重要的是，MP7 及 MP8 的法定環評報告刻意逃避應有的專業景觀影響評估，誤導城規會委員。而 MP6 更好像在撮要上沒有就環評着墨。三份報告亦沒有看見空氣通風評估，及對候鳥遷徙影響評估。5567 戶家庭，只提供 1215 個私家車車位。即每 4.5 戶爭一個車位。這只會帶來區內道路嚴重違泊情況。嚴重影響交通擠塞。

發展項目建議的龐然巨大結構物會完全破壞該區天際線，破壞該區的低密度發展模式，是完全不符合周邊天然自然環境，和整個附近一般均是低層發展（三至四層左右）絕對不協調。

詳細反對理由如下：-

- a) 我們強烈要求需保留已經政府批准的 OZP 中的原有規劃地帶，即「康樂」及「丁類房屋發展」用途。這個牛潭尾地區極度缺乏適當的康樂發展，政府須早日兌現承諾。丁類發展項目，應該是低密度的，對區內設施不構成過度負荷。我們不反對適量增加發展規模，以作為發展「康樂」項目或提供安老設施等用途的誘因。但不是上述三個申請書的粗暴式增加。
- b) 申請書建議的地積比率為 1.2 或 2.0 的“R(C)”。這是不可以接受！！與毗鄰的發展密度絕不相容。錦繡花園大約只是 0.4（加州花園及附近的明珠花園相類似）。1.2 或 2.0 的發展密度根本是嚴重破壞了后海灣濕地緩衝區的緩衝作用。
- c) 52.5 米的 16 層或 74.5 米的 23 層建築物是完全不可接受的混凝土屏風牆，破壞了該地區的自然環境和低層建築。除了阻礙空氣流通外，景觀的影響根本不可能接受。
- d) MP/7 及 8 撮要中顯示的法定要求環評報告中竟然沒有正確的景觀影響評估（16 層高建築物跟周邊三四層高的發展完全顯得格格不入）。也沒有空氣通風評估。我們要求規劃署署長批評這份有嚴重缺失的環評報告。這兩份申請書中

的電腦模擬圖片，是刻意避開選取有嚴重景觀影響的角度；另外更竟然使用“半透明”色調來顯示建議的建築體！這是嚴重誤導城規會。城規會須批評這份申請書。

我們就着景觀製作了一些並不專業的景觀圖片，附上給署長參考。可以看見申請項目的景觀影響是極嚴重的，不可能接受的。

兩份撮要並沒有刊出相關的生態、空氣、水質等的環評研究，我們無法判斷申請人有沒有作綜合性的環評，從而詳細分析 cumulative environmental impacts。

e) MP/6 撮要中似乎並沒有提供環評報告，讓公眾參考。我們不得知道這發展項目對自然生態、水質等的環境影響評估；特別是景觀影響評估。

f) 申請書亦沒有空氣通風評估 (Air Ventilation Assessment)，對候鳥遷徙影響的評估。

g) 就三份申請書提供的電腦模擬圖片，在廣闊的平地中，突然屹立了多幢 50 多米或 70 多米石屎屏風牆，16 或 23 層高建築物跟周邊三四層高的發展完全顯得格格不入。不單止是錦繡居民不可以接受，我們相信在新建單車徑上的遊人也會覺得兀突。

g) 三個申請項目建議的 5567 個單位只提供 1215 個私家車車位。這只會引起區內道路嚴重非法違泊情況。當然，提供更多的車位，又將引致交通擠塞問題。因此這區，根本不可能接受這樣的密度發展。三個項目 5000 多個單位。大部分均將使用錦繡花園大道出入迴旋處，將令這區交通，特別是錦繡大道不勝負荷。

h) 建議的住宅項目缺乏基本社區設施（未察覺有包括居民巴士），這將引致該等住戶使用錦繡花園的設施。引致居民間的磨擦。不利建立和諧社區。

基於上述原因，我們強烈要求規劃署署長拒絕接納上述三項規劃申請！！

謝謝



第十一屆錦繡花園管理諮詢委員會

主席 黃楚銘 謹啓

2022 年 6 月 9 日

副本抄送

城市規劃委員會

環境保護署署長

元朗民政事務處民政專員

漁農自然護理署署長

世界自然（香港）基金會

長春社



非專業製作
視覺圖只作參考





非專業製作
視覺圖只作參考

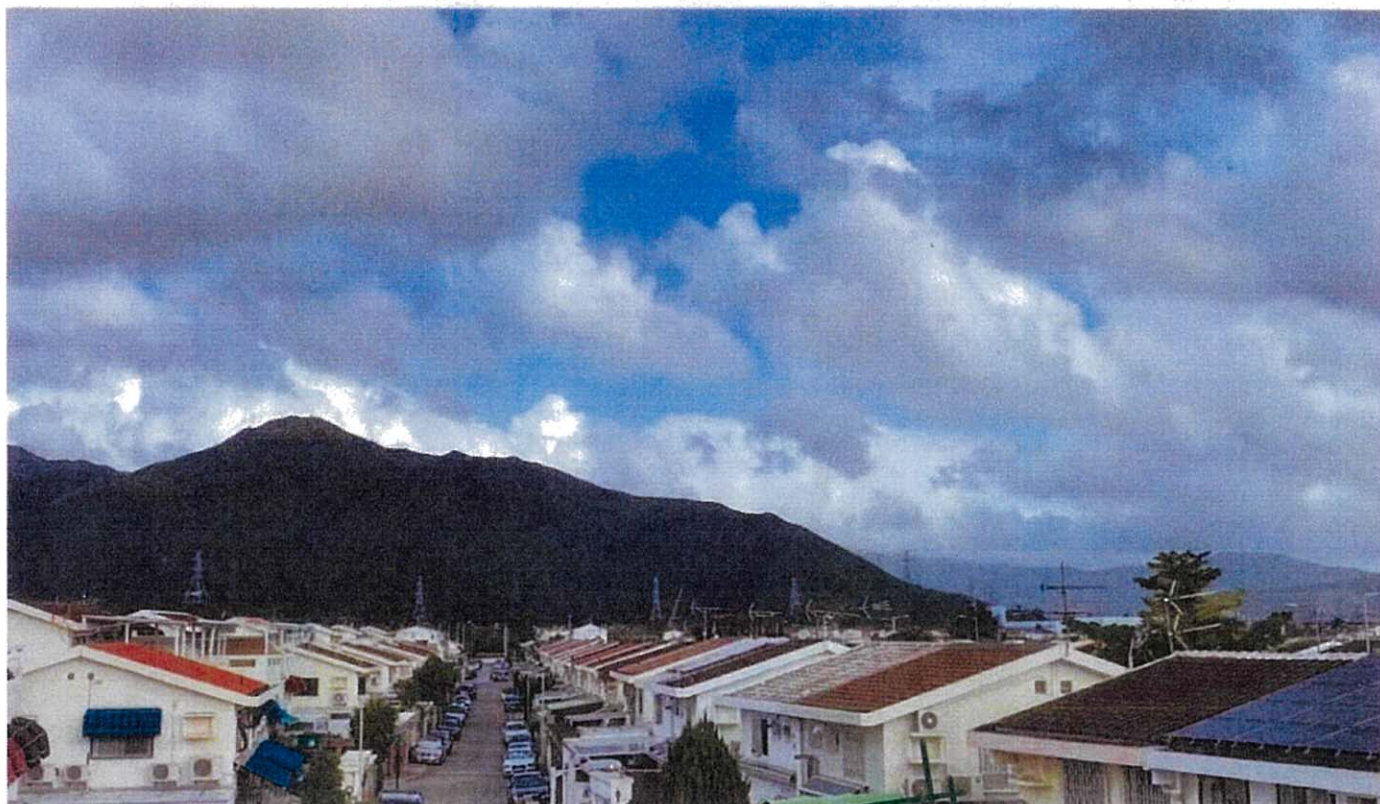




非專業製作
視覺圖只作參考







非專業製作
視覺圖只作參考



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反對Y/YL-MP/6 ; Y/YL-MP/7 ; Y/YL-MP/8 申請的開發提案

15/06/2022 16:36

From:

To:

File Ref:

tpbpd@pland.gov.hk, jenna_fc_yuen@had.gov.hk

致：城市規劃委員會
CC: 元朗民政事務署

尊敬的先生/女士們：

關於第Y/YL-MP/6 ; Y/YL-MP/7 ; Y/YL-MP/8 申請的開發提案

收到貴方關於上述三（3）個開發提案的通知後，我們加州花園，加州豪園 都已經就有關問題召開業主座談會，會上各業主 居民都強烈反對在附近的這些新擬議開發項目，並主要關注對我方加州花園大道前的一段 青山公路米埔段至潭尾段/錦繡花園之園環4個出口，每週五天早上7:30開始都長期堵塞，做成現有周邊住宅區的交通擠塞影響嚴重！

我們 按照貴處所提供數據推算：當這些發展項目將使人口增加10000多人，並可能每天增加約3000輛乘用車，使用主要道路；從米埔段和錦繡路一直到青山路潭尾段。青山公路現有的容量包括老人之家、堆場、垃圾收集站和集裝箱停車場等，已使路面飽和！

日常交通不僅會影響當地周邊地區，而且一旦發生事故，也會給應急車輛帶來不便和延誤。

我們還注意到，青山公路沿線有更多潛在的開發項目，因此現有交通配置的容量肯定不足。

未知 貴處有何 新的交通設施去疏導 目前已經飽和的路面情況？

加州花園 名仕居
業主委員會 主席
陳清華 敬上

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

參考編號

Reference Number:

220616-153142-44548

提交限期

Deadline for submission:

17/06/2022

提交日期及時間

Date and time of submission:

16/06/2022 15:31:42

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

加州豪園A期業主委員會

意見詳情

Details of the Comment :

本會為新界元朗和生圍加州豪園A期業主委員會，就有關Y-YL-MP/6之申請出強烈反對，謹請 貴會細閱我方下列反對意見：

現時的交通設施配套未能配合大量增加的人口，不宜發展高樓大廈。由[住宅(丁類)]地帶改為[住宅(丙類)]，大大增加入住人口。隨著政府宣佈北部發展項目，鄰近地段的持分者陸續改變土地用途，近日接獲多個改變土地用途的諮詢，如Y-YL-NTM-5; Y/YL-MP/7; Y/YL-MP/8，分別為增加大量過渡性房屋，改變住宅用途或將康樂用地改為住宅等，惟鄰近錦繡花園及本苑一帶之配套設施只適合現時的低密度住宅，如盲目批准，會引致許多預期的問題，大大影響現時居民的日常生活。

1) 增加有關道路的交通負荷，引致交通擠塞。

現時於錦繡迴旋處交通非常繁忙，對附近交通造成嚴重負擔。在沒有大型基建及良善公共運輸交通網絡下，鄰近居民則大多數駕駛私家車，引致道路負載量超出負荷；尤其現時錦繡花園迴旋處已經常擠塞，引致倒灌，會導致高速公路塞車情況。若有關申請成功獲批，必會增加的交通負荷，引致交通擠塞。

2) 大型的基建，對鄰近居民造成滋擾。

有關申請單位數目增加至3000多個單位，於基建時造成嚴重的噪音；另外，建

3) 有關申請用途複雜，擔心鄰近影響治安。

有關申請除大幅增加單位數目，更有100個安老院舍床位、旅遊巴車位及輕型及重型貨車車位，申請用途複雜，擔心鄰近影響治安。

4) 嚴重破壞米埔生態環境，阻礙候鳥航道，更造成屏風效應，不宜發展高樓大廈。

有關申請之土地鄰近米埔自然保護區，周邊為低密度住宅，有關申請地點改建為高達23層高之樓宇，與周邊環境格格不入，並會嚴重破壞米埔整體生態環境，更阻礙候鳥航道；再者，密集的建築物阻擋光線及令風速減慢，造成屏風效應，居民用電加大，產生熱氣，造成惡性循環，長遠而言，此舉影響附近居民健康。

5) 沒有提交「視覺影響評估」及「景觀影響評估」。

惟申請人提交的報告書中，並沒有就有關申請提交「視覺影響評估」及「景觀影響評估」兩份報告供參考，以評估有關申請對周邊環境的影響。興建高層樓宇使道路使用者的視線減少，增加交通意外風險；亦嚴重影響鄰近景觀，申請需有詳盡報告。

區內已規劃可發展為高樓大廈的地段有凹頭站(逢吉鄉)及新田站，貴會應考慮先發展有

關地段，而非盲目批准有關申請，而影響周邊的環境及鄰近居民的生活作息。

加州豪園A期業主委員會謹啟

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

參考編號
Reference Number: 220616-153629-98347

提交限期
Deadline for submission: 17/06/2022

提交日期及時間
Date and time of submission: 16/06/2022 15:36:29

有關的規劃申請編號
The application no. to which the comment relates: Y/YL-MP/6

「提意見人」姓名/名稱
Name of person making this comment: 加州豪園B期業主委員會

意見詳情
Details of the Comment :

會為新界元朗和生圍加州豪園B期業主委員會，就有關Y-YL-MP/6之申請出強烈反對，謹請 貴會細閱我方下列反對意見：

現時的交通設施配套未能配合大量增加的人口，不宜發展高樓大廈。由 [住宅(丁類)] 地帶改為[住宅(丙類)]，大大增加入住人口。隨著政府宣佈北部發展項目，鄰近地段的持份者陸續改變土地用途，近日接獲多個改變土地用途的諮詢，如Y-YL-NTM-5; Y/YL-MP/7; Y/YL-MP/8，分別為增加大量過渡性房屋，改變住宅用途或將康樂用地改為住宅等，惟鄰近錦繡花園及本苑一帶之配套設施只適合現時的低密度住宅，如盲目批准，會引致許多預期的問題，大大影響現時居民的日常生活。

1) 增加有關道路的交通負荷，引致交通擠塞。

現時於錦繡迴旋處交通非常繁忙，對附近交通造成嚴重負擔。在沒有大型基建及良善公共運輸交通網絡下，鄰近居民則大多數駕駛私家車，引致道路負載量超出負荷；尤其現時錦繡花園迴旋處已經常擠塞，引致倒灌，會導致高速公路塞車情況。若有關申請成功獲批，必會增加的交通負荷，引致交通擠塞。

2) 大型的基建，對鄰近居民造成滋擾。

有關申請單位數目增加至3000多個單位，於基建時造成嚴重的噪音；另外，建築時期，有大量重型車輛出入，對鄰近道路使用者安全構成威脅。

3) 有關申請用途複雜，擔心鄰近影響治安。

有關申請除大幅增加單位數目，更有100個安老院舍床位、旅遊巴車位及輕型及重型貨車車位，申請用途複雜，擔心鄰近影響治安。

4) 嚴重破壞米埔生態環境，阻礙候鳥航道，更造成屏風效應，不宜發展高樓大廈。

有關申請之土地鄰近米埔自然保護區，周邊為低密度住宅，有關申請地點改建為高達23層高之樓宇，與周邊環境格格不入，並會嚴重破壞米埔整體生態環境，更阻礙候鳥航道；再者，密集的建築物阻擋光線及令風速減慢，造成屏風效應，居民用電加大，產生熱氣，造成惡性循環，長遠而言，此舉影響附近居民健康。

5) 沒有提交「視覺影響評估」及「景觀影響評估」。

惟申請人提交的報告書中，並沒有就有關申請提交「視覺影響評估」及「景觀影響評估」兩份報告供參考，以評估有關申請對周邊環境的影響。興建高層樓宇使道路使用者的視線減少，增加交通意外風險；亦嚴重影響鄰近景觀，申請需有詳盡報告。

6) 區內已有部份規劃可發展為高樓大廈的地段，如凹頭站 (逢吉鄉)及新田站，貴會應考慮先發展有關地段，而非盲目批准有關申請，而影響周邊的環境及鄰近居民的生活作息。

加州豪園B期業主委員會謹啟

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

參考編號

Reference Number:

220617-012821-43743

提交限期

Deadline for submission:

17/06/2022

提交日期及時間

Date and time of submission:

17/06/2022 01:28:21

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

元朗加州花園偉仕居業主委員會

意見詳情

Details of the Comment :

致：元朗民政事務處 阮方晴專員
粉嶺、上水、元朗東規劃處 1城市規劃師 張玉儀女士

敬啟者：

就 貴處之檔案編號(5) in HADYLC&D 17-45/45/01/232 Pt14, (15) in HADYLC&D 17-45/45/01/315, (17) in HADYLC&D 17-45/45/01/315, (74) in HADYLC&D 17-45/45/13/03向本村提出收集意見，因受最近疫情及限聚令等原因影響，敝會於收到 貴處來信後，並未能於貴處來信之收集意見限期前，進行任何聚眾之常規村務會議，以對 貴處之來信作出常規討論及意見收集。由於 貴處信件發出到意見收集之期限只有區區十數天，在沒有足夠時間準備下敝會只能以一般村務WHATSAPP群組等對 貴處之要求收集一些初步意見，雖收集到之意見因未能舉行常規會議作深入討論，但有發表意見之居民大多數都持反對及懷疑態度，其意見包括該些發展將對區內治安及交通流量等有極深遠影響。

由於 貴處以上各信件之限期將近，為避免 貴處誤以為敝村居民沒有任何意見需要表達，故此現特來信說明，敝會謹代表敝村居民反對以上各檔案編號之申請，反對之原因及詳情將於敝會成功舉行村務會議後收集整理好再來信加以說明。

最後敝會希望 貴處對收集居民意見一事能從善如流，順應民意，盡量避免出現諮詢時間不足之情況出現，以減低居民對 貴處之懷疑，如蒙傾聽不勝感激。

此致

元朗民政事務處

粉嶺、上水、元朗東規劃處

加州花園 偉仕居業主委員會主席

梁敏慧謹啟

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



再次強烈反對申請項目Y/YL-MP/6,Y/YL-MP/7 及Y/YL-MP/8
31/08/2022 14:08

From:

To:

Cc:

城市規劃委員會 <tpbpd@pland.gov.hk>

規劃處署長 <tspd@pland.gov.hk>, 環境保護署署長 <ecfc@epd.gov.hk>, 元朗民政事務處
民政專員 <doyl@had.gov.hk>, 致漁農自然護理署署長 <mailbox@afcd.gov.hk>, 世界自然
(香港) 基金會 <wwf@wwf.org.hk>, 長春社 <cahk@cahk.org.hk>

File Ref:

1 attachment



20220831致城規會.pdf

致 城市規劃委員會 <tpbpd@pland.gov.hk>

敬啟者：

請參閱附件

Fairview Park Management Advisory Committee
錦綉花園管理諮詢委員會

致 城市規劃委員會 <tpbpd@pland.gov.hk>

敬啟者：

強烈反對申請項目 Y/YL-MP/6, Y/YL-MP/7 及 Y/YL-MP/8

對新鴻基發展項目提交的進一步資料的回應

就著上述的改變土地用途申請，儘管發展商在網上並無提供進一步資料，但我們在審視發展商在八月份提交的進一步資料後，發現 Y/YL-MP 6 / 7 / 8 號申請的發展項目基本上跟5月的沒有改變。

因此我們堅定維持我們原有的反對！

希望城規會能否決有關之申請。

就着「進一步資料」，我們有以下的觀察/意見：-

- 1) 基本上補充資料沒有就着錦繡居民關注的事項作出任何回應。我們感到極度失望。補充資料內發展商還說「... undertake great care to devise a development scheme which respect both present and future Planning context for subject site and surroundings」。可真諷刺。
- 2) 就着眾多環保團體的反對及對自然生態影響破壞的關注，特別是雀鳥生態及侵入了濕地緩衝區的關注，發展商完全沒有詳細、對題及/或科學客觀性的回應。我們重申，城規會若批准上述三項發展項目，是對米埔濕地，包括濕地緩衝區，將開了一個非常惡劣的先例，造成永遠無法補救的破壞！Irreversible Damages!
- 3) 就着規劃署對項目發展龐然巨物（16 至 23 層）與週邊低密度建築（一般是三層）不配合，特別是景觀的關注，發展商只是繼續用偷換概念來作回應。並刻意錯誤引用北部都會區發展將令區內變天為藉口，借用新田科學城、及北環綫車站周邊高密度發展群來蒙混過關。城規會委員一定知道上述的較高密度發展，距離 Y/YL-MP 6 / 7 / 8 的發展項目有着極大距離！就算最近的擬建牛潭尾車站，相信亦應有 2 至 3 公里距離，且在環迴公路的東面，與在西面的錦綉花園、加州花園、米埔保育區或濕地緩衝區，根本是兩碼子事，風馬牛不相及。

Fairview Park Management Advisory Committee
錦綉花園管理諮詢委員會

- 4) 發展商亦沒有如實反映發展項目對附近居民做成完全不可能接受的景觀影響，仍然是刻意用一些有利角度，來淡化建築羣的惡劣景觀、環境影響。
- 5) 奇怪竟然補充資料並無「修改」的交通影響評估的回應。相信可能運輸署是對發展項目沒有意見，這個是極度錯誤的。詳細閱讀報告，發展商竟然只是預計三個發展項目在增加5567戶，15,000多人情況下，錦繡大道（我們錦繡居民的唯一出入口）在早上繁忙時間只輕微增加85架車輛出迴旋處，傍晚只增加80車次由迴旋處進入！簡直難以置信！事實上，單從發展商報告得知，在我們這區錦綉花園，5000多戶加上鄰近社區的低密度屋苑，2019年早上從錦繡大道出迴旋處，已達950車次（但根據我們的觀察，實質數目應不只這個），居民現在已每天忍受著塞車情況。報告明顯低估發展項目對當區交通負荷壓力。當然，相信報告是根據調低了的私家車泊位數目（5567戶只提供1215個私家車泊位），運輸署及發展商明顯是不理會我們的預告，這區未來必將出現的嚴重違例泊車，報告的交通評估應該將這些車流也計算在內。我們預期，若項目獲得通過，錦繡大道必定出現 Grid lock 情況（即車龍由迴旋處塞至錦繡路交通燈，並伸延至錦繡大閘內）。

謝謝

第十一屆錦綉花園管理諮詢委員會



主席 黃楚銘

2022年8月31日

副本抄送

規劃處署長 <tspd@pland.gov.hk>

環境保護署署長 <ecfc@epd.gov.hk>

元朗民政事務處民政專員 <doyl@had.gov.hk>

致漁農自然護理署署長 <mailbox@afcd.gov.hk>

世界自然（香港）基金會 <wwf@wwf.org.hk>

長春社 <cahk@cahk.org.hk>

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

參考編號
Reference Number: 220902-123557-39825

提交限期
Deadline for submission: 02/09/2022

提交日期及時間
Date and time of submission: 02/09/2022 12:35:57

有關的規劃申請編號
The application no. to which the comment relates: Y/YL-MP/6

「提意見人」姓名/名稱
Name of person making this comment: 加州豪園A期業主委員會

意見詳情
Details of the Comment :

本會為新界元朗和生圍加州豪園A期業主委員會，就有關Y-YL-MP/6之申請出強烈反對，謹請 貴會細閱我方下列反對意見：

現時的交通設施配套未能配合大量增加的人口，不宜發展高樓大廈。由 [住宅(丁類) 地帶改為[住宅(丙類) I]，大大增加入住人口。隨著政府宣佈北部發展項目，鄰近地段的持份者陸續改變土地用途，近日接獲多個改變土地用途的諮詢，如Y-YL-NTM-5; Y/YL-MP/7; Y/YL-MP/8，分別為增加大量過渡性房屋，改變住宅用途或將康樂用地改為住宅等，惟鄰近錦繡花園及本苑一帶之配套設施只適合現時的低密度住宅，如盲目批准，會引致許多預期的問題，大大影響現時居民的日常生活。

1) 增加有關道路的交通負荷，引致交通擠塞。

現時於錦繡迴旋處交通非常繁忙，對附近交通造成嚴重負擔。在沒有大型基建及良善公共運輸交通網絡下，鄰近居民則大多數駕駛私家車，引致道路負載量超出負荷；尤其現時錦繡花園迴旋處已經常擠塞，引致倒灌，會導致高速公路塞車情況。若有關申請成功獲批，必會增加的交通負荷，引致交通擠塞。

2) 大型的基建，對鄰近居民造成滋擾。

申請3,090個住宅單位，於基建時造成嚴重的噪音；另外，建築時期，有大量重型車輛出入，對鄰近道路使用者安全構成威脅。

3) 有關申請用途複雜，擔心鄰近影響治安。

有關申請除大幅增加單位數目影響交通外，重型貨車車位，申請用途複雜，擔心鄰近影響治安。

4) 嚴重破壞米埔生態環境，阻礙候鳥航道，更造成屏風效應，不宜發展高樓大廈。

有關申請之土地鄰近米埔自然保護區，周邊為低密度住宅，有關申請地點改建為高達23層高之樓宇，與周邊環境格格不入，並會嚴重破壞米埔整體生態環境，更阻礙候鳥航道；再者，密集的建築物阻擋光線及令風速減慢，造成屏風效應，居民用電加大，產生熱氣，造成惡性循環，長遠而言，此舉影響附近居民健康。

5) 沒有提交「視覺影響評估」及「景觀影響評估」。

惟申請人提交的報告書中，並沒有就有關申請提交「視覺影響評估」及「景觀影響評估」兩份報告供參考，以評估有關申請對周邊環境的影響。興建高層樓宇使道路使用者的視線減少，增加交通意外風險；亦嚴重影響鄰近景觀，申請需有詳盡報告。

6) 擔心有關用地於成功為[住宅 (丙類) 1]後，繼而再申請為[住宅 (乙類)]，再次增加有關用地的密度。其實區內已有部份規劃可發展為高樓大廈的地段，如凹頭站 (逢吉鄉)及新田站，貴會應考慮先發展有關地段，而非盲目批准有關申請，而影響周邊的環境及鄰近居民的生活作息。

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

參考編號

220902-123723-63260

Reference Number:

提交限期

02/09/2022

Deadline for submission:

提交日期及時間

02/09/2022 12:37:23

Date and time of submission:

有關的規劃申請編號

Y/YL-MP/6

The application no. to which the comment relates:

「提意見人」姓名/名稱

加州豪園B期業主委員會

Name of person making this comment:

意見詳情

Details of the Comment :

本會為新界元朗和生圍加州豪園B期業主委員會，就有關Y-YL-MP/6之申請出強烈反對，謹請 貴會細閱我方下列反對意見：

現時的交通設施配套未能配合大量增加的人口，不宜發展高樓大廈。由 [住宅(丁類) 地帶改為[住宅(丙類) 1]，大大增加入住人口。隨著政府宣佈北部發展項目，鄰近地段的持份者陸續改變土地用途，近日接獲多個改變土地用途的諮詢，如Y-YL-NTM-5; Y/YL-MP/7; Y/YL-MP/8，分別為增加大量過渡性房屋，改變住宅用途或將康樂用地改為住宅等，惟鄰近錦繡花園及本苑一帶之配套設施只適合現時的低密度住宅，如盲目批准，會引致許多預期的問題，大大影響現時居民的日常生活。

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有關申請除大幅增加單位數目影響交通外，重型貨車車位，申請用途複雜，擔心鄰近影響治安。

4) 嚴重破壞米埔生態環境，阻礙候鳥航道，更造成屏風效應，不宜發展高樓大廈。

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461

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

參考編號

Reference Number:

221006-142556-56987

提交限期

Deadline for submission:

14/10/2022

提交日期及時間

Date and time of submission:

06/10/2022 14:25:56

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Chan Ching wah

意見詳情

Details of the Comment :

我們反對！

由於本區原本係低密度設計，

主幹道僅靠舊青山公路潭尾段 雙向雙程窄小道路 進出，

該申請屋苑出入口主要依靠 KAM POK Road 進出；

KAM POK ROAD 為 雙向雙程窄小道路，

現時已經多時擠塞，路面經常無法順利通過，

實際已無法再容納此

3200 單位 人員的流動 與 900 架次汽車的增加！

而且近年鄰近地區 村鎮 屋苑人口，車輛

已經不斷增加，政府相關部門並無任何交通數據更新！

忽然大量增加附近區域的高層住宅單位數量，

必然加重整區的道路擠塞情況！

祈請城規會必須正視！此致

城市規劃委員會

加州花園 名仕居 業主委員會主席

陳清華

加州花園業主委員會
Estate Owners' Committee of Palm Springs

致城市規劃委員會秘書：
香港北角渣華道333號
北角政府合署15樓

檔案編號: (37) in HAD YL C&D 17-45/45/01/232 Pt. 14

關於：規劃申請編號 Y/YL - MP/6

在沒有公佈新增公路網前，反對審批任何發展項目！

整區多項規劃同時發展，屋宇幢數多且密，部份樓高超出40層，人口預計增加數萬，相對各種車輛，突增加超出2萬多！還未計算各種，公共交通聚集，及其上落客等候須時，若然把車輛，同時擺放在馬路，則可超出元朗區域！

現有青山公路是舊有設計，路窄單程相向，現時平日非常擠塞，又以早上更甚，全集中在錦綉花園，外圍迴旋處進出，形成樽頸地帶，倘若有交通意外封路，則整區停頓！

既然是城市規劃，新發展區首要根據預計未來10年的人口密度，先行規劃三通，即水、電、路的安排及配套设施，不能待發展後，才去作統計再追加！

現時整區同期，新申請發展眾多，可謂百花齊放，但未聞在計劃中的道路網公佈！

理應優先解決，現有交通難題，例如擴闊馬路，單程相向改為單向，加建天橋、隧道，及多條與外連接幹線，莫求流量加快，減少制造樽頸地帶！

在沒有公佈新增公路網前，反對審批任何發展項目！



主席 徐洪達

2022 年度加州花園業主委員會

二零二二年十月十日



本公司檔案編號：FAIV/23/GM/L008

郵寄及傳真 (2877 0245)

敬啟者：

規劃申請編號 Y/YL-MP/6

本公司，錦綉花園物業管理有限公司，為錦綉花園（「本屋苑」）物業管理人，現就城市規劃委員會於 2 月 17 日收到申請人提交進一步資料的通知及元朗民政事務處就有關申請致本公司日期為 3 月 3 日的來信，再次就以上編號為 Y/YL-MP/6 的規劃申請，提出強烈反對。眾所周知，該發展項目與錦綉大道息息相關，所以我們首先在此強調指出：錦綉大道於 70 年代建成通車，當時僅僅是提供給錦綉花園必要的交通配套設施，所以道路設計上並非應付繁重的車輛穿梭；但隨著 40 多年的演變，錦綉大道周邊興建了許多合法及非法的物流場地，令錦綉大道額外增加了許多重型車輛使用；而最近更有眾多的圍繞錦綉大道樓宇發展項目推出，這無疑將會令已十分繁重的道路負荷百上加斤，從而加速路面耗損，變相令私家道路扮演公共交通的角色，但有關維修費用卻須由本屋苑業戶承擔，做成極之不公情況，業戶們對此亦多次表示強烈不滿。另外，亦增加交通意外機會，噪音困擾亦難免。

除此之外就 Y/YL-MP/6 的規劃申請而言也存在下列問題：

1. 新發展項目的落成也會對本屋苑現有開闊的周邊環境帶來屏風效應。嚴重影響錦綉花園現有的居住環境。
2. 該發展乃至周邊附近都沒有完善的生活配套設施，屋苑落成後將對錦綉居民生活設施造成極大負荷。
3. 工程期間將有大量泥頭車進出地盤，定必影響錦綉花園環境衛生。
4. 工程期間將造成嚴重噪音滋擾，從而影響錦綉花園居民的寧靜生活。

基於上述原因，我們藉此一併建議政府按新批地（號碼：2265）內一般條款第 4 條收回該條原屬私家道路，但實際上卻用作公共道路的錦綉大道，事實上政府有責任為新發展項目周邊地區提供完善的公共交通配套，而不是把該等責任，例如管理及維修道路支出，轉嫁於道路擁有人及錦綉花園住戶承擔。

此致

城市規劃委員會秘書
香港北角渣華道 333 號
北角政府合署 15 樓

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

副本抄送：第十一屆錦綉花園管理諮詢委員會
2023 年 3 月 14 日

606

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

參考編號

Reference Number:

230323-105348-18037

提交限期

Deadline for submission:

24/03/2023

提交日期及時間

Date and time of submission:

23/03/2023 10:53:48

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Chan Ching wah

意見詳情

Details of the Comment:

我們反對！

由於有關選址地點 距離 Yau Pok Road 濕地保護區不足500米，建做如此高密度房屋，直接影響了濕地保護區的候鳥飛行路線！

希 貴處 秉持維護香港僅有濕地的原則（2022年5月19日 不支持南生圍濕地緩衝區申建洋房的判決）

元朗加州花園名仕居 業主委員會

1)

南生圍濕地緩衝區申建逾百幢洋房 規劃署不支持

https://www.hk01.com/article/772203?utm_source=01appshare&utm_medium=referral

2)

【明報專訊】世界進入了重視自然生態的時代，愈來愈多人明白濕地對全體生物以至人類的重要，各國都採取措施保護濕地，很不幸，最近二三十年我們重複又重複地見到，香港濕地被人胡亂填埋而政府束手無策，地產商的建屋大計又不斷進迫，濕地面積持續壓縮，看不到逆轉的曙光，對比內地中央政府強化保護生態的政策和執行，香港愈來愈落後，最近的幾件事突顯兩地在保護濕地方面的反差。

2021年12月24日人大常委會通過了濕地保護法，2022年6月1日起施行，禁止佔用國家重要濕地，要求建設項目選址、選線應當避讓濕地，以及提出禁止佔用紅樹林濕地等規定。

幾乎同時，2021年12月31日香港城市規劃上訴委員會以三比二票數裁決地產商上訴得直，推翻城市規劃委員會（下稱城規會）先前否決的改劃土地用途申請，開綠燈讓地產商在南生圍填魚塘、建高樓，包括28幢高達25層的住宅大樓、140幢3層高的房屋，以及5幢非住宅建築，抵抗地產勢力入侵南生圍濕地的多年努力終於失守。

為什麼這個消息令愛護香港的人沮喪？因為去年10月行政長官剛在《施政報告》中宣布「北部都會區發展策略」，非常高調談濕地保育，提到收回魚塘和濕地，甚至加入政府土地去建設濕地保育公園，讓大家相信濕地前途樂觀。踏入2022年，行政長官又宣布改

組架構的計劃，「環境局」擴大職能成為「環境及生態局」，更使人以為「生態」終於在施政層面得到高度的確認。

被否決項目 6年後復活

誰知正面消息未轉化為行動就已經橫生枝節，南生圍守了幾十年的關口給打破，正是：這邊廂火勢受控了，那邊廂又新起火頭，最樂觀的人都無法不搖頭嘆息，為什麼2016年否決了的地產項目可以6年後復活？平常法庭判案上訴總有個期限，不可能這樣吧。政府沒能駕馭行政體系的運作，給地產商打倒自己對濕地的善意規劃，保護生態的靈魂在哪裏？究竟香港的濕地及總體生態何時才得安寧？

在保護生態尤其是濕地這件事上，香港現在是全國最落後，令愛護香港的人痛心，相比之下內地近年在保護自然生態包括濕地方面，取得重大進展，香港社會與政府必須深刻認識「生態文明建設」的新時代，保護生態相當於保障全體社群的安居樂業，是長治久安的根本。

讓我們回顧內地濕地的歷史過程，1950年代起，隨着人口增加，經濟開發，尤其是1978年改革開放後，全國各地的濕地遭到圍湖造田、圍填海造地的侵蝕，面積大幅減少，嚴重損害濕地發揮的生態功能，其中沿海灘塗面積銳減超過一半，情況一度岌岌可危。

幸好生態重要的意識迅速提高，1992年國家加入《拉姆薩爾濕地公約》，2000年起濕地面積有所回升；2004年訂定《全國濕地保護工程規劃》，陸續建立大批濕地保護區，包括數十個國際重要濕地；2012年十八大確立了「大力推進生態文明建設」，「生態文明」進入社會主流，漸多人知道濕地的生態功能：涵養水源、淨化水質、維護生物多樣性、蓄洪防旱、調節氣候和儲碳固碳等，以及維持糧食和水資源安全的重要作用。2018年習近平主席在全國生態環境保護大會上，說明生態文明建設必須堅持：「在環境品質底線方面，將生態環境品質只能更好、不能變壞作為底線」（註1）。2021年3月《十四五規劃》「主要發展目標」內，「生態文明建設」甚至列在「民生福祉」之前，又明確全面保護自然岸線，整治修復濱海濕地2萬公頃，粵港澳大灣區是重點地區之一（註2）。

在這個背景下，除了濕地保護法，還有三件大事必須注意：

一、2018年4月生態環境部成立，除了原環境保護局職責，還吸納氣候變化、山林、江河、海洋的生態保護，年底更組成生態環境保護綜合執法隊伍。

二、2018年7月14日國務院發出通知（註3），為了保護濱海濕地，除了黨中央、國務院和中央軍委會確定的「國家重大戰略項目」外，全國嚴禁圍填海，收回省市的審批權，全部集中由國務院處理。

<http://www.facebook.com/SundayMingpao>

第25屆執委會

委員名單

主席

文美桂

首副主席

黎志超

副主席

文貴旗

執行委員

文中慶

文燕華

文志良

馮應祥

黃廣寧

周興華

周振勳

尹順利

潘家樂

張桂芳

郭庭容

郭海賢

委員

文慶龍

文耀全

文志全

文添發

文好義

文國基

文貴壽

文建立

文添福

文天維

文安平

文裕星 MH

文富財

文有福

文泰山

文成立

文銀新

文銳鈞 MH

文炳南

文金穩

文志雙

文錦濤

文錦洪

鄺偉強

尹偉傑

周貴賢

黎志文

馮錦仔

馮日柱

黃福安

陳冠盛

潘啟芬

張炳容



新田鄉鄉事委員會

SAN TIN RURAL COMMITTEE

Appendix V-d of RNTPC
Paper No. Y/YL-MP/6A

307

敬啟者：

(傳真及郵遞文件)

反對在竹園申請地點由「住宅(丁類)」地帶改劃為
「住宅(丙類)1」地帶並修訂適用於申請地點土地用途地帶
(申請編號 Y/YL-MP/6)

就新田錦學路下竹園近錦繡花園附近申請興建估計多達3,090個中
高密度單位。上述的申請損害原有的鄉村環境，影響居民的居住質素，新
田鄉鄉事會就上述規劃申請 Y/YL-MP/6 申請人的諮詢，新田鄉鄉事會反對
如下：

1. 上述住宅面積達131,380平方米的申請將涉及超過3,090個住宅單位，居住人數估計多達萬多人，原有的排污、排水、交通、行人和空氣流通造成直接負面影響，直接影響村民的健康及生活模式，上述申請沒有提出怎樣解決突然倍增的人口問題，交通、道路及康樂生活設施等各項配套問題，由此而產生的污水及污染物的排放，將嚴重影響附近村民及鄰近土地，本鄉事委員會反對該方案，以免損害本鄉村民權益及生活質素。
2. 上述發展計劃為中高密度發展與原有附近平房式低密度發展格格不入，影響附近環境及景觀。
3. 該發展涉及8,830平方米政府土地，發展後休憩用地只開放2,100平方米予公眾，本鄉事委員會認為應開放涉及8,830平方米政府土地相若的休憩用地予公眾才合乎公平及共享原則。

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此致

城市規劃委員會



新田鄉鄉事委員會

新田鄉

鄉事委員會

主席：

首副主席：

副主席：

謹啟

文美桂

黎志超

文貴旗

2021年10月13日

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

參考編號

Reference Number:

211013-145720-04166

提交限期

Deadline for submission:

15/10/2021

提交日期及時間

Date and time of submission:

13/10/2021 14:57:20

有關的規劃申請編號

The application no. to which the comment relates:

Y/YL-MP/6

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. 新田鄉鄉事委員會

意見詳情

Details of the Comment :

就新田錦堡路下竹園近錦繡花園附近申請興建估計多達3,090個中高密度單位。上述的申請損害原有的鄉村環境，影響居民的居住質素，新田鄉鄉事會就上述規劃申請Y/YL-MP/6申請人的諮詢，新田鄉鄉事會反對如下：

1. 上述住宅面積達131,380平方米的申請將涉及超過3,090個住宅單位，居住人數估計多達萬多人，原有的排污、排水、交通、行人和空氣流通造成直接負面影響，直接影響村民的健康及生活模式，上述申請沒有提出怎樣解決突然倍增的人口問題，交通、道路及康樂生活設施等各項配套問題，由此而產生的污水及污染物的排放，將嚴重影響附近村民及鄰近土地，本鄉事委員會反對該方案，以免損害本鄉村民權益及生活質素。
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此致

城市規劃委員會

新田鄉鄉事委員會

二零二一年十月十三日



新田鄉鄉事委員會

SAN TIN RURAL COMMITTEE

329

RECEIVED

31 JAN 2022

Town Planning Board

敬啟者：

(傳真及郵遞文件)

反對在竹園申請地點由「住宅(丁類)」地帶改劃為
「住宅(丙類)1」地帶並修訂適用於申請地點土地用途地帶
(申請編號 Y/YL-MP/6)

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如下：

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流通造成直接負面影響，直接影響村民的健康及生活模式，上述申請沒
有提出怎樣解決突然倍增的人口問題，交通、道路及康樂生活設施等各
項配套問題，由此而產生的污水及污染物的排放，將嚴重影響附近村民
及鄰近土地，本鄉事委員會反對該方案，以免損害本鄉村民權益及生活
質素。
2. 上述發展計劃為中高密度發展與原有附近平房式低密度發展格格不
入，影響附近環境及景觀，其中這些高樓與竹園村鄰近的小型屋宇發展
區相鄰，嚴重影響該區小型屋宇的景觀，但發展商明顯沒有標示這個方
向的橫切面圖，淡化對鄰近小型屋宇的影響。
3. 該發展涉及 8,830 平方米政府土地，發展後休憩用地只開放 2,100
平方米予公眾，本鄉事委員會認為應開放涉及 8,830 平方米政府土地相
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境，本會反對有關規劃申請。

此致

城市規劃委員會



新田鄉鄉事委員會

主席： 文美桂

首副主席：黎志超

副主席： 文貴旗 謹啟

2022 年 1 月 31 日

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

211006-213734-79662

Reference Number:**提交限期**

15/10/2021

Deadline for submission:**提交日期及時間**

06/10/2021 21:37:34

Date and time of submission:**有關的規劃申請編號**

Y/YL-MP/6

The application no. to which the comment relates:**「提意見人」姓名/名稱**先生 Mr. Daniel K. H. CH
AM**Name of person making this comment:****意見詳情****Details of the Comment :**

I refer to the application : Y/YL-MP/6 ,please be informed that after consult the local residents in the vicinity of the application site, I strongly object on the application for the following reasons:

(1) There is no acceptable justification to re-zone the subject site from R(D) to R(C)1, all the developments in the vicinity (including Fairview Park, Palm Springs and Villages) are low density (the zoning are R(C), R(D) and V). Increase the plot ratio from 0.2 of existing R(D) zone to 2 is considered too excessive, and any development in that parameter is not compactable to the land use in that area in the OZP. It is not in harmony and in line with the developments in the vicinity. Increase the building high from 3 storeys to 23 storeys (79.9 mPD) is considered too excessive, and it is visually intrusive from the vicinity as shown in the photo images provided by the applicant. The proposed development is considered incompatible with the surrounding land uses which are predominated by low-rise and low-density residential dwellings/village houses and unused/vacant land.

(2) The site is adjacent to valuable wetland with distinct and valuable ecological values. The development of 23 storeys proposed by the applicant is considered too excessive and will affect the ecological values of the nearby wetland area. The proposed development in the re-zoning application is against the planning intention and direction mentioned in the Explanatory Statement.

(3) Piecemeal re-zoning without overall study and review of other zoning in the OZP will jeopardize the long-term planning and land use in this and other sensitive and low-rise development areas in this OZP. Extensive development will jeopardize the conservation value of the nearby wetland and its vicinity. There are valuable wetlands with distinct and valuable ecological values in the adjacent areas and the wetland nearby; the re-zoning application has not addressed these issues to a satisfactory level.

(4) The additional traffic generated from the development will affect the traffic volume of Fairview Park Boulevard (if the owners of Fairview Park allow the residents of the new development to use that road - which is unlikely to be happened) which is a private road and subject to numerous complaints from the residents of Fairview Park on the additional traffic generated by developments (both authorized and unauthorized developments) in the vicinity. Without the consent of a

ll the owners of Fairview Park, the proposed development is not allowed to use that private road and all the new traffic will be diverted to the junction of Castle Peak Road.

(5) The critical junction at Fairview Park round-about will be overloaded and the additional traffic generated by the 597 vehicles in the proposed site will further deteriorate the adverse traffic at Pok Oi Round-about.

(6) Kam Pok Road is a narrow road with junctions at Castle Peak Road and Fairview Park Boulevard, the traffic generated at peak hours will seriously affect the traffic at both junctions and it is expected that there will be many complaints from the residents nearby in the future, Transport Department will be blamed if the new traffic generated by the new development deteriorates the current traffic situation in that area and in Pok Oi Round-about in the future.

(7) The application site falls within Deep Bay Buffer Zone 2 and the proposed development can not meet the "Town Planning Board Guidelines for Application for Developments within Deep Bay Buffer Zones" in that:

(i) There is insufficient information in the submission to demonstrate that the proposed development will have insignificant impacts on the environment, ecology, sewerage and traffic in the area including the Mai Po Nature Reserve and Inner Deep Bay; the development will affect the existing wetland and fish ponds in the vicinity; and there is insufficient information in the submission to demonstrate that the proposed development will not have adverse impacts on the ecology in the area including the Mai Po Nature Reserve and Inner Deep Bay area.

(8) The approval of the application will set an undesirable precedent for similar applications in this ecologically sensitive area. The site on the other side of Yau Pok Road (TPB approval on residential development in "REC" zone with a plot ratio of 0.2 and 3 storeys) and the R(D) site at its south-west direction (Kam Pok Road and Ha San Wai Road- P.R. 0.2 and 3 storeys) will apply for increase of Plot Ratio and building height if this application is approved. Any additional development apart from the original planning intention will further deteriorate the traffic, sewage, visual, land use compatibility of the area. It will set a very undesirable precedent case for similar application in this area in the future.

(9) TPB has approved 5 planning applications on the application site, with planning intention of P.R.0.2 and 3 storeys. From the deliberations of the RNTPC, the planning parameters and intensification of the site under the current OZP were considered appropriate and suitable. The previous approvals conformed with the OZP restrictions and were in line with the planning intention of the "R(D)" zone (which is primarily for improvement and upgrading of existing temporary structures within the rural areas through redevelopment of existing temporary structures into permanent buildings and for low-rise, low-density residential developments subject to planning permission from the Board). Any approval of re-zoning to the requested planning parameter would jeopardize the planning intention of the whole area.

(10) The proposed Ngau Tam Mei Rail Station is on the other side of San Tin Highway, development of high intensity should only be restricted to the other side of San Tin Highway, with is within the catchment of proposed Rail Station in the future.

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

Daniel K.H. CHAM (Chairman, Tin Shui Wai South Area Committee/ Member, Election Committee)

寄件者: [REDACTED]
寄件日期: 2021年10月06日星期三 21:35
收件者: tpbpd@pland.gov.hk
主旨: Representation on Y_YL MP6
附件: Representation on Y_YL_MP6.docx

Dear Sir,

Attached is my representations on Y/YL/MP/6.

Please acknowledge receipt of the documents

Regards

Daniel Cham

就規劃申請提出意見

Comments on Planning Application

Y/YL-MP/6

請勿填寫此欄 For Official Use Only	檔案編號 Reference No. 收到日期 Date Received	Y/YL-NTM/6
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重要提示：意見必須於指定的法定期限屆滿前向城市規劃委員會(委員會)提出。

Important Note: The comment should be made to the Town Planning Board (the Board) before the expiry of the specified statutory period.

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

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

By Fax : 2877 0245 or 2522 8426

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

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

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

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- (2) The site is adjacent to valuable wetland with distinct and valuable ecological values. The development of 23 storeys proposed by the applicant is considered too excessive and will affect

the ecological values of the nearby wetland area. The proposed development in the re-zoning application is against the planning intention and direction mentioned in the Explanatory Statement.

- (3) Piecemeal re-zoning without overall study and review of other zoning in the OZP will jeopardize the long-term planning and land use in this and other sensitive and low-rise development areas in this OZP. Extensive development will jeopardize the conservation value of the nearby wetland and its vicinity. There are valuable wetlands with distinct and valuable ecological values in the adjacent areas and the wetland nearby; the re-zoning application has not addressed these issues to a satisfactory level.
- (4) The additional traffic generated from the development will affect the traffic volume of Fairview Park Boulevard (if the owners of Fairview Park allow the residents of the new development to use that road - which is unlikely to be happened) which is a private road and subject to numerous complaints from the residents of Fairview Park on the additional traffic generated by developments (both authorized and unauthorized developments) in the vicinity. Without the consent of all the owners of Fairview Park, the proposed development is not allowed to use that private road and all the new traffic will be diverted to the junction of Castle Peak Road.
- (5) The critical junction at Fairview Park round-about will be overloaded and the additional traffic generated by the 597 vehicles in the proposed site will further deteriorate the adverse traffic at Pok Oi Round-about.
- (6) Kam Pok Road is a narrow road with junctions at Castle Peak Road and Fairview Park Boulevard, the traffic generated at peak hours will seriously affect the traffic at both junctions and it is expected that there will be many complaints from the residents nearby in the future, Transport Department will be blamed if the new traffic generated by the new development deteriorates the current traffic situation in that area and in Pok Oi Round-about in the future.
- (7) The application site falls within Deep Bay Buffer Zone 2 and the proposed development cannot meet the "Town Planning Board Guidelines for Application for Developments within Deep Bay Buffer Zones" in that:
 - (i) There is insufficient information in the submission to demonstrate that the proposed development will have insignificant impacts on the environment, ecology, sewerage and traffic in the area including the Mai Po Nature Reserve and Inner Deep Bay; the development will affect the existing wetland and fish ponds in the vicinity; and there is insufficient information in the submission to demonstrate that the proposed development will not have adverse impacts on the ecology in the area including the Mai Po Nature Reserve and Inner Deep Bay area.

- (8) The approval of the application will set an undesirable precedent for similar applications in this ecologically sensitive area. The site on the other side of Yau Pok Road (TPB approval on residential development in "REC" zone with a plot ratio of 0.2 and 3 storeys) and the R(D) site at its south-west direction (Kam Pok Road and Ha San Wai Road- P.R. 0.2 and 3 storeys) will apply for increase of Plot Ratio and building height if this application is approved. Any additional development apart from the original planning intension will further deteriorate the traffic, sewage, visual, land use compatibility of the area. It will set a very undesirable precedent case for similar application in this area in the future.
- (9) TPB has approved 5 planning applications on the application site, with planning intention of P.R.0.2 and 3 storeys. From the deliberations of the RNTPC, the planning parameters and intension of the site under the current OZP were considered appropriate and suitable. The previous approvals conformed with the OZP restrictions and were in line with the planning intention of the "R(D)" zone (which is primarily for improvement and upgrading of existing temporary structures within the rural areas through redevelopment of existing temporary structures into permanent buildings and for low-rise, low-density residential developments subject to planning permission from the Board). Any approval of re-zoning to the requested planning parameter would jeopardize the planning intention of the whole area.
- (10) The proposed Ngau Tam Mei Rail Station is on the other side of San Tin Highway, development of high intensity should only be restricted to the other side of San Tin Highway, with is within the catchment of proposed Rail Station in the future.

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

Daniel K.H. CHAM (Chairman, Tin Shui Wai South Area Committee/ Member, Election Committee)

簽署 Signature



日期 Date : 6th October, 2021

寄件者: manfuwan
寄件日期: 2021年10月15日星期五 17:41
收件者: tpbpd@pland.gov.hk
主旨: 關於規劃申請編號Y/YL-MP/6之意見信
附件: 致規劃署意見信.pdf

敬啟者：

現奉上關於規劃申請編號Y/YL-MP/6之意見信，請參考。勞煩之處，敬請諒解！

文富穩區議員辦事處
助理 阮育賢 代行
2021年10月15日



關於規劃申請編號 Y/YL-MP/6 之意見

敬啟者：

對於規劃申請編號 Y/YL-MP/6 本人有以下意見：

- 1、此申請地點位於錦墾路段，該路段過於狹窄，故地盤發展範圍需收窄，用之擴寬道路，並增設單車徑。(附圖藍色線條示)
- 2、要求將地盤發展成低密度的三層住宅。新田鄉所屬地區大部分環境均以低密度開發，地積比例都是在零點四或以下，周邊樓宇的高度發展都是局限於三層，若高於此規格，將會遮擋周邊住宅的現有開放景觀。
- 3、於發展地段所用到的主要交通要道其中有錦繡迴旋處，但此地作為元朗交通要道，交通堵塞問題已存在已久，問題尚未解決，若再發展高層住宅，增加大量人口，祇會對交通堵塞問題雪上加霜！
- 4、因附近綠化地及休憩地緊缺，故此發展範圍內的綠化及休憩地帶應從現時規劃位置遷移至接近附近村落位置，並與附近居民共享。(附圖綠色線條示)
- 5、要求發展屋苑需於範圍內開設一條道路予附近村民共同使用。(附圖示)

另：附圖以供參考。

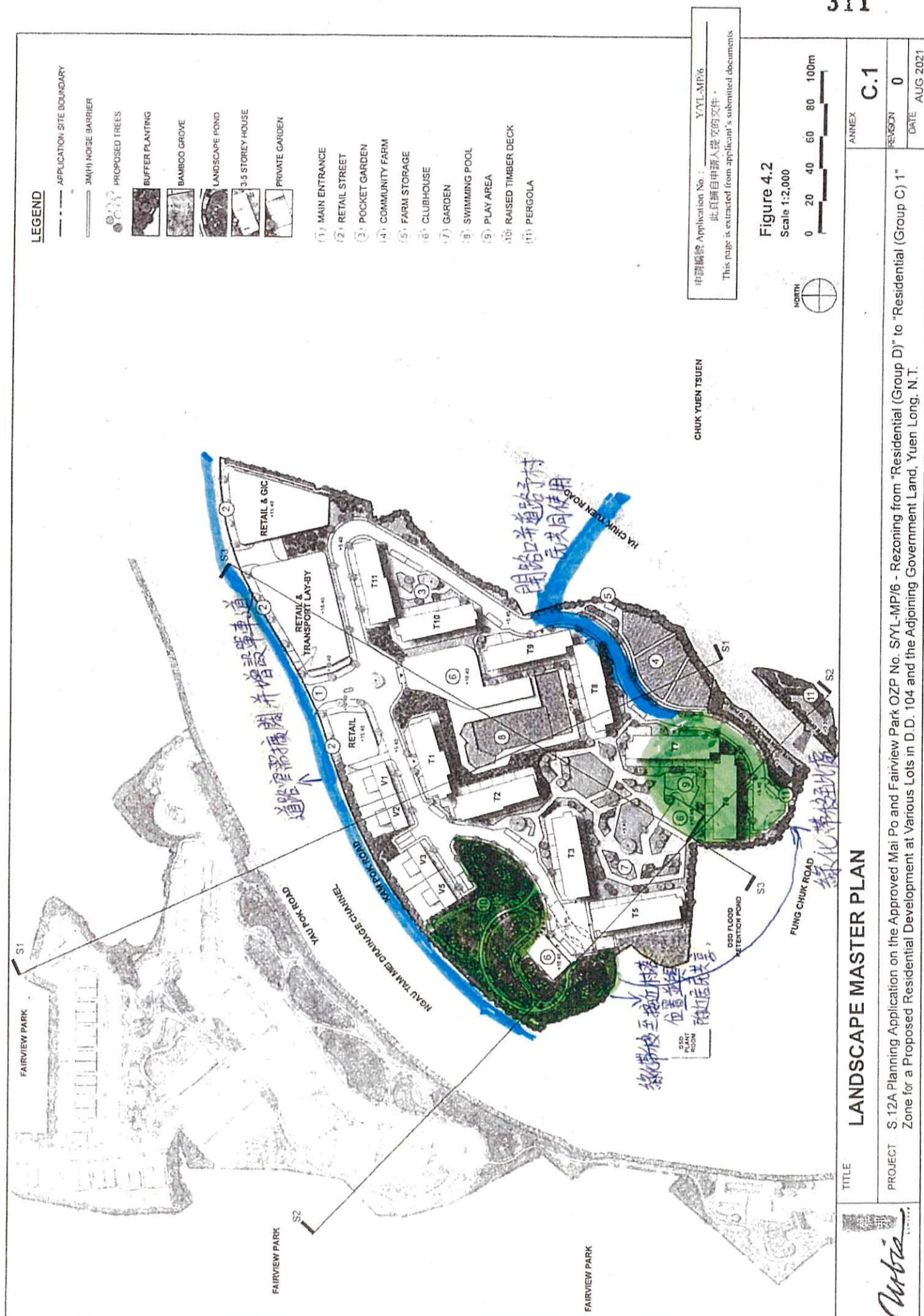
此致

城市規劃委員會
秘書處

簽署：

元朗區議員 文富穩 BBS

2021 年 10 月 15 日



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城市規劃委員會秘書
06/06/2022 12:47

From:

To: <tpbpd@pland.gov.hk>

Cc: <tpbpd@pland.gov.hk>

File Ref:

1 attachment



關於元朗米埔-錦壚規劃.pdf

致：城市規劃委員會秘書
關於元朗米埔-錦壚規劃編號Y/YL-MP/6之意見
詳見附件。

文富穩區議員辦事處
助理 司徒育霞 代行
2022年6月6日
電話：



關於元朗米埔-錦壘規劃編號 Y/YL-MP/6 之意見

敬啟者：

- 一、對於規劃申請編號 Y/YL-MP/6 本人有以下之意見：
 - 二、此申請位於錦壘路段，該路段過於狹窄，鄰近錦繡花園迴旋處，屬繁忙堵塞路段，公共交通車輛、客、貨車均經此路出入，交通堵塞問題多年未解決，附近居民多次投訴道路堵塞問題，政府一直未重視，也未曾有任何方案舒緩附近交通繁忙時段問題，現改變住宅類型，發展大型高層住宅，居民未入住交通已超負荷，若大幅增加私人住宅密度發展，祇會增加附近居民出行時間，對交通堵塞問題雪上加霜。
 - 三、新田所屬地樓宇均以低密度發展，地積比例均在零點四以下，周邊樓宇高度發展均屬三層低密度，若附近建築高層樓宇，將會遮擋周邊住宅現有景觀及增加此區人口居住密度。
 - 四、發展地段鄰近米埔濕地公園，周邊綠化地及休憩地緊缺，如在此地建築大型住宅，將會縮小濕地範圍，破壞濕地周邊環境，影響民眾了解濕地多樣性。
 - 五、新田所屬地段無完善排污系統，如何處理污水/化糞池所造成的環境污染，如沒有妥善設置和維修，便會污染環境並可能會損害附近人口的健康，如在此地建築大型住宅，在各方面設施都沒有完善情況下，會影響周邊環境及村民健康。
- 就以上原因，反對改變住宅土地類型用途，如在此地建築大型高層住宅，需充分考慮建設大型社區對附近交通、濕地、環境所造成影響。

勞煩之處，敬請諒解

此致

城市規劃委員會
秘書處

簽署

元朗區議員 文富穩 BBS

2022 年 6 月 2 日

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

220601-141909-71317

提交限期**Deadline for submission:**

17/06/2022

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

01/06/2022 14:19:09

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

Y/YL-MP/6

「提意見人」姓名/名稱**Name of person making this comment:**先生 Mr. Cham Ka Hung
Daniel, BBS MH BH JP**意見詳情****Details of the Comment :**

I refer to the application Y/YL-MP/6 and the further information submitted on 18-5-2022, please be informed that after consult the local residents in the vicinity of the application site, I strongly object on the application for the following reasons:

(1) TPB has approved 5 planning applications on the application site, with planning intention of P.R.0.2 and 3 storeys. From the deliberations of the RNTPC, the planning parameters and intensification of the site under the current OZP were considered appropriate and suitable. The previous approvals conformed with the OZP restrictions and were in line with the planning intention of the "R(D)" zone (which is primarily for improvement and upgrading of existing temporary structures within the rural areas through redevelopment of existing temporary structures into permanent buildings and for low-rise, low-density residential developments subject to planning permission from the Board). Any approval of re-zoning to the requested planning parameter would jeopardize the planning intention of the whole area.

(2) The application to release the restrictions in this sensitive area has encourage for developers in the vicinity, including the site at the North East of the application site (Yau Pok Road, which is REC Zone and the development was previously approved by RNTPC with PR of 0.4), and the site at Kam Pok Road [R(D) site at the South of the site, and the development was approved by RNTPC before], to plan and to submit applications to increase the PR, building height and other development parameters. A good example of this argument is that developer has already submitted S12. application for re-zoning the site at the South West of the application site (Yau Pok Road, application Y/YL-MP/7) with a PR of 1.203 with development of 16 storeys and 1228 flats, which is the 1/4 of the flats of Fairview Park; the total flats of both Y/YL-MP/7 and Y/YL-MP/6 are 4318, which is almost equal to the 86% of total number of 5024 flats at Fairview Park. The increase in development parameters along Kam Pok Road and Yau Pok Road will deteriorate the wetland conservation of the Deep Bay Area.

(3) There is no acceptable justification to re-zone the subject site from R(D) to R(C)1, all the developments in the vicinity (including Fairview Park, Palm Springs and Villages) are low density (the zoning are R(C), R(D) and (V). Increase the plot ratio from 0.2 of existing R(D) zone to 2 is considered too excessive, and any development in that parameter is not compactable to the land use in that area in the OZP. It is not in harmony and in line with the developments in the vicinity

y. Increase the building high from 3 storeys to 23 storeys (79.9 mPD) and 3090 flats are considered too excessive, and it is visually intrusive from the vicinity as shown in the photo images provided by the applicant. The proposed development is considered incompatible with the surrounding land uses which are predominated by low-rise and low-density residential dwellings/village houses and unused/vacant land.

(4) The site is adjacent to valuable wetland with distinct and valuable ecological values. The development of 23 storeys proposed by the applicant is considered too excessive and will affect the ecological values of the nearby wetland area. The proposed development in the re-zoning application is against the planning intention and direction mentioned in the Explanatory Statement.

(5) The layout of the development being surrounded by the proposed high towers will increase the bird-window collision risks as well as lead to habitat fragmentation that reduces the ecological carrying capacity, and degrade the ecological function of the area.

(6) The Site, adjacent wetland and ponds are utilized by wetland-dependent birds and is connected with the wetland ecosystem in Deep Bay. The large-scale residential development will result in irreversible loss of wetland and disturbance impact (e.g., human activities, light glare, noise) to the nearby wetland habitat. It fails to comply with the "no-net-loss in wetland" principle.

(7) The application site falls within Deep Bay Buffer Zone 2 and the proposed development cannot meet the "Town Planning Board Guidelines for Application for Developments within Deep Bay Buffer Zones" in that:

(i) There is insufficient information in the submission to demonstrate that the proposed development will have insignificant impacts on the environment, ecology, sewerage and traffic in the area including the Mai Po Nature Reserve and Inner Deep Bay; the development will affect the existing wetland and fish ponds in the vicinity; and there is insufficient information in the submission to demonstrate that the proposed development will not have adverse impacts on the ecology in the area including the Mai Po Nature Reserve and Inner Deep Bay area.

(ii) In addition, development proposal in the Deep Bay Area should adopt the principle of "no-net loss in wetland" which may refer to both loss in 'area' and 'function'. This is to ensure that there will be no decline in wetland or ecological functions served by the existing wetland within the Site. The proposed development would lead to a substantial reduction of the wetland area.

(8) approving the application would set an undesirable precedent for similar applications for large-scale development in this ecological sensitive area. In addition, as landscape changes including vegetation and wetland clearance were seen at the Site. Any additional development apart from the original planning intention will further deteriorate the traffic, sewerage, visual, land use compatibility of the area.

(9) Piecemeal re-zoning without overall study will jeopardize the long-term planning and land use in this and other sensitive and low-rise development areas in this OZP. Extensive development will jeopardize the conservation value of this site and the ponds and wetland with valuable ecological values in its vicinity. The re-zoning application has not addressed these issues to a satisfactory level.

(10) The additional traffic generated from the development will affect the traffic volume of Fairview Park Boulevard (if the owners of Fairview Park allow the residents of the new development to use that road - which is unlikely to be happened) which is a private road and subject to numerous complaints from the residents of Fairview Park on the additional traffic generated by developments (both authorized and unauthorized developments) in the vicinity. Without the consent of all the owners of Fairview Park, the proposed development is not allowed to use that private road.

ad and all the new traffic will be diverted to the junction of Castle Peak Road.

(11) The critical junction at Fairview Park round-about will be overloaded and the additional traffic generated by the 597 vehicles in the proposed site will further deteriorate the adverse traffic at Pok Oi Round-about.

(12) Kam Pok Road is a narrow road with junctions at Castle Peak Road and Fairview Park Boulevard, the traffic generated at peak hours will seriously affect the traffic at both junctions and it is expected that there will be many complaints from the residents nearby in the future, Transport Department will be blamed if the new traffic generated by the new development deteriorates the current traffic situation in that area and in Pok Oi Round-about in the future.

(13) The proposed Ngau Tam Mei Rail Station is on the other side of San Tin Highway, development of high intensity should only be restricted to the other side of San Tin Highway, with is within the catchment of proposed Rail Station in the future.

(14) TPB has received 8 re-zoning applications in recent months in Nam San Wai, Mai Po and Ngau Tam Mei OZP, with proposed 23,700 flats. Approval of this application will encourage more and more intensive development application which will affect the whole area without long term comprehensive studies. The planning parameters and intensification of the site under the current OZP were considered appropriate and suitable. Any approval of re-zoning to the requested planning parameter would jeopardize the planning intention of the whole area.

Daniel K.H. CHAM (Chairman, Tin Shui Wai South Area Committee/ Member, Election Committee)



關於米埔錦墾申請編號 Y/YL-MP/6 之意見



敬啟者：

對於規劃申請編號 Y/YL-MP/6 本人持反對意見：

新田大部分樓宇均以低密度開發，地積比例都是在零點四或以下，周邊樓宇的高度發展都是局限於三層，申請編號擬建不低於 23 層，若建築越來越多高層住宅，將會失去元朗鄉村自然生態與住宅共融特色。

新田有多項大型高層建築申請，通往主要交通要道 1：博愛迴旋處、2：錦繡迴旋處，因地理環境關係，交通經常堵塞，造成交通黑點，此問題已存在多年，仍未有任何舒緩解決方案，若再發展高層住宅，增加大量人口，只會令交通擠塞情況惡化，交通堵塞問題若再不改善，情況將會更加嚴重，故建議將申請編號：元朗米埔-錦墾 Y/YL-MP/6、元朗牛潭尾 Y/YL-NTM/5、青山公路潭尾段 Y/YL-NSW/8、石湖圍 Y/YL-NTM/8、石湖圍 Y/YL-NTM/6,Y/NTM/7、南生圍榮基村 Y/YL-NSW/7、Y/YL-ST/1Y/YL-ST/1、潭尾以西 Y/YL-NSW/9、米埔-攸墾 Y/YL-MP/7,Y/YL-MP/8、個案合併作為交通評估。

此致

城市規劃委員會

秘書處

簽署：

元朗區議員 文富穩

2022 年 08 月 23 日

第25屆執委會

委員名單

主席

文美桂

首副主席

黎志超

副主席

文貴旗

執行委員

文中慶

文燕華

文志良

馮應祥

周興華

周振勳

尹順利

潘家樂

張桂芳

郭庭容

郭海賢

委員

文慶龍

文耀全

文志全

文添發

文好義

文國基

文貴香

文建立

文添福

文天維

文安平

文祿星 MH

文富財

文有福

文泰山

文成立

文銀新

文銳鈞

文炳南 MH

文金穩

文志雙

文錦濤

文錦洪

鄺偉強

尹偉傑

周貴賢

黎志文

馮錦仔

馮日柱

黃福安

陳冠盛

潘啟芬

張炳容



新田鄉鄉事委員會

SAN TIN RURAL COMMITTEE

地址：

444

敬啟者：

(傳真及郵遞文件)

反對在竹園申請地點由「住宅(丁類)」地帶改劃為
「住宅(丙類)1」地帶並修訂適用於申請地點土地用途地帶
(申請編號 Y/YL-MP/6)

就新田錦學路下竹園近錦繡花園附近申請興建估計多達3,090個中
高密度單位。上述的申請損害原有的鄉村環境，影響居民的居住質素，新
田鄉鄉事會就上述規劃申請 Y/YL-MP/6 申請人的諮詢，新田鄉鄉事會反對
如下：

1. 上述住宅面積達131,380平方米的申請將涉及超過3,090個住宅單
位，居住人數估計多達萬多人，原有的排污、排水、交通、行人和空
氣流通造成直接負面影響，直接影響村民的健康及生活模式，加上相
鄰 Y/YL-MP/7 及 Y/YL-MP/8 兩個申請共合約220,470平方米同類放寬
地積比率住宅申請，合共約7,627個住宅單位，居住人數估計多達萬
多人30,000人左右，車輛達1,406輛，上述申請沒有提出怎樣解決
突然倍增的人口問題，交通、道路及康樂生活設施等各項配套問題，
由此而產生的污水及污染物的排放，將嚴重影響附近村民及鄰近土
地，本鄉事委員會反對該方案，以免損害本鄉村民權益及生活質素。
2. 上述發展計劃為中高密度發展與原有附近平房式低密度發展格格不
入，影響附近環境及景觀，其中這些高樓與竹園村鄰近的小型屋宇發
展區相鄰，嚴重影響該區小型屋宇的景觀，但發展商明顯沒有標示這
個方向的橫切面圖，淡化對鄰近小型屋宇的影響。
3. 該發展涉及8,830平方米政府土地，發展後休憩用地只開放2,100
平方米予公眾，本鄉事委員會認為應開放涉及8,830平方米政府土地
相若的休憩用地予公眾才合乎公平及共享原則。

上述申請直接影響本區村民的健康及和諧，同時破壞風水和原有的生態環
境，本會反對有關規劃申請。

第25屆執委會

委員名單

主席

文美桂

首副主席

黎志超

副主席

文貴旗

執行委員

文中慶

文燕華

文志良

馮應祥

周興華

周振勳

尹順利

潘家樂

張桂芳

郭庭容

郭海賢

委員

文慶龍

文耀全

文志全

文添發

文好義

文國基

文貴壽

文連立

文添福

文天維

文安平

文耀星 MH

文富財

文有福

文泰山

文成立

文銀新

文銳鈞

文炳南 MH

文金穩

文志雙

文錦濤

文錦洪

鄧偉強

尹偉傑

周貴賢

黎志文

馮錦仔

馮日柱

黃福安

陳冠盛

潘啟芬

張炳容



新田鄉鄉事委員會

SAN TIN RURAL COMMITTEE

444

上述申請直接影響本區村民的健康及和諧，同時破壞風水和原有的生態環境，本會反對有關規劃申請。

此致

城市規劃委員會



新田鄉鄉事委員會

首副主席：黎志超

副主席：文貴旗 謹啟

2022年8月29日

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/YL-MP/6 Received on 13/09/2022

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

有關這項申請本人反對。其位於近青山公路
(鰲魚灣) 之青山鰲魚灣路附近一帶之道路基本上
已不能負擔雙程交通出入, 若該項發展獲予批
准, 將使附近一帶交通完全癱瘓。

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

王振華(新豐(白)街)

簽署 Signature

日期 Date

8 Oct 2022



關於米埔錦壘申請編號 Y/YL-MP/6 持反對意見

敬啟者：

對於規劃申請編號 Y/YL-MP/6，欲興建不低於 25 層住宅，本人持反對意見：

- 一. 發展地段鄰近米埔濕地保護區，周邊綠化地緊缺，若繼續興建越來越多大型住宅，將會縮小濕地範圍，破壞濕地周邊環境，影響民眾了解濕地多樣性。
- 二. 新田大部份樓宇以低密度開發，地積比例均在零點四或以下，周邊樓宇高度發展局限於三層，若將來興建越來越多高層住宅，將會遮擋周邊住宅現有開放景觀及增加此區人口居住密度。
- 三. 發展地鄰近錦繡迴旋處，屬交通繁忙路段，每天有大型貨車、客車、公共車輛必經此路通過，目前居民未入住交通已超負荷，若繼續興建越來越多高層住宅令居住人口爆增，只會令交通堵塞問題雪上加霜。發展商提供接駁巴士給屋苑內居民出入，發展商只考慮屋苑內居民出行問題，增加接駁巴士占用車道只會令迴旋處交通更加堵塞，若不解決迴旋處根本交通問題，增加接駁巴士也祇會令居民外出等待時間加長。

同時建議將現時規劃申請合併作為交通評估，比單一交通方案更能體現問題，規劃地段：元朗米埔-錦壘 Y/YL-MP/6、元朗牛潭尾 Y/YL-NTM/5、青山公路潭尾段 Y/YL-NSW/8、石湖圍 Y/YL-NTM/8、石湖圍 Y/YL-NTM/6、Y/NTM/7、南生圍榮基村 Y/YL-NSW/7、新田練板村 Y/YL-ST/1、潭尾以西 Y/YL-NSW/9、米埔-攸壘 Y/YL-MP/7、Y/YL-MP/8。

此致

城市規劃委員會

秘書處

簽署：

元朗區議員 文富穩 BBS

2022 年 10 月 10 日



新田鄉鄉事委員會

SAN TIN RURAL COMMITTEE

地址：元

467



敬啟者：

(傳真及郵遞文件)

反對在竹園申請地點由「住宅(丁類)」地帶改劃為
「住宅(丙類)1」地帶並修訂適用於申請地點土地用途地帶
(申請編號 Y/YL-MP/6)

就新田錦墾路下竹園近錦繡花園附近申請興建估計多達3,090個中高密度單位。上述的申請損害原有的鄉村環境，影響居民的居住質素，新田鄉鄉事會就上述規劃申請 Y/YL-MP/6 申請人的諮詢，新田鄉鄉事會反對如下：

1. 上述住宅面積達131,485平方米的申請將涉及超過3,090個住宅單位，居住人數估計多達萬多人，原有的排污、排水、交通、行人和空氣流通造成直接負面影響，直接影響村民的健康及生活模式，加上相鄰 Y/YL-MP/7 及 Y/YL-MP/8 兩個申請共合約220,470平方米同類放寬地積比率住宅申請，合共約7,627個住宅單位，居住人數估計多達萬多人30,000人左右，車輛達1,406輛，上述申請沒有提出怎樣解決突然倍增的人口問題，交通、道路及康樂生活設施等各項配套問題，由此而產生的污水及污染物的排放，將嚴重影響附近村民及鄰近土地，本鄉事委員會反對該方案，以免損害本鄉村民權益及生活質素。
2. 上述發展計劃為中高密度發展與原有附近平房式低密度發展格格不入，影響附近環境及景觀，其中這些高樓與竹園村鄰近的小型屋宇發展區相鄰，嚴重影響該區小型屋宇的景觀，但發展商明顯沒有標示這個方向的橫切面圖，淡化對鄰近小型屋宇的影響。
3. 該發展涉及8,830平方米政府土地，發展後休憩用地只開放2,100平方米予公眾，本鄉事委員會認為應開放涉及8,830平方米政府土地相若的休憩用地予公眾才合乎公平及共享原則。

上述申請直接影響本區村民的健康及和諧，同時破壞風水和原有的生態環境，本會反對有關規劃申請。



新田鄉鄉事委員會

SAN TIN RURAL COMMITTEE

地址：

467

此致

城市規劃委員會

新田鄉鄉事委員會

首副主席：黎志超

副主席：文貴旗 謹啟



2022 年 10 月 13 日



關於米埔錦壘申請編號 Y/YL-MP/6 持反對意見

敬啟者：

對於規劃申請編號 Y/YL-MP/6，欲興建不低於 23 層住宅，本人持反對意見：

- 一、發展地段鄰近米埔濕地保護區，興建高層住宅將會破壞濕地周邊環境，影響民眾了解濕地多樣性。
- 二、新田樓宇以低密度開發，周邊樓宇高度發展局限於三層，若將來興建越來越多高層住宅，將會遮擋周邊住宅現有開放景觀及增加居住人口密度。
- 三、發展地鄰近錦繡迴旋處，屬交通繁忙路段，每天有大型貨車、客車、公共車輛必經此路通過，目前居民未入住交通已超負荷，若繼續興建越來越多高層住宅令居住人口爆增，只會令交通堵塞問題雪上加霜。發展商將來提供接駁巴士給屋苑內居民出入，發展商只考慮屋苑內居民出行問題，增加接駁巴士占用車道同時令迴旋處交通更加堵塞，若不解決迴旋處根本交通問題，增加接駁巴士也祇會令居民外出等待時間加長。

建議將現時規劃申請中個案合併作為交通評估，比單一交通評估更能體現問題：元朗米埔-錦壘 Y/YL-MP/6、元朗牛潭尾 Y/YL-NTM/5、青山公路潭尾段 Y/YL-NSW/8、石湖圍 Y/YL-NTM/8、石湖圍 Y/YL-NTM/6、Y/NTM/7、南生圍榮基村 Y/YL-NSW/7、新田練板村 Y/YL-ST/1、潭尾以西 Y/YL-NSW/9、米埔-攸壘 Y/YL-MP/7、Y/YL-MP/8。

此致

城市規劃委員會

秘書處

簽署：

元朗區議員 文富穩 BBS

2022 年 12 月 21 日

辦事處地址

E-MAIL

電話：

傳真：



關於米埔錦壘申請編號 Y/YL-MP/6 持反對意見

敬啟者：

對於規劃申請編號 Y/YL-MP/6，欲興建不低於 23 層住宅，本人持反對意見：

- 一、發展地段鄰近米埔濕地保護區，是雀鳥重要棲息地之一，如欲在此地興建高層住宅，破壞濕地周邊環境，濕地一旦被破壞以後不可再複製。
- 二、新田樓宇均以低密度開發，周邊樓宇高度發展局限於三層，若將來興建越來越多高層住宅，可預計會遮擋周邊住宅現有開放景觀。
- 三、發展商地段鄰近錦繡迴旋處，屬交通繁忙路段，居民未入住交通已超負荷，若繼續興建越來越多高層住宅令居住人口爆增，只會令交通堵塞問題雪上加霜。

過往規劃發展沒有作整體考慮，以致道路未能應付增加人口後的交通流量，建議將以下申請中規劃個案合併作為交通評估，比單一交通評估更能體現問題：元朗米埔-錦壘 Y/YL-MP/6、元朗牛潭尾 Y/YL-NTM/5、青山公路潭尾段 Y/YL-NSW/8、石湖圍 Y/YL-NTM/8、石湖圍 Y/YL-NTM/6、Y/NTM/7、南生圍榮基村 Y/YL-NSW/7、新田練板村 Y/YL-ST/1、潭尾以西 Y/YL-NSW/9、米埔-攸壘 Y/YL-MP/7、Y/YL-MP/8。

此致

城市規劃委員會

秘書處

簽署：

元朗區議員 文富穩 BBS

2023 年 02 月 21 日

辦事處地址：

E-MAIL:

電話：

傳真：

tpbpd@pland.gov.hk

寄件者: EAP KFBG <eap@kfbg.org>
寄件日期: 2021年10月15日星期五 15:29
收件者: tpbpd@pland.gov.hk
主旨: KFBG's comments on Y/YL-MP/6
附件: 211015 s12a MP 6 a.pdf

Dear Sir/ Madam,

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

Best Regards,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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

15th October, 2021.

By email only

Dear Sir/ Madam,

**To rezone the application site from "Residential (Group D)" to
"Residential (Group C) 1" and amend the Notes of the zone applicable to the site
(Y/YL-MP/6)**

1. We refer to the captioned.
2. The gist of this application states that the site will be located in *'just 860 m away from Ngau Tam Mei Station in just over a decade's time'* (remarks: Ngau Tam Mei (NTM) Station is a proposed MTR station under the Northern Link (NOL) project), and the Supporting Planning Statement for this application also indicates that the site is about 1.5 km from the proposed San Tin Station which would be within the proposed 'San Tin/ Lok Ma Chau Development Node'. However, we would like to remind the Board that the site is neither within the proposed San Tin/ Lok Ma Chau Development Node boundary nor the 'San Tin Technopole' boundary recently proposed in the Northern Metropolis Development Strategy report¹ under the 2021 Policy Address. In fact, San Tin Highway and Castle Peak Road are located in between the application site and the proposed NTM Station. At present, although there are footpaths (passing under the San Tin Highway) connecting the NTM area to the Chuk Yuen Tsuen area (i.e., the village adjacent to the application site), vehicles can only reach the NTM area from the site by first travelling at least several hundred meters southward to the Fairview Park roundabout, or even a longer distance to the junction between Castle Peak Road and San Tam Road, and then accessing the former area through San Tam Road.

¹<https://www.policyaddress.gov.hk/2021/eng/pdf/publications/Northern/Northern-Metropolis-Development-Strategy-Report.pdf>

3. While the site is not within the aforementioned planned development areas nor adjacent to any proposed MTR Station, we would also like the Board to note that the application site is at present largely within Wetland Buffer Area (WBA), which is primarily delineated to buffer the sensitive and internationally important Deep Bay wetlands², and, indeed, the site is now just located less than 170 m from the Wetland Conservation Area² (WCA; see **Figure 1**). Furthermore, the site is also just located less than 930 m from the 'Mai Po Inner Deep Bay Ramsar Site' (see **Figure 2**), which is recognised as a wetland of international importance and was designated under the intergovernmental treaty – Ramsar Convention, in 1995. The NTM and San Tin Stations are yet to be built. But, important wetland areas (e.g., WCA, NTM Drainage Channel (NTMDC, see later explanation)) are already located close to the application site. Indeed, we would also like the Board to ask relevant authorities and/ or the applicant as to whether there will be a new carriageway to facilitate the movement of vehicles (e.g., shortening the travelling distance) between the proposed development (with 3090 flats and 100 beds in RCHE) and the proposed NTM Station, in the future.

4. Now, the site and its surroundings mainly comprise grassland/ shrubland and low-rise structures/ buildings (e.g., 3-storey village houses in Chuk Yuen Tsuen, low-rise houses in Fairview Park and associated low-rise structures). There are no existing high-rise buildings/ structures in the close vicinity of the site and its immediate surroundings. On-site photos showing the site and its surroundings are shown in **Figure 3**. Although the proposed building height can reach 79.9 mPD (23 storeys) under the current application, the Supporting Planning Statement (Section 7.13) states the following:

'... ..The scale of the development... ..is considered not incompatible to the surrounding environment. The design of the Indicative Development Scheme can enhance the visual interest of the currently monotonous and derelict assessment area... ..heavy-standard compensatory planting will help to integrate the development with the surrounding landscape. Not least, the proposal is compatible with the existing visual composition whilst introducing a desirable visual contrast for the area... ..

... ..While the overall visual impact of the project may be considered as slightly adverse in comparison to the existing site condition... ..the proposed development is considered to bring positive contribution to the evolving visual character of the area which is close to the future development node of the NOL at Ngau Tam Mei with the employment of

² https://www.info.gov.hk/tpb/en/forms/Guidelines/pg12c_e.pdf

green infrastructure and well-landscaping.

5. While we cannot quite understand how the application site can be considered to be ‘close to’ the future ‘development node of the NOL at NTM’, we would like to again point out that the site is now located less than 170 m from the WCA and next to wetland habitat of moderate ecological importance (i.e., NTMDC; see later explanation). Also, we would like the Board to look at the photomontage extracted from the gist and reproduced in **Figure 4** of this letter, as well as the on-site conditions as shown in **Figure 3**. We urge the Board to consider whether the proposed development, with 10 high-rise blocks ranging from 16 to 23 storeys and several blocks from 3 to 5 storeys, can be considered to be compatible (or ‘not incompatible’) with the existing surroundings, and whether the addition of trees or plantings could help to integrate the proposed high-rise blocks (i.e., max. 23 storeys) with the surroundings.

6. The NTMDC next to the application site is considered to be a habitat of moderate ecological importance by the Ecological Impact Assessment (EcoIA) submitted for the application; 28 bird species of conservation concern/ wetland dependent bird species have been recorded in this channel, including the globally Endangered Black-faced Spoonbill³ (BFS; maximum count: 30 individuals). Indeed, according to the EcoIA (flight-line survey), BFS has even been recorded flying over the application site. The EcoIA (Sections 7.2.7 and 7.2.8.3) for this application, however, mentions the following:

‘... ..Higher abundance of wetland-dependent species including Black-faced Spoonbill were recorded in NTMDC during low tide (Table 5), particularly in dry season..... It should be noted that the concrete lined bed (average width of 30 m) of NTMDC is located about 4 to 6 meters lower than Kam Pok Road. The grasscrete embankment of NTMDC, as well as the existing roadside tree planting, have already provided a certain level of screening, which limits disturbance to waterbirds utilizing NTMDC. The current vehicle use and recreational activities (including vehicle use of Kam Pok Road commuting between Castel Peak Road and open storage areas close to Fairview Park, and resident use of Yau Pok Road and cycle track) have not imposed significant impact to waterbirds utilizing NTMDC. Some waterbirds, including Black-faced Spoonbills forage within sight of the Castel Park (Peak) Road, which is subject to very high levels of usage.....’

³ <https://www.iucnredlist.org/fr/species/22697568/119347801>

... ..Traffic peak hours rarely coincide with peak bird activity (i.e. early morning or low tide). In addition, the proposed residential development will be further separated from Kam Pok Road and NTMDC by the proposed landscape area distancing traffic within the development from the NTMDC; therefore, the increased traffic flow caused by the proposed residential development is not predicted to impose significant additional impact on waterbirds utilizing NTMDC. Therefore, the disturbance impacts during operational phase would be of low magnitude... ..

.....Compared to the construction phase, noise impacts during the operation of the development would be considerably reduced. At this time the main source of disturbance would be from the increased glare as a result of lighting during the night time and the increased human population in the area, potentially leading to increased disturbance to nearby habitats. However, as discussed in Section 7.2.7 above, waterbirds in NTMDC and other wetlands in AA are already habituated to relatively high levels of human activity compared to other wetlands in Hong Kong; therefore, the increased in human activity within the Application Site and the adjoining public roads (i.e. Kam Pak Road and Yau Pok Road) is quantitative only (resulting from an increase in frequency of human activity) rather than a qualitative change (as would arise if human activity were to be newly introduced to a previously undisturbed area). In addition, since the Application Site is situated closed to existing residential developments and extensive existing artificial lighting (such as road lights for the Kam Pok Road and nearby villages), nocturnal species would have already adapted to the environment or otherwise avoided the area. No significant additional glare impact is predicted. In the absence of mitigation measures, the disturbance impact on bird species of conservation importance during the operational phase is predicted to be of Low Significance... ..’

7. Regarding the above, in addition to glare, we would like the Board to consider whether the population/ activities in the proposed development would produce noise (e.g., through driving, public activities). We would also like the Board to look at **Figure 4** of this letter again (the photomontage for this application); then we urge the Board, after liaising with relevant authorities/ parties, to consider whether existing and/ or future (e.g., proposed) tree planting/ landscaping features can effectively screen off the disturbance (such as noise and light) from the proposed development (max. 23 storeys). While the vegetation may be able to screen off ‘glare’ along the road to a certain extent, can the trees/ plantings screen off the noise generated from the road and activities within the proposed development? Can the

additional 'glare' caused by the proposed high-rise blocks (like those shown in **Figure 4**) be effectively screened off by the plantings/ trees? Most importantly, we urge the Board to seriously consider, after consulting relevant authorities and looking at **Figure 4** (and **Figure 3** as well), as to whether the Kam Pok Road and Yau Pok Road sections as well as the pedestrian roads and cycle track next to the application site are, at present, heavily used by vehicles/ pedestrians/ cyclists; in other words, are these sections/ areas heavily disturbed by 'high levels of human activities' now? Alternatively, would the future residents/ visitors of the proposed development greatly change the disturbance level (not only frequency but also intensity) and significantly increase the potential disturbance impact (e.g., through 'resident use') on the NTMDC as compared to the current situation? We would like to remind the Board that the proposed development would introduce 3090 additional residential units (plus 100 beds in RCHE) into this locality; according to the sewage impact assessment for this application, the estimated residential population of the proposed development would be 8343.

8. As shown above, the EcoIA mentions that BFS could be observed foraging within sight of the Castle Peak Road, which is subject to high level of usage. However, has the EcoIA demonstrated how many BFS were observed foraging 'within sight of Castle Peak Road', and how close were these birds to Castle Peak Road? We urge the Board to liaise with relevant authorities as to whether a map has been used to illustrate the distribution of wetland birds of conservation importance within the assessment area in the EcoIA, and also urge relevant parties to explain how close the above observation was to Castle Peak Road, and the general distribution of waterbirds in NTMDC. If Castle Peak Road is subject to high level of usage as claimed, we urge the Board to seriously consider whether Kam Pok Road and Yau Pok Road sections next to the application site would be at the same level of usage, and also whether Castle Peak Road is frequently used by pedestrians at present (which is one of the main sources of disturbance) (see **Figure 3**).

9. The EcoIA also claims that, as shown above, '*waterbirds in NTMDC and other wetlands in AA (Assessment Area) are already habituated to relatively high levels of human activity compared to other wetlands in Hong Kong.*' We would like the Board to liaise with relevant parties/ authorities as to whether there has been any scientific study to justify this statement.

10. Indeed, there are numerous scientific studies investigating the effect of human disturbance on birds, and some have pointed out that the mere presence of human (e.g., approaching human, a walking human) could already be considered as a source of

disturbance (e.g., 4, 5) (see also a photo in **Figure 3**). While one of the key concerns would be how long the disturbance distance is, the approved Environmental Impact Assessment (EIA) for the Sheung Shui to Lok Ma Chau Spur Line has provided that the exclusion distance (where a species is precluded from using the area because of the impacts from the station and railway) of BFS is 100 m, and the maximum distance of reduced density ranges from 150 to 200 m⁶; also, this approved EIA has considered the overall disturbance sensitivity of BFS to be ‘high’⁶. In addition to this EIA, there is also a scientific study (published in 2015) examining the response of wintering BFS to disturbance⁷; this study states that:

‘... The spoonbills showed the strongest behavioural response to the non-threatening anthropogenic stimuli, and human approach followed by motor vehicles caused longer responses per event than did any other type of disturbing stimulus. Flight distance caused by human approach varied depending on conditions; inactive spoonbills in mixed-species associations started to flee at the greatest distance (197.4 m, with a 50% probability), whereas the spoonbills in a single conspecific flock were the most tolerant of human approaches, regardless of their activeness (61.0–61.7 m, with a 50% probability).... Human approach had been identified as the most important disturbing stimulus that should be controlled as a priority.... The tolerance of sympatric species as well as the behavioural response of target species should be considered when a buffer area for wildlife management, particularly against human disturbance, is planned....’

11. Regarding the effect on bird flight line, the EcoIA considers that the impact is of low significance. While birds in the locality can of course shift westward or fly higher to avoid the proposed high-rise blocks, we would like the Board to seriously consider the potential cumulative impacts of approving this application. We urge the Board to consider whether the approval of this application for high-rise development within WBA (largely) would set a precedent for other similar applications in the Deep Bay Area.

⁴https://www.researchgate.net/publication/261180661_The_impact_of_human_disturbance_on_birds_A_selective_review

⁵ <https://www.frontiersin.org/articles/10.3389/fevo.2018.00175/full>

⁶ https://www.epd.gov.hk/eia/register/report/eiareport/eia_0712001/Volume1/kcrc-ss-lmc-eia-f-6980-4-d.htm

⁷https://www.researchgate.net/publication/273123874_Behavioural_responses_of_wintering_black-faced_spoonbills_Platalea_minor_to_disturbance

12. As aforementioned, the site is largely within WBA, and there is a Town Planning Board guideline for development in this zone and the wider Deep Bay Area (i.e., TPB PG-NO. 12c²). Regarding developments within the Deep Bay Area and WBA, this guideline mentions the following:

‘...A “precautionary approach” has been adopted by the Board in view of the known intrinsic value of fish ponds in ecological terms and the complex response of birds to future landuse changes and carrying capacity which has not been fully understood. The intention is to protect and conserve the existing ecological functions of fish ponds in order to maintain the ecological integrity of the Deep Bay wetland ecosystem as a whole. This “precautionary approach” is formulated with the support of scientific surveys and analysis as provided in the Study....

.....Development/redevelopment which may have negative impacts on the ecological value of the WCA would not be supported by the Board, unless the ecological impact assessment can demonstrate that the negative impacts could be mitigated through positive measures....

.....For those disturbed areas directly abutting the WCA, the development should provide a wetland and visual buffer to separate the development from the WCA to minimise its impact on the wetland....

.....Residential development projects which include replacement of existing open storage and port back-up uses and/ or proposal of detailed wetland restoration may be given special consideration subject to satisfactory ecological and other impact assessments. These developments should be compatible with the surrounding land uses and the rural setting of the area....

.....In addition to ecological consideration, other planning considerations including development intensity, compatibility with the surrounding land uses, environmental impacts (e.g., noise, air and water qualities), traffic and drainage impacts, provision of infrastructure and visual impact are also important in the assessment of an application within the Deep Bay Area.’

13. Simply speaking, we do not consider that the proposed high-rise blocks are compatible with the current setting of the locality which at present comprise mainly low-rise houses/

ll the owners of Fairview Park, the proposed development is not allowed to use that private road and all the new traffic will be diverted to the junction of Castle Peak Road.

(5) The critical junction at Fairview Park round-about will be overloaded and the additional traffic generated by the 597 vehicles in the proposed site will further deteriorate the adverse traffic at Pok Oi Round-about.

(6) Kam Pok Road is a narrow road with junctions at Castle Peak Road and Fairview Park Boulevard, the traffic generated at peak hours will seriously affect the traffic at both junctions and it is expected that there will be many complaints from the residents nearby in the future, Transport Department will be blamed if the new traffic generated by the new development deteriorates the current traffic situation in that area and in Pok Oi Round-about in the future.

(7) The application site falls within Deep Bay Buffer Zone 2 and the proposed development can not meet the "Town Planning Board Guidelines for Application for Developments within Deep Bay Buffer Zones" in that:

(i) There is insufficient information in the submission to demonstrate that the proposed development will have insignificant impacts on the environment, ecology, sewerage and traffic in the area including the Mai Po Nature Reserve and Inner Deep Bay; the development will affect the existing wetland and fish ponds in the vicinity; and there is insufficient information in the submission to demonstrate that the proposed development will not have adverse impacts on the ecology in the area including the Mai Po Nature Reserve and Inner Deep Bay area.

(8) The approval of the application will set an undesirable precedent for similar applications in this ecologically sensitive area. The site on the other side of Yau Pok Road (TPB approval on residential development in "REC" zone with a plot ratio of 0.2 and 3 storeys) and the R(D) site at its south-west direction (Kam Pok Road and Ha San Wai Road- P.R. 0.2 and 3 storeys) will apply for increase of Plot Ratio and building height if this application is approved. Any additional development apart from the original planning intention will further deteriorate the traffic, sewage, visual, land use compatibility of the area. It will set a very undesirable precedent case for similar application in this area in the future.

(9) TPB has approved 5 planning applications on the application site, with planning intention of P.R.0.2 and 3 storeys. From the deliberations of the RNTPC, the planning parameters and intensification of the site under the current OZP were considered appropriate and suitable. The previous approvals conformed with the OZP restrictions and were in line with the planning intention of the "R(D)" zone (which is primarily for improvement and upgrading of existing temporary structures within the rural areas through redevelopment of existing temporary structures into permanent buildings and for low-rise, low-density residential developments subject to planning permission from the Board). Any approval of re-zoning to the requested planning parameter would jeopardize the planning intention of the whole area.

(10) The proposed Ngau Tam Mei Rail Station is on the other side of San Tin Highway, development of high intensity should only be restricted to the other side of San Tin Highway, with is within the catchment of proposed Rail Station in the future.

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

Daniel K.H. CHAM (Chairman, Tin Shui Wai South Area Committee/ Member, Election Committee)

寄件者: [REDACTED]
寄件日期: 2021年10月06日星期三 21:35
收件者: tpbpd@pland.gov.hk
主旨: Representation on Y_YL MP6
附件: Representation on Y_YL_MP6.docx

Dear Sir,

Attached is my representations on Y/YL/MP/6.

Please acknowledge receipt of the documents

Regards

Daniel Cham

structures, grassland/ shrubland (some are evolved from abandoned farmland), ponds, drainage facilities, plantations, roads/ cycle tracks/ paths not heavily used as well as some waste ground and open storage to the further south – there are no high-rise buildings at all. We are also highly concerned about the obvious visual impacts that would be caused by the proposed high-rise development. In addition, we do not consider the additional human disturbance impact that would potentially be caused by the residents/ users from the proposed development which contains 3090 residential units (estimated residential population: 8343) would be of low significance, in view of the fact that high abundance of large waterbirds (including the globally Endangered BFS) utilise the NTMDC and many of them have been considered to be disturbance sensitive. Indeed, 30 individuals (maximum count) of the globally Endangered BFS, which is sensitive to disturbance/ human disturbance^{6,7}, have been recorded in the NTMDC; this simply means that this channel could support 7-8% of the Deep Bay population (using the Deep Bay abundances recorded in 2015, 2016, 2019 and 2020 as the base^{8, 9, 10, 11}), and this clearly highlights its conservation importance. Any additional disturbance to this channel should be carefully assessed, and mitigated if possible, in order not to further reduce the range of habitats suitable for this endangered species. However, we do not agree to the assessment in the EcolA relating to this aspect. In view of all the above, we object to this application and we urge the Board to reject it unequivocally. We also urge the Board to consider whether the ‘precautionary approach’ should also be applied when considering the potential impacts of the proposed development on NTMDC.

14. The gist of this application also mentions the following: ‘... ..*These pieces of residual area have been left idle for decades and are considered a waste of scarce land resource... ..*’ We would like to remind the Board that, according to the gist, there are five approved (with conditions) planning applications for low-rise residential developments (two are amendments to approved schemes) covering the current application site; the first one (A/YL-MP/110) was approved 18 years ago (in 2003) and the latest one (A/YL-MP/205) was approved 8 years ago (in 2013).

15. Thank you for your attention.

⁸ https://eaaflyway.net/wp-content/uploads/2018/01/bfs_census_2015.pdf

⁹ https://eaaflyway.net/wp-content/uploads/2018/01/bfs_census_2016.pdf

¹⁰ https://www.eaaflyway.net/wp-content/uploads/2021/01/bfs_census_report_2019.pdf

¹¹ <https://www.hkbws.org.hk/cms/en/hkbws/work/endangered-species/bfs-en/bfscensus2020>



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

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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

Figure 1. Distance between the application site and WCA.

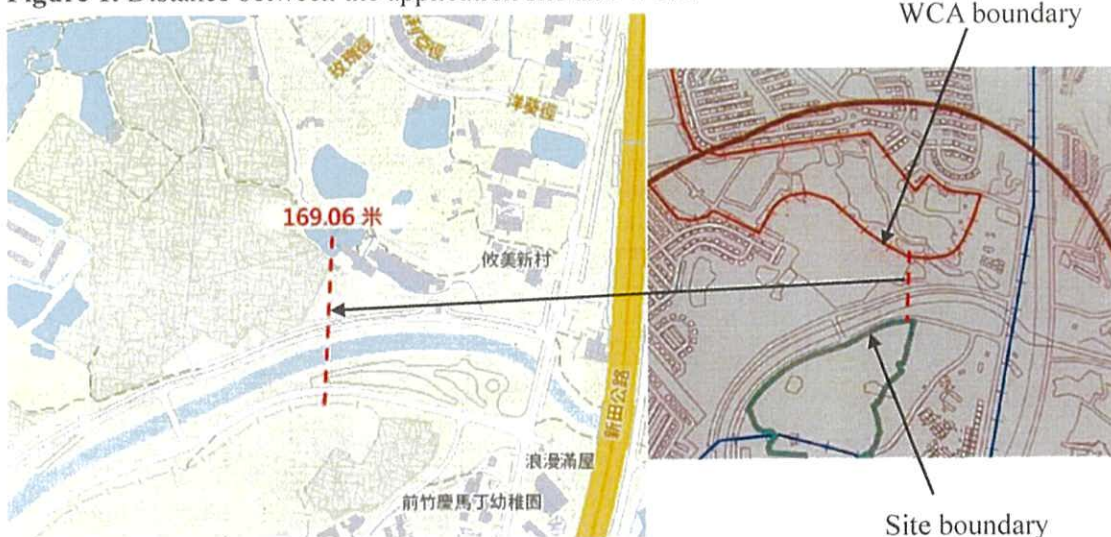


Figure 2. Distance between the application site and Ramsar Site.



Figure 3. On-site photos taken in October 2021.

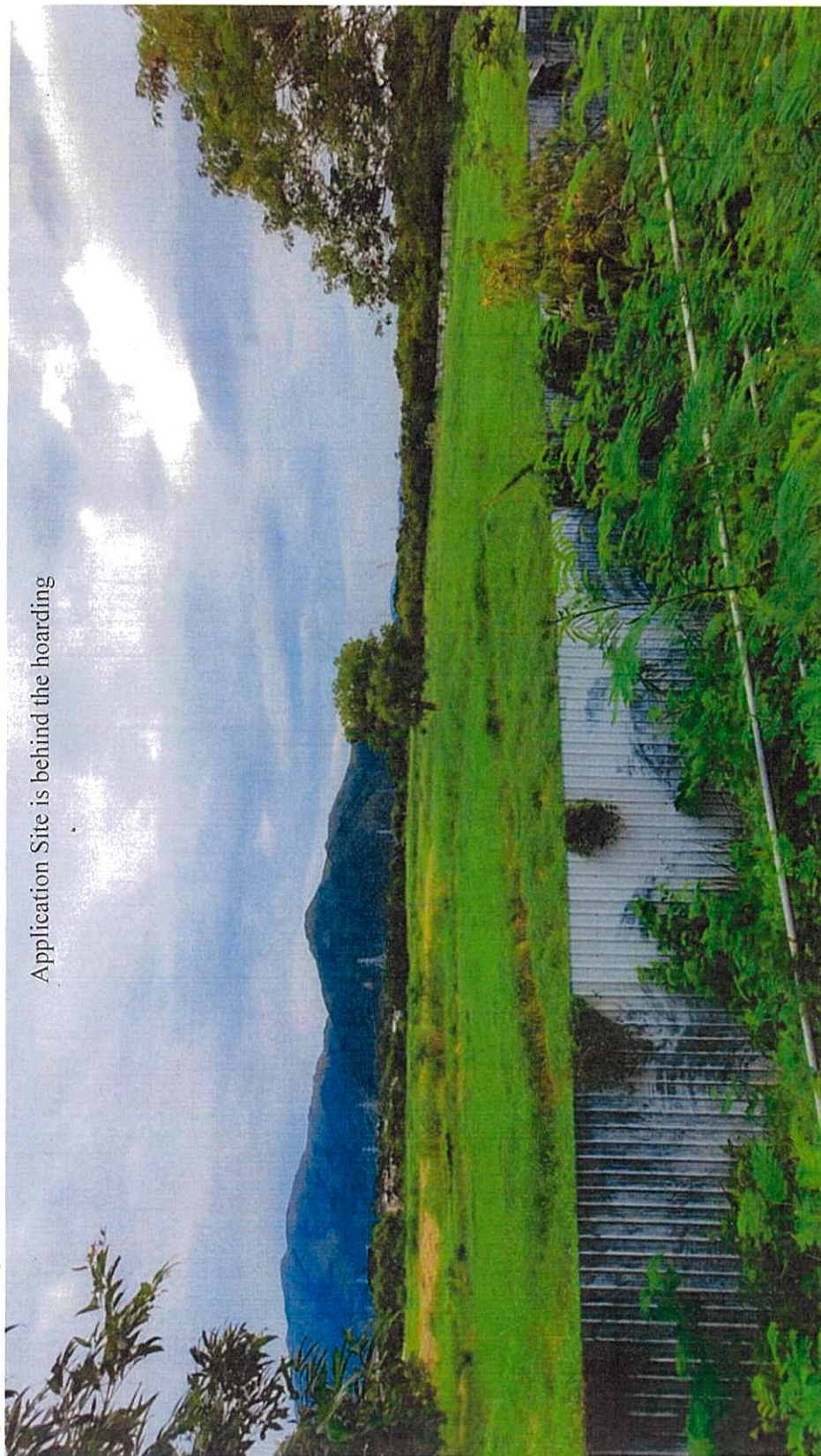


Figure 3. Cont'd.



Figure 3. Cont'd.

Area to the north/northwest of the site and the low-rise buildings in Fairview Park and Palm Springs

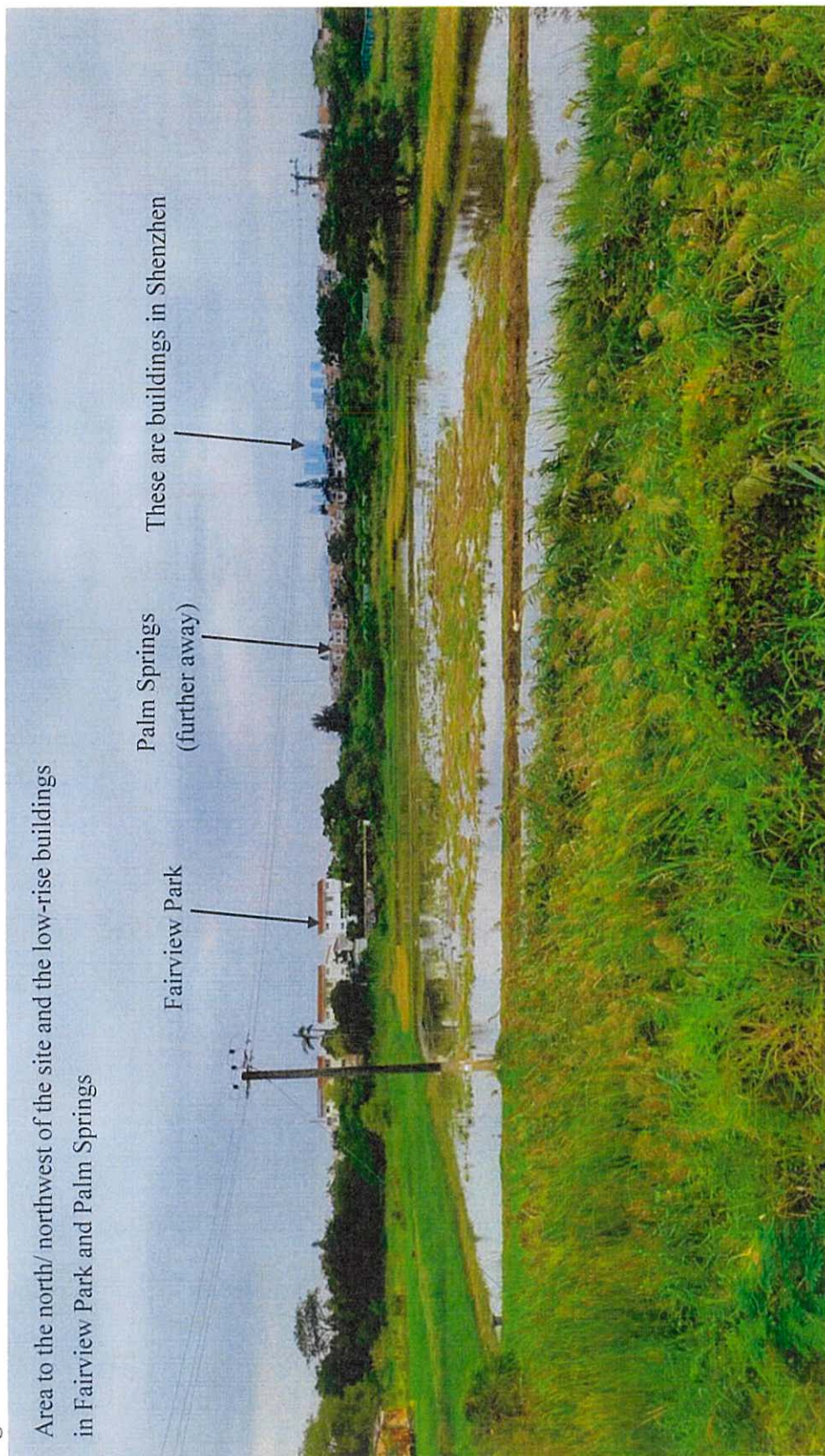


Figure 3. Cont'd.



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

Figure 3. Cont'd.

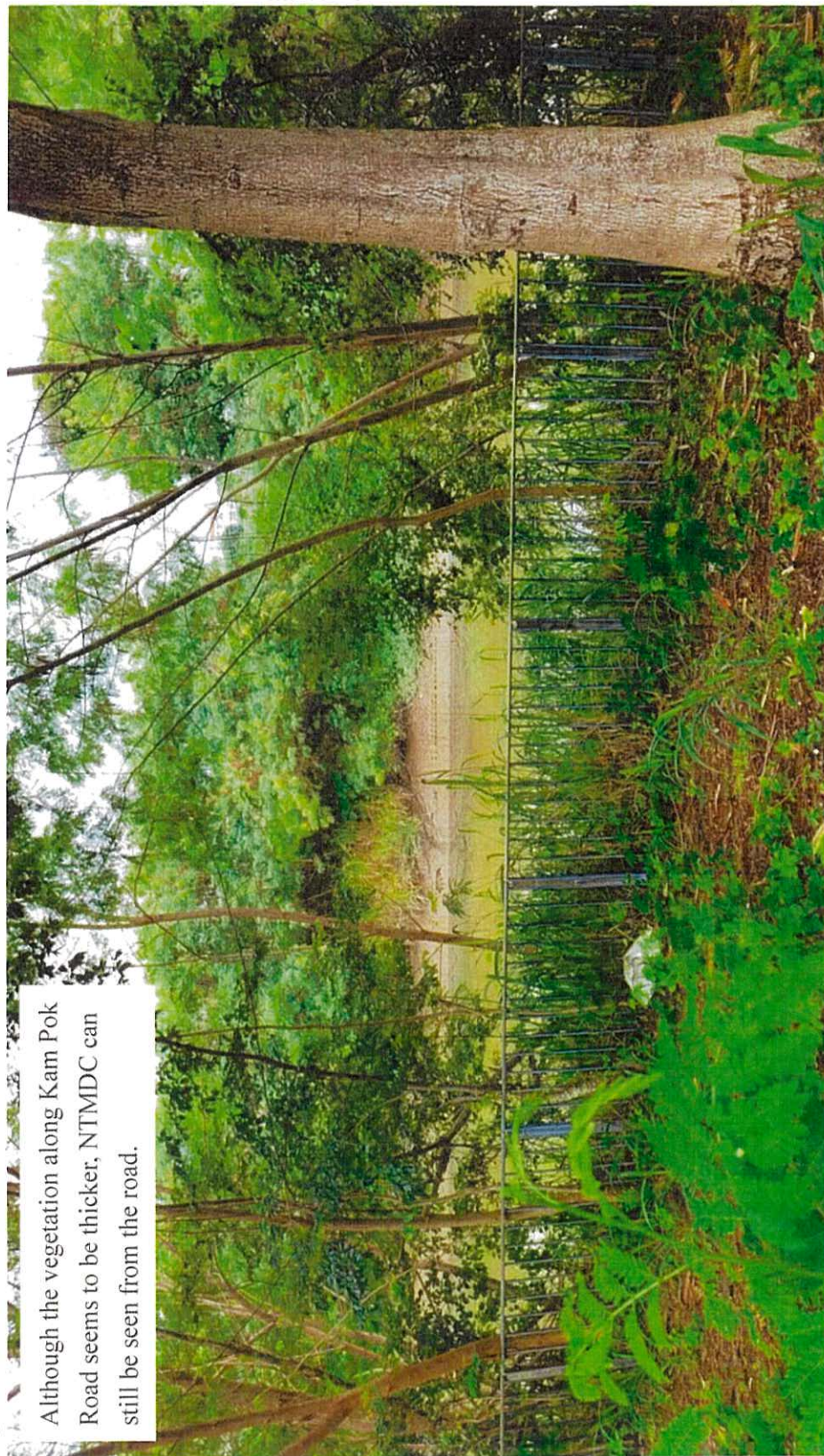


Figure 3. Cont'd.

Kam Pok Road and
pedestrian road next to the
site; are they heavily used?



Figure 3. Cont'd.



Although the vegetation along Kam Pok
 Road seems to be thicker, NTMDC can
 still be seen from the road.

Figure 3. Cont'd.



Figure 4. Photomontage extracted from the gist of this application.



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

寄件者: Andrew Chan (Local Biodiversity) <cmchan@wwf.org.hk>
寄件日期: 2021年10月15日星期五 17:38
收件者: tpbpd@pland.gov.hk
主旨: s12a_Y_YL-MP_6_2021 10(Oct)_WWF
附件: s12a_Y_YL-MP_6_2021 10(Oct)_WWF.pdf

Dear Sir/Madam,

Attached please find our submission on the captioned.

Best regards,
Andrew Chan
Senior Conservation Officer, Policy
WWF-Hong Kong 世界自然基金會香港分會

together possible 

Find out more and get involved at wwf.org.hk

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



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15 October 2021

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

By E-mail ONLY

Dear Sir/Madam,

**Re: To rezone the application site from "Residential (Group D)" to "Residential (Group C)1"
and amend the Notes of the zone applicable to the site at Kam Pok Road, Mai Po, Yuen
Long (Y/YL-MP/6)**

WWF would like to lodge our objection on the captioned.

Not in line with TPB Guideline No. 12C

Majority of the captioned rezoning site falls within "Wetland Buffer Area ("WBA")" designated under the Town Planning Board Guideline No. 12C (hereafter "the Guideline"). According to the Guideline, "WBA" is intended to protect the ecological integrity of fish ponds and wetlands in "Wetland Conservation Area" ("WCA") and avoid development that would have negative off-site disturbance impact on the ecological value of fish ponds¹. The Guideline also stated that residential development projects should be compatible with the rural setting of the area². As per information from the gist of the captioned application, majority of the proposed residential buildings at the site will be 16 to 23 storeys. We consider that the proposed high-rise development is not compatible with the surrounding environment which is currently a rural area with low-rise development (Fig. 1). Also, we worry that the proposed high-rises would cause disturbance impacts, such as noise and light pollution, to the fish ponds in the "WCA" which is only less than 200m with the closest distance with the application site (Fig. 1). As such, we consider that the

¹ Section 6.4 of the Town Planning Board Guideline No. 12C

² Section 6.7.3 of the Town Planning Board Guideline No. 12C

together possible™

贊助人：香港特別行政區行政長官
林鄭月娥女士、大紫荊勳章 GBS
主席：白丹尼先生
行政總裁：黃碧霞女士
義務公司秘書：嘉信秘書服務有限公司
義務司庫：匯豐銀行
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The Chief Executive of the HKSAR
Chairman: Mr. Daniel R Bradshaw
CEO: Ms Nicole Wong

Honorary Company Secretary:
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Honorary Treasurer: HSBC
Registered Charity

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

captioned application is not in line with the Town Planning Board Guideline No. 12C and therefore should be rejected.

Setting undesirable precedent

We worry that approving the captioned development would set an undesirable precedent for high-rise development in other areas of "WBA" which would cause cumulative adverse ecological impacts to the fishponds and wetland ecosystem in the nearby "WCA". As such, we consider that the captioned application should be rejected.

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

Yours faithfully,

A handwritten signature in black ink, appearing to be 'A. Chan', written in a cursive style.

Andrew Chan

Senior Conservation Officer, Policy

Figure 1. The proposed rezoning site (area enclosed by red boundary), located in a rural area with low-rise development, is in close proximity to "Wetland Conservation Area" ("WCA", area enclosed by yellow boundary) with the closest distance less than 200m (Image source: Google Earth)



寄件者: Andrew Chan (Local Biodiversity) <cmchan@wwf.org.hk>
寄件日期: 2021年12月17日星期五 15:25
收件者: tpbpd@pland.gov.hk
主旨: s12afi_Y_YL-MP_6_1_2021 12(Dec)_WWF
附件: s12afi_Y_YL-MP_6_1_2021 12(Dec)_WWF.pdf; Annex1_s12a_Y_YL-MP_6_2021 10(Oct)_WWF.pdf

Dear Sir/Madam,

Attached please find our submission and Annex 1 for the captioned.

Best regards,
Andrew Chan
Senior Conservation Officer, Policy
WWF-Hong Kong 世界自然基金會香港分會

together possible 

Find out more and get involved at wwf.org.hk

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40 YEARS
OF ACTION FOR NATURE

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17 December 2021

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

By E-mail ONLY

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and amend the Notes of the zone applicable to the site at Kam Pok Road, Mai Po, Yuen
Long (Y/YL-MP/6)

Regarding the supplementary information submitted by the applicant dated 12 November 2021 for the captioned, WWF considers that our letter submitted to the Town Planning Board dated 15 October 2021 is still valid (please refer to Annex 1). Therefore, we would maintain our objection to the captioned application.

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

Yours faithfully,

Andrew Chan
Senior Conservation Officer, Policy

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贊助人：香港特別行政區行政長官
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15 October 2021

**Chairperson and members
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333 Java Road, North Point, Hong Kong
(E-mail: tpbpd@pland.gov.hk)

By E-mail ONLY

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² Section 6.7.3 of the Town Planning Board Guideline No. 12C

together possible™

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寄件者: [REDACTED]
寄件日期: 2021年12月17日星期五 17:30
收件者: tpbpd@pland.gov.hk
主旨: 反對土地更改用途申請 (編號Y/YL-MP-6)
附件: 反對土地更改用途申請 (編號Y_YL-MP-6) .docx; 未命名的附件 00091.htm

城市規劃委員會主席
甯漢豪女士, J.P., 發展局常任秘書長
城市規劃委員會 秘書處
香港北角渣華道333號北角政府合署15樓

主席:

就更改土地用途申請 (編號: Y/YL-MP-6) 提出意見

本辦事處連日來收到居民就一宗更改土地用途的申請, 反映意見, 他們表達了對該申請的看法和憂慮。本人綜合了各居民的意見後, 現向 貴會就此申請, 表示反對。

1. 首先, 該申請的所在地位於錦綉花園大道相鄰的錦墾路, 該土地位於兩個大型低密度屋苑 - 錦綉花園及加州花園之間。申請一方提到將有意興建14座大廈, 我們認為這樣的設計, 將會與這裡原本的生活環境和景觀不一致, 讓居民的生活型態出現重大改變。居民的生活環境、出行方式將可能有極大影響, 委員會審批申請前, 請盡量考慮。
2. 第二, 該申請的土地所在的位置, 正處於米埔濕地緩衝帶, 處於該緩衝帶上的土地地積比率, 都應處於低水平。除非政府有任何大型土地政策上的改變, 否則 貴會審批時, 應當維持該政策原則, 以符合 貴會的公正性。米埔自然保護區乃《拉姆薩爾公約》規定下的國際重要濕地, 它成為了候鳥遷徙的重要中途站, 有很高的生態保育、市民教育及旅遊發展等重大價值。濕地緩衝帶的確立, 是為了保護米埔濕地的形態, 免於受外間過多的侵擾、侵蝕。所以緩衝帶上的住宅建設, 盡量保持低密度、寧靜、較少人口等的生態。
3. 第三, 該申請的土地位處的錦墾路, 在兩個大型低密度屋苑 - 錦綉花園及加州花園之間, 這兩個屋苑及附近的多個村屋屋苑, 居民生活大多使用私家車, 最近的大型運輸樞紐 - 錦綉迴旋處, 現時使用的車輛, 流量極高; 錦墾路另一處出口為青山公路。青山公路 - 新田段本身只是一條窄窄的雙程道路, 由於鄰近關口, 沿線貨櫃場林立, 加上居民的車輛, 我擔心附近的交通不勝負荷。3000多個新住宅及600多個車位的車輛, 無疑加重負擔。此外, 在交通上, 此處到元朗市中心的必經之地 - 博愛迴旋處已經超負荷運作, 政府對此仍然沒有理想的新方案解決此一問題。到時元朗的交通將雪上加霜。
4. 最後, 我認為政府應對土地用途的更改進行詳盡研究, 因為「北部都會區」計劃的長遠的土地用途, 急待政府規劃及定調。最近一份施政報告提出的「北部都會區」計劃, 人口由現在的60-70萬 (北區30萬; 新田、廈村、天水圍約30萬), 可能增加到200萬。房屋基建, 交通先行, 接著更有商業設施、社區設施如教育、醫療、老人服務、休憩用地等, 需要一籃子全盤考慮。此申請無疑增加「北部都會區」的規劃難度。

本人支持政府為社會提供更多房屋供應, 解決民生居住問題。然而我也希望政府能夠作詳盡及妥善的規劃, 從設計的最初就能把市民的居住問題, 減到最少。

經民聯 錦綉花園社區主任
張弓發
二〇二一年十二月十七日



香港經濟民生聯盟
Business and Professionals
Alliance for Hong Kong

經民聯元朗辦事處張弓發 社區幹事

城市規劃委員會主席
甯漢豪女士, J.P., 發展局常任秘書長
城市規劃委員會 秘書處
香港北角渣華道 333 號北角政府合署 15 樓

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本辦事處連日來收到居民就一宗更改更改土地用途的申請，反映意見，他們表達了對該申請的看法和憂慮。本人綜合了各居民的意見後，現向 貴會就此申請，表示反對。

1. 首先，該申請的所在地位於錦綉花園大道相鄰的錦墾路，該土地位於兩個大型低密度屋苑 - 錦綉花園及加州花園之間。申請一方提到將有意興建 14 座大廈，我們認為這樣的設計，將會與這裡原本的生活環境和景觀不一致，讓居民的生活型態出現重大改變。居民的生活環境、出行方式將可能有極大影響，委員會審批申請前，請盡量考慮。
2. 第二，該申請的土地所在的位置，正處於米埔濕地緩衝帶，處於該緩衝帶上的土地地積比率，都應處於低水平。除非政府有任何大型土地政策上的改變，否則 貴會審批時，應當維持該政策原則，以符合 貴會的公正性。米埔自然保護區乃《拉姆薩爾公約》規定下的國際重要濕地，它成為了候鳥遷徙的重要中途站，有很高的生態保育、市民教育及旅遊發展等重大價值。濕地緩衝帶的確立，是為了保護米埔濕地的形態，免於受外間過多的侵擾、侵蝕。所以緩衝帶上的住宅建設，盡量保持低密度、寧靜、較少人口等的生態。
3. 第三，該申請的土地位處的錦墾路，在兩個大型低密度屋苑 - 錦綉花園及加州花園之間，這兩個屋苑及附近的多個村屋屋苑，居民生活大多使用私家車，最近的大型運輸樞紐 - 錦綉迴旋處，現時使用的車輛，流量極高；錦墾路另一處出口為青山公路。青山公路 - 新田段本身只是一條窄窄的雙程道路，由於鄰近關口，沿線貨櫃場林立，加上居民的車輛，我擔心附近的交通不勝負荷。3000 多個新住宅及 600 多個車位的車輛，無疑加重負擔。此外，在交通上，此處到元朗市中心的必經之地 - 博愛迴旋處已經超負荷運作，政府對此仍然沒有理想的新方案解決此一問題。到時元朗的交通將雪上加霜。
4. 最後，我認為政府應對土地用途的更改進行詳盡研究，因為「北部都會區」計劃的長遠的土地用途，急待政府規劃及定調。最近一份施政報告提出的「北部都會區」計劃，人口由現在的 60-70 萬（北區 30 萬；新田、廈村、天水圍約 30 萬），可能增加到 200 萬。房屋基建，交通先行，接



香港經濟民生聯盟
Business and Professionals
Alliance for Hong Kong

經民聯元朗辦事處 張弓發 社區幹事

著更有商業設施、社區設施如教育、醫療、老人服務、休憩用地等，需要一籃子全盤考慮。此申請無疑增加「北部都會區」的規劃難度。

本人支持政府為社會提供更多房屋供應，解決民生居住問題。然而我也希望政府能夠作詳盡及妥善的規劃，從設計的最初就能把市民的居住問題，減到最少。

經民聯 錦綉花園社區主任
張弓發
二〇二一年十二月十七日

tpbpd@pland.gov.hk

寄件者: [REDACTED]
寄件日期: 2022年01月31日星期一 11:46
收件者: tpbpd@pland.gov.hk
副本: roy@cahk.org.hk
主旨: Comments on the Section 12A Application No. Y/YL-MP/6
附件: TPB20220131(MP6).pdf

Dear Sir/Madam,

Attached please find our submission on the captioned.

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

T: 2728 6781
D: 2272 0307
F: 2728 5538

Registered Name 註冊名稱: The Conservancy Association 長春社
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

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31st January 2022

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

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

Dear Sir/Madam,

Comments on the Section 12A Application No. Y/YL-MP/6

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

1. Not in line with the planning intention

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

By introducing a population of 8,343 including 3,090 flats and 100 beds in RCHE, such large development scale would potentially induce adverse off-site disturbance impacts on adjacent wetland in Wetland Conservation Area (WCA), affect ecological function and integrity of Deep Bay wetland ecosystems. We opine that this is definitely not in line with the TPB Guideline No. 12C and the planning intention of WBA.

2. Incompatible with the surrounding environment

Regarding 9.3.1 section of the Explanatory Statement of Approved Mai Po and Fairview Park Outline Zoning Plan (S/YL-MP/6) mentions that *"is primarily to*



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improve and upgrade the existing temporary structures within the rural area to permanent buildings. Replacement housing for temporary structures shall not result in a total redevelopment in excess of a maximum building area of 37.2m² and a maximum building height of 2 storeys (6m)." However, the proposed application, comprising 14 residential blocks with 3 to 23 storeys and 6 non-residential blocks with 1-3 storeys, would be a large amendment to the original planning requirement. It is highly incompatible with the surrounding rural setting with low development density which is usually no more than 3 storeys high.

3. Cumulative impacts

Over the past decade, there were already cumulative losses of wetlands in the Deep Bay wetland ecosystem. For instance, Fairview Park and Palm Spring as well as Futian District of Shenzhen were all built on wetland. Many large-scale development applications within WBA have been approved or submitted for approval. In future, the adjacent San Tin/Lok Ma Chau Development Node, Northern Link, San Tin Technopole under Northern Metropolis Development Strategy would further increase development pressure within the region. In such case, the proposed development would merely constitute greater pressure in the already rather fragile Deep Bay ecosystem.

Yours faithfully,

Chow Oi Chuen

Campaign Officer

The Conservancy Association

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HKBWS's comments on the planning application to rezone the application site from "Residential (Group D)" to "Residential (Group C) 1" and amend the Notes of the zone applicable to the site at Kam Pok Road, Mai Po (Y/YL-MP/6)
04/02/2022 18:12

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

Dear Sir/Madam,

The Hong Kong Bird Watching Society's comments on the planning application to rezone the application site from "Residential (Group D)" to "Residential (Group C) 1" and amend the Notes of the zone applicable to the site at Kam Pok Road, Mai Po (Y/YL-MP/6) is attached.

Thank you.

Best Regards,

Wong Suet Mei | 黃雪媚

Conservation Officer | 保育主任

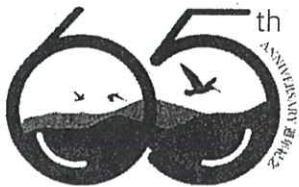
Hong Kong Bird Watching Society | 香港觀鳥會

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20220204_KamPokRoad_RezonetoRD_Y_YL_MP_6[2]_hkbws.pdf



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

By email only

4 February 2022

Dear Sir/Madam,

Comments on the application to rezone the application site from "Residential (Group D)" to "Residential (Group C) 1" and amend the Notes of the zone applicable to the site at Kam Pok Road, Mai Po (Y/YL-MP/6)

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

1 Not in line with the planning intention of the "Other Specified Uses (for "Comprehensive Development to include Wetland Restoration Area" only)" (OU(WRA)) zoning and the Wetland Buffer Area (WBA) under the Town Planning Board Planning Guideline No. 12C

- 1.1 The development site falls within WBA in Deep Bay area. According to the Town Planning Board Guideline No. TPB PG-NO. 12C, *'in considering development proposals in the Deep Bay Area, the Board adopts the Study's recommended principle of "no-net-loss in wetland"'*. Moreover, WBA is *"to protect the ecological integrity of the fish ponds and wetland within the WCA and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds."* Moreover, *"As a substantial amount of the fish ponds within the WBA have already been lost over time through filling and certain areas have been degraded by the presence of open storage use, these degraded areas may be considered as target areas to allow an appropriate level of residential/recreational development so as to provide an incentive to remove the open storage use and/or*

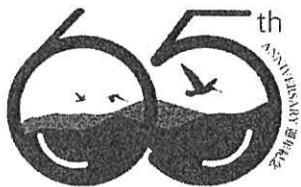
香港觀鳥會 Hong Kong Bird Watching Society

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to restore some of the fish ponds lost.”¹

- 1.2 The application site is also zoned as Residential (Group D) zone, where is intended “primarily for improvement and upgrading of existing temporary structures within the rural areas through redevelopment of existing temporary structures into permanent buildings. It is also intended for low-rise, low-density residential developments subject to planning permission from the Town Planning Board” under the Approved Mai Po and Fairview Park Outline Zoning Plan No. S/YL-MP/6². The maximum building height allowed in this zoning is 2 storeys (6m).
- 1.3 According to the study on the Ecological Value of Fishponds in the Deep Bay Area published by the Planning Department, it is stated that “the most significant factors contributing to higher bird usage were larger area of ponds and increasing distance to human disturbance”. Given the close distance to the WCA and ecological sensitive birds and habitats, we are highly concerned the proposed residential development consists of 14 blocks of 3 – 24 storeys high buildings, would unavoidably bring disturbance to them, including noise, light pollution, increase in bird collision risk and the increased human disturbance from the population from 3,090 flats, leading to degradation of habitat quality of nearby wetlands including Ramsar Site, fishponds and water channel.
- 1.4 As birds often appear to be attracted to artificial light from building at night, and this kind of artificial light emitted from windows is usually implicated as one of the factors of bird collision, we are concerned the applicant would have underestimated the bird collision risk aroused from the proposed development. These towers are highly visible over a large area due to its building height would apparently become light façades during night time. However, the current submitted proposal and assessments including flight line survey, are not adequate to access and avoid the impacts from bird collision.
- 1.5 We consider the residential development is not in line with the above planning intention of WBA as it would bring negative off-site disturbance to the Wetland Conservation Area (WCA), and destroy the open and low-density rural landscape which the general development intensity is of a maximum plot ratio of 0.4 and not

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

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



more than 3-storey high. We urge the Town Planning Board (Board) to reject this rezoning application.

2 Cumulative ecological impacts and undesirable precedent set on Deep Bay area

2.1 Cumulative ecological impacts to the fishponds of Deep Bay area need to be carefully assessed given that a number of other residential developments have already been proposed and approved in close proximity of the application site. We are concerned all the potential residential and commercial developments would all cumulatively cause significant impacts on the Ramsar Site, WCA, birds' flight path, and also the Great Cormorant night roost of significant size.

2.2 Moreover, the approval of this application will set an undesirable precedent to the future similar applications within the OU(WRA) zone, WCA and WBA, and thus nullifying the statutory planning control mechanism. We urge the Board to reject this application in order to protect OU(WRA) zone from any development threats.

3 Justifications for the decision and comments made by Government departments and the Board

According to the Hong Kong Planning Standards and Guidelines (HKPSG), Chapter 10, Section 2.1, the Board has the responsibility to, (ii) *"restrict uses within conservation zones to those which sustain particular landscapes, ecological and geological attributes and heritage features"* and (iii), *"control adjoining uses to minimise adverse impacts on conservation zones and optimise their conservation value"*. We note that all other Government bureaux/departments are also bound to the HKPSG, and the Agriculture, Fisheries and Conservation Department (AFCD) and the Planning Department (PlanD) have the responsibility to advise the Board on the ecological³ and planning aspects in particular. Given AFCD's mission to conserve natural environment and safeguard the ecological integrity⁴, and the proposed development is not in line with the planning intention of the statutory zoning, HKBWS would also expect AFCD and PlanD to object to this application. Should AFCD, PlanD or the Board feels otherwise, we urge that the appropriate justifications are provided.

³ AFCD Role of Department. Available at: http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html

⁴ AFCD Vision and Mission. Available at:
http://www.afcd.gov.hk/english/aboutus/vision_mission/abt_vision_mission.html



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

Yours faithfully,
Wong Suet Mei
Conservation Officer
The Hong Kong Bird Watching Society

cc.

The Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
WWF – Hong Kong
TrailWatch

香港觀鳥會 Hong Kong Bird Watching Society

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17th June 2022

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

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

Dear Sir/Madam,

Comments on the Section 12A Application No. Y/YL-MP/6

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

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

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

A Section 16 application A/YL-MP/205 has once been submitted to Town Planning Board at the application site currently zoned “Residential (Group D)” to facilitate a residential development project. We note that maximum building height, maximum numbers of storeys, numbers of units of proposed development (Table 1) are higher than the previous one.

Table 1 Development parameter of A/YL-MP/205 and Y/YL-MP/6

	A/YL-MP/205	Y/YL-MP/6
Maximum building height	10.8m	74.5m



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Maximum no. of storeys	3	23
No. of units	106	3,090 Flats 100 Beds in RCHE

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

2. Adverse ecological impacts

Despite provision of Ecological Impact Assessment (EcoIA), we are still doubtful that at least some of the potential ecological impacts remains unsolved:

- i. Disturbance on bird species at Ngau Tam Mei Drainage Channel (NTMDC): From the EcoIA, high diversity of ardeids such as Black-faced Spoonbill, Eurasian Spoonbill, Chinese Pond Heron, Little Egret, Grey Heron, Great Egret, etc., can be spotted at NTMDC in the east of the application site. Off-site negative impact, such as construction noise during construction phase and human activities during operation phase, would adversely affect foraging behavior of these birds. We still worry how these impacts can be avoided or mitigated.
- ii. Disruption on flight lines of waterbirds: The EcoIA revealed that apart from the major flight line observed along NTMDC, some other flight lines were recorded passing over the application site. Viewing the current maximum building height (i.e. 74.5m) and numbers of storeys (i.e. 23 storeys), we worry that potential disruption on flight lines on waterbirds would be anticipated.
- iii. Light disturbance: Additional light source from residential towers and open space would pose disturbance on birds and other wildlife. However, we cannot see how the applicant attempts to evaluate potential light impact properly in both day time and night time during the construction and operation phase. We also worry that the proposed landscape pond, acting as a disturbance buffer, would generate additional glare and this might bring light source even more

The Conservancy Association

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close to NTMDC.

- iv. Bird collision: Even though Section 7.2.5 of the EcoIA mentions that the current residential development would not have extensive reflective surfaces, the height of residential towers, as mentioned above, would be substantial and they tends to have more areas of glass. Therefore, risk on bird collision would still be an issue. Meanwhile, nocturnal avian collision with buildings is not clearly identified and evaluated in the EcoIA.

3. Potential cumulative impacts

We note that some development projects were not included in assessing cumulative impacts, such as Y/YL-MP/7, Y/YL-MP/8, A/YL-MP/287, Northern Link, and so on. We worry that exclusion of some development projects would downplay interactions between the environmental impacts of the project and the environmental impacts of other developments.

Over the past decade, there were already cumulative loss of wetlands in Deep Bay wetland ecosystem. For instance, Fairview Park and Palm Spring as well as Futian District of Shenzhen were all built on wetland. Many large-scale development applications within WBA have been approved or submitted for approval. In future, the adjacent San Tin/Lok Ma Chau Development Node, Northern Link, San Tin Technopole under Northern Metropolis Development would further increase development pressure within the region. In such case, the proposed development would merely constitute greater pressure in the already rather fragile Deep Bay ecosystem, and set undesirable precedent for similar applications for large-scale development in the area.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

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2022年6月17日 反對Y/YL-MP/6、Y/YL-MP/7 及 Y/YL-MP/8的規劃申請
17/06/2022 14:51

From: [REDACTED]
To: tpbpd@pland.gov.hk
Cc: doyl@had.gov.hk
File Ref:

1 attachment



2022年6月17日 反對發展商於錦綉旁興建高樓.docx

香港 北角 渣華道 333 號
北角政府合署 17 樓
城市規劃委員會主席
甯漢豪女士, J.P., 發展局常任秘書長 (規劃及地政)

尊敬的甯主席:

反對Y/YL-MP/6、Y/YL-MP/7 及 Y/YL-MP/8的規劃申請

就近期有申請，要求想在元朗錦綉花園旁邊的3幅土地上，申請要求改變土地用途，興建住宅，我們對此表達反對意見。並希望政府審批申請前，必先考慮該地方原有的居民的民生需求，決不能為解決住屋問題，犧牲原有居民的生活條件。

在交通方面，申請的土地在錦綉路，可能出現的新屋苑，其居民的私家車，將需要使用錦綉大道及錦綉迴旋處，才可以駛上高速公路。申請中的超過1000個車位及這些車位的私家車，勢必大大加重錦綉大道的壓力，現時早上上班，出迴旋處已經出現車龍，將來將會更加困難，居民生活大受影響。

在錦綉位於青山公路以西，在對面的北環線沿線，已經大量的住屋建設計劃，最臨近錦綉花園的牛潭尾站，位於青山公路以東，在沒有新隧道或新天橋的情況下，本來本村居民要到新的牛潭尾站，便需要使用錦綉迴旋處，此迴旋處已經有相當大的壓力，新的發展令錦綉迴旋處壓力加重，不良的影響不敢想像。

另外，錦綉花園一帶位處米埔濕地緩衝帶上，這一帶多年來一向都是以低矮平房為主，當局實在不應打破這先例，破壞鄉郊生活的型態。而米埔自然保護區內，有大量的候鳥棲息，在環評報告裡也看不到該項目對濕地生態可能出現的影響。

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如有查詢，請致電 與辦事處職員聯絡。佇候 佳音。

順祝 政祺

經民聯社區幹事
張弓發 謹啟
2022年6月17日

副本送：元朗民政事務處



香港經濟民生聯盟
Business and Professionals
Alliance for Hong Kong

經民聯元朗辦事處 張弓發 社區幹事

香港 北角 渣華道 333 號
北角政府合署 17 樓
城市規劃委員會主席

甯漢豪女士, J.P., 發展局常任秘書長 (規劃及地政)

尊敬的甯主席:

反對 Y/YL-MP/6、Y/YL-MP/7 及 Y/YL-MP/8 的規劃申請

就近期有申請，要求想在元朗錦綉花園旁邊的 3 幅土地上，申請要求改變土地用途，興建住宅，我們對此表達反對意見。並希望政府審批申請前，必先考慮該地方原有的居民的民生需求，決不能為解決住屋問題，犧牲原有居民的生活條件。

在交通方面，申請的土地在錦壘路，可能出現的新屋苑，其居民的私家車，將需要使用錦綉大道及錦綉迴旋處，才可以駛上高速公路。申請中的超過 1000 個車位及這些車位的私家車，勢必大大加重錦綉大道的壓力，現時早上上班，出迴旋處已經出現車龍，將來將會更加困難，居民生活大受影響。

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經民聯元朗辦事處 張弓發 社區幹事

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如有查詢，請致電 2443 2389 與辦事處職員聯絡。佇候 佳音。

順祝 政祺

經民聯社區幹事

張弓發 謹啟

2022 年 6 月 17 日



香港經濟民生聯盟
Business and Professionals
Alliance for Hong Kong

403 附頁 1

經民聯元朗辦事處

張弓發 社區幹事

香港 北角 渣華道 333 號

北角政府合署 17 樓

城市規劃委員會主席

甯漢豪女士, J.P., 發展局常任秘書長 (規劃及地政)



尊敬的甯主席:

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張弓發 社區幹事

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順祝 政祺

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張弓發 謹啟

2022 年 6 月 17 日

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HKBWS's comments on the application to rezone the application site from "Residential (Group D)" to "Residential (Group C) 1" and amend the Notes of the zone applicable to the site at Kam Pok Road, Mai Po (Y/YL-MP/6)

17/06/2022 18:18

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

Dear Sir/Madam,

The Hong Kong Bird Watching Society's comments on the application to rezone the application site from "Residential (Group D)" to "Residential (Group C) 1" and amend the Notes of the zone applicable to the site at Kam Pok Road, Mai Po (Y/YL-MP/6) is attached.

Thank you.

Best Regards,

Wong Suet Mei | 黃雪媚
Conservation Officer | 保育主任
Hong Kong Bird Watching Society | 香港觀鳥會
A: 7C, V Ga Building, 532 Castle Peak Road, Kowloon, Hong Kong
香港九龍荔枝角青山道532號偉基大廈7樓C室

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



20220617_KamPokRoad_RezoneToR_C1_Y_YL_MP_6[4]_HKBWS.pdf



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

By email only

17 June 2022

Dear Sir/Madam,

Comments on the application to rezone the application site from "Residential (Group D)" to "Residential (Group C) 1" and amend the Notes of the zone applicable to the site at Kam Pok Road, Mai Po (Y/YL-MP/6)

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

1 Not in line with the planning intention of the "Other Specified Uses (for "Comprehensive Development to include Wetland Restoration Area" only)" (OU(WRA)) zoning and the Wetland Buffer Area (WBA) under the Town Planning Board Planning Guideline No. 12C

1.1 The development site falls within WBA in Deep Bay area. According to the Town Planning Board Guideline No. TPB PG-NO. 12C, *'in considering development proposals in the Deep Bay Area, the Board adopts the Study's recommended principle of "no-net-loss in wetland"'*. Moreover, WBA is *"to protect the ecological integrity of the fish ponds and wetland within the WCA and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds."* Moreover, *"As a substantial amount of the fish ponds within the WBA have already been lost over time through filling and certain areas have been degraded by the presence of open storage use, these degraded areas may be considered as target areas to allow an appropriate level of residential/recreational development so as to provide an incentive to remove the open storage use and/or*

香港觀鳥會 Hong Kong Bird Watching Society

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Lai Chi Kok, Kowloon, Hong Kong

香港註冊慈善機構 註冊編號第100號 香港特許註冊 註冊編號第100號 註冊編號第100號





to restore some of the fish ponds lost.”¹

- 1.2 The application site is also zoned as Residential (Group D) zone, where is intended “primarily for improvement and upgrading of existing temporary structures within the rural areas through redevelopment of existing temporary structures into permanent buildings. It is also intended for low-rise, low-density residential developments subject to planning permission from the Town Planning Board” under the Approved Mai Po and Fairview Park Outline Zoning Plan No. S/YL-MP/6². The maximum building height allowed in this zoning is 2 storeys (6m).
- 1.3 According to the study on the Ecological Value of Fishponds in the Deep Bay Area published by the Planning Department, it is stated that “the most significant factors contributing to higher bird usage were larger area of ponds and increasing distance to human disturbance”. Given the close distance to the WCA and ecological sensitive birds and habitats, we are highly concerned the proposed residential development consists of 14 blocks of 3 – 24 storeys high buildings, would unavoidably bring disturbance to them, including noise, light pollution, increase in bird collision risk and the increased human disturbance from the population from 3,090 flats, leading to degradation of habitat quality of nearby wetlands including Ramsar Site, fishponds and water channel.
- 1.4 As birds often appear to be attracted to artificial light from building at night, and this kind of artificial light emitted from windows is usually implicated as one of the factors of bird collision, we are concerned the applicant would have underestimated the bird collision risk aroused from the proposed development. These towers are highly visible over a large area due to its building height would apparently become light façades during night time. However, the current submitted proposal and assessments including flight line survey, are not adequate to access and avoid the impacts from bird collision.
- 1.5 We consider the residential development is not in line with the above planning intention of WBA as it would bring negative off-site disturbance to the Wetland Conservation Area (WCA), and destroy the open and low-density rural landscape which the general development intensity is of a maximum plot ratio of 0.4 and not

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

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



more than 3-storey high. We urge the Town Planning Board (Board) to reject this rezoning application.

2 Cumulative ecological impacts and undesirable precedent set on Deep Bay area

- 2.1 Cumulative ecological impacts to the fishponds of Deep Bay area need to be carefully assessed given that a number of other residential developments have already been proposed and approved in close proximity of the application site. We are concerned all the potential residential and commercial developments would all cumulatively cause significant impacts on the Ramsar Site, WCA, birds' flight path, and also the Great Cormorant night roost of significant size.
- 2.2 Moreover, the approval of this application will set an undesirable precedent to the future similar applications within the OU(WRA) zone, WCA and WBA, and thus nullifying the statutory planning control mechanism. We urge the Board to reject this application in order to protect OU(WRA) zone from any development threats.

3 Justifications for the decision and comments made by Government departments and the Board

According to the Hong Kong Planning Standards and Guidelines (HKPSG), Chapter 10, Section 2.1, the Board has the responsibility to, (ii) *"restrict uses within conservation zones to those which sustain particular landscapes, ecological and geological attributes and heritage features"* and (iii), *"control adjoining uses to minimise adverse impacts on conservation zones and optimise their conservation value"*. We note that all other Government bureaux/departments are also bound to the HKPSG, and the Agriculture, Fisheries and Conservation Department (AFCD) and the Planning Department (PlanD) have the responsibility to advise the Board on the ecological³ and planning aspects in particular. Given AFCD's mission to conserve natural environment and safeguard the ecological integrity⁴, and the proposed development is not in line with the planning intention of the statutory zoning, HKBWS would also expect AFCD and PlanD to object to this application. Should AFCD, PlanD or the Board feels otherwise, we urge that the appropriate justifications are provided.

³ AFCD Role of Department. Available at: http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html

⁴ AFCD Vision and Mission. Available at:

http://www.afcd.gov.hk/english/aboutus/vision_mission/abt_vision_mission.html



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

Yours faithfully,
Wong Suet Mei
Conservation Officer
The Hong Kong Bird Watching Society

cc.

The Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
WWF – Hong Kong
TrailWatch

香港觀鳥會 Hong Kong Bird Watching Society

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Lai Chi Kok, Kowloon, Hong Kong

香港觀鳥會為註冊慈善機構，在香港註冊，並獲政府認可。 The Hong Kong Bird Watching Society is a registered charity in Hong Kong, and is a registered charity by the government.



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**Comments on the Section 12A Application No. Y/YL-MP/6**

24/03/2023 10:57

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

1 attachment



TPB20230324(MP6).pdf

Dear Sir/Madam,

Please refer to the attachment for the captioned.

Yours faithfully,

Ng Hei Man (Mr.)

Campaign Manager

The Conservancy Association

T: 2728 6781

D: 2272 0303

F: 2728 5538

Registered Name 註冊名稱 : The Conservancy Association 長春社

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

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The Conservancy Association

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Road, Kwai Chung, New Territories, H.K.
網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
電子郵件 E-mail: cahk@cahk.org.hk

24th March 2023

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

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

Dear Sir/Madam,

Comments on the Section 12A Application No. Y/YL-MP/6

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

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

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

A Section 16 application A/YL-MP/205 has once been submitted to Town Planning Board at the application site currently zoned “Residential (Group D)” to facilitate a residential development project. We note that maximum building height, maximum numbers of storeys, numbers of units of proposed development (Table 1) are higher than the previous one.

Table 1 Development parameter of A/YL-MP/205 and Y/YL-MP/6

	A/YL-MP/205	Y/YL-MP/6
Maximum building height	10.8m	74.5m



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

電子郵件 E-mail: cahk@cahk.org.hk

Maximum no. of storeys	3	23
No. of units	106	3,090 Flats 100 Beds in RCHE

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

2. Adverse ecological impacts

Despite provision of Ecological Impact Assessment (EcoIA), we are still doubtful that at least some of the potential ecological impacts remains unsolved:

- i. Disturbance on bird species at Ngau Tam Mei Drainage Channel (NTMDC): From the EcoIA, high diversity of ardeids such as Black-faced Spoonbill, Eurasian Spoonbill, Chinese Pond Heron, Little Egret, Grey Heron, Great Egret, etc., can be spotted at NTMDC in the east of the application site. Off-site negative impact, such as construction noise during construction phase and human activities during operation phase, would adversely affect foraging behavior of these birds. We still worry how these impacts can be avoided or mitigated.
- ii. Disruption on flight lines of waterbirds: The EcoIA revealed that apart from the major flight line observed along NTMDC, some other flight lines were recorded passing over the application site. Viewing the current maximum building height (i.e. 74.5m) and numbers of storeys (i.e. 23 storeys), we worry that potential disruption on flight lines on waterbirds would be anticipated.
- iii. Light disturbance: Additional light source from residential towers and open space would pose disturbance on birds and other wildlife. However, we cannot see how the applicant attempts to evaluate potential light impact properly in both day time and night time during the construction and operation phase. We also worry that the proposed landscape pond, acting as a disturbance buffer, would generate additional glare and this might bring light source even more



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close to NTMDC.

- iv. Bird collision: Even though Section 7.2.5 of the EcoIA mentions that the current residential development would not have extensive reflective surfaces, the height of residential towers, as mentioned above, would be substantial and they tend to have more areas of glass. Therefore, risk on bird collision would still be an issue. Meanwhile, nocturnal avian collision with buildings is not clearly identified and evaluated in the EcoIA.

3. Potential cumulative impacts

We note that some development projects were not included in assessing cumulative impacts, such as Y/YL-MP/7, Y/YL-MP/8, A/YL-MP/287, Northern Link, and so on. We worry that exclusion of some development projects would downplay interactions between the environmental impacts of the project and the environmental impacts of other developments.

Over the past decade, there were already cumulative loss of wetlands in Deep Bay wetland ecosystem. For instance, Fairview Park and Palm Spring as well as Futian District of Shenzhen were all built on wetland. Many large-scale development applications within WBA have been approved or submitted for approval. In future, the adjacent San Tin/Lok Ma Chau Development Node, Northern Link, San Tin Technopole under Northern Metropolis Development would further increase development pressure within the region. In such case, the proposed development would merely constitute greater pressure in the already rather fragile Deep Bay ecosystem, and set undesirable precedent for similar applications for large-scale development in the area.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

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**KFBG's comments on Y/YL-MP/6**

24/03/2023 16:34

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

1 attachment



230324 s12a MP 6c.pdf

Dear Sir/ Madam,

Attached please see our comments regarding Y/YL-MP/6. There is one pdf file attached to this email. If you cannot see/ download/ open this file, please notify us through email.

Thank You and Best Regards,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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

24th March 2023.

By email only

Dear Sir/ Madam,

To rezone the application site from "Residential (Group D)" to "Residential (Group C)"
1" and amend the Notes of the zone applicable to the site
(Y/YL-MP/6)

1. We refer to the captioned.
2. From the latest further information (FI; i.e., the 'updated indicative scheme (Feb 2023)') provided for this application, we could see that the development parameters have been proposed to be slightly reduced, and there is also a two-page 'Ecological Review' on the Revised Scheme. However, we consider our concerns would still remain the same – we could not see how the reduction in total flat nos. from 3,090 to 2,771 could relieve our concerns on the potential disturbance impacts (e.g., operational phase) to be caused by the proposed development on the highly sensitive bird species inhabiting the Ngau Tam Mei Drainage Channel, as illustrated and elaborated in our previous submissions. Thus we consider our views as mentioned before would still largely remain the same and our previous submissions are attached below for your reference.
3. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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

2nd March 2023.

By email only

Dear Sir/ Madam,

To rezone the application site from "Residential (Group D)" to "Residential (Group C)"
1" and amend the Notes of the zone applicable to the site
(Y/YL-MP/6)

1. We refer to the captioned.
2. We in general maintain our view and our previous submissions are attached to this letter (after **Figure 1**). But we would also like to share with the Board our latest observation from the Ngau Tam Mei Drainage Channel (NTMDC); please see **Figure 1**. As shown, flocks of wild ducks and Black-faced Spoonbill could still be observed in January 2023 from the NTMDC; this indicates clearly that NTMDC is a wetland habitat regularly visited by many wetland bird species, not occasionally.
3. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

Figure 1. Flocks of wild ducks and Black-faced Spoonbill utilising the NTMDC section close to Y/YL-MP/6, observed on 30th January 2023.

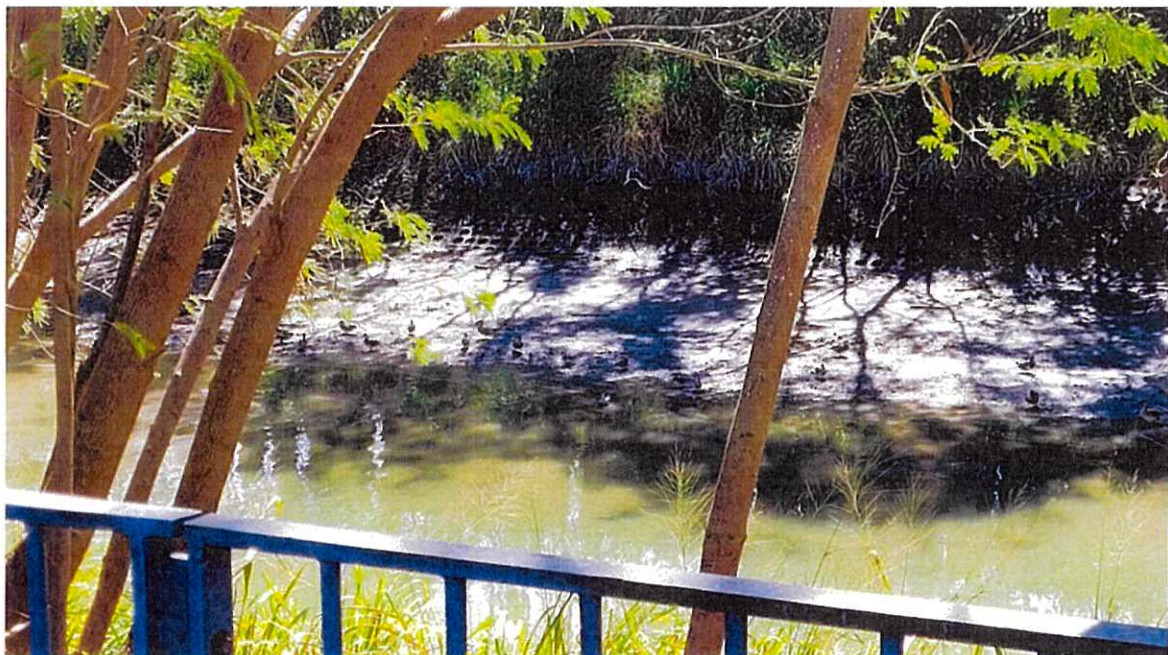
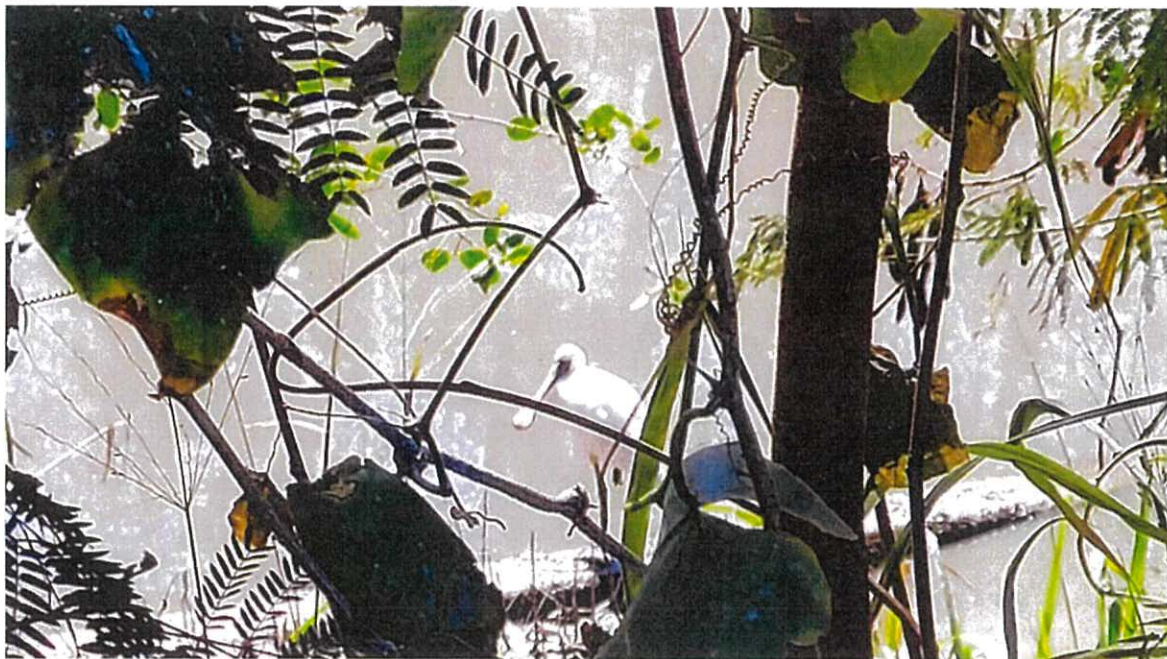


Figure 1. Cont'd.



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

21st December 2022.

By email only

Dear Sir/ Madam,

**To rezone the application site from "Residential (Group D)" to "Residential (Group C)
1" and amend the Notes of the zone applicable to the site
(Y/YL-MP/6)**

1. We refer to the captioned.
2. We visited the area where the site is located on three consecutive days in mid-November 2022, and we would like the Board and relevant authorities such as the Agriculture, Fisheries and Conservation Department (AFCD) to see some on-site photos taken during these visits as shown in **Figures 1, 2 and 3**.
3. We should have in our previous submissions shown to the Board that the Ngau Tam Mei Drainage Channel (NTMDC) section adjacent to the application sites **Y/YL-MP/6** and **Y/YL-MP/8** was inhabited by many wetland birds, including wild ducks that are highly sensitive to human disturbance, and this previous observation was made in December 2021 (see Figure 1 of **Appendix A, Annex 1**). In our recent visits in mid-November 2022, we again observed flocks of wild ducks (and many other waterbird species such as ardeids) in this channel section (between **Y/YL-MP/6** and **Y/YL-MP/8**; see **Figure 1**), with some individuals scattered in the section next to **Y/YL-MP/7**. As observed, they are highly sensitive to approaching human (**Figure 2**; see also Figure 5 of **Appendix A, Annex 1**). In addition, we also observed **Black-faced Spoonbill** individuals, which is a wetland bird species considered to be **Globally Endangered¹**, actively foraging in the NTMDC section next to both **Y/YL-MP/6** and

¹ <https://www.iucnredlist.org/species/22697568/119347801>

Y/YL-MP/7 in mid-November 2022 (see Figure 3). Locations of our recent sightings are shown in Figure 4.

4. Our past and recent observations as well as the data from various Ecological Impact Assessments for the planning applications in this area clearly indicate that **the NTMDC section of concern would be regularly utilised by wintering waterbirds including species of conservation concern and species sensitive to human disturbance.** The repeated occurrence (e.g., in both wintering seasons of 2021 and 2022) of wild ducks and many other wetland birds indicates that **these birds are unlikely to only visit this channel section occasionally.** This would be **contributed by the relatively very low human disturbance** in the locality at present (see Figure 5), and the free air space around this channel (i.e., no high-rise buildings blocking the flightpaths) (see Figure 4 of Appendix A, Annex 1). Undoubtedly, as mentioned in our previous submissions, **this section is already an existing portion of the Deep Bay Wetland system.** Indeed, it is also not too far from the internationally recognised wetland – Mai Po and Inner Deep Bay Ramsar Site. We believe that ecological corridor exists between the channel section of concern and the Ramsar Site.

5. We urge the Board and relevant authorities to seriously consider how the introduction of the human population associated with the present application would change the disturbance level of the locality. For instance, **would the nearby pedestrian walkway and cycle track as well as vehicle roads surrounding the NTMDC be more intensively used by humans (e.g., the residents) as compared to the present situation (see Figure 5 of the present letter and also Figure 3 of Appendix A, Annex 2)?** If human activities in the locality would be potentially increased in the future after the proposed residential development is occupied, would the habitat quality of the NTMDC section of concern decrease (e.g., potentially receiving more human disturbance from the nearby increased population and traffic)? If the NTMDC section of concern eventually would be visited less by waterbirds including those species of conservation concern, this is already an ecological impact (i.e., a clear reduction in Environmental Capacity).

6. In the 14th Meeting of the Conference of the Contracting Parties to the Ramsar Convention on Wetlands, which was just held in Wuhan in November 2022, our Country had already emphasised the importance of wetland protection, which is for the benefits of the future generation². Indeed, our Country has also emphasised the importance of Ecological

² <https://news.rthk.hk/rthk/ch/component/k2/1674390-20221105.htm>

Civilisation, which was even included into our National Constitution in 2018. Following the above, we do not believe that allowing any development that would directly threaten an existing wetland ecosystem inhabited by many species of conservation concern would be in line with the current development direction of our Country.

7. We cannot fathom how the potential increase in human disturbance (from the potential increase in human activities and traffic) and its associated potential ecological impacts on the NTMDC can be meaningfully mitigated. For instance, is it possible to restrict the future residents not to use the cycle track and pedestrian walkway surrounding the NTMDC? Following a precautionary principle we urge the Board to reject this high-rise and high density (as compared to the surroundings and existing situation) development proposal to safeguard the NTMDC section of concern, which is now part of the invaluable Deep Bay Wetland system, and to help achieve the Ecological Civilisation goal of our Country.

8. Thank you for your attention.

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cc. AFCD
The Conservancy Association
Green Power
Hong Kong Bird Watching Society

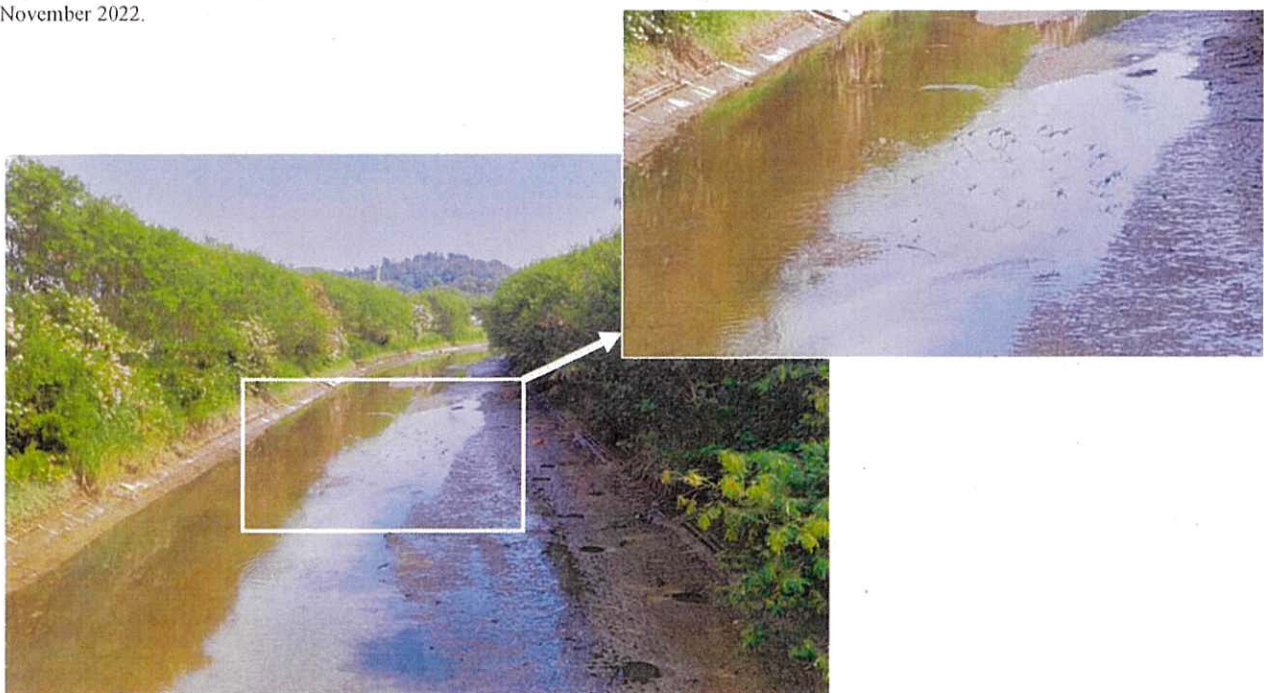
Figure 1. Flocks of wild ducks (and also other waterbirds such as ardeids) utilising the NTMDC section between Y/YL-MP/6 and Y/YL-MP/8; observed in mid-November 2022.





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Figure 2. Wild ducks are highly sensitive to human disturbance; this flock was scared away by the approaching photographer; taken in mid-November 2022.



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

Figure 3. Black-faced Spoonbill foraging in the NTMDC section next to Y/YL-MP/6 and Y/YL-MP/7.

Two individuals were observed foraging in the NTMDC section next to Y/YL-MP/6 on 15 Nov 2022.



On 17 Nov 2022, two individuals were first observed foraging in the NTMDC section to the north of Fairview Park Boulevard (i.e., next to Y/YL-MP/7), and then they moved further north along the channel.

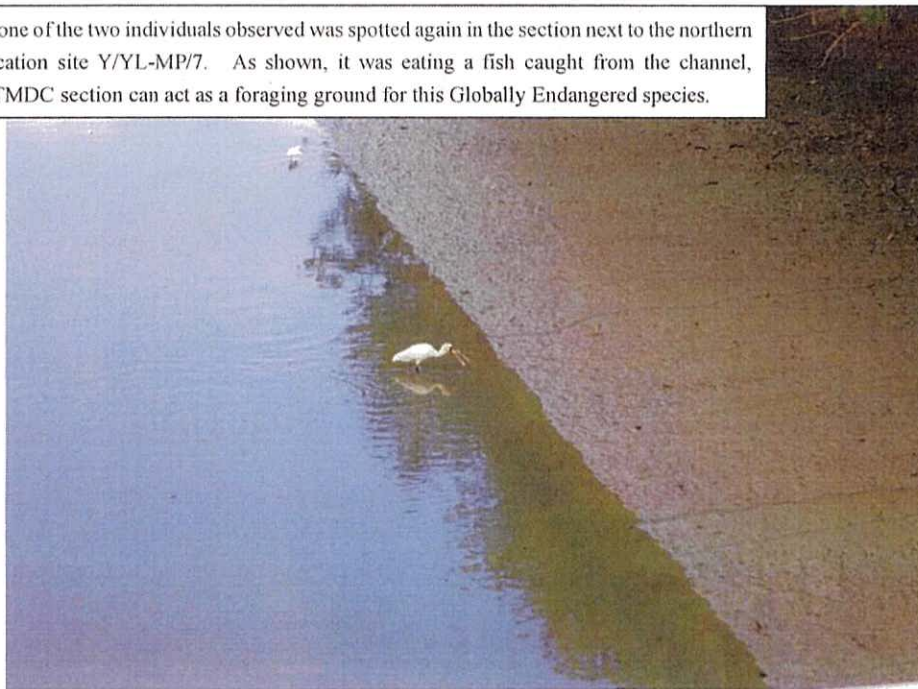




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Figure 3. Cont'd.

On 17 Nov 2022, one of the two individuals observed was spotted again in the section next to the northern part of the application site Y/YL-MP/7. As shown, it was eating a fish caught from the channel, indicating this NTMDC section can act as a foraging ground for this Globally Endangered species.



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Figure 4. Locations of recent sightings in mid-Nov 2022 – red dashed circle: Black-faced Spoonbill; green circle: main duck flocks.

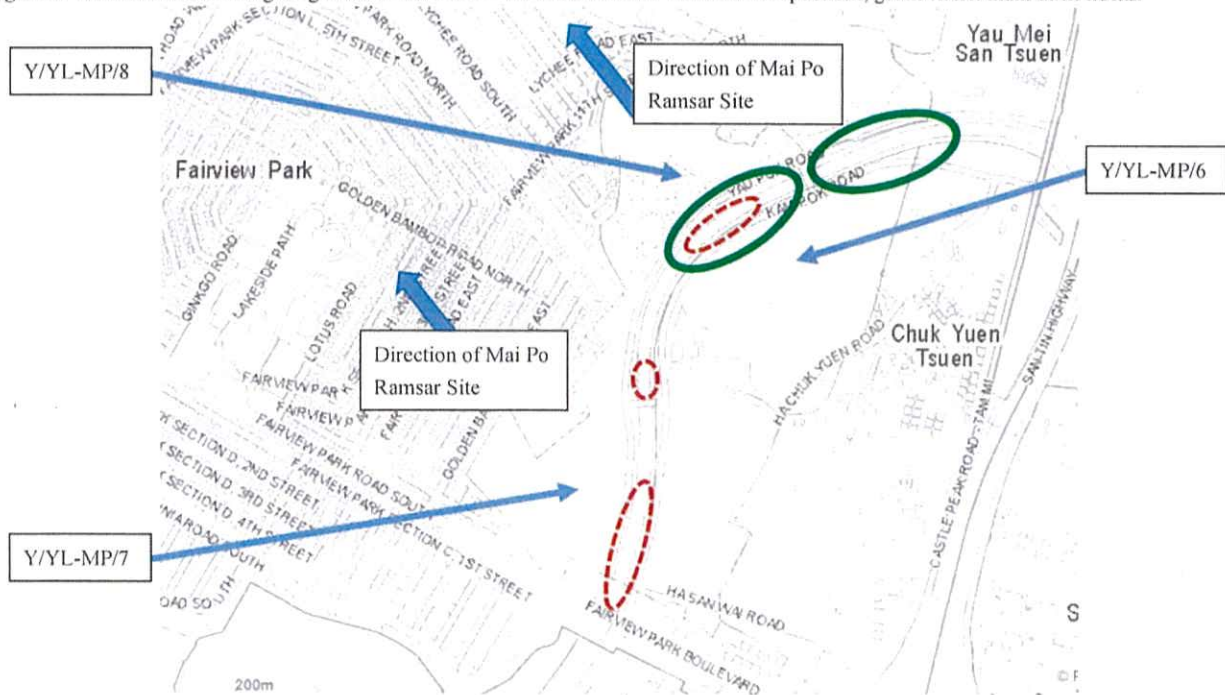


Figure 5. Yau Pok Road, associated cycle track and pedestrian walkway alongside the NTMDC section of concern; taken near noon on 17 Nov 2022.



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

17th December, 2021.

By email only

Dear Sir/ Madam,

**To rezone the application site from "Residential (Group D)" to "Residential (Group C)
1" and amend the Notes of the zone applicable to the site
(Y/YL-MP/6)**

1. We refer to the captioned.
2. We maintain our views on this application and our previous submission is attached in **Appendix 1** for your reference.
3. However, in addition to our previous submission, we would also like to share with the Board and relevant authorities our latest observations regarding the Ngau Tam Mei Drainage Channel (NTMDC), which is a watercourse receiving tidal influence next to the application site.
4. Three site visits (conducted separately on three consecutive days; each lasted for only around one to two hours roughly) were carried out to the areas surrounding the aforementioned channel in mid-December 2021, during low tides. Flocks of wild ducks could be observed foraging and roosting in the channel section next to the application site (see **Figure 1**). Northern Shoveler (*Spatula clypeata*) was the dominant species observed, while some individuals of Eurasian Teal (*Anas crecca*) were also found roosting along the channel (**Figure 2**). We roughly counted the number of individuals, and the abundance of wild ducks observed per visit ranged from at least 30 to around 70 individuals. Indeed, the counting was mainly conducted from a bridge (relevant lamp posts no. BD1300 and BD1299) and along the channel section from this bridge to Castle Peak Road. We did not systematically count all the ducks

inhabiting the channel section within the Assessment Area covered by the Ecological Impact Assessment (EcoIA) submitted for this application; thus the abundance observed could not reflect the actual number of individuals inhabiting this section (i.e., the actual number may be higher). Besides ducks, of course we observed many wader and ardeid species in the channel as well (as you can see from the on-site photos). In particular, we could also observe some Black-winged stilt individuals (*Himantopus himantopus*; **Figure 3**).

5. The EcoIA submitted for the current application claims that bird surveys for the assessment were carried out monthly between March 2015 and May 2016, and between November 2019 and October 2020. According to this EcoIA, three duck species (including the two observed in our visits) were recorded in the NTMDC and the maximum counts of these species in the NTMDC (i.e., Northern Shoveler, Northern Pintail (*A. acuta*) and Eurasian Teal) were 9, 4 and 6, respectively (as shown in Table 5 of the EcoIA). But as aforementioned, the abundances of wild ducks recorded in our visits ranged from at least 30 to a maximum of around 70 individuals. The EcoIA also recorded only ONE individual (maximum count already) of Black-winged Stilt in the NTMDC. In contrast, we could count several in the channel just from one photo taken during one of our visits (**Figure 3**).

6. Regarding the birds recorded in the NTMDC, Section 5.2.2 of the EcoIA mentions the following: ‘...the NTMDC...supports a moderate number of foraging ardeids during the wintering period...However, the relatively high counts only appeared in the dry season and/or on an occasional basis. In general bird numbers in the Channel within AA (Assessment Area) were very low.’ We do not quite agree with the above statement. The waterbird abundance and diversity observed in our visits reflect that the NTMDC, at least the section next to the application site, has already become considerably important foraging and roosting habitats for many wintering waterbird species. Many of the observed species are also of conservation importance and these species seem to be regularly visiting this section during favorable tides. Indeed, moderate numbers of wild ducks could be observed during all our visits (see **Figure 1**), and this reflects they were unlikely to be visiting the channel only on an occasional basis. But to be honest, we do not consider our findings to be very surprising as the channel section next to the application site is not far from the Mai Po Nature Reserve at all. Waterbirds can easily fly from the Reserve to this channel section (and vice versa) through the fish pond and abandoned farmland area between Fairview Park and Palm Springs, and of course they can also easily fly over the low-rise Fairview Park. Indeed, during one of our visits, we could observe ducks flying to the Mai Po area from the channel over Fairview Park (**Figure 4**). Also, one remarkable point is that our observations were recorded only during three visits; each

visit lasted for one to two hours (in contrast, the bird surveys for the EcoIA were carried out monthly for more than two years).

7. We urge the Board and relevant authorities to seriously take note of our observations (and the limited survey efforts involved (i.e., only three visits)), and to critically review the adequateness of the submitted EcoIA.

8. Wild ducks are usually highly sensitive to human disturbance. A study conducted in North America targeting wintering ducks (including the two species we observed) has indicated that nearly 80% of the studied individuals responded to the source of disturbance from a distance ranging between 51 – 100 m (more than 70% of them swam or flew away)¹. We could see similar behaviors during our visits; we observed that individuals of wild ducks simply swam or even flew away when the photographer approached them or when they could see the approaching photographer (see **Figure 5**), and they also responded to other human activities along the channel as well. Thus, the presence of a moderate number of wild ducks in this channel section clearly reflect that the existing disturbance level in the locality of concern is generally low (please also refer to some photos in Figure 3 of **Appendix 1** which show the areas surrounding the channel (e.g., Kam Pok Road, Yau Pok Road and associated cycle track and pedestrian road)). Also, in Hong Kong, wild ducks are usually restricted to wetlands in the northwestern New Territories area (i.e., it is not easy to see a wild duck in other parts of Hong Kong). Our observations reflect that the NTMDC section next to the application site is simply, and already, part of the Deep Bay wetland system, with considerable connection with the Mai Po Nature Reserve. **We urge the Board and relevant authorities to seriously consider whether the habitat quality of this channel section would still remain the same when 3,090 flats (including 10 high-rise blocks ranging from 16 to 23 storeys and several blocks from 3 to 5 storeys) are built next to it** (please also see Figure 4 in **Appendix 1**).

9. In another scientific paper² studying the impacts of disturbance to waterbirds, the following is mentioned in the concluding section:

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

² Burton, N.H.K., Rehfish, M.M. and Clark, N.A. (2003) Impacts of disturbance from construction work on the densities and feeding behavior of waterbirds using the intertidal mudflats of Cardiff Bay, U.K. *Environmental Management*, 30(6), 865-871.

*‘As with Burton and others (2002), this paper has shown that **man’s activities can seriously depress local habitat quality and an estuary’s carrying capacity for waterbirds.** Clearly, such findings have implications for waterbirds on numerous estuarine sites. Disturbance, either from construction work itself or from increased traffic or recreation, is an increasing problem not just in the UK, but at estuarine sites throughout the world (Davidson and Rothwell 1993, Brown and others 2000). Although it is difficult to determine whether disturbance has an impact at the population level, such an impact would likely occur if the reduction in habitat quality associated with increased disturbance was sufficiently widespread.’*

10. We urge the Board and relevant authorities to seriously consider whether allowing more and more relatively high-rise and high-density developments to appear in the Wetland Buffer Area would jeopardise the integrity of the Wetland Conservation Area and eventually affect the overall carrying capacity of the Deep Bay wetland, which is of global conservation importance.

11. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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



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

Figure 1. Flocks of wild ducks observed in the NTMDC section next to the application site.



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



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

Figure 1. Cont'd.



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Email: eap@kfbg.org



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

Figure 1. Cont'd.



香港新界大埔林錦公路
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Email: eap@kfbg.org

Figure 2. Northern Shoveler (upper) and Eurasian Teal (lower) observed in the NTMDC.





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

Figure 3. Black-winged Stilt individuals observed in the NTMDC.



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

Figure 4. Ducks flying towards the Mai Po area.

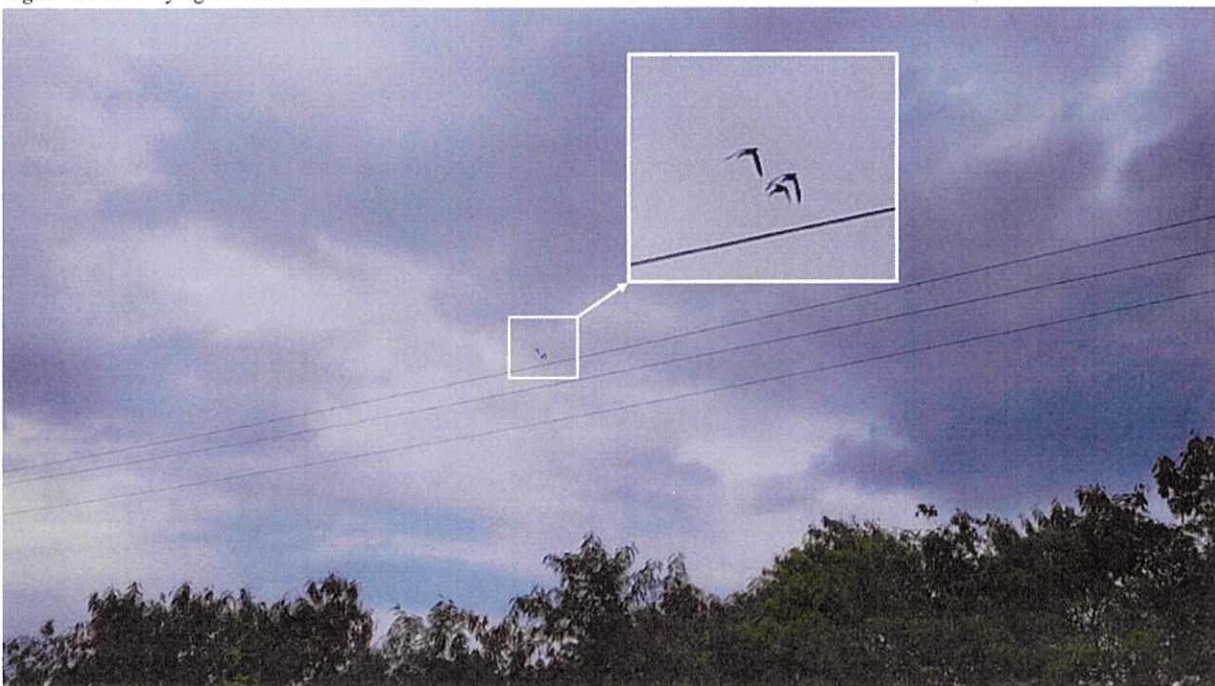


Figure 5. Responses of wild ducks and other waterbirds to the approaching photographer.

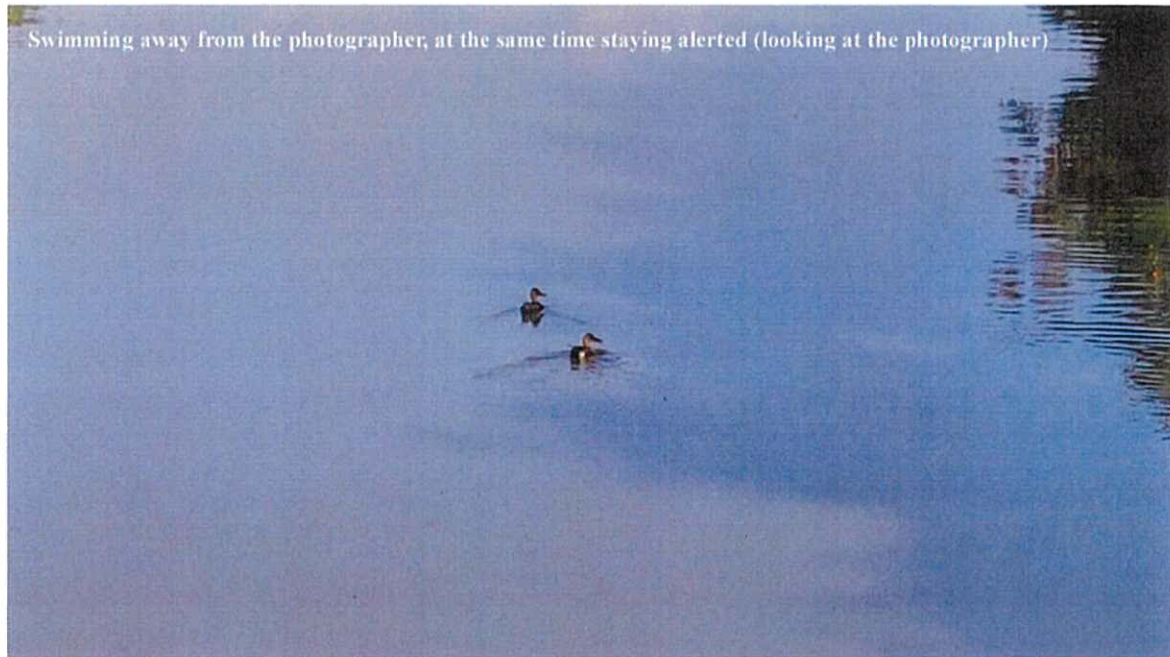
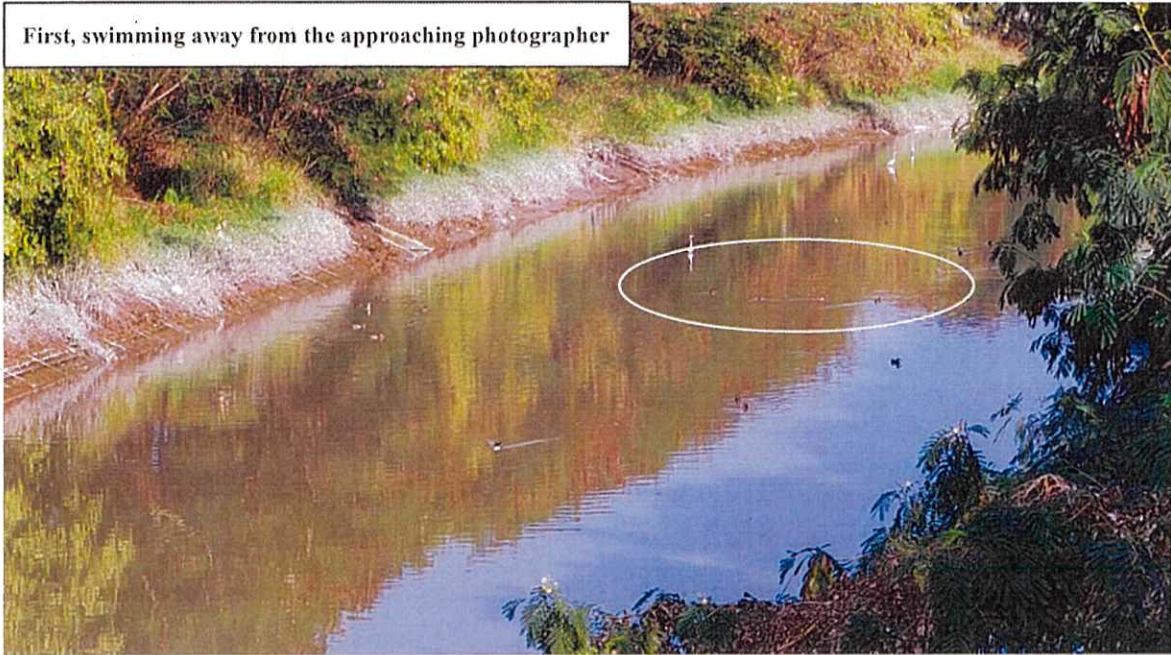
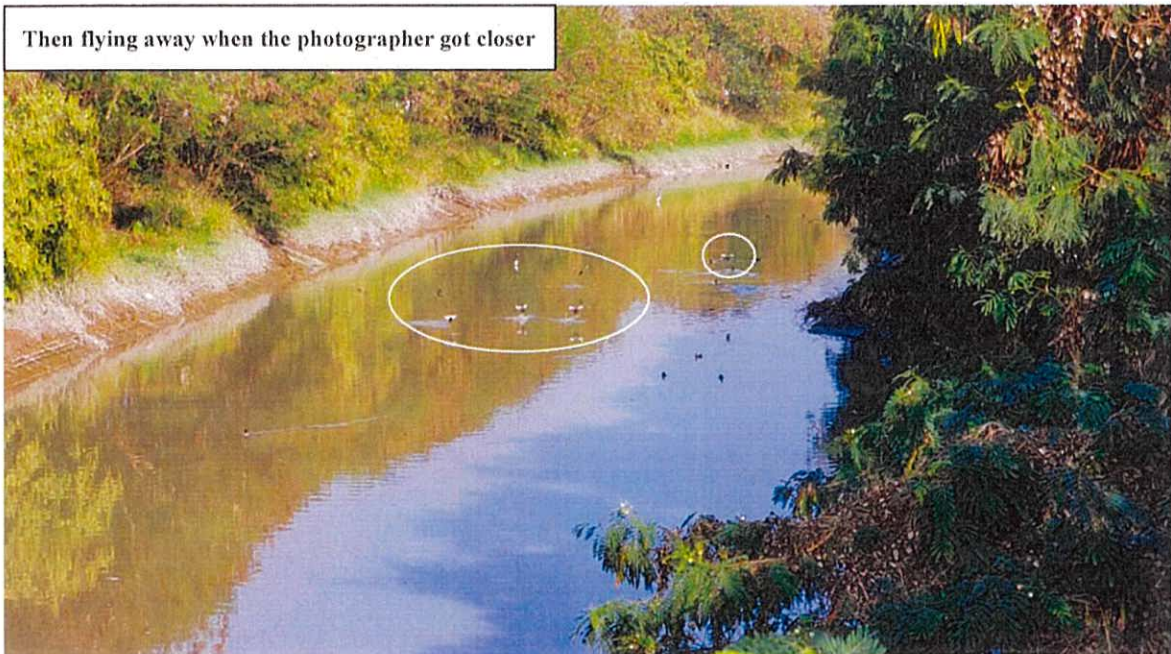


Figure 5. Cont'd.

First, swimming away from the approaching photographer



Then flying away when the photographer got closer

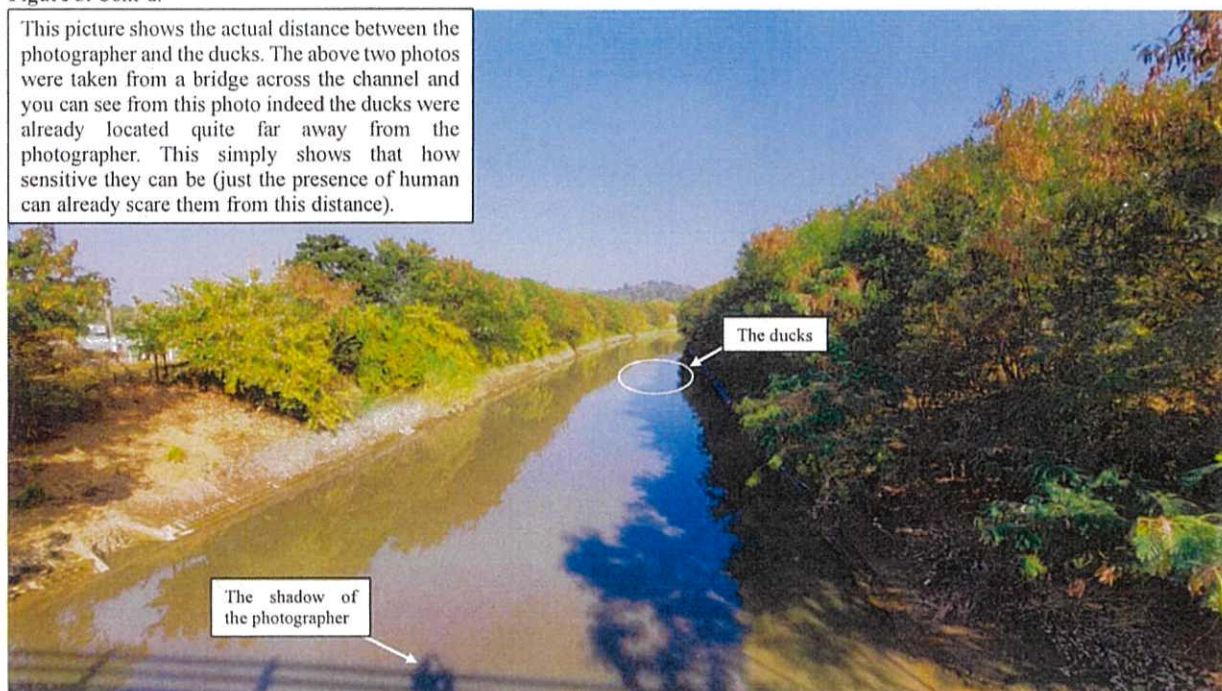




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Kadoorie Farm & Botanic Garden Corporation

Figure 5. Cont'd.

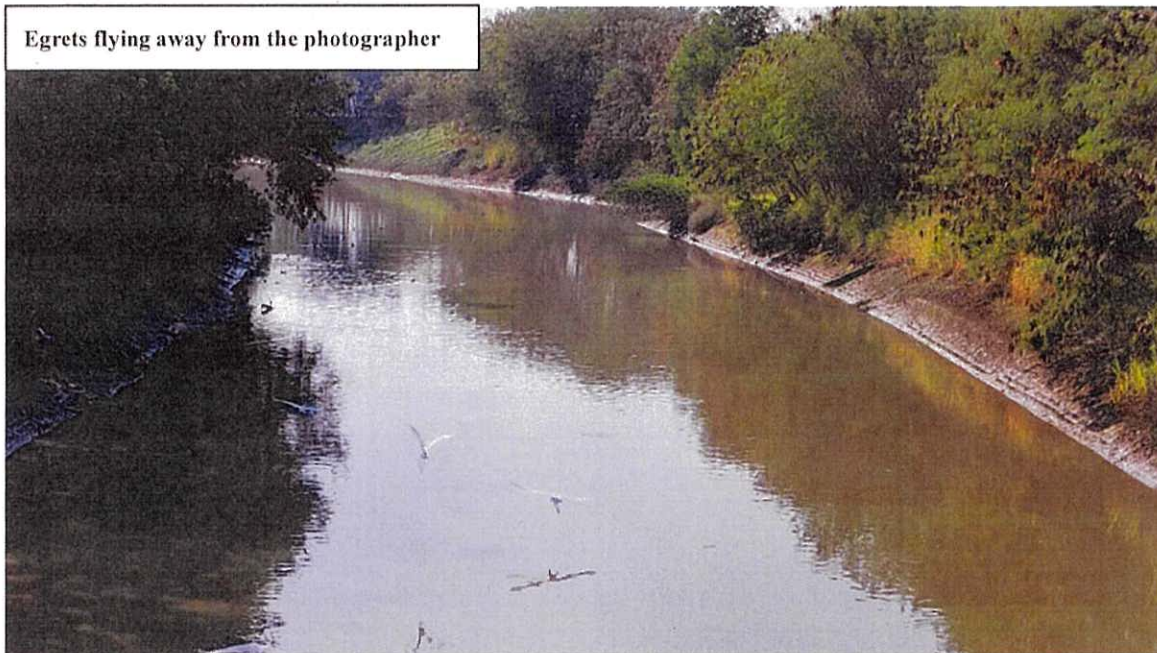
This picture shows the actual distance between the photographer and the ducks. The above two photos were taken from a bridge across the channel and you can see from this photo indeed the ducks were already located quite far away from the photographer. This simply shows that how sensitive they can be (just the presence of human can already scare them from this distance).



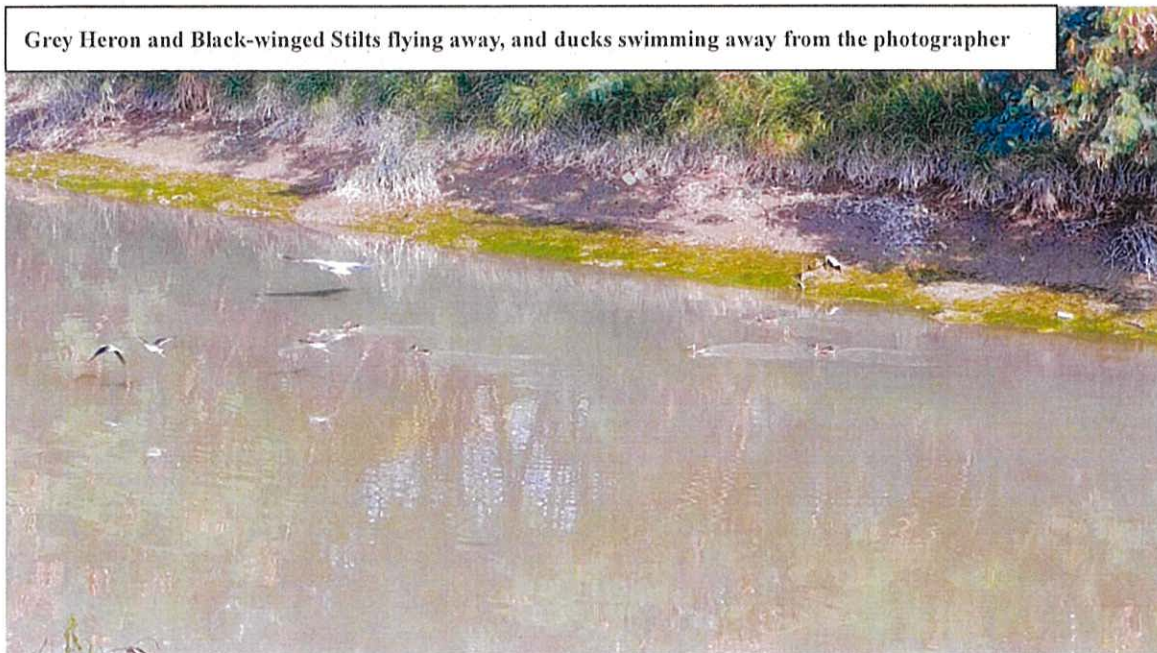
香港新界大埔林錦公路
Lam Kam Road, Tai Po, New Territories, Hong Kong
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Figure 5. Cont'd.

Egrets flying away from the photographer



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



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

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

15th October, 2021.

By email only

Dear Sir/ Madam,

**To rezone the application site from "Residential (Group D)" to
"Residential (Group C) 1" and amend the Notes of the zone applicable to the site
(Y/YL-MP/6)**

1. We refer to the captioned.
2. The gist of this application states that the site will be located in '*just 860 m away from Ngau Tam Mei Station in just over a decade's time*' (remarks: Ngau Tam Mei (NTM) Station is a proposed MTR station under the Northern Link (NOL) project), and the Supporting Planning Statement for this application also indicates that the site is about 1.5 km from the proposed San Tin Station which would be within the proposed 'San Tin/ Lok Ma Chau Development Node'. However, we would like to remind the Board that the site is neither within the proposed San Tin/ Lok Ma Chau Development Node boundary nor the 'San Tin Technopole' boundary recently proposed in the Northern Metropolis Development Strategy report¹ under the 2021 Policy Address. In fact, San Tin Highway and Castle Peak Road are located in between the application site and the proposed NTM Station. At present, although there are footpaths (passing under the San Tin Highway) connecting the NTM area to the Chuk Yuen Tsuen area (i.e., the village adjacent to the application site), vehicles can only reach the NTM area from the site by first travelling at least several hundred meters southward to the Fairview Park roundabout, or even a longer distance to the junction between Castle Peak Road and San Tam Road, and then accessing the former area through San Tam Road.

¹<https://www.policyaddress.gov.hk/2021/eng/pdf/publications/Northern/Northern-Metropolis-Development-Strategy-Report.pdf>

3. While the site is not within the aforementioned planned development areas nor adjacent to any proposed MTR Station, we would also like the Board to note that the application site is at present largely within Wetland Buffer Area (WBA), which is primarily delineated to buffer the sensitive and internationally important Deep Bay wetlands², and, indeed, the site is now just located less than 170 m from the Wetland Conservation Area² (WCA; see **Figure 1**). Furthermore, the site is also just located less than 930 m from the ‘Mai Po Inner Deep Bay Ramsar Site’ (see **Figure 2**), which is recognised as a wetland of international importance and was designated under the intergovernmental treaty – Ramsar Convention, in 1995. The NTM and San Tin Stations are yet to be built. But, important wetland areas (e.g., WCA, NTM Drainage Channel (NTMDC, see later explanation)) are already located close to the application site. Indeed, we would also like the Board to ask relevant authorities and/ or the applicant as to whether there will be a new carriageway to facilitate the movement of vehicles (e.g., shortening the travelling distance) between the proposed development (with 3090 flats and 100 beds in RCHE) and the proposed NTM Station, in the future.

4. Now, the site and its surroundings mainly comprise grassland/ shrubland and low-rise structures/ buildings (e.g., 3-storey village houses in Chuk Yuen Tsuen, low-rise houses in Fairview Park and associated low-rise structures). There are no existing high-rise buildings/ structures in the close vicinity of the site and its immediate surroundings. On-site photos showing the site and its surroundings are shown in **Figure 3**. Although the proposed building height can reach 79.9 mPD (23 storeys) under the current application, the Supporting Planning Statement (Section 7.13) states the following:

‘... The scale of the development... is considered not incompatible to the surrounding environment. The design of the Indicative Development Scheme can enhance the visual interest of the currently monotonous and derelict assessment area... heavy-standard compensatory planting will help to integrate the development with the surrounding landscape. Not least, the proposal is compatible with the existing visual composition whilst introducing a desirable visual contrast for the area...’

‘... While the overall visual impact of the project may be considered as slightly adverse in comparison to the existing site condition... the proposed development is considered to bring positive contribution to the evolving visual character of the area which is close to the future development node of the NOL at Ngau Tam Mei with the employment of’

² https://www.info.gov.hk/tpb/en/forms/Guidelines/pg12c_e.pdf

green infrastructure and well-landscaping.’

5. While we cannot quite understand how the application site can be considered to be ‘close to’ the future ‘development node of the NOL at NTM’, we would like to again point out that the site is now located less than 170 m from the WCA and next to wetland habitat of moderate ecological importance (i.e., NTMDC; see later explanation). Also, we would like the Board to look at the photomontage extracted from the gist and reproduced in **Figure 4** of this letter, as well as the on-site conditions as shown in **Figure 3**. We urge the Board to consider whether the proposed development, with 10 high-rise blocks ranging from 16 to 23 storeys and several blocks from 3 to 5 storeys, can be considered to be compatible (or ‘not incompatible’) with the existing surroundings, and whether the addition of trees or plantings could help to integrate the proposed high-rise blocks (i.e., max. 23 storeys) with the surroundings.

6. The NTMDC next to the application site is considered to be a habitat of moderate ecological importance by the Ecological Impact Assessment (EcoIA) submitted for the application; 28 bird species of conservation concern/ wetland dependent bird species have been recorded in this channel, including the globally Endangered Black-faced Spoonbill³ (BFS; maximum count: 30 individuals). Indeed, according to the EcoIA (flight-line survey), BFS has even been recorded flying over the application site. The EcoIA (Sections 7.2.7 and 7.2.8.3) for this application, however, mentions the following:

‘.....Higher abundance of wetland-dependent species including Black-faced Spoonbill were recorded in NTMDC during low tide (Table 5), particularly in dry season.....It should be noted that the concrete lined bed (average width of 30 m) of NTMDC is located about 4 to 6 meters lower than Kam Pok Road. The grasscrete embankment of NTMDC, as well as the existing roadside tree planting, have already provided a certain level of screening, which limits disturbance to waterbirds utilizing NTMDC. The current vehicle use and recreational activities (including vehicle use of Kam Pok Road commuting between Castel Peak Road and open storage areas close to Fairview Park, and resident use of Yau Pok Road and cycle track) have not imposed significant impact to waterbirds utilizing NTMDC. Some waterbirds, including Black-faced Spoonbills forage within sight of the Castel Park (Peak) Road, which is subject to very high levels of usage.....’

³ <https://www.iucnredlist.org/fr/species/22697568/119347801>

... ..Traffic peak hours rarely coincide with peak bird activity (i.e. early morning or low tide). In addition, the proposed residential development will be further separated from Kam Pok Road and NTMDC by the proposed landscape area distancing traffic within the development from the NTMDC; therefore, the increased traffic flow caused by the proposed residential development is not predicted to impose significant additional impact on waterbirds utilizing NTMDC. Therefore, the disturbance impacts during operational phase would be of low magnitude... ..

.....Compared to the construction phase, noise impacts during the operation of the development would be considerably reduced. At this time the main source of disturbance would be from the increased glare as a result of lighting during the night time and the increased human population in the area, potentially leading to increased disturbance to nearby habitats. However, as discussed in Section 7.2.7 above, waterbirds in NTMDC and other wetlands in AA are already habituated to relatively high levels of human activity compared to other wetlands in Hong Kong; therefore, the increased in human activity within the Application Site and the adjoining public roads (i.e. Kam Pak Road and Yau Pok Road) is quantitative only (resulting from an increase in frequency of human activity) rather than a qualitative change (as would arise if human activity were to be newly introduced to a previously undisturbed area). In addition, since the Application Site is situated closed to existing residential developments and extensive existing artificial lighting (such as road lights for the Kam Pok Road and nearby villages), nocturnal species would have already adapted to the environment or otherwise avoided the area. No significant additional glare impact is predicted. In the absence of mitigation measures, the disturbance impact on bird species of conservation importance during the operational phase is predicted to be of Low Significance.....’

7. Regarding the above, in addition to glare, we would like the Board to consider whether the population/ activities in the proposed development would produce noise (e.g., through driving, public activities). We would also like the Board to look at **Figure 4** of this letter again (the photomontage for this application); then we urge the Board, after liaising with relevant authorities/ parties, to consider whether existing and/ or future (e.g., proposed) tree planting/ landscaping features can effectively screen off the disturbance (such as noise and light) from the proposed development (max. 23 storeys). While the vegetation may be able to screen off ‘glare’ along the road to a certain extent, can the trees/ plantings screen off the noise generated from the road and activities within the proposed development? Can the

additional ‘glare’ caused by the proposed high-rise blocks (like those shown in **Figure 4**) be effectively screened off by the plantings/ trees? Most importantly, we urge the Board to seriously consider, after consulting relevant authorities and looking at **Figure 4** (and **Figure 3** as well), as to whether the Kam Pok Road and Yau Pok Road sections as well as the pedestrian roads and cycle track next to the application site are, at present, heavily used by vehicles/ pedestrians/ cyclists; in other words, are these sections/ areas heavily disturbed by ‘high levels of human activities’ now? Alternatively, would the future residents/ visitors of the proposed development greatly change the disturbance level (not only frequency but also intensity) and significantly increase the potential disturbance impact (e.g., through ‘resident use’) on the NTMDC as compared to the current situation? We would like to remind the Board that the proposed development would introduce 3090 additional residential units (plus 100 beds in RCHE) into this locality; according to the sewage impact assessment for this application, the estimated residential population of the proposed development would be 8343.

8. As shown above, the EcoIA mentions that BFS could be observed foraging within sight of the Castle Peak Road, which is subject to high level of usage. However, has the EcoIA demonstrated how many BFS were observed foraging ‘within sight of Castle Peak Road’, and how close were these birds to Castle Peak Road? We urge the Board to liaise with relevant authorities as to whether a map has been used to illustrate the distribution of wetland birds of conservation importance within the assessment area in the EcoIA, and also urge relevant parties to explain how close the above observation was to Castle Peak Road, and the general distribution of waterbirds in NTMDC. If Castle Peak Road is subject to high level of usage as claimed, we urge the Board to seriously consider whether Kam Pok Road and Yau Pok Road sections next to the application site would be at the same level of usage, and also whether Castle Peak Road is frequently used by pedestrians at present (which is one of the main sources of disturbance) (see **Figure 3**).

9. The EcoIA also claims that, as shown above, ‘*waterbirds in NTMDC and other wetlands in AA (Assessment Area) are already habituated to relatively high levels of human activity compared to other wetlands in Hong Kong.*’ We would like the Board to liaise with relevant parties/ authorities as to whether there has been any scientific study to justify this statement.

10. Indeed, there are numerous scientific studies investigating the effect of human disturbance on birds, and some have pointed out that the mere presence of human (e.g., approaching human, a walking human) could already be considered as a source of

disturbance (e.g., 4, 5) (see also a photo in **Figure 3**). While one of the key concerns would be how long the disturbance distance is, the approved Environmental Impact Assessment (EIA) for the Sheung Shui to Lok Ma Chau Spur Line has provided that the exclusion distance (where a species is precluded from using the area because of the impacts from the station and railway) of BFS is 100 m, and the maximum distance of reduced density ranges from 150 to 200 m⁶; also, this approved EIA has considered the overall disturbance sensitivity of BFS to be ‘high’⁶. In addition to this EIA, there is also a scientific study (published in 2015) examining the response of wintering BFS to disturbance⁷; this study states that:

‘... The spoonbills showed the strongest behavioural response to the non-threatening anthropogenic stimuli, and human approach followed by motor vehicles caused longer responses per event than did any other type of disturbing stimulus. Flight distance caused by human approach varied depending on conditions; inactive spoonbills in mixed-species associations started to flee at the greatest distance (197.4 m, with a 50% probability), whereas the spoonbills in a single conspecific flock were the most tolerant of human approaches, regardless of their activeness (61.0–61.7 m, with a 50% probability).... Human approach had been identified as the most important disturbing stimulus that should be controlled as a priority.... The tolerance of sympatric species as well as the behavioural response of target species should be considered when a buffer area for wildlife management, particularly against human disturbance, is planned....’

11. Regarding the effect on bird flight line, the EcoIA considers that the impact is of low significance. While birds in the locality can of course shift westward or fly higher to avoid the proposed high-rise blocks, we would like the Board to seriously consider the potential cumulative impacts of approving this application. We urge the Board to consider whether the approval of this application for high-rise development within WBA (largely) would set a precedent for other similar applications in the Deep Bay Area.

⁴https://www.researchgate.net/publication/261180661_The_impact_of_human_disturbance_on_birds_A_selective_review

⁵ <https://www.frontiersin.org/articles/10.3389/fevo.2018.00175/full>

⁶ https://www.epd.gov.hk/eia/register/report/eiareport/eia_0712001/Volume1/krcr-ss-lmc-eia-f-6980-4-d.htm

⁷https://www.researchgate.net/publication/273123874_Behavioural_responses_of_wintering_black-faced_spoonbills_Platalea_minor_to_disturbance

12. As aforementioned, the site is largely within WBA, and there is a Town Planning Board guideline for development in this zone and the wider Deep Bay Area (i.e., TPB PG-NO. 12c²). Regarding developments within the Deep Bay Area and WBA, this guideline mentions the following:

‘.....A “precautionary approach” has been adopted by the Board in view of the known intrinsic value of fish ponds in ecological terms and the complex response of birds to future landuse changes and carrying capacity which has not been fully understood. The intention is to protect and conserve the existing ecological functions of fish ponds in order to maintain the ecological integrity of the Deep Bay wetland ecosystem as a whole. This “precautionary approach” is formulated with the support of scientific surveys and analysis as provided in the Study.....

.....Development/redevelopment which may have negative impacts on the ecological value of the WCA would not be supported by the Board, unless the ecological impact assessment can demonstrate that the negative impacts could be mitigated through positive measures.....

.....For those disturbed areas directly abutting the WCA, the development should provide a wetland and visual buffer to separate the development from the WCA to minimise its impact on the wetland.....

.....Residential development projects which include replacement of existing open storage and port back-up uses and/ or proposal of detailed wetland restoration may be given special consideration subject to satisfactory ecological and other impact assessments. These developments should be compatible with the surrounding land uses and the rural setting of the area.....

.....In addition to ecological consideration, other planning considerations including development intensity, compatibility with the surrounding land uses, environmental impacts (e.g., noise, air and water qualities), traffic and drainage impacts, provision of infrastructure and visual impact are also important in the assessment of an application within the Deep Bay Area.’

13. Simply speaking, we do not consider that the proposed high-rise blocks are compatible with the current setting of the locality which at present comprise mainly low-rise houses/

structures, grassland/ shrubland (some are evolved from abandoned farmland), ponds, drainage facilities, plantations, roads/ cycle tracks/ paths not heavily used as well as some waste ground and open storage to the further south – there are no high-rise buildings at all. We are also highly concerned about the obvious visual impacts that would be caused by the proposed high-rise development. In addition, we do not consider the additional human disturbance impact that would potentially be caused by the residents/ users from the proposed development which contains 3090 residential units (estimated residential population: 8343) would be of low significance, in view of the fact that high abundance of large waterbirds (including the globally Endangered BFS) utilise the NTMDC and many of them have been considered to be disturbance sensitive. Indeed, 30 individuals (maximum count) of the globally Endangered BFS, which is sensitive to disturbance/ human disturbance^{6,7}, have been recorded in the NTMDC; this simply means that this channel could support 7-8% of the Deep Bay population (using the Deep Bay abundances recorded in 2015, 2016, 2019 and 2020 as the base^{8,9,10,11}), and this clearly highlights its conservation importance. Any additional disturbance to this channel should be carefully assessed, and mitigated if possible, in order not to further reduce the range of habitats suitable for this endangered species. However, we do not agree to the assessment in the EcoIA relating to this aspect. In view of all the above, we object to this application and we urge the Board to reject it unequivocally. We also urge the Board to consider whether the ‘precautionary approach’ should also be applied when considering the potential impacts of the proposed development on NTMDC.

14. The gist of this application also mentions the following: ‘.....*These pieces of residual area have been left idle for decades and are considered a waste of scarce land resource.....*’ We would like to remind the Board that, according to the gist, there are five approved (with conditions) planning applications for low-rise residential developments (two are amendments to approved schemes) covering the current application site; the first one (A/YL-MP/110) was approved 18 years ago (in 2003) and the latest one (A/YL-MP/205) was approved 8 years ago (in 2013).

15. Thank you for your attention.

⁸ https://eaaflyway.net/wp-content/uploads/2018/01/bfs_census_2015.pdf

⁹ https://eaaflyway.net/wp-content/uploads/2018/01/bfs_census_2016.pdf

¹⁰ https://www.eaaflyway.net/wp-content/uploads/2021/01/bfs_census_report_2019.pdf

¹¹ <https://www.hkbws.org.hk/cms/en/hkbws/work/endangered-species/bfs-en/bfscensus2020>



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Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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

Figure 1. Distance between the application site and WCA.

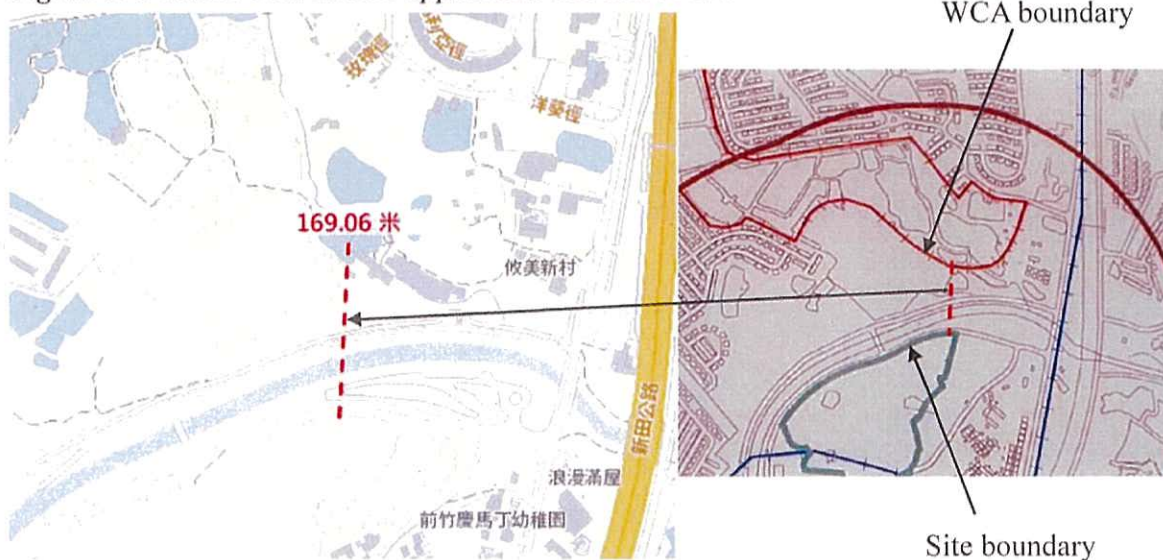


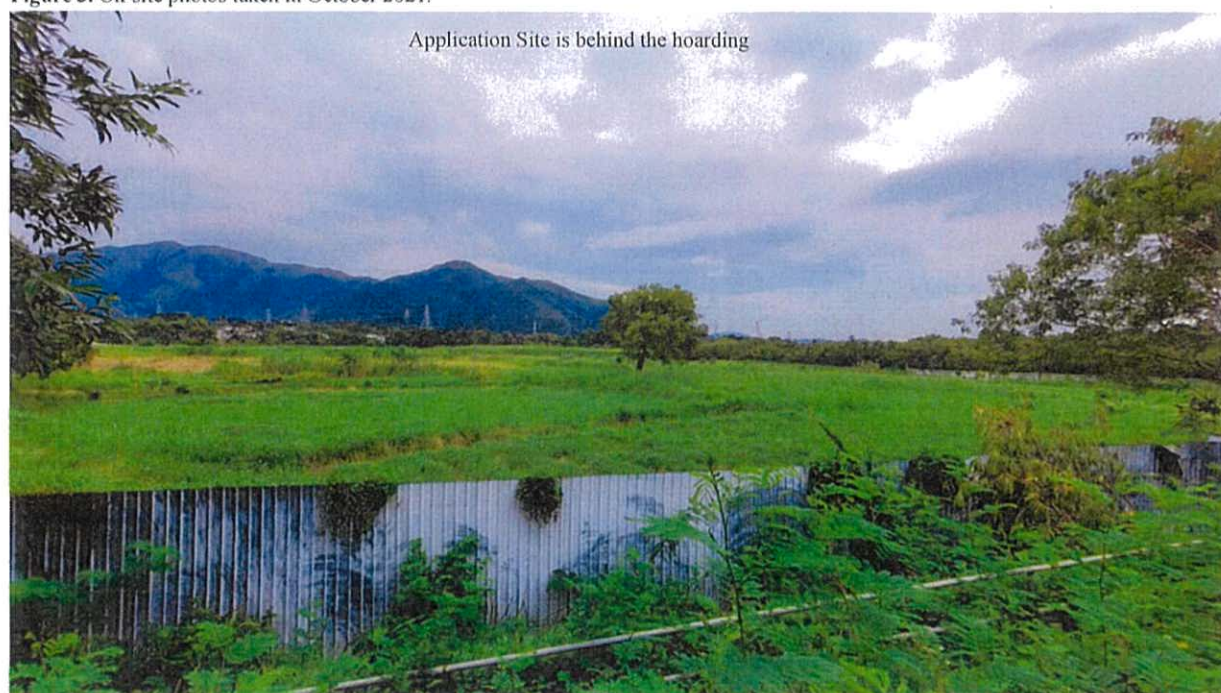
Figure 2. Distance between the application site and Ramsar Site.





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Figure 3. On-site photos taken in October 2021.

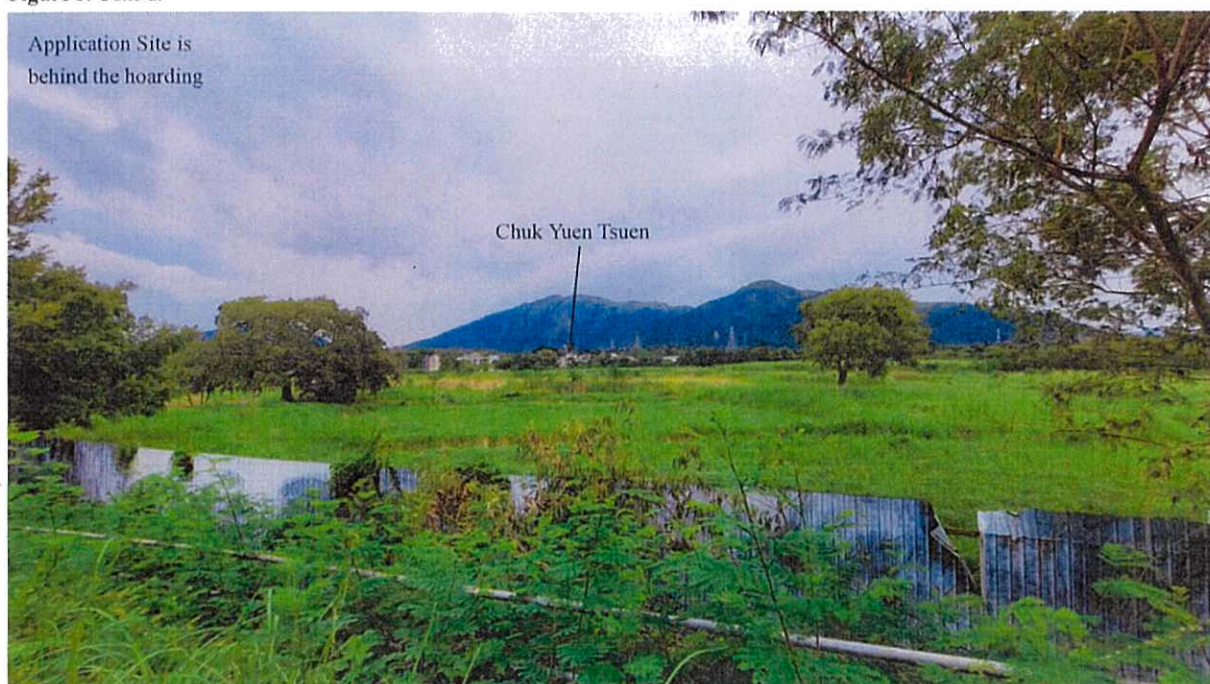


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Figure 3. Cont'd.

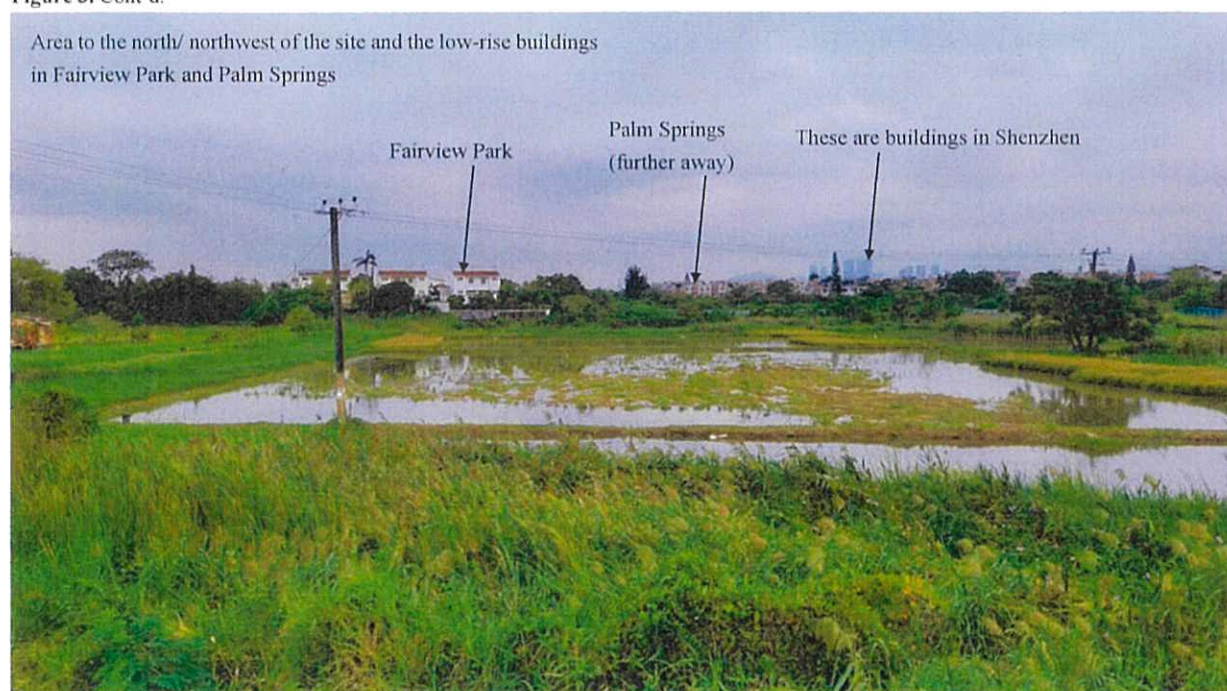


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Figure 3, Cont'd.



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Figure 3. Cont'd.



Yau Pok Road, pedestrian road and cycle track close to the site; are they heavily used?

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Figure 3. Cont'd.



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Figure 3. Cont'd.

Kam Pok Road and pedestrian road next to the site; are they heavily used?



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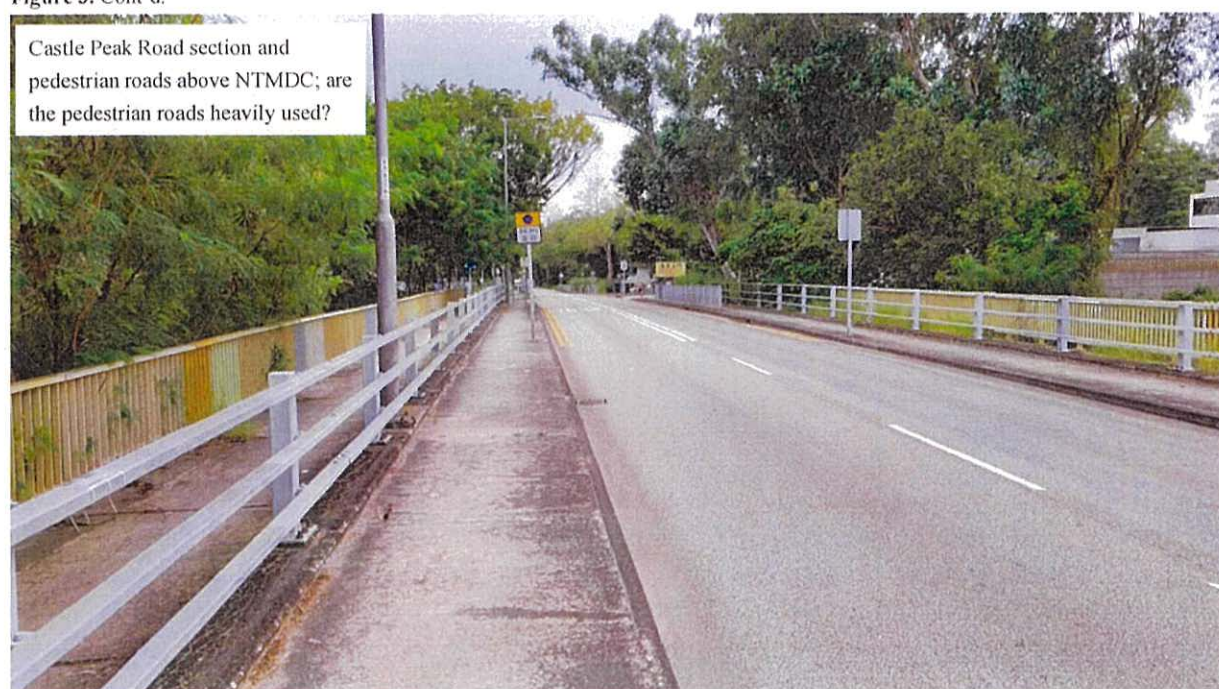
Figure 3. Cont'd.

Although the vegetation along Kam Pok Road seems to be thicker, NTMDC can still be seen from the road.



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Figure 3. Cont'd.



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Figure 4. Photomontage extracted from the gist of this application.



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