

# TOWN PLANNING BOARD

城市規劃委員會文件第 10435 號  
考慮日期：2018 年 6 月 22 日

《香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32》  
考慮申述編號 TPB/R/S/H15/32-1 至 3 及  
意見編號 TPB/R/S/H15/32-C1 至 C14

《香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32》

考慮申述編號 TPB/R/S/H15/32-1 至 3 及

意見編號 TPB/R/S/H15/32-C1 至 C14

申述事項	申述人 (編號 TPB/R/S/H15/32-)	提意見人 (編號 TPB/R/S/H15/32-)
<p><b>修訂項目 A –</b> 把位於石排灣道及田灣山道交界的一幅土地由「政府、機構或社區」地帶及顯示為「道路」的地方改劃為「住宅(甲類)5」地帶</p>	<p><u>總數：2</u></p> <p><u>反對(2)</u> <b>R1</b>：中西區關注組 <b>R2</b>：環保觸覺</p>	<p><u>總數：7</u></p> <p><u>支持 R1 至 R3(5)</u> <b>C1</b>：美港聯盟 <b>C2</b>：Melanie Moore <b>C3</b>：John Moore <b>C4</b>：Evelyn Moore <b>C5</b>：Genevieve Moore</p> <p><u>支持 R1(1)</u> <b>C6</b>：中西區關注組</p> <p><u>與 R1 及 R2(1)相關</u> <b>C14</b>：香港房屋協會(下稱「房協」)</p>
<p><b>修訂項目 B –</b> 把位於石排灣道近石排灣道及田灣山道交界的一幅狹長土地由顯示為「道路」的地方改劃為「綠化地帶」</p>	<p><u>總數：1</u></p> <p><u>反對(1)</u> <b>R1</b>：中西區關注組</p>	<p><u>總數：2</u></p> <p><u>支持 R1(1)</u> <b>C6</b>：中西區關注組</p> <p><u>與 R1 至 R2(1)相關</u> <b>C14</b>：房協</p>

<p><b>修訂項目 C –</b> 把毗鄰香港仔漁類批發市場的一幅土地由「休憩用地」地帶及顯示為「道路」的地方改劃為「政府、機構或社區」地帶</p>	<p><b><u>總數：1</u></b>  <b><u>反對(1)</u></b> <b>R1：中西區關注組</b></p>	<p><b><u>總數：2</u></b>  <b><u>支持 R1(1)</u></b> <b>C6：中西區關注組</b>  <b><u>與 R1 (1)相關</u></b> <b>C7：任葆琳(南區區議員)</b></p>
<p><b>修訂項目 D –</b> 把位於石排灣道華貴邨東面的一幅土地從規劃區剔除，以納入《薄扶林分區計劃大綱草圖編號 S/H10/16》內</p>	<p><b><u>總數：3</u></b>  <b><u>反對(3)</u></b> <b>R1：中西區關注組</b>  <b>R2：環保觸覺</b>  <b>R3：Mary Mulvihill</b></p>	<p><b><u>總數：12</u></b>  <b><u>支持 R1 至 R3(5)</u></b> <b>C1：美港聯盟</b>  <b>C2：Melanie Moore</b>  <b>C3：John Moore</b>  <b>C4：Evelyn Moore</b>  <b>C5：Genevieve Moore</b>  <b><u>支持 R1(1)</u></b> <b>C6：中西區關注組</b>  <b><u>支持 R3(3)</u></b> <b>C8：Mary Mulvihill</b>  <b>C9：Christopher Carline</b>  <b>C10：Luk Pang Kei</b>  <b><u>沒有指明(3)</u></b> <b>C11：尖沙咀居民關注組</b>  <b>C12：Steve Sau</b>  <b>C13：Lee Wai Kuen</b></p>

註：所有申述書和意見書載於附件 VIII(只提供予城市規劃委員會委員)，並已上載至城市規劃委員會(下稱「城規會」)網站 [http://www.info.gov.hk/tpb/tc/Website\\_S\\_H15\\_32\\_CHI.html](http://www.info.gov.hk/tpb/tc/Website_S_H15_32_CHI.html)，以及存放於規劃署位於北角及沙田的規劃資料查詢處供公眾查閱。

## 1. 引言

- 1.1 二零一七年九月十五日，《香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32》(見附件 I)根據《城市規劃條例》(下稱「條例」)第 5 條展示，以供公眾查閱。修訂項目載於附件 II 的修訂項目附表，其位置在圖 H-1 上顯示。
- 1.2 在為期兩個月的展示期內，當局共接獲 3 份申述書。二零一七年十二月十五日，當局公布所接獲的申述書，讓公眾提出意見，為期 3 星期，其間共接獲 14 份意見書。
- 1.3 二零一八年三月二十三日，城規會同意把所有申述(R1 至 R3)及意見書(C1 至 C14)以集體形式一併考慮。本文件旨在向城規會提供資料，以便考慮各項申述及意見。城規會已根據條例第 6B(3)條，邀請申述人及提意見人出席會議。

## 2. 背景

- 2.1 二零一六年十月二十八日，城規會轄下的都會規劃小組委員會(下稱「小組委員會」)同意由房協提交的一宗第 12A 條申請(編號 Y/H15/11)<sup>1</sup>。該宗申請涉及把位於石排灣道及田灣山道交界的一幅土地由「政府、機構或社區」地帶及顯示為「道路」的地方改劃為「住宅(甲類)」地帶，以作擬議住宅發展並為漁光村重建提供一塊遷置用地。相關的都會規劃小組委員會文件載於附件 VII(只提供予委員)，而上述小組委員會會議的記錄則載於附件 III。
- 2.2 二零一七年五月十二日，小組委員會同意對香港仔及鴨脷洲分區計劃大綱圖作出擬議修訂，以落實一宗獲批准的第 12A 條申請(編號 Y/H15/11)的決定。相關的都會規劃小組委員會文件第 3/17 號上載至城規會的網站

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<sup>1</sup> 公眾可到規劃署北角及沙田的規劃資料查詢處查閱相關的小組委員會文件及技術評估。全套小組委員會文件包括技術評估亦備存於城規會秘書處，供委員查閱。

[http://www.info.gov.hk/tpb/en/papers/MPC/580-mpc\\_3-17.pdf](http://www.info.gov.hk/tpb/en/papers/MPC/580-mpc_3-17.pdf)，而上述小組委員會會議的記錄則載於附件 IV。

- 2.3 二零一七年八月二十五日，小組委員會同意對香港仔及鴨脷洲分區計劃大綱圖作出擬議修訂，主要把位於石排灣道華貴邨東面的一幅土地從香港仔及鴨脷洲分區計劃大綱圖的規劃區剔除，以納入薄扶林分區計劃大綱圖內，從而在薄扶林南發展公營房屋以作為華富邨重建的遷置用地之一。相關的都會規劃小組委員會文件第 6/17 號上載至城規會的網站 [http://www.info.gov.hk/tpb/en/papers/MPC/587-mpc\\_6-17.pdf](http://www.info.gov.hk/tpb/en/papers/MPC/587-mpc_6-17.pdf)，而上述小組委員會會議的記錄則載於附件 V。
- 2.4 有關《薄扶林分區計劃大綱草圖編號 S/H10/16》的申述和意見的聆聽會，已於二零一八年五月十七日、二零一八年五月二十一日及二零一八年五月二十五日舉行。

### 3. 申述

#### 3.1 申述事項

全部 3 份申述書均為表示反對的申述；**R1** 表示反對全部 4 項修訂項目，**R2** 表示反對修訂項目 A 及 D，而 **R3** 表示只反對修訂項目 D。這些申述書由關注組、環保團體和一名公眾人士提交。所有申述書和意見書載於附件 VIII(只提供予委員)，並已上載至城規會網站 [http://www.info.gov.hk/tpb/tc/Website\\_S\\_H15\\_32\\_CHI.html](http://www.info.gov.hk/tpb/tc/Website_S_H15_32_CHI.html) 及存放於規劃署位於北角及沙田的規劃資料查詢處供公眾查閱。這些申述和意見的主要理由撮錄如下：

#### 3.2 表示反對的申述的主要理由

- 3.2.1 申述人 **R1** 反對全部修訂項目，理由是發展密度和建築物高度過高；破壞周邊綠化地區的生態；以及運輸及交通安排不足。
- 3.2.2 申述人 **R2** 反對修訂項目 A 及 D，理由是劃設「綠化地帶」旨在抑制市區範圍的擴展；改劃綠化地帶用地或長滿植物的用地以提供土地作城市發展，違反「綠化地帶」的規劃原則，並會對自然環境及生態造成負

面影響。目前的房屋危機是由內地移民和投資大量湧入所引致，政府與其尋找更多土地作發展之用，不如制定人口政策以控制人口增長。政府應先考慮發展其他土地資源(例如棕地、前軍事用地或高爾夫球場)，才改劃社會價值較高的綠化地帶和「政府、機構或社區」用地作房屋發展。

3.2.3 申述人 **R3** 反對修訂項目 **D**，理由是應維持香港仔郊野公園邊緣的綠化地帶的完整性，而不應將之撥入薄扶林範圍作發展；以及批准該項修訂會開放綠化地帶作進一步的發展。

#### 4. 就申述提出的意見

4.1 在 14 份就申述提出的意見書中，**C1 至 C5**(支持 **R1 至 R3**) 反對修訂項目 **A** 及 **D**；**C6**(支持 **R1**)反對全部修訂項目；**C7**(與 **R1** 相關)就修訂項目 **C** 提供意見；**C8 至 C10**(支持 **R3**)和 **C11 至 C13** 反對修訂項目 **D**；**C14**(與 **R1** 和 **R2** 相關)支持修訂項目 **A** 及 **B**。提意見人包括一名南區區議員 (**C7**)、房協(**C14**)、關注組(**C1**、**C6** 和 **C11**)和公眾人士。所有申述書和意見書載於附件 **VIII**(只提供予委員)，並已上載至城規會網站 [http://www.info.gov.hk/tpb/tc/Website\\_S\\_H15\\_32\\_CHI.html](http://www.info.gov.hk/tpb/tc/Website_S_H15_32_CHI.html) 及存放於規劃署位於北角及沙田的規劃資料查詢處供公眾查閱。

4.2 **C1 至 C6** 和 **C8 至 C13** 提出的主要反對理由與上文第 3.2 段所載由申述人提出的理由相若，即失去綠化地區，破壞自然環境，以及開放綠化地區作進一步的發展。**C7** 就修訂項目 **C** 提供意見，表示可待「香港仔整體交通情況」的顧問研究完成後才改劃有關用地。

4.3 **C14** 由房協提交，房協指漁光村已落成逾 50 年，設施日漸老化，故重建漁光村實屬必要。漁光村的重建取決於能否物色到一幅對受影響居民而言可以接受的適當遷置用地。漁光村的居民大多是長者，若可在附近地方進行安置則最為理想，因為可讓年老居民維繫區內的社交圈子。修訂項目 **A** 的用地是唯一可即時作區內遷置的可用用地，以便分階段重建漁光村；而且附近一帶並無其他合適的替代用地，可供適時原區

遷置漁光村。房協進行的技術評估亦證明，擬議發展不會對周邊地區的交通、環境、視覺、景觀、岩土、生態和基礎設施造成不良影響。房協先後於二零一六年一月二十日和一月二十七日舉行兩次簡介會，分別諮詢田灣居民和漁光村受影響的租戶。房協亦於二零一六年三月二十一日向南區區議會轄下的地區發展及房屋事務委員會介紹擬議發展。當區居民和南區區議會普遍支持擬議發展。

## 5. 規劃考慮因素及評估

### 5.1 申述用地及周邊地區(圖 H-1)

#### **申述用地 A (即修訂項目 A)(圖 H2 至 H4)**

5.1.1 申述用地 A 位於石排灣道及田灣山道交界，廣為天然及人造山坡所覆蓋。周邊地區以住宅為主，並設有多項政府、機構或社區設施。該用地南端有部分地方建有一幢細小的單層建築物，屬食物環境衛生署(下稱「食環署」)防治蟲鼠辦事處，而該辦事處將會重設於擬議發展內。此外，田灣街現有的綜合家庭服務中心將會遷至擬議發展內一間面積較大的處所，以服務當地社區。食環署及社會福利署均同意有關重置及搬遷安排。除了防治蟲鼠辦事處外，該用地並無其他指定或長遠已規劃的政府、機構或社區用途。相關決策局／部門亦未有要求使用／預留該用地作政府、機構或社區用途。

#### **申述用地 B (即修訂項目 B)(圖 H2 至 H4)**

5.1.2 申述用地 B 位於申述用地 A 的西南鄰，是一幅植物茂生的狹長山坡。將該用地改劃為「綠化地帶」，是要反映該處的現況及其規劃意向。

#### **申述用地 C (即修訂項目 C)(圖 H5 至 H7)**

5.1.3 申述用地 C 涵蓋兩幅土地，屬香港仔漁類批發市場的一部分。將該用地改劃為「政府、機構或社區」地

帶，是要反映香港仔海傍道已落成的道路路線和漁類批發市場的現有界線。

### **申述用地 D (即修訂項目 D) (圖 H8 至 H9)**

5.1.4 申述用地 D 是位於石排灣道華貴邨東北面一幅植物茂生的山坡用地，其北面、東面和南面均是滿布植被的山坡。該用地是被選為發展公營房屋的五幅政府用地之一，以配合華富邨重建。有關土地範圍已從香港仔及鴨脷洲分區計劃大綱圖中剔除，以納入薄扶林分區計劃大綱圖。香港仔及鴨脷洲分區計劃大綱圖的規劃區界線亦已作出相應修訂。

## **5.2 規劃意向**

5.2.1 「住宅(甲類)」地帶的規劃意向，主要是作高密度住宅發展。在建築物的最低 3 層，或現有建築物特別設計的非住宅部分，商業用途屬經常准許的用途。

5.2.2 「政府、機構或社區」地帶的規劃意向，主要是提供政府、機構或社區設施，以配合當地居民及／或該地區、區域，以至全港的需要；以及是供應土地予政府、提供社區所需社會服務的機構或其他機構，以供用於與其工作直接有關或互相配合的用途。

5.2.3 「休憩用地」地帶的規劃意向，主要是提供戶外公共空間作各種動態及／或靜態康樂用途，以配合當地居民和其他市民的需要。

5.2.4 「綠化地帶」的規劃意向，主要是利用天然地理環境作為市區和近郊的發展區的界限，保護天然景觀和環境，以及為當地居民和遊人提供郊野康樂場地。根據一般推定，此地帶不宜進行發展。

## **5.3 對申述所持的理由作出的回應**

5.3.1 至於涉及申述用地 D 的申述(即 **R1 至 R3**)，申述人反對有關修訂的主要理由包括失去綠化地區，破壞自然環境／生態環境，以及開放綠化地帶作進一步的發

展。這些反對理由均與薄扶林南的擬議公營房屋發展有關，故應在討論薄扶林分區計劃大綱圖時考慮。事實上，**R1 至 R3** 亦就《薄扶林分區計劃大綱草圖編號 S/H10/16》提交類似的申述(分別為 R1260、R1259 及 R1787)，城規會已予以考慮<sup>2</sup>。

5.3.2 至於涉及申述用地 **B** 及 **C** 的申述(即 **R1**)，需指出的是申述人並沒有提出任何具體的反對理由。把這些用地分別改劃作「綠化地帶」及「政府、機構或社區」地帶，是為了反映有關用地的現況，因此是合適的。

5.3.3 至於涉及申述用地 **A** 的申述(即 **R1** 及 **R2**)，當局對申述所持的理由作出的回應如下：

#### 發展密度及建築物高度

5.3.4 申述用地 **A** 涉及一宗由房協提交的第 12A 條申請(申請編號 Y/H15/11)，該宗申請於二零一六年十月二十八日獲小組委員會考慮和同意。申述用地 **A** 距離漁光村約 900 米，當局認為是一幅合適的遷置用地，可配合漁光村重建。在「住宅(甲類)5」地帶下，申述用地 **A** 的擬議發展的最大總樓面面積限制為 27 414 平方米(相等於 10.5 倍的總地積比率)，當局認為該用地與周邊位於「住宅(甲類)」及「住宅(戊類)」地帶內的發展(大部分地方的地積比率約為 8 倍至 15 倍<sup>3</sup>不等)互相協調。申述用地 **A** 的最高建築物高度限制為主水平基準上 100 米，亦與田灣區內「住宅(甲類)」及「住宅(戊類)」地帶的建築物高度限制互相協調，該區的建築物高度限制大致由石排灣道兩旁的主水平基準上 85 米和 100 米，逐漸向位於山上的田灣邨遞增。重建漁光村後將會在現有單位數目上提供約 1 400 個單位(包括申述用地 **A** 擬議發展約 600 個單位)。

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<sup>2</sup> 關於《薄扶林分區計劃大綱草圖編號 S/H10/16》的申述 R1260、R1259 及 R1787，當局的回應載於另一份城市規劃委員會文件第 10425 號。《薄扶林分區計劃大綱草圖編號 S/H10/16》的申述和意見的聆聽會已分別於二零一八年五月十七日、五月二十一日及五月二十五日舉行。城規會將於二零一八年六月二十二日商議這些申述和意見。

<sup>3</sup> 香港仔及鴨脷洲分區計劃大綱圖雖無訂定地積比率和上蓋面積限制，規劃區內的發展仍受《建築物(規劃)規例》規管。

## 對自然環境及周邊地區的影響

5.3.5 申述人關注到申述用地 A 的擬議發展可能會造成交通、環境及生態影響，而公眾就第 12A 條申請(編號 Y/H15/11)提交的意見書亦提出相若的關注。小組委員會在同意該宗第 12A 條申請時，已考慮到項目倡議者(即房協(C14))所進行的多項影響評估的結果，並備悉擬議發展不會對周邊地區的交通、環境、視覺、景觀、岩土、生態及基礎建設造成不良影響。此外，有關進行噪音影響評估和詳細天然山坡災害研究的規定，亦會納入申述用地的批地條件中。

## 其他事宜

5.3.6 正如上文第 5.3.4 段所述，申述用地 A 是漁光村重建的一幅合適遷置用地。申述人 R2 所建議的其他替代用地(例如棕地、前軍事用地或高爾夫球場)並不適宜取代申述用地，作為漁光村重建的原區遷置用地。

## 5.4 對意見所持的理由作出的回應

關於意見 C14，當局已知悉其表示支持申述用地 A 及 B 的意見。意見 C1 至 C13 所持的理由與申述所提出的理由相若。上文第 5.3 段對申述作出的回應亦適用。

5.5 各項申述理由和意見摘要，以及規劃署對申述和意見的回應，載於附件 VI。

## 6. 諮詢政府部門

規劃署已諮詢以下政府部門，他們的意見已適當地收錄在上文：

- (a) 土木工程拓展署總工程師／專責事務(工程)；
- (b) 路政署總工程師／港島；
- (c) 運輸署署長；
- (d) 漁農自然護理署署長；
- (e) 環保署署長；
- (f) 食物環境衛生署署長；

- (g) 房屋署署長；
- (h) 康樂及文化事務署署長；
- (i) 社會福利署署長；
- (j) 地政總署地政專員／港島西及南；
- (k) 民政事務總署南區民政事務專員；以及
- (l) 土木工程拓展署土力工程處處長。

## 7. 規劃署的意見

基於上文第 5 段的評估，規劃署不支持所有申述(**R1 至 R3**)，並認為不應修訂分區計劃大綱草圖以順應申述，原因如下：

- (a) 修訂項目 A 是合適的，有助漁光村重建。擬議發展不會對周邊地區的交通、環境、視覺、景觀、岩土、生態和基礎設施造成不良影響(**R1 及 R2**)；
- (b) 修訂項目 B 及 C 是為了反映有關用地的現況(**R1**)；以及
- (c) 修訂項目 D 與薄扶林南的擬議公營房屋發展有關，城市規劃委員會已在討論薄扶林分區計劃大綱圖時考慮有關申述(**R1 至 R3**)。

## 8. 請求作出決定

請城規會審議各項申述和意見，並決定建議／不建議順應／局部順應申述的內容而修訂該圖則。

## 附件

- 附件 I                      《香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32》(縮圖)
- 附件 II                     《香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32》的修訂項目附表
- 附件 III                    城市規劃委員會轄下都會規劃小組委員會二零一六年十月二十八日的會議記錄摘要(只提供英文版)

- 附件 IV** 城市規劃委員會轄下都會規劃小組委員會二零一七年五月十二日的會議記錄摘要(只提供英文版)
- 附件 V** 城市規劃委員會轄下都會規劃小組委員會二零一七年八月二十五日的會議記錄摘要(只提供英文版)
- 附件 VI** 申述及意見摘要和規劃署回應
- 附件 VII** 都會規劃小組委員文件第 Y/H15/11A 號(文件正文)(只提供予委員)
- 附件 VIII** 所提交的全部申述書和意見書(只提供予委員)
- 圖 H-1** 申述用地的位置圖
- 圖 H-2 至 H-4** 申述用地 A 及 B 的平面圖、航攝照片及實地照片
- 圖 H-5 至 H-7** 申述用地 C 的平面圖、航攝照片及實地照片
- 圖 H-8 至 H-9** 申述用地 D 的平面圖及航攝照片

規劃署

二零一八年六月



規劃範圍界線已作修改  
BOUNDARY OF  
PLANNING SCHEME AMENDED

申述個案編號R1-R2  
REPRESENTATIONS No. R1-R2  
意見編號C1-C6和C14  
COMMENTS No. C1-C6 & C14  
修訂項目A  
AMENDMENT ITEM A

申述個案編號R1  
REPRESENTATIONS No. R1  
意見編號C6和C14  
COMMENTS No. C6 & C14  
修訂項目B  
AMENDMENT ITEM B

申述個案編號R1-R3  
REPRESENTATIONS No. R1-R3  
意見編號C1-C6和C8-C13  
COMMENTS No. C1-C6 & C8-C13  
修訂項目D  
AMENDMENT ITEM D

申述個案編號R1  
REPRESENTATIONS No. R1  
意見編號C6-C7  
COMMENTS No. C6-C7  
修訂項目C  
AMENDMENT ITEM C

貨物裝卸區  
CARGO HANDLING AREA

香港仔西避風塘  
ABERDEEN WEST  
TYPHOON SHELTER

石排灣  
SHEK PAI WAN

電力供應裝置及酒店  
ELECTRICITY SUPPLY  
INSTALLATION AND HOTEL

地點界線只作識別用  
SITE BOUNDARY FOR  
IDENTIFICATION PURPOSE ONLY

位置圖 LOCATION PLAN

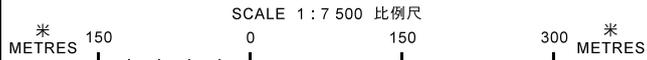
就香港仔及鴨洲分區計劃大綱草圖編號 S/H15/32  
提出的申述個案編號R1-R3及相關意見編號C1-C14作出考慮  
CONSIDERATION OF REPRESENTATIONS No. R1-R3  
AND RELATED COMMENTS No. C1-C14  
TO THE DRAFT ABERDEEN & AP LEI CHAU  
OUTLINE ZONING PLAN No. S/H15/32

規劃署  
PLANNING  
DEPARTMENT



參考編號  
REFERENCE No.  
R/S/H15/32

圖 PLAN  
H - 1



本摘要圖於2018年5月18日擬備，  
所根據的資料為於2017年9月15日  
展示的分區計劃大綱圖編號S/H15/32  
EXTRACT PLAN PREPARED ON 18.5.2018  
BASED ON OUTLINE ZONING PLAN  
No. S/H15/32 EXHIBITED ON 15.9.2017



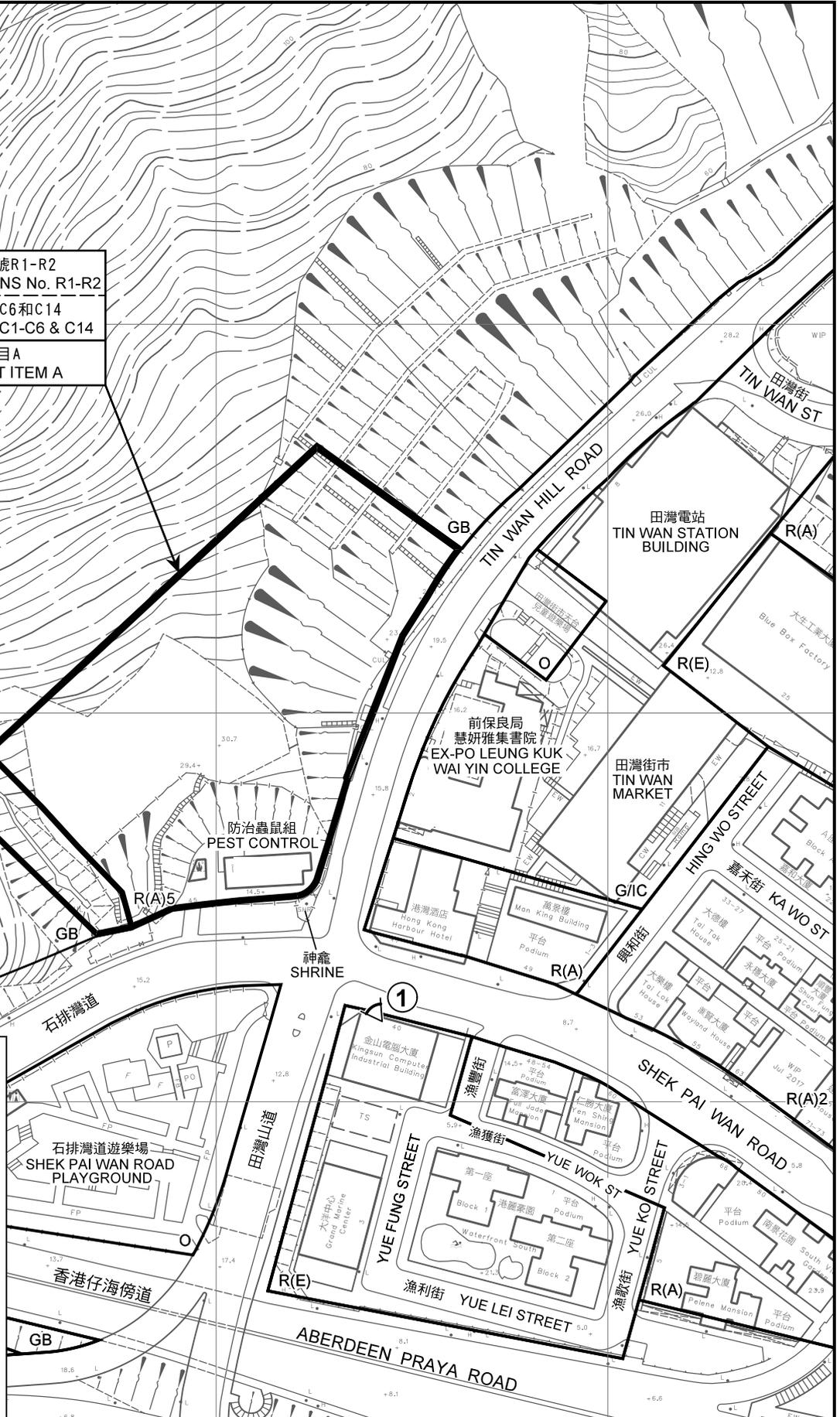
申述個案編號R1-R2  
REPRESENTATIONS No. R1-R2  
意見編號C1-C6和C14  
COMMENTS No. C1-C6 & C14  
修訂項目A  
AMENDMENT ITEM A

申述個案編號R1  
REPRESENTATIONS No. R1  
意見編號C6和C14  
COMMENTS No. C6 & C14  
修訂項目B  
AMENDMENT ITEM B

**圖例 LEGEND**

- R(A)** 住宅(甲類)  
RESIDENTIAL (GROUP A)
- R(E)** 住宅(戊類)  
RESIDENTIAL (GROUP E)
- G/I/C** 政府、機構或社區  
GOVERNMENT, INSTITUTION OR COMMUNITY
- O** 休憩用地  
OPEN SPACE
- GB** 綠化地帶  
GREEN BELT
- ①** 實地照片的觀景點(參閱圖H-4)  
VIEWING POINT OF SITE PHOTO  
(REFER PLAN H-4)

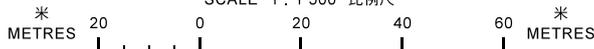
地點界線只作識別用  
SITE BOUNDARY FOR  
IDENTIFICATION PURPOSE ONLY



**平面圖 SITE PLAN**

就香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32  
提出的申述個案編號R1-R3及相關意見編號C1-C14作出考慮  
CONSIDERATION OF REPRESENTATIONS No. R1-R3  
AND RELATED COMMENTS No. C1-C14  
TO THE DRAFT ABERDEEN & AP LEI CHAU  
OUTLINE ZONING PLAN No. S/H15/32

SCALE 1 : 1 500 比例尺



規劃署  
**PLANNING  
DEPARTMENT**



參考編號  
REFERENCE No.  
R/S/H15/32

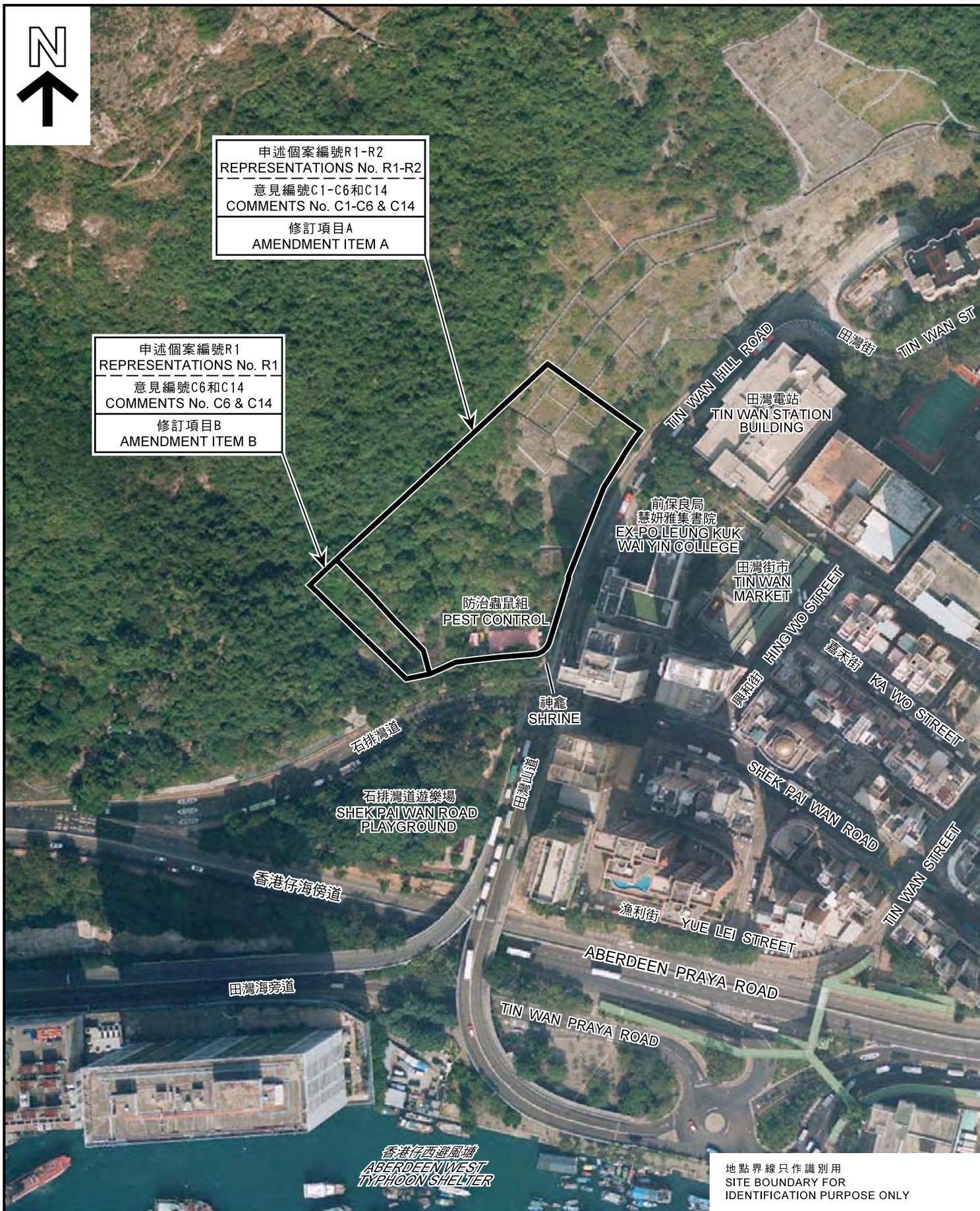
**圖 PLAN**  
H - 2

本摘要圖於2018年5月18日擬備，  
所根據的資料為測量圖編號  
11-SW-23C  
EXTRACT PLAN PREPARED ON 18.5.2018  
BASED ON SURVEY SHEET No.  
11-SW-23C



申述個案編號R1-R2  
 REPRESENTATIONS No. R1-R2  
 意見編號C1-C6和C14  
 COMMENTS No. C1-C6 & C14  
 修訂項目A  
 AMENDMENT ITEM A

申述個案編號R1  
 REPRESENTATIONS No. R1  
 意見編號C6和C14  
 COMMENTS No. C6 & C14  
 修訂項目B  
 AMENDMENT ITEM B



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 SITE BOUNDARY FOR  
 IDENTIFICATION PURPOSE ONLY

**航攝照片 AERIAL PHOTO**

本摘要圖於2018年5月18日擬備，所根據的資料為地政總署於2016年1月1日拍得的航攝照片編號CS62660

EXTRACT PLAN PREPARED ON 18.5.2018  
 BASED ON AERIAL PHOTO No. CS62660  
 TAKEN ON 1.1.2016 BY  
 LANDS DEPARTMENT

就香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32 提出的申述個案編號R1-R3及相關意見編號C1-C14作出考慮  
 CONSIDERATION OF REPRESENTATIONS No. R1-R3  
 AND RELATED COMMENTS No. C1-C14  
 TO THE DRAFT ABERDEEN & AP LEI CHAU  
 OUTLINE ZONING PLAN No. S/H15/32

**規劃署  
 PLANNING  
 DEPARTMENT**



參考編號  
 REFERENCE No.  
 R/S/H15/32

**圖 PLAN**  
 H - 3

1



申述個案編號R1  
REPRESENTATIONS No. R1  
意見編號C6和C14  
COMMENTS No. C6 & C14  
修訂項目B  
AMENDMENT ITEM B

申述個案編號R1-R2  
REPRESENTATIONS No. R1-R2  
意見編號C1-C6和C14  
COMMENTS No. C1-C6 & C14  
修訂項目A  
AMENDMENT ITEM A

地點界線只作識別用  
SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

**實地照片 SITE PHOTO**

本圖於2018年5月18日擬備，所根據的資料為攝於2017年3月28日的實地照片  
EXTRACT PLAN PREPARED ON 18.5.2018  
BASED ON SITE PHOTO TAKEN ON 28.3.2017

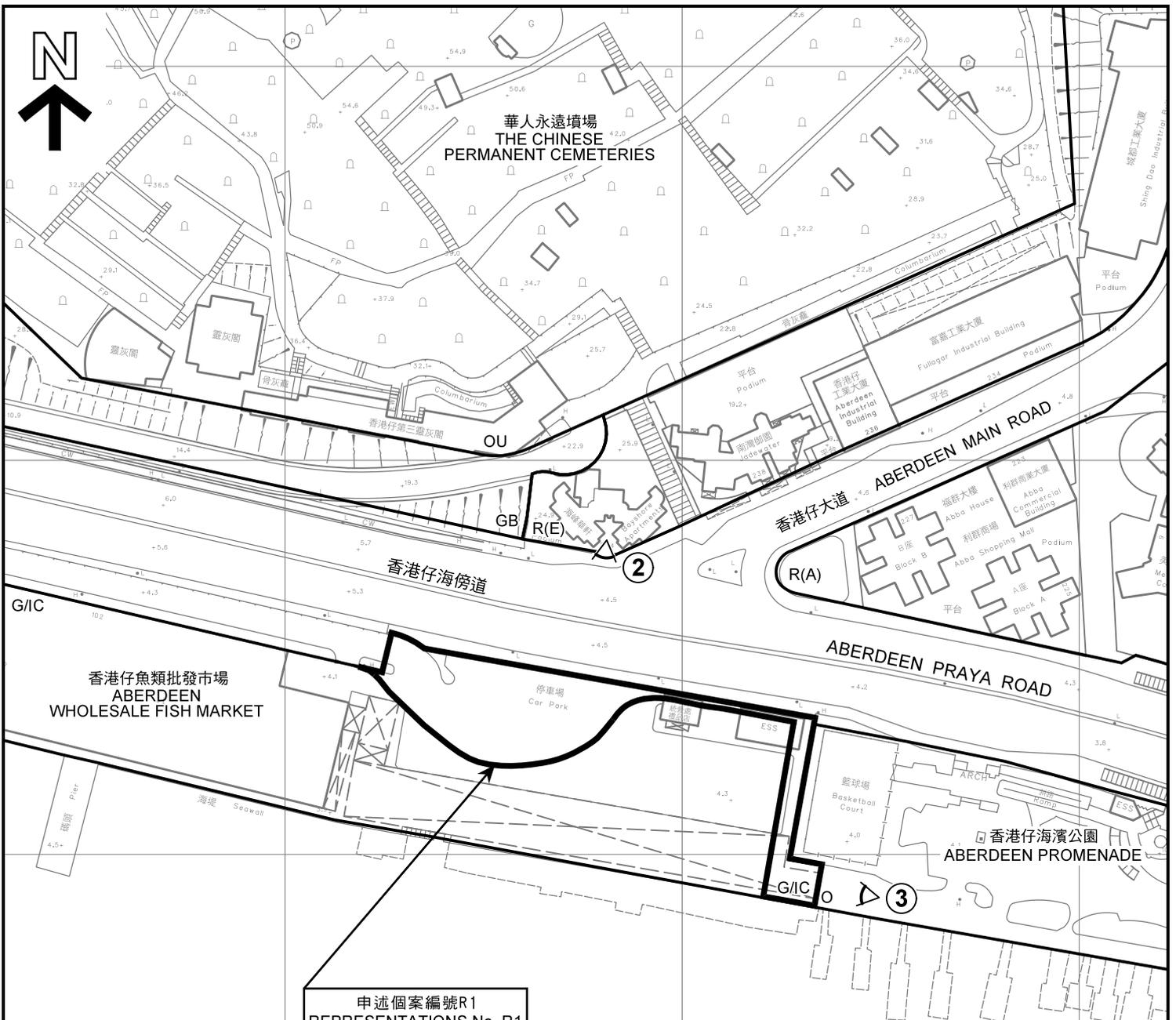
就香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32 提出的申述個案編號R1-R3及相關意見編號C1-C14作出考慮  
CONSIDERATION OF REPRESENTATIONS No. R1-R3 AND RELATED COMMENTS No. C1-C14 TO THE DRAFT ABERDEEN & AP LEI CHAU OUTLINE ZONING PLAN No. S/H15/32

規劃署  
PLANNING DEPARTMENT



參考編號  
REFERENCE No.  
R/S/H15/32

圖 PLAN  
H - 4

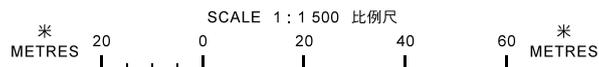


申述個案編號 R1  
 REPRESENTATIONS No. R1  
 意見編號 C6-C7  
 COMMENTS No. C6-C7  
 修訂項目 C  
 AMENDMENT ITEM C

- 圖例 LEGEND**
- R(A)** 住宅 (甲類)  
RESIDENTIAL (GROUP A)
  - R(E)** 住宅 (戊類)  
RESIDENTIAL (GROUP E)
  - G/I/C** 政府、機構或社區  
GOVERNMENT, INSTITUTION OR COMMUNITY
  - O** 休憩用地  
OPEN SPACE
  - OU** 其他指定用途  
OTHER SPECIFIED USES
  - GB** 綠化地帶  
GREEN BELT
  - ②** 實地照片的觀景點 (參閱圖 H-7)  
VIEWING POINT OF SITE PHOTO (REFER PLAN H-7)
- 地點界線只作識別用  
 SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

**平面圖 SITE PLAN**

就香港仔及鴨洲分區計劃大綱草圖編號 S/H15/32 提出的申述個案編號 R1-R3 及相關意見編號 C1-C14 作出考慮  
 CONSIDERATION OF REPRESENTATIONS No. R1-R3 AND RELATED COMMENTS No. C1-C14 TO THE DRAFT ABERDEEN & AP LEI CHAU OUTLINE ZONING PLAN No. S/H15/32



本摘要圖於 2018 年 5 月 18 日擬備，  
 所根據的資料為測量圖編號  
 11-SW-23C 及 D  
 EXTRACT PLAN PREPARED ON 18.5.2018  
 BASED ON SURVEY SHEETS No.  
 11-SW-23C & D

規劃署  
**PLANNING DEPARTMENT**



參考編號  
 REFERENCE No.  
**R/S/H15/32**

**圖 PLAN**  
**H - 5**



華人永遠墳場  
THE CHINESE  
PERMANENT CEMETERIES

香港仔大道  
ABERDEEN MAIN ROAD

南寧街  
NAM NING ST

香港仔大道

香港仔海傍道

香港仔魚類批發市場  
ABERDEEN  
WHOLESALE FISH MARKET

ABERDEEN PRAYA ROAD

香港仔海濱公園  
ABERDEEN PROMENADE

香港仔西避風塘  
ABERDEEN WEST  
TYPHOON SHELTER

申述個案編號R1  
REPRESENTATIONS No. R1  
意見編號C6-C7  
COMMENTS No. C6-C7  
修訂項目C  
AMENDMENT ITEM C

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SITE BOUNDARY FOR  
IDENTIFICATION PURPOSE ONLY

### 航攝照片 AERIAL PHOTO

就香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32  
提出的申述個案編號R1-R3及相關意見編號C1-C14作出考慮  
CONSIDERATION OF REPRESENTATIONS No. R1-R3  
AND RELATED COMMENTS No. C1-C14  
TO THE DRAFT ABERDEEN & AP LEI CHAU  
OUTLINE ZONING PLAN No. S/H15/32

規劃署  
PLANNING  
DEPARTMENT



參考編號  
REFERENCE No.  
R/S/H15/32

圖 PLAN  
H - 6

本摘要圖於2018年5月18日擬備，所根據的資料為地政總署於2016年1月1日拍得的航攝照片編號CS62660  
EXTRACT PLAN PREPARED ON 18.5.2018  
BASED ON AERIAL PHOTO No. CS62660  
TAKEN ON 1.1.2016 BY  
LANDS DEPARTMENT



申述個案編號R1 REPRESENTATIONS No. R1
意見編號C6-C7 COMMENTS No. C6-C7
修訂項目C AMENDMENT ITEM C

地點界線只作識別用  
SITE BOUNDARY FOR  
IDENTIFICATION PURPOSE ONLY

### 實地照片 SITE PHOTOS

本圖於2018年5月18日擬備，所根據的  
資料為攝於2017年3月28日的實地照片  
EXTRACT PLAN PREPARED ON 18.5.2018  
BASED ON SITE PHOTOS TAKEN ON 28.3.2017

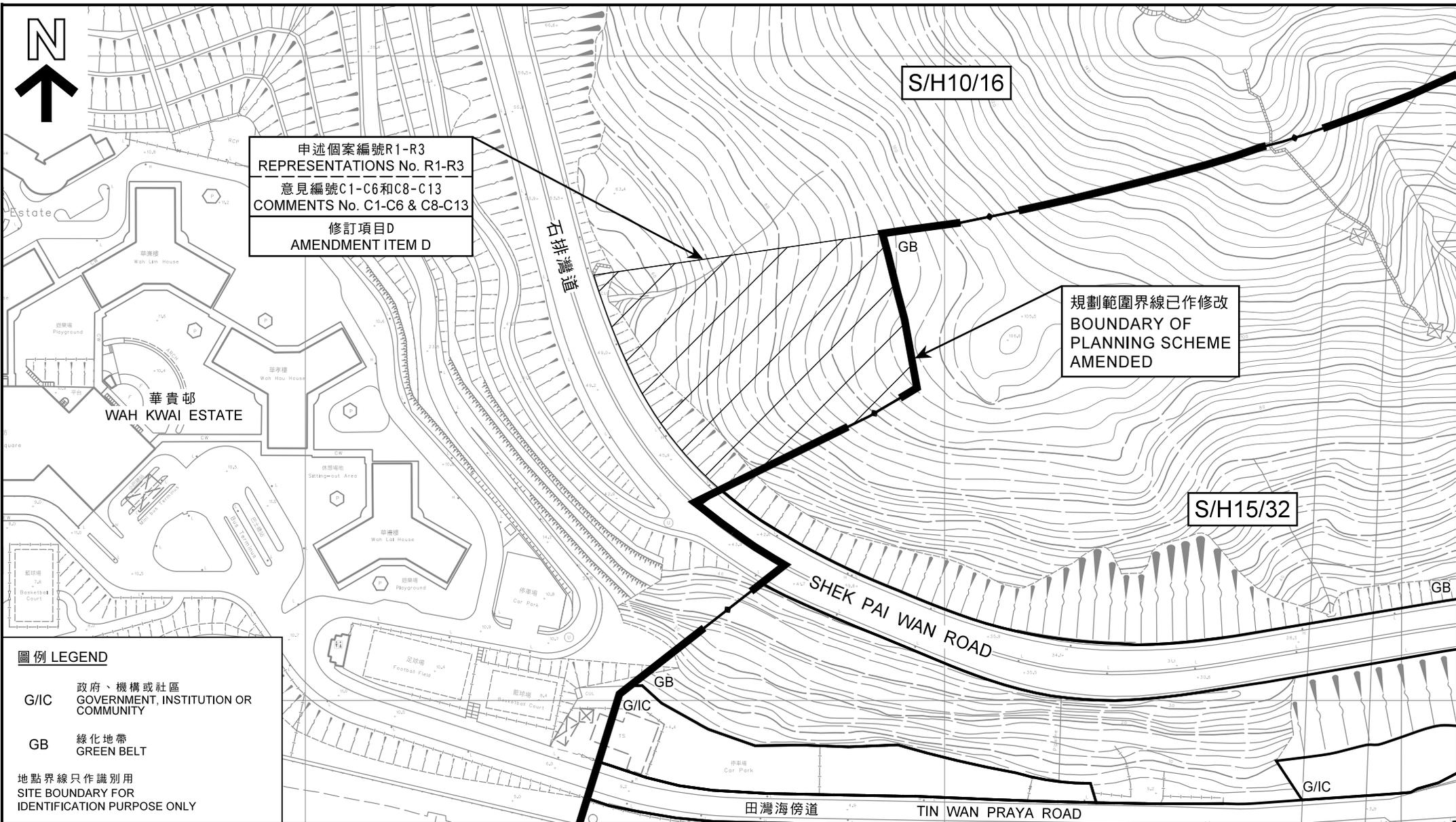
就香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32  
提出的申述個案編號R1-R3及相關意見編號C1-C14作出考慮  
CONSIDERATION OF REPRESENTATIONS No. R1-R3  
AND RELATED COMMENTS No. C1-C14  
TO THE DRAFT ABERDEEN & AP LEI CHAU  
OUTLINE ZONING PLAN No. S/H15/32

規劃署  
PLANNING  
DEPARTMENT



參考編號  
REFERENCE No.  
R/S/H15/32

圖 PLAN  
H - 7



**圖例 LEGEND**

G/IC	政府、機構或社區 GOVERNMENT, INSTITUTION OR COMMUNITY
GB	綠化地帶 GREEN BELT

地點界線只作識別用  
SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

本摘要圖於2018年6月12日擬備，  
所根據的資料為測量圖編號  
11-SW-22D

EXTRACT PLAN PREPARED ON 12.6.2018  
BASED ON SURVEY SHEET No. 11-SW-22D

**平面圖 SITE PLAN**

就香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32  
提出的申述個案編號R1-R3及相關意見編號C1-C14作出考慮  
CONSIDERATION OF REPRESENTATIONS No. R1-R3  
AND RELATED COMMENTS No. C1-C14  
TO THE DRAFT ABERDEEN & AP LEI CHAU  
OUTLINE ZONING PLAN No. S/H15/32

SCALE 1:2 000 比例尺

米 METRES 40 0 40 80 米 METRES

**規劃署  
PLANNING  
DEPARTMENT**

參考編號  
REFERENCE No.  
R/S/H15/32

**圖 PLAN**  
H - 8



申述個案編號R1-R3  
 REPRESENTATIONS No. R1-R3  
 意見編號C1-C6和C8-C13  
 COMMENTS No. C1-C6 & C8-C13  
 修訂項目D  
 AMENDMENT ITEM D

規劃範圍界線已作修改  
 BOUNDARY OF  
 PLANNING SCHEME  
 AMENDED

華貴邨  
 WAH KWAI ESTATE

S/H10/16

S/H15/32

SHEK PAI WAN ROAD

田灣海傍道  
 TIN WAN PRAYA ROAD

地點界線只作識別用  
 SITE BOUNDARY FOR  
 IDENTIFICATION PURPOSE ONLY

航攝照片 AERIAL PHOTO

本摘要圖於2018年6月12日擬備，所根據的資料為地政總署於2017年1月6日拍得的航攝照片編號E011989C  
 EXTRACT PLAN PREPARED ON 12.6.2018  
 BASED ON AERIAL PHOTO No. E011989C  
 TAKEN ON 6.1.2017 BY LANDS DEPARTMENT

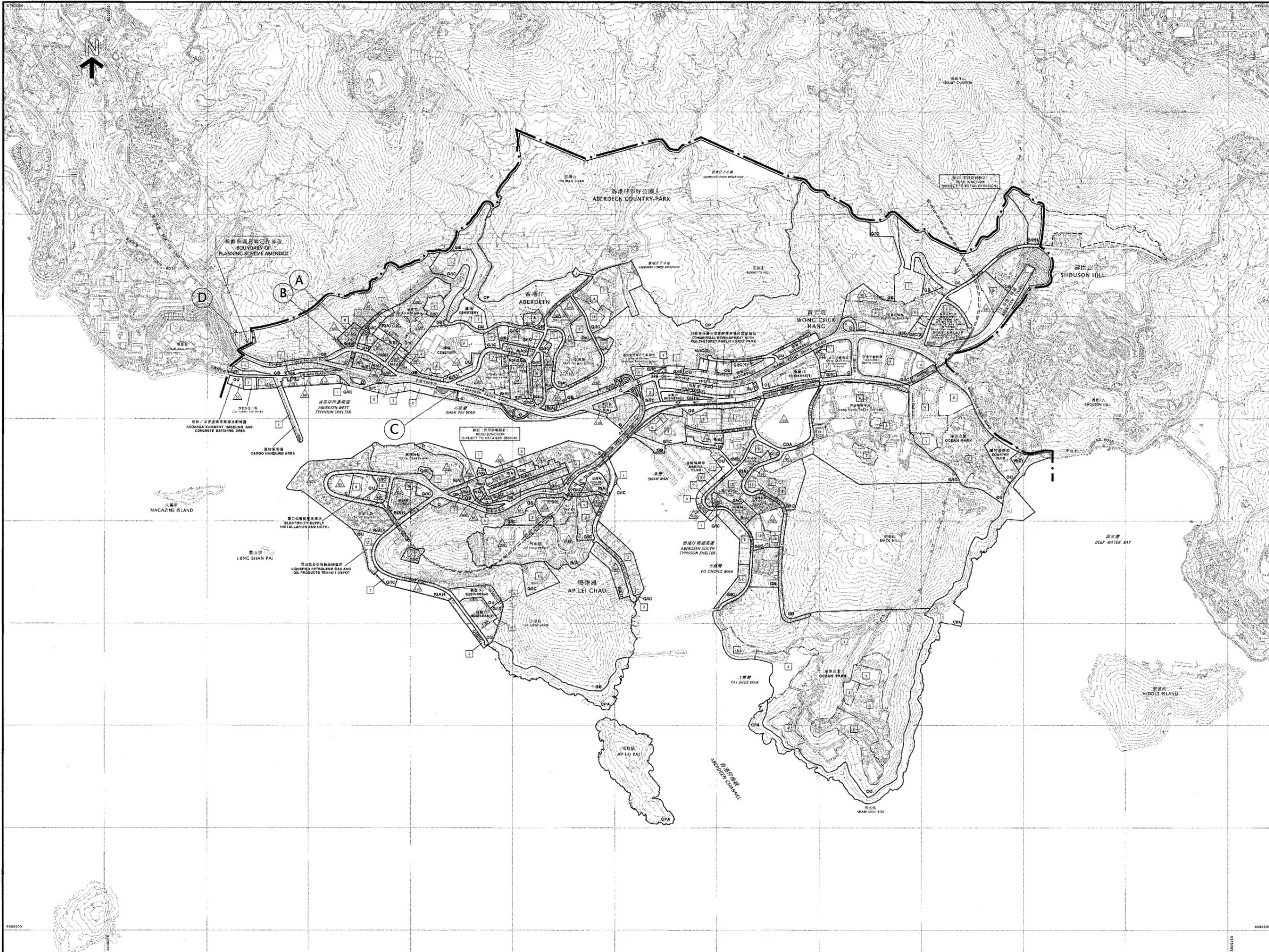
就香港仔及鴨脷洲分區計劃大綱草圖編號 S/H15/32 提出的申述個案編號R1-R3及相關意見編號C1-C14作出考慮  
 CONSIDERATION OF REPRESENTATIONS No. R1-R3 AND RELATED COMMENTS No. C1-C14 TO THE DRAFT ABERDEEN & AP LEI CHAU OUTLINE ZONING PLAN No. S/H15/32

規劃署  
 PLANNING  
 DEPARTMENT



參考編號  
 REFERENCE No.  
 R/S/H15/32

圖 PLAN  
 H - 9



**圖例 NOTATION**

ZONES	地帶	
COMMERCIAL	C	商業
COMPREHENSIVE DEVELOPMENT AREA	CDA	綜合發展區
RESIDENTIAL (GROUP A)	RA(A)	住宅(甲類)
RESIDENTIAL (GROUP C)	RA(C)	住宅(丙類)
RESIDENTIAL (GROUP D)	RA(D)	住宅(丁類)
RESIDENTIAL (GROUP E)	RA(E)	住宅(戊類)
INDUSTRIAL	I	工業
GOVERNMENT, INSTITUTION OR COMMUNITY	GIC	政府、機構或社區
OPEN SPACE	O	休憩用地
OTHER SPECIFIED USES	OU	其他指定用途
GREEN BELT	GB	綠化地帶
COASTAL PROTECTION AREA	CPA	海岸保護區
SITE OF SPECIAL SCIENTIFIC INTEREST	SSSI	具特殊科學價值地點
COUNTRY PARK	CP	郊野公園
COMMUNICATIONS	交通	
RAILWAY AND STATION (UNDERGROUND)		鐵路及車站(地下)
RAILWAY AND STATION (ELEVATED)		鐵路及車站(高架)
MAJOR ROAD AND JUNCTION		主要道路及路口
ELEVATED ROAD		高架道路
MISCELLANEOUS	其他	
BOUNDARY OF PLANNING SCHEME		規劃區界線
BUILDING HEIGHT CONTROL ZONE BOUNDARY		建築物高度管制界線
MAXIMUM BUILDING HEIGHT (IN METRES ABOVE PRINCIPAL DATUM)		最高樓宇高度(在主水平基準上若干米)
MAXIMUM BUILDING HEIGHT (IN NUMBER OF STOREYS)		最高樓宇層數(樓層數)
PETROL FILLING STATION	P F S	加油站
NON-BUILDING AREA	NBA	非建築用地

**土地用途及面積一覽表 SCHEDULE OF USES AND AREAS**

USES	大約總面積百分比 APPROXIMATE AREA %	用途	
	公頃 HECTARES	% 百分比	
COMMERCIAL	1.49	0.19	商業
COMPREHENSIVE DEVELOPMENT AREA	7.17	0.92	綜合發展區
RESIDENTIAL (GROUP A)	60.84	7.77	住宅(甲類)
RESIDENTIAL (GROUP C)	0.40	0.05	住宅(丙類)
RESIDENTIAL (GROUP E)	3.40	0.44	住宅(戊類)
INDUSTRIAL	5.91	0.75	工業
GOVERNMENT, INSTITUTION OR COMMUNITY	101.09	13.03	政府、機構或社區
OPEN SPACE	15.51	1.98	休憩用地
OTHER SPECIFIED USES	108.19	13.65	其他指定用途
GREEN BELT	213.09	27.21	綠化地帶
COASTAL PROTECTION AREA	26.35	3.62	海岸保護區
SITE OF SPECIAL SCIENTIFIC INTEREST	1.98	0.25	具特殊科學價值地點
COUNTRY PARK	101.73	12.99	郊野公園
NULLAH	1.27	0.16	溝渠
TYHOON SHELTER	84.22	10.76	避風塘
MAJOR ROAD ETC.	46.40	6.32	主要道路等
<b>TOTAL PLANNING SCHEME AREA</b>	<b>783.02</b>	<b>100.00</b>	<b>規劃範圍總面積</b>

夾附的《註釋》屬這份圖則的一部分，現經修訂並按照城市規劃條例第5條展示。  
THE ATTACHED NOTES ALSO FORM PART OF THIS PLAN AND HAVE BEEN AMENDED FOR EXHIBITION UNDER SECTION 5 OF THE TOWN PLANNING ORDINANCE

**核准圖編號 S/H 15/31 的修訂 AMENDMENTS TO APPROVED PLAN No. S/H15/31**

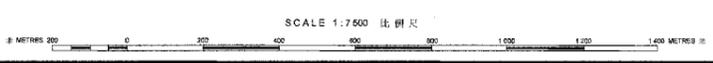
AMENDMENTS EXHIBITED UNDER SECTION 5 OF THE TOWN PLANNING ORDINANCE	經城市規劃條例第5條展示的修訂
AMENDMENT ITEM A	修訂項目A項
AMENDMENT ITEM B	修訂項目B項
AMENDMENT ITEM C	修訂項目C項
AMENDMENT ITEM D	修訂項目D項

(參看附表) (SEE ATTACHED SCHEDULE)

2017年9月15日 按照城市規劃條例第5條展示的核准圖編號 S/H15/31 的修訂 AMENDMENTS TO APPROVED PLAN No. S/H15/31 EXHIBITED UNDER SECTION 5 OF THE TOWN PLANNING ORDINANCE ON 15 SEPTEMBER 2017

Fiona Lung 陸小玉 SECRETARY 城市規劃委員會秘書

香港城市規劃委員會依據城市規劃條例擬備的香港仔及鴨脷洲(港島規劃區第15及16區)分區計劃大綱圖  
TOWN PLANNING ORDINANCE, HONG KONG TOWN PLANNING BOARD  
HONG KONG PLANNING AREAS No. 15 & 16 - ABERDEEN & AP LEI CHAU - OUTLINE ZONING PLAN



規劃署遵照城市規劃委員會指示擬備 PREPARED BY THE PLANNING DEPARTMENT UNDER THE DIRECTION OF THE TOWN PLANNING BOARD

圖則編號 PLAN No. S/H15/32

**SCHEDULE OF AMENDMENTS TO  
THE APPROVED ABERDEEN & AP LEI CHAU OUTLINE ZONING PLAN NO. S/H15/31  
MADE BY THE TOWN PLANNING BOARD  
UNDER THE TOWN PLANNING ORDINANCE (Chapter 131)**

**I. Amendments to Matters Shown on the Plan**

- Item A – Rezoning of a site at the junction of Shek Pai Wan Road and Tin Wan Hill Road from “Government, Institution or Community” (“G/IC”) and an area shown as ‘Road’ to “Residential (Group A)5” (“R(A)5”).
- Item B – Rezoning of a strip of land at Shek Pai Wan Road near the junction of Shek Pai Wan Road and Tin Wan Hill Road from an area shown as ‘Road’ to “Green Belt” (“GB”).
- Item C – Rezoning of a piece of land adjoining the Aberdeen Wholesale Fish Market from “Open Space” and an area shown as ‘Road’ to “G/IC”.
- Item D – Excision of an area to the east of Wah Kwai Estate across Shek Pai Wan Road from the planning scheme area for incorporation into the draft Pok Fu Lam Outline Zoning Plan No. S/H10/16.

**II. Amendments to the Notes of the Plan**

Incorporation of the “R(A)5” sub-area and stipulation of the maximum gross floor area and building height restrictions for the “R(A)5” sub-area in the Remarks of the Notes for the “R(A)” zone.

Town Planning Board

15 September 2017

**Extract of the Minutes of Meeting of the Metro Planning Committee of  
the Town Planning Board held on 28.10.2016**  
**二零一六年十月二十八日的城市規劃委員會都會規劃小組委員會會議記錄的摘錄**

**Agenda Item 3**

**Section 12A Application**

[Open Meeting (Presentation and Question Sessions only)]

Y/H15/11                      Application for Amendment to the Draft Aberdeen & Ap Lei Chau  
Outline Zoning Plan No. S/H15/30, To rezone the application site from  
"Government, Institution or Community" and an area shown as 'Road'  
to "Residential (Group A)", Junction of Shek Pai Wan Road and Tin  
Wan Hill Road, Tin Wan, Aberdeen  
  
(MPC Paper No. Y/H15/11)

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3.                      The Committee noted that a replacement page (page 10 of the Paper) with revised paragraph 8.12(c) to incorporate the latest comments of District Officer (Southern) was

tabled at the meeting.

4. The Secretary reported that the application was submitted by the Hong Kong Housing Society (HKHS). Townland Consultants Limited (TCL), Dennis Lau & Ng Chun Man Architects & Engineers (Hong Kong) Limited (DLN), C.M. Wong & Associates Limited (CMW) and Ramboll Environ Hong Kong Limited (Environ) were four of the consultants of the applicant. The following Members had declared interests in the item:

- |  |  |
|--|--|
| Mr K.K. Ling<br>(the Chairman)<br><i>as the Director of Planning</i> | - being an ex-officio member of the Supervisory Board of HKHS; |
| Mr K.K. Cheung   | - his firm having current business dealings with HKHS;         |
| Mr Patrick H.T. Lau  | - having current business dealings with TCL and DLN;           |
| Mr Thomas O.S. Ho  | - having past business dealings with HKHS, TCL, DLN and CMW;   |
| Mr Dominic K.K. Lam  | - having past business dealings with HKHS and Environ;         |
| Mr Franklin Yu   | - having past business dealings with CMW;                      |
| Dr Lawrence W.C. Poon  | - being an ex-employee of HKHS;                                |
| Dr Wilton W.T. Fok   | - co-owning with spouse a flat in Ap Lei Chau; and             |
| Mr Wilson W.S. Pang  | - owning a flat in Ap Lei Chau.                                |

5. The Committee noted that the Chairman, Mr Dominic K.K. Lam and Mr Patrick H.T. Lau had tendered apologies for being unable to attend the meeting and Mr Franklin Yu

had not arrived at the meeting yet. Since the interests of Mr Thomas O.S. Ho and Dr Lawrence W.C. Poon were indirect and the properties of Dr Wilton W.T. Fok and Mr Wilson W.S. Pang did not have a direct view of the site, the Committee agreed that they could stay in the meeting. As the interest of Mr K.K. Cheung was direct, the Committee agreed that he should leave the meeting temporarily for the item.

[Mr K.K. Cheung left the meeting temporarily at this point.]

### Presentation and Question Sessions

6. The following representatives from the Planning Department (PlanD) and the representatives of the applicant were invited to the meeting at this point:

Mr Louis K. H. Kau - District Planning Officer/Hong Kong (DPO/HK)

Miss Jessica K.T. Lee - Senior Town Planner/Hong Kong (STP/HK)

Mr Eric Yeung ]

Mr Pang Chuck Hang ]

Ms Cindy Tsang ]

Ms Gladys Leung ]

Ms Mary Chan ] Applicant's representatives

Mr James Chong ]

Mr Tony Cheng ]

Mr Chris Lee ]

Mr Robin Li ]

7. The Vice-chairman extended a welcome and explained the procedure of the hearing. He then invited Miss Jessica K.T. Lee, STP/HK, to brief Members on the background of the application. With the aid of a PowerPoint presentation, Miss Jessica K.T. Lee presented the application and covered the following aspects as detailed in the Paper :

The Proposal

- (a) the applicant proposed to rezone the site located at the junction of Shek Pai Wan Road and Tin Wan Hill Road from “Government, Institution or Community” (“G/IC”) and an area shown as ‘Road’ to “Residential (Group A)” (“R(A)”) with a maximum building height (BH) restriction of 100mPD;
- (b) the site (about 7,725m<sup>2</sup>) was mainly covered by natural and man-made slopes with a 1-storey building at its southern corner for the Food and Environmental Hygiene Department’s (FEHD’s) pest control office. The proposed public housing development providing 600 flats would serve as a decanting site for the redevelopment of Yue Kwong Chuen (YKC). Based on an indicative development scheme proposal submitted by HKHS, the proposed development comprised one 25-storey residential block on top of a 3-storey podium with retail facilities, a multi-function room for residents, a relocated integrated family service centre (IFSC) and a reprovisioned FEHD’s pest control office subject to a total plot ratio of 10.5 and a site coverage of 38%;

Surrounding Areas

- (c) the site was surrounded by natural slopes to the northeast, north and northwest. To the southeast were private residential developments and some industrial buildings within the “R(A)” and “R(E)” zones respectively, and to the further northeast was Tin Wan Estate. A number of government, institution and community (GIC) uses, including Tin Wan Market, Tin Wan Station Building and a school, were located to the east of the site across Tin Wan Hill Road, and the Shek Pai Wan Road Playground was located to the south;
- (d) the site was currently subject to a BH restriction of one storey. The surrounding developments were subject to stepped maximum BH restrictions of 85mPD, 100mPD, 130mPD and 150mPD;

Public Comments and Departmental Comments

- (e) during the first three weeks of the three statutory publication periods, a total of four comments from a Southern District Council (SDC) member and individuals were received. The SDC member supported the application for reasons of increasing housing supply and shortening the waiting time for public housing and indicated that 70% of the respondents of a questionnaire survey of Tin Wan residents supported the application. The other two commenters objected to the application on the grounds of adverse visual and air ventilation impacts and traffic congestion problem arising from the proposed residential development. The remaining commenter considered that the existing traffic congestion problem was already very serious and there was insufficient supporting facilities in the area;
- (f) departmental comments were set out in paragraph 8 of the Paper. Concerned departments had no objection to or no adverse comment on the application. The Commissioner for Transport (C for T) considered the submitted traffic impact assessment (TIA) acceptable and the Secretary for Transport and Housing had granted policy support to the proposed public housing development at the site in order to provide rehousing support for the redevelopment of YKC;

PlanD's View

- (g) PlanD had no objection to the application based on the assessments set out in paragraph 10 of the Paper, which were summarised as follows:
  - (i) the proposed rezoning for residential use was compatible with the surrounding developments and the BH restrictions stipulated for “R(A)” zones in the Tin Wan area. The site located 900m away from YKC was a suitable decanting site for YKC redevelopment, and there was no request from relevant bureaux/departments to use/reserve the site for GIC uses;

- (ii) the application would have no adverse implication on the GIC and open space provisions in the Aberdeen and Ap Lei Chau area. The existing pest control office would be reprovided in the proposed development and an IFSC at Tin Wan would also be relocated to the proposed development with an enlarged premises. Relevant departments had agreed to the reprovisioning and relocation arrangements; and
- (iii) the proposed rezoning was considered acceptable in traffic, environmental and infrastructural terms. Concerned departments had no objection to or no adverse comment on the application. Regarding the objecting public comments, the assessments above were relevant.

8. The Vice-chairman then invited the applicant's representatives to elaborate on the application. With the aid of a PowerPoint presentation, Ms Cindy Tsang made the following main points:

Background

- (a) the rezoning application was to facilitate the redevelopment of YKC. YKC was completed in 1960s and in dire need of redevelopment to meet the current living standards. The success of the redevelopment would depend on the smooth re-housing of 2,500 affected residents. During the site search exercise for a suitable decanting site, HKHS consulted the SDC on 30.9.2013 and noted the request of YKC residents for relocation within the same district;
- (b) the site, being 900m away from YKC, was identified as a suitable decanting site for affected tenants of Phase 1 redevelopment while the Phase 2 affected tenants would be decanted to Phase 1 site. The proposed development at the site together with the redevelopment of YKC would provide about 1,400 additional public housing units;

Site Characters and Indicative Development Scheme

- (c) the site had a number of site constraints including the irregular topography and steep slopes ranging from 14mPD to 50mPD. The difficult site topography was one of the factors defining the layout of the proposed development which resulted in a compact building footprint. The proposed development comprised a residential tower with 100mPD to provide 600 flats on top of a 3-storey podium which would accommodate the FEHD's pest control office, an IFSC, a multi-function room for future residents and retail facilities;

Local Consultations

- (d) the HKHS had actively engaged with the local residents and SDC on the proposed development and held briefing sessions on 20.1.2016 and 27.1.2016 with SDC members, representatives of incorporated owners/owners corporation and local residents. On 21.3.2016, the indicative development scheme was presented to the District Development Housing Committee (DDHC) of SDC which indicated their support to the scheme;

Planning Justifications

- (e) the proposed rezoning was in line with the policy objectives in enhancing housing supply and better utilising land resource. It was compatible with the surrounding land uses and BH restrictions in the area and would have no implication on the GIC and open space provisions. The proposed development also respected the request of the affected residents for rehousing in the same district. The proposed development had a number of design merits including a compact building footprint to minimise slope cutting and disturbance to natural landscape, the provision of convenient communal open space for residents, maximising greening coverage and road side greening, compliance with sustainable building guidelines and maintaining the character the area;

Technical Assessments and Departmental Comments

- (f) a number of technical assessments were conducted which concluded that the proposed development would not have adverse impact on the surroundings from the visual, landscape, traffic, environmental, geotechnical, drainage, sewage and ecological aspects. Besides, concerned departments had no objection to or no adverse comment on the application and the Secretary for Transport and Housing had granted policy support for the proposed public housing development at the site; and

Conclusion

- (g) the proposed rezoning could optimise the use of land resource and responded to the Government's initiatives of increasing housing supply. It was compatible with the surrounding land uses and had the planning gain of providing affordable housing to the community and enhancing the existing GIC facilities. As a decanting site, the proposed development would allow rehousing of YKC residents within the same district so as to minimise the adjustment of those elderly residents and would facilitate the success of the YKC redevelopment. The proposed layout with compact footprint would minimise slope works required and the impact on surrounding landscape. The design of the proposed development could ensure a quality, healthy and safe living environment for future residents and would not induce undesirable impacts.

9. As the presentations from PlanD's representatives and the applicant's representatives had been completed, the Vice-chairman invited questions from Members.

10. Noting that there was a shrine located to the immediate south of the site, a Member asked whether the design of the indicative development scheme had taken into account the potential interface between the proposed development and the shrine and whether the owner/operator of the shrine had been consulted. In response, Ms Cindy Tsang said that the shrine fell outside the site boundary and would not be affected by the proposed

development. The residential tower would be set back from the shrine and planting would be provided along the site boundary to minimise potential nuisance. Mr Pang Chuck Hang, the applicant's representative, supplemented that HKHS had made an attempt to identify the owner/operator of the shrine through the Home Affairs Department but in vain. The proposed development would be designed in such a way to minimise the interface problem between the shrine and future residents, if any.

11. A Member asked the number of residents that could be accommodated in the proposed development, the redevelopment programme of YKC, and any special design in the proposed development to cater for the needs of the elderly. In response, Mr Pang Chuck Hang said that YKC had a total of 1,144 flats and 600 flats would be affected in the Phase 1 redevelopment. Residents of Phase 1 redevelopment would be decanted to the proposed development upon its completion in 2022. The Phase 1 redevelopment of YKC was expected to be completed by 2026 for accommodating residents of Phase 2 redevelopment. Upon completion of the whole redevelopment of YKC in 2031 and the proposed development, about 2,600 flats would be provided. Noting that over 50% of the YKC residents were currently aged 50 or above, the proposed development would adopt an universal design to cater for the needs of the elderly.

12. The Vice-chairman asked about the views of the YKC residents consulted at the meeting on 27.1.2016 and measures to be taken to address the comments of Architectural Services Department (ArchSD) with regard to solar heat gain and glare issue for flats facing west. In response, Ms Cindy Tsang said that at the briefing session on 27.1.2016, YKC residents indicated support to the proposal of rehousing them within the same district and their major concerns were the details of the rehousing arrangement and the design of the proposed development. Regarding ArchSD's comments, Ms Mary Chan, the applicant's representative, said that only a limited number of flats in the proposed development would be facing west and consideration could be given to have architectural fins and special materials for the window glass to address the concerns on solar heat and glare.

13. A Member asked about the provisions of GIC facilities and open space in the area and whether the nearby Tin Wan Station Building would have any impact on the proposed development. In response, Mr Louis K.H. Kau, DPO/HK, said that the provision of GIC facilities such as sports centres, social welfare facilities and wet markets were sufficient to

serve the population in Aberdeen and Ap Lei Chau area in accordance with the Hong Kong Planning Standards and Guidelines. Whilst there was a shortfall of about 2.8 ha district open space, there was a surplus of about 8.4 ha local open space making an overall surplus of open space provision. Ms Jessica K.T. Lee, STP/HK, said that Tin Wan Station Building was located to the further northeast of the site and an application for government staff quarters next to it was approved by the Committee earlier this year. In that application, the Electrical and Mechanical Services Department (EMSD) confirmed that Tin Wan Station Building would have no adverse impact on the government staff quarters. EMSD had no comment on the current application and thus it was anticipated that Tin Wan Station Building would have no adverse impact on the proposed development. Mr Tony Cheng, the applicant's representative, supplemented that the noise impact assessment for the proposed development concluded that there would be no adverse noise impact arising from Tin Wan Station Building and the nearby industrial buildings on the future residents.

14. As the applicant's representatives had no further points to raise and there were no further questions from Members, the Vice-chairman informed the applicant's representatives that the hearing procedure for the application had been completed and the Committee would deliberate on the application in their absence and informed the applicant of the Committee's decision in due course. The Vice-chairman thanked the applicant's representatives and PlanD's representatives for attending the meeting. They left the meeting at this point.

#### Deliberation Session

15. A Member said that there were temple and shrine in the vicinity of the site, the traffic and pedestrian flow as well as the joss-sticks burning activities of the temple/shrine might create nuisance and generate complaints from the future residents of the proposed development. The Member considered that the applicant should adopt appropriate design measures to minimise the possible interface problem between the proposed development and the temple/shrine. The Committee noted the Member's view and agreed to convey the concern to the applicant.

16. After further deliberation, the Committee decided to agree to the application for rezoning the site from "G/IC" and an area shown as 'Road' to "R(A)" with a maximum BH restriction of 100mPD. The proposed amendment to the draft Aberdeen and Ap Lei Chau

Outline Zoning Plan (OZP) No. S/H15/30 would be submitted to the Committee for approval prior to gazetting under section 5 of the Town Planning Ordinance after reference back of the OZP for amendment by the Chief Executive in Council. The Committee also agreed to advise the applicant to adopt appropriate design measures to minimise any possible interface problem between the proposed development at the site and the adjacent temple/shrine.

**Extract of the Minutes of Meeting of the Metro Planning Committee of**  
**the Town Planning Board held on 12.5.2017**  
**二零一七年五月十二日的城市規劃委員會都會規劃小組委員會會議記錄的摘錄**

**Agenda Item 9**

[Open Meeting]

Proposed Amendments to the Approved Aberdeen & Ap Lei Chau Outline Zoning Plan No. S/H15/31

(MPC Paper No.3/17)

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40. The Secretary reported that the proposed amendments were in the Aberdeen and Ap Lei Chau area and involved, amongst others, the rezoning of a site arising from a section 12A application for development of public rental flats by the Hong Kong Housing Society (HKHS). The following Members have declared interests on the item:

Mr Raymond K.W. Lee - being an ex-officio member of the Supervisory Board  
*as Director of Planning* of the HKHS;

- Mr K.K. Cheung - his firm having current business dealings with HKHS;
- Mr Thomas O.S. Ho - having past business dealings with HKHS;
- Dr Lawrence W.C. Poon - being an ex-employee of HKHS;
- Dr Wilton W.T. Fok - co-owning with spouse a flat in Ap Lei Chau; and
- Mr Patrick H.T. Lau - owning a flat in Tin Wan.

41. The Committee noted that Messrs Patrick H.T. Lau and Thomas O.S. Ho had tendered apologies for being unable to attend the meeting and Dr Lawrence W.C. Poon had already left the meeting. According to the procedure and practice adopted by the Town Planning Board, as the proposed public rental flats by HKHS in relation to the rezoning site was to take forward the decision of the Committee on an approved section 12A application, the interests of those Members in relation to HKHS would only needed to be recorded and they could stay in the meeting. The Committee agreed to this arrangement. The Committee also agreed that as the property co-owned by Dr Wilton W.T. Fok and his spouse did not have a direct view of the amendment items, he should be allowed to stay in the meeting.

#### Presentation and Question Sessions

42. With the aid of a PowerPoint presentation, Miss Jessica Lee, STP/HK, presented the proposed amendments as detailed in the Paper and covered the following main points:

#### Background

- (a) on 28.10.2016, the Committee agreed to a section 12A application (No. Y/H15/11) to rezone a piece of government land at the junction of Shek Pai Wan Road and Tin Wan Hill Road from “Government, Institution or Community” (“G/IC”) and an area shown as ‘Road’ to “Residential (Group A)” (“R(A)”) for development of public rental flats by the HKHS for the purpose of rehousing tenants to be affected by the redevelopment of Yue

Kwong Chuen in phases. The proposed development comprised a 28-storey building with a building height (BH) of 100mPD and a gross floor area (GFA) of 27,414m<sup>2</sup>, providing 600 units. The existing Food and Environmental Hygiene Department's pest control office currently occupying a portion of the site would be reprovisioned within the future development (Amendment Item A);

Proposed Amendments to the Outline Zoning Plan (OZP)

- (b) Amendment Item A – rezoning a site at the junction of Shek Pai Wan Road and Tin Wan Hill Road (about 0.78ha) from “G/IC” and an area shown as ‘Road’ to “R(A)5”, subject to a maximum GFA of 27,414m<sup>2</sup> and a maximum BH of 100mPD;
- (c) Amendment Item B – rezoning a strip of land (about 0.08ha) to the immediate southwest of the site under Amendment Item A from an area shown as ‘Road’ to “Green Belt” to reflect its current condition; and
- (d) Amendment Item C – rezoning two pieces of land (about 0.16ha) adjoining the Aberdeen Wholesale Fish Market from “Open Space” and area shown as ‘Road’ to “G/IC”, subject to a maximum BH of 2 storeys, to reflect the as-built alignment of Aberdeen Praya Road and the existing boundary of the Aberdeen Wholesale Fish Market; and

Departmental Consultation

- (e) concerned government bureaux and departments had no objection to or no adverse comment on the proposed amendments.

43. Members had no question on the proposed amendments.

44. After deliberation, the Committee:

- (a) agreed to the proposed amendments to the approved Aberdeen & Ap Lei

Chau OZP and that the draft Aberdeen & Ap Lei Chau OZP No. S/H15/31A at Attachment II (to be renumbered to S/H15/32 upon exhibition) and its Notes at Attachment III of the Paper were suitable for exhibition under section 5 of the Ordinance; and

- (b) adopted the revised Explanatory Statement (ES) at Attachment IV of the Paper as an expression of the planning intentions and objectives of the Board for the various land use zonings of the draft Aberdeen & Ap Lei Chau OZP No. S/H15/31A and the revised ES would be published together with the OZP.

**Extract of the Minutes of Meeting of the Metro Planning Committee of  
the Town Planning Board held on 25.8.2017**

**二零一七年八月二十五日的城市規劃委員會都會規劃小組委員會會議記錄的摘錄**

**Agenda Items 7 and 8**

[Open Meeting]

Proposed Amendments to the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/15  
(MPC Paper No.5/17)

Proposed Amendments to the Approved Aberdeen and Ap Lei Chau Outline Zoning Plan  
No. S/H15/31

(MPC Paper No.6/17)

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19. The Committee noted that the two agenda items were related to the rezoning of five sites for public housing developments in close proximity and agreed that they could be considered together.

20. The Secretary reported that the proposed amendments involved rezoning of five sites for public housing developments by the Housing Department (HD) which was the executive arm of the Hong Kong Housing Authority (HKHA). The following Members had declared interests on the item:

Mr Raymond K.W. Lee - being a member of the Strategic Planning Committee  
(the Chairman) (SPC) and the Building Committee of the HKHA;  
*as the Director of*  
*Planning*

Mr Martin W.C. Kwan - being an alternate member for the Director of Home  
*as the Chief Engineer* Affairs who was a member of the SPC and Subsidised  
*(Works) of Home Affairs* Housing Committee of HKHA;  
*Department*

Mr Patrick H.T. Lau - having current business dealings with HKHA and  
owning a flat in Tin Wan;

- Mr Thomas O.S. Ho - having current business dealings with HKHA;
- Mr K.K. Cheung - his firm having current business dealings with HKHA;
- Mr Franklin Yu having past business dealings with HKHA;
- Dr Lawrence W.C. Poon - his spouse working in HD, which was the executive arm of the HKHA, but had no involvement in planning work; and
- Dr Wilton W.T. Fok - co-owning with his spouse a flat in Ap Lei Chau and his company locating at Cyberport being covered by the Pok Fu Lam OZP.

21. Mr K.K. Cheng also declared an interest in the item as he had current business dealings with Ebenezer School and Home for the Visually Impaired, the subject of a previous rezoning application No. Y/H10/5 discussed in MPC Paper No. 5/17.

22. The Committee noted that Dr Wilton W.T. Fok had tendered an apology for being unable to attend the meeting and agreed that Mr Patrick H.T. Lau could stay in the meeting as his property did not have a direct view of the sites. Since application No. Y/H10/5 was not the proposed amendment item, the Committee agreed that Mr K.K. Cheng could stay in the meeting. According to the procedure and practice adopted by the Board, as the proposed public housing developments by HD in relation to the rezoning sites were subjects of amendments to the Outline Zoning Plans (OZPs) proposed by the Planning Department (PlanD), the interests of the Members in relation to HKHA would only need to be recorded and they should be allowed to stay in the meeting.

[Mr Franklin Yu arrived to join the meeting at this point.]

#### Presentation and Question Sessions

23. The following government representatives and consultants were invited to the meeting at this point:

- Mr Louis K.H. Kau - District Planner Officer/Hong Kong (DPO/HK), PlanD;
- Mr Derek P.K. Tse - Senior Town Planner/Hong Kong (STP/HK), PlanD;
- Mr Theron K.K. Chan - Chief Planning Officer/2 (CPO/2), HD;
- Mr Antony K.C. Chung - Senior Architect/5, HD;
- Mr Joe B.M. Leung - Senior Civil Engineer/2 (SCE/2), HD;
- Mr Frankie H.K. Leung - Civil Engineer, HD;
- Mr S.C. Lo - Senior Landscape Architect/2, HD;
- Ms Bess C.Y. Cheng - Planning Officer/24, HD;
- Mr James W.C. Yip - Senior Engineer/Special Duties (Works), Civil Engineering and Development Department (SE/SD(Works), CEDD);
- Mr V.S. Chan - Engineer/SD(Works), CEDD;
- Ms C.Y. Ho - Senior Nature Conservation Officer (S), Agriculture, Fisheries and Conservation Department (AFCD);
- Ms Chole C.U. Ng - Nature Conservation Officer (HK), AFCD;
- Mr Chan Siu Yuen - Project Manager, Ove Arup & Partners Hong Kong Limited (Arup);
- Dr Kin Lo - Associate Director, Arup;

- Mr Brad Fong - Senior Engineer, Arup;
- Ms Kristin Lai - Engineer, Arup; and
- Mr Geoff Carey - Director, AEC Limited.

24. The Chairman extended a welcome and invited Mr Derek P.K. Tse, STP/HK, to brief Members on the Papers. With the aid of a PowerPoint presentation, Mr. Derek P.K. Tse, presented the proposed amendments as detailed in the Papers and covered the following main points:

Background

- (a) the 2014 Policy Address announced the partial lifting of the Pok Fu Lam Moratorium (PFLM) to facilitate the redevelopment of Wah Fu Estate (WFER) and the public housing developments at the five sites which would serve as major reception resources for WFER and provide additional public housing units. WFER together with the proposed public housing developments would provide about 11,900 additional public housing units. In parallel, the Government was actively considering the South Island Line (West) (SIL(W)) proposed with a view to addressing the associated transport needs;
- (b) to better preserve and to minimise adverse impact on natural stream courses with high ecological value, the old Dairy Farm remains and existing hiking trails, the total development area had been reduced from 18ha to 13ha and the original boundary of Kai Lung Wan site had been revised. The Kai Lung Wan site was split into Kai Lung Wan (North) (KLW(N)) and Kai Lung Wan (South) (KLW(S)) sites;

Development Proposals

- (c) according to HD's conceptual plan for the proposed development, the proposed public housing developments would comprise 11 residential

blocks providing about 8,900 units (or equivalent to domestic gross floor area of 443,000m<sup>2</sup>). Stepped building height (BH) concept had been adopted with two height bands of 200mPD and 230mPD. Retail outlets, government institution and community (GIC) facilities and a public vehicle park would also be provided. The proposed public housing developments were expected to be completed in 2025 to 2027 by phases;

- (d) despite the reduction in total development area, the overall flat production was proposed to remain unchanged, resulting in an increase in the overall domestic plot ratio (PR) from about 6 to about 7;

Technical Considerations

- (e) various technical assessments on traffic, ecological, cultural heritage, air ventilation, visual and landscape aspects had been conducted, which concluded that there would be no insurmountable technical problem for the proposed public housing developments. HD and CEDD would review the technical assessment results and carry out detailed design and relevant detailed technical assessments at the detailed design stage;
- (f) the traffic impact assessment (TIA) had assessed the scenarios of with and without SIL(W) in place and its findings indicated that with the implementation of the proposed road improvement works at Pok Fu Lam Road/Victoria Road junction, traffic performance at key junctions and road links in the area would be acceptable. Besides, a new road was proposed to connect the KLW(N) site from Pok Fu Lam Road and a public vehicle park was planned within the KLW(N) site to re-provision the affected open-air vehicle parks and to meet the parking needs in the district. New pedestrian facilities and bus/mini-bus lay-bys would also be provided;
- (g) areas of high ecological value had been excluded from the development areas. Nevertheless, two fauna species and four floral species of conservation importance were identified within the development areas. Besides, natural stream courses of low to moderate ecological value and

secondary woodlands of moderate ecological value fell within development areas would be affected. Relevant mitigation measures were proposed to mitigate the potential ecological impact,;

- (h) according to the preliminary tree assessment, approximately 4,480 trees would be affected by the proposed developments. 2,060 trees would be retained, 59 trees would be transplanted and 2,364 trees would be felled. To mitigate the landscape impact, the preliminary tree compensation proposal stated that the felled trees would be compensated at a ratio of 1:1;
- (i) while no site of archaeological interest or declared monument were identified, one proposed Grade 3 historic structure fell within the proposed works area. CEDD would conduct heritage impact assessment subject to the final grading results;
- (j) the proposed developments were visually not incompatible with the surrounding existing developments. The proposed BH of KLW(N) site of 230mPD was similar to that of Chi Fu Fa Yuen. With the proposed BH of the remaining sites of 200mPD and 170mPD, a stepped BH profile could be maintained in the area. Regarding the potential air ventilation impact, six local air paths with minimum widths of 20m to 30m were reserved. HD would carry out a quantitative air ventilation assessment (AVA) at the detailed design stage. The stepped BH concept and the requirement of AVA had been stated in the Explanatory Statement (ES) of the Pok Fu Lam OZP;
- (k) provision of GIC facilities and open space generally met the requirements of the Hong Kong Planning Standards and Guidelines (HKPSG);

*Proposed Amendment Items*

- (l) Wah Fu North site (Amendment Item A) and Wah King Street site (Amendment Item B) were proposed to be rezoned from “Open Space” (“O”) to “Residential (Group A)” (“R(A)”), Wah Lok Path site

(Amendment Item C) from “Government, Institution or Community” (“G/IC”) to “R(A)”, KLW(S) site (Amendment Item D) from “Green Belt” (“GB”) to “R(A)”, and KLW(N) site (Amendment Item E) from “GB” to “R(A)1” with ‘Public Vehicle Park’ as always permitted use on the Pok Fu Lam OZP. Since part of the KLW(S) site fell within the planning scheme area of the Aberdeen & Ap Lei Chau OZP, it was proposed to excise that portion from the Aberdeen & Ap Lei Chau OZP for incorporation into the Pok Fu Lam OZP;

- (m) given that the proposed developments were subject to the Building (Planning) Regulations (B(P)R) as well as PFLM and a planning brief would be prepared setting out the planning parameters of the five sites, no PR, BH and site coverage (SC) restrictions were proposed in the Notes of “R(A)” zone. This was in line with other “R(A)” sites on the Pok Fu Lam OZP;

#### Public Consultation

- (n) on 31.7.2017, the District Development and Housing Committee (DDHC) of Southern District Council (SDC) had been consulted on the proposed public housing developments and the proposed amendments to the approved Pok Fu Lam OZP. DDHC passed a motion supporting the proposals and requesting the Government to address all different views of the affected residents and to commence the detailed planning works for SIL(W) immediately. Members of SDC also raised concerns on traffic and visual impacts arising from the proposed public housing developments and WFER as well as the details and programme of WFER; and

#### Rezoning Application No. Y/H10/5

- (o) the Committee rejected the rezoning application to rezone the site of Ebenezer School & Home for the Visually Impaired from “G/IC” to “R(C)7” but agreed to rezone the site to “Comprehensive Development Area” to ensure the continuous provision of services by the school. Since

then, the applicant had not made any progress nor confirmed any relocation plan. It was considered more appropriate to retain the site as “G/IC” zone as there was no imminent need for the proposed development. Should the details of the relocation plan be available in future, the applicant could submit a fresh rezoning application.

[Dr Frankie W.C. Yeung arrived to join the meeting and Mr Thomas O.S. Ho left the meeting at this point.]

### Proposed Development Scheme

25. Some Members raised the following questions:

- (a) clarification on the total number of flats of the proposed public housing developments and WFER;
- (b) the current number of flats in WFE and the net increase in number of flats upon WFER, and whether it was possible to further increase the flat production of WFER; and
- (c) whether planning permissions would be required if the five sites were used for private residential developments and Wah Fu Estate was redeveloped into a private residential development.

26. Mr Louis K.H. Kau, DPO/HK, and Mr Theron K.K. Chan, CPO/2, HD made the following responses:

- (a) according to the 2014 Policy Address, WFER together with the proposed public housing developments would provide an additional 11,900 public housing units, among which 8,900 new units from the five proposed public housing developments and 3,000 additional units from WFER;
- (b) the current number of flats of WFE was 9,200. WFER would adopt PRs of 6 to 7 and the total number of flats would be increased by 3,000 units to

12,200 units in total. Apart from traffic constraint, WFER would also adopt the stepped BH concept and hence, room for further increase in flat production was limited; and

- (c) no planning permission would be required for private residential development in “R(A)” zone. Nevertheless, the purpose of partial uplifting PFLM was to release the five rezoning sites for public housing developments to facilitate WFER. Having considered that the traffic generation arising from public housing development would be less significant than those from private residential development and given the constraints of traffic infrastructure in Pok Fu Lam area, WFE would only be redeveloped for providing public housing.

#### GIC facilities and Open Space Provision

27. Some Members raised the following questions:

- (a) any social welfare facility for the elderly was planned within the proposed public housing developments;
- (b) the reasons for not re-provisioning the affected Wah Chui Street Sitting-out Area;
- (c) noting that the open space provision was sufficient to meet the requirements of HKPSG, whether such provision would be able to meet the updated standards of open space provision in future, and the current utilization of the open space in the area;
- (d) any sites would be reserved within WFER for re-provisioning of the rezoned “G/IC” and “O” sites;
- (e) noting that there were shortfalls of clinic/health centre and sport centre in Pok Fu Lam area, whether there was any need to reserve “G/IC” sites for free-standing GIC facilities; and

- (f) whether the residential blocks would be built on top of the proposed public vehicle park.

28. Mr Louis K.H. Kau and Mr Theron K.K. Chan made the following responses:

- (a) a GIC block with social welfare facilities for the elderly was planned within Wah Fu North site and KLW(N) site (i.e. Amendment Items A and E), but the types of GIC facilities to be provided were not yet firmed up at this stage. HD would liaise with relevant departments to identify suitable GIC facilities to meet the local needs;
- (b) the Leisure and Cultural Services Department had advised that no replacement site for the affected Sitting-out Area was required as local open space would be provided within the proposed public housing developments. The planned population of Southern District was about 305,000 and the total open space provision, including both local and district open space, was 81.65ha. According to HKPSG, the standard for provision of open space was a minimum 20ha per 100,000 persons. The current provision was sufficient to meet the requirements of HKPSG. Besides, the current open space provision per person of about 2.67m<sup>2</sup> was higher than the recommended ratio of 2.5m<sup>2</sup> per person under Hong Kong 2030+. There was no information on the current utilization of open space in the area;
- (c) according to HD's proposed development scheme, GIC facilities would be provided within the proposed public housing sites. Also, local open space would be provided based on the population of the proposed developments. As such, reprovisioning of the "G/IC" and "O" sites was not necessary;
- (d) with reference to the Attachment VII of the MPC Paper No. 5/17, while there were shortfall of one clinic/health centre and one sports centre in the Pok Fu Lam area, there were three existing clinic/health centres and six existing sports centres in Southern District. Hence, no additional "G/IC"

site was required for the provision of free-standing GIC facilities at this juncture; and

- (e) given the site configuration of KLW(N) site, a podium design would be adopted for accommodating GIC facilities and the proposed public vehicle park.

### Traffic and Accessibility Issues

29. Some Members raised the following questions:

- (a) whether WFER would be taken place in parallel with the proposed public housing developments and whether the TIA had taken into account the cumulative traffic impact of both developments;
- (b) what the reasons were for not taking into account the increased population and traffic generation of WFER;
- (c) since the KLW(S) site was isolated from the other four sites, whether the future residents of KLW(S) site would be served by the proposed Wah Fu Station or Tin Wan Station of the proposed the SIL(W) line; and
- (d) whether there were any pedestrian connection between the KLW(S) site and Tin Wan or Wah Kwai Estate.

30. Mr Louis K.H. Kau, Mr Theron K.K. Chan, Mr James W.C. Yip, SE/SD(Works), CEDD, and Mr Joe B.M. Leung, SCE/2, HD made the following responses:

- (a) since the proposed public housing developments would serve as the major reception resources for WFER, the study of WFER would commence once the proposed public housing developments were confirmed. Significant increase in population and traffic flow arising from the proposed developments was not expected. The TIA conducted did not cover the

traffic impact arising from WFER as its implementation details were not available at this stage and HD wished to conduct the TIA when planning parameters were more firm at later stage. Furthermore, the implementation of SIL(W) and other transportation infrastructures such as SIL(E) and Central-Wan Chai bypass would have significant implications on the traffic condition of Pok Fu Lam area. Therefore, a separate TIA would be conducted by HD to assess the overall traffic impact of the area taking into account the WFER and SIL(W) when implementation details of both were available;

- (b) various pedestrian linkages, including footbridge and at-grade crossing, were planned to integrate the five proposed public housing development with the WFE to form a larger neighborhood. It was expected that future residents of the proposed developments, including the KLW(S) site, would be served by the proposed Wah Fu Station through the above pedestrian linkage; and
- (c) the KLW(S) site was far away from Tin Wan and separated from Wah Kwai Estate by steep slopes. However, a footbridge across Shek Pai Wan Road next to the site and pedestrian improvement works along Shek Pai Wan Road south bound linking to the KLW(N) site with a lift tower were proposed to enhance the connectivity of KLW(S) site.

#### Rezoning of the “GB” sites and Ecological and Landscape Impacts

31. Some Members raised the following questions:

- (a) noting that the KLW(S) site forming part of a large “GB” zone located to the northeast of Shek Pai Wan Road and a green channel was proposed within the site, whether the site was of high ecological value and whether the proposed rezoning of the site would affect the integrity of the “GB” zone;
- (b) how the boundaries of KLW(N) and KLW(S) sites were delineated and

whether an assessment had been conducted to assess the ecological value of the entire “GB” zone or only focus on the rezoning sites;

- (c) how the ecological value of the affected natural stream course could be compensated;
- (d) the reasons for not rezoning the “GB” area located in-between KLW(N) and KLW(S) sites for residential use in view of the keen demand of housing land supply; and
- (e) noting that 2,364 trees would be felled and only about 260 trees would be re-planted within the five development sites and surrounding areas, what the mitigation measures were to compensate the remaining number of trees to be felled.

32. Mr Louis K.H. Kau and Mr James W.C. Yip made the following responses

- (a) with reference to Drawing 11 of MPC Paper No. 5/17, the proposed green channel within KLW(S) site was to compensate a 214m long natural stream course of moderate ecological value located within the KLW(N) site. It would also provide a potential habitat for translocating affected fauna species of conservation importance. Regarding the ecological value of KLW(S) site, while the site was covered with vegetation, there were man-made slopes and retaining wall structures near Shek Pai Wan Road and the vegetation cover was mainly composed of shrubland of lower ecological value;
- (b) PlanD had carried out two rounds of “GB” review to identify suitable “GB” sites for residential development. The Stage 2 GB review covered “GB” sites located in the fringe of built-up areas close to the existing developed areas or public road, and the original Kai Lung Wan Site was identified with potential for housing development. Subsequently, a feasibility study had been conducted to evaluate the ecological value of these potential housing sites, which revealed that there were a natural stream course and

woodland area with species of conservation value within the site. The Kai Lung Wan site was therefore divided into KLW(N) and KLW(S) sites and their boundaries were delineated to avoid woodland of high ecological value and areas of conservation importance;

- (c) in view of the steep slope to the south of the KLW(S) site and hydrological consideration, the proposed green channel would run through the site from east to north so as to create a suitable habitat and to maintain a shallower gradient of the green channel following the contour. The proposed green channel would adopt natural bedding and would be longer than the natural stream course in the KLW(N) site to be compensated. Extending the boundary of the KLW(S) site southwards would require a large scale of slope-cutting which would generate more construction waste;
- (d) according to the preliminary tree compensation proposal, the trees felled would be compensated at a ratio of 1:1 in quantity and new tree planting would be within the five sites and in roadside areas, as well as woodland planting at surrounding slope areas. As estimated by HD, about 260 trees could be planted within the five development sites and in roadside amenity areas; and compensatory woodland planting of about 6.5ha would be carried out in the vicinity of the sites at a compensation ratio of 1:1.

#### Development Restrictions in the Notes for “R(A)” zone

33. The Vice-chairman enquired the reasons for not imposing PR, BH and SC restrictions for the “R(A)” on the OZP and whether such practice was common in other OZPs or to allow flexibility for the proposed public housing developments. In response, Mr Louis K.H. Kau said that in the Notes of the Pok Fu Lam OZP, there were PR and SC restrictions for “R(B)” and “R(C)” zones, but not for “R(A)” zone. Generally speaking, no PR and SC restrictions were imposed within “R(A)” zone on the OZPs on Hong Kong Island, and the development intensity of this type of high-density residential developments was generally subject to the provisions of the B(P)R. As for public housing developments, they would also be subject to control of the relevant planning brief.

34. The Vice-chairman had reservation on rezoning “GB” sites for residential use, in particular the KLW(S) site which was relatively isolated from the other four sites as well as Wah Fu and Wa Kwai Estates. The Vice-chairman considered the site should be retained as “GB” zone to protect the proposed green channel and to provide a less disturbed environment.

35. A Member was of the view that the KLW(S) site was important for facilitating WFER as it would contribute to provide public housing units for rehousing the affected residents of WFE. Besides, the connectivity issue of the site was not insurmountable. Although there was no detailed design on the proposed green channel, it was not uncommon to find some natural streams in close proximity to residential developments in other areas. Another Member echoed the importance of rehousing affected residents within the same district and considered that the isolated location of KLW(S) site could be addressed by appropriate public transportation provision in future.

36. At the invitation of the Chairman, Mr Theron K.K. Chan supplemented that the KLW(S) site would provide about 1,320 units. Besides, pedestrian improvement works were proposed to strengthen the connectivity of the sites including the connectivity between the KLW(S) and KLW(N) sites which would serve as a key transportation hub with retail and welfare facilities for the developments. The distance between the KLW(N) and KLW(S) sites was about 150m.

37. A Member considered that the rezoning proposals could be exhibited for public inspection to gauge public view. The Board would consider the public view and ensure that the rezoning of the “GB” and “O” sites for residential use was fully justified before making a final decision. If local rehousing was an important consideration, the Member suggested that consideration could be given to redeveloping WFE in phases.

38. The Chairman concluded that Members generally agreed that all amendment items were suitable for exhibition. The Board would consider the representation(s) and comment(s) received and ensure that the rezoning proposals were fully justified, especially from traffic and ecological aspects.

39. The Vice-chairman enquired if opportunities should be taken to impose

development restrictions for “R(A)” zone on the Pok Fu Lam OZP. The Chairman explained that generally speaking, for “R(A)” zones on Hong Kong Island, the development parameters of residential development would be subject to the provisions of the B(P)R. The development parameters of the proposed public housing developments would be specified in the relevant paragraphs of the ES. A planning brief would also be prepared to set out the detailed planning requirements of the sites.

40. Noting that development restrictions were specified in the Notes of other residential zones on the Aberdeen & Ap Lei Chau OZP, a Member suggested that the development restrictions for the “R(A)” zone should be incorporated into the Notes in due course as development in the Pok Fu Lam area had been frozen for a long while. Another Member considered and the Vice-chairman agreed that it was not appropriate to impose the development restrictions at this juncture without detailed study and the imposition of development restrictions for the “R(A)” zone should be subject to a comprehensive review and the practice adopted in other OZPs in the metro area.

41. After deliberation, the Committee decided to :

- (a) agree to the proposed amendments to the approved Pok Fu Lam OZP and that the draft Pok Fu Lam OZP No. S/H10/15A at Attachment II of MPC Paper No. 5/17 (to be renumbered to S/H10/16 upon exhibition) and its Notes at Attachment III of MPC Paper No. 5/17 were suitable for exhibition under section 5 of the Ordinance;
- (b) adopt the revised ES at Attachment IV of MPC Paper No. 5/17 for the draft Pok Fu Lam OZP No. S/H10/15A as an expression of the planning intentions and objectives of the Board for the various land use zonings of the OZP and the revised ES would be published together with the OZP;
- (c) agree to the proposed amendment to the approved Aberdeen & Ap Lei Chau OZP and that the draft Aberdeen & Ap Lei Chau OZP No. S/H15/31B at Attachment II of MPC Paper No. 6/17 (to be renumbered to S/H15/32 upon exhibition) and its Notes at Attachment III of MPC Paper No. 6/17 were suitable for exhibition under section 5 of the Ordinance; and

- (d) adopt the revised ES at Attachment IV of MPC Paper No. 6/17 for the draft Aberdeen & Ap Lei Chau OZP No. S/H15/31B as an expression of the planning intentions and objectives of the Board for the various land use zonings of the OZP and the revised ES would be published together with the OZP.

**Summary of Representations and Comments and PlanD's Responses  
in respect of the Draft Aberdeen & Ap Lei Chau Outline Zoning Plan (OZP) No. S/H15/32**

**Representations**

<b>Representation No. (TPB/R/S/H15/32-)</b>	<b>Representer</b>	<b>Subject of Representation</b>	<b>Responses to Representations</b>
1	Central & Western Concern Group	Opposes <u>all Amendment Items</u> on grounds of high development intensity and building heights, ecological damage to surrounding green areas, and inadequate transport and traffic arrangements.	<p><b><u>Representation Site A</u></b> Representation site A is the subject of a s.12A application No. Y/H15/11 submitted by the Hong Kong Housing Society (HKHS), which was considered and agreed by the Metro Planning Committee (MPC) of the Town Planning Board (the Board) on 28.10.2016. Being located about 900m away from Yue Kwong Chuen, representation site A is considered a suitable decanting site to facilitate the redevelopment of Yue Kwong Chuen. The proposed development at representation site A is restricted to a maximum gross floor area of 27,414m<sup>2</sup> (equivalent to a total plot ratio of 10.5) under "Residential (Group A)5" ("R(A)5") zone, which is considered compatible with the surrounding developments within "R(A)" and "R(E)" zones mostly with plot ratios ranging from about 8 to 15. At a maximum building height of 100mPD, representation site A is also considered compatible with the building height restrictions set for the "R(A)" and "R(E)" zones in Tin Wan area generally stepping up from 85mPD and 100mPD along the two sides of Shek Pai Wan Road towards Tin Wan Estate further uphill.</p> <p>Regarding the representer's concerns on the potential traffic, environmental and ecological impacts caused by the proposed development at representation site A, similar concerns had also been raised in the public comments to the s.12A application No. Y/H15/11. In agreeing to the s.12A application, MPC had already taken into account the findings of various impact assessments conducted by the</p>

Representation No. (TPB/R/S/H15/32-)	Representer	Subject of Representation	Responses to Representations
			<p>project proponent (i.e. HKHS (C14)), and noted that the proposed development would not generate adverse traffic, environmental, visual, landscape, geotechnical, ecological and infrastructural impacts on the surrounding areas. The requirements for a noise impact assessment and a detailed nature terrain hazard study would also be incorporated into the land grant conditions of the site.</p> <p><b><u>Representation Sites B &amp; C</u></b> As the rezoning of these sites to “Green Belt” (“GB”) and “Government, Institution or Community” (“G/IC”) respectively is to reflect the current condition of the sites, they are considered appropriate.</p> <p><b><u>Representation Site D</u></b> The objection grounds, which are related to the proposed public housing development in Pok Fu Lam South area, should be considered in the context of the Pok Fu Lam Outline Zoning Plan (OZP). In fact, the representer also submitted similar representation to the draft Pok Fu Lam OZP No. S/H10/16 (i.e. R1260), which has been considered by the Board.</p>
2	Green Sense	Opposes <u>Amendment Items A and D</u> on grounds that “GB” zone is for preventing urban sprawl; the rezoning of green belt site or well-vegetated site to provide land for urban development is against this planning principle and will cause adverse impacts on the natural environment and ecology. The current housing crisis is caused by the influx of migrants and	<p><b><u>Representation Site A</u></b> See Responses to <b>R1</b> above on representation site A.</p> <p>The suggested alternative sites (e.g. brownfield sites, ex-military sites or golf courses) are considered not suitable to replace the representation site as a local decanting site for redevelopment of Yue Kwong Chuen.</p> <p>As regards the comments that the housing problem is a matter of</p>

Representation No. (TPB/R/S/H15/32-)	Representer	Subject of Representation	Responses to Representations
		<p>investment from the Mainland. Instead of finding more land for development, the Government should formulate a population policy to control the population growth. Alternative land resources (e.g. brownfield sites, ex-military sites or golf courses) should be considered for development before green belt and "G/IC" sites (which have higher social value) are rezoned for housing development.</p>	<p>population policy, during the planning process of the proposed development project, the project proponent (i.e. HKHS (C14)) has undertaken relevant technical assessments to assess the needs of or impacts on the district concerned arising from any additional population in order to ensure that the living quality of residents in the district would not be adversely affected.</p> <p><b><u>Representation Site D</u></b> See Responses to <b>R1</b> above on representation site D. In fact, the representer also submitted similar representation to the draft Pok Fu Lam OZP No. S/H10/16 (i.e. R1259), which has been considered by the Board.</p>
3	Mary Mulvihill	<p>Opposes <u>Amendment Item D</u> on grounds that the green belt on the fringe of Aberdeen Country Park should be kept intact instead of being transferred to Pok Fu Lam for development; and the approval of the amendment would open up the green belt zone for further development.</p>	<p>See Responses to <b>R1</b> above on representation site D. In fact, the representer also submitted similar representation to the draft Pok Fu Lam OZP No. S/H10/16 (i.e. R1787), which has been considered by the Board.</p>

**Comments**

Comment No. (TPB/R/S/H15/32-C)	Commenter	Gist of Comment	Responses to Comments
1 to 5	Alliance for a Beautiful Hong Kong Melanie Moore John Moore Evelyn Moore Genevieve Moore	<ul style="list-style-type: none"> <li>Object to Amendment Items A and D.</li> <li>The subject site lies in “GB” zone which plays an important role in providing buffer between urban developments to contain urban sprawl.</li> <li>The well-forested area is also an important habitat supporting many wildlife species.</li> <li>Development of the green belt will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen area and will reduce the landscape value of the area.</li> <li>It will also set an undesirable precedent for other development in other “GB” zones or country park areas.</li> <li>Town Planning Board should reject these proposals.</li> </ul>	See Responses to <b>R2</b> above.
6	Central & Western Concern Group	<ul style="list-style-type: none"> <li>Objects to all Amendment Items.</li> </ul>	See Responses to <b>R1</b> above.
7	Pauline Yam (Southern District Councillor)	<ul style="list-style-type: none"> <li>Provides comments on Amendment Item C.</li> <li>Developments around the Aberdeen Wholesale Fish Market are high density developments and there are insufficient transport facilities around. More effective uses should be considered when changing the land use.</li> <li>The Consultancy Study on Overall Traffic Conditions of Aberdeen is being undertaken and the proposed amendment should wait for the final result of the Study.</li> </ul>	As the rezoning of the site to “G/IC” is to reflect the current condition of the site, the zoning is considered appropriate.  The subject consultancy study was commenced in July 2017 for completion in July 2018. The short-term, medium-term and long-term traffic and transport improvement proposals were presented to the Traffic

Comment No. (TPB/R/S/H15/32-C)	Commenter	Gist of Comment	Responses to Comments
8	Mary Mulvihill	<ul style="list-style-type: none"> <li>• Objects to Amendment Item D.</li> <li>• The Amendment is using the provision of public housing as an excuse to encroach and develop the green belt.</li> <li>• The moratorium on height limits on Pok Fu Lam has been lifted and this will inevitably have a negative on green views.</li> </ul>	<p>and Transport Committee of Southern District Council (SDC) on 19.3.2018 and 21.5.2018. There is no improvement proposal related to Amendment Item C or in its close proximity.</p> <p>The objection grounds, which are related to the proposed public housing development in Pok Fu Lam South area, should be considered in the context of the Pok Fu Lam OZP.</p>
9	Christopher Carline	<ul style="list-style-type: none"> <li>• Objects to Amendment Item D.</li> <li>• Object to rezoning of green belt on the edge of Aberdeen Country Park and transfer it to Pok Fu Lam for development.</li> <li>• The natural environment will be damaged.</li> </ul>	<p>See response to C8 above.</p>
10	Luk Pang Kei	<ul style="list-style-type: none"> <li>• Objects to Amendment Item D.</li> <li>• Oppose to a large area of the green belt on the fringe of Aberdeen Country Park being transferred to Pok Fu Lam for residential development.</li> <li>• The approval of the amendment would open the way for development along Shek Pai Wan Road.</li> <li>• The natural environment must be kept intact and the Town Planning Board must reject the Amendment.</li> </ul>	<p>Ditto</p>
11	Tsim Sha Tsui Residents Concern Group	<ul style="list-style-type: none"> <li>• Objects to Amendment Item D.</li> <li>• Development on the edge of Aberdeen Country Park will remove hundreds of trees and fauna destroying the natural</li> </ul>	<p>Ditto</p>

Comment No. (TPB/R/S/H15/32-C)	Commenter	Gist of Comment	Responses to Comments
12	Steve Sau	<ul style="list-style-type: none"> <li>• habitat of many species.</li> <li>• Wah Fu Estate can be redeveloped through some rezoning in Pok Fu Lam or a staggered in-situ programme.</li> <li>• The high buildings will also destroy the verdant landscape.</li> </ul> <ul style="list-style-type: none"> <li>• Objects to Amendment Item D.</li> <li>• Objects to the excision of green belt in Aberdeen for incorporation into Pok Fu Lam for development.</li> <li>• Green belt has high conservation value and is important in containing urban sprawl.</li> <li>• Construction of new housing will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen areas.</li> <li>• It will set undesirable precedent for other residential development in green belt and Country Park areas leading to degradation of the natural environment and a reduction in landscape value.</li> </ul>	Ditto
13	Lee Wai Kuen	<ul style="list-style-type: none"> <li>• Objects to Amendment Item D.</li> <li>• Objects to the excision of green belt in Aberdeen for incorporation into Pok Fu Lam for residential development.</li> </ul>	Ditto
14	Hong Kong Housing Society	<ul style="list-style-type: none"> <li>• Supports Amendment Items A and B.</li> <li>• Yue Kwong Chuen has been developed for more than 50 years and its facilities are aging. Redevelopment of Yue Kwong Chuen is necessary and relies on a suitable decanting site that is acceptable to the affected residents. Most of the Yue Kwong Chuen residents are elderly people and it would be most desirable if they could be rehoused in the vicinity so as to maintain their social ties in the neighbourhood.</li> </ul>	Noted

<b>Comment No. (TPB/R/S/H15/32-C)</b>	<b>Commenter</b>	<b>Gist of Comment</b>	<b>Responses to Comments</b>
		<ul style="list-style-type: none"> <li>• The site under Amendment Item A is the only viable and immediately available site for local decanting to facilitate redevelopment of Yue Kwong Chuen by phases. There are no other suitable alternative sites in the vicinity that allow for local decanting of Yue Kwong Chuen in a timely manner.</li> <li>• The development intensity of the site is compatible with the surrounding development. Technical assessments undertaken have demonstrated that the proposed development will not induce undesirable traffic, environmental, visual, landscape, geotechnical, ecological and infrastructural impacts on the surrounding areas.</li> <li>• The site will provide space for government, institution and community facilities to serve the community. There will be compensatory tree planting at a 1:1 ratio for the site.</li> <li>• Two briefing sessions were conducted by HKHS on 20.1.2016 and 27.1.2016 to consult Tin Wan residents and Yue Kwong Chuen affected tenants respectively. The proposed development was also presented to the District Development and Housing Committee of SDC on 21.3.2016. The local residents and SDC in general supported the development proposal.</li> <li>• Amendment Item B is to rezone an area shown as 'Road' to "GB" and there is no development involved.</li> </ul>	

**APPLICATION FOR AMENDMENT OF PLAN**  
**UNDER SECTION 12A OF THE TOWN PLANNING ORDINANCE**

**APPLICATION NO. Y/H15/11**

<b><u>Applicant</u></b>	Hong Kong Housing Society (HKHS) represented by Townland Consultants Limited
<b><u>Plan</u></b>	Draft Aberdeen & Ap Lei Chau Outline Zoning Plan (OZP) No. S/H15/30
<b><u>Application Site</u></b>	Government land at junction of Shek Pai Wan Road and Tin Wan Hill Road, Aberdeen
<b><u>Site Area</u></b>	About 7,725m <sup>2</sup>
<b><u>Land Status</u></b>	Government Land
<b><u>Zoning</u></b>	“Government, Institution or Community” (“G/IC”) (about 7,684m <sup>2</sup> , 99.5%) and an area shown as ‘Road’ (about 41m <sup>2</sup> , 0.5%)  <u>“G/IC” zone</u> (a) restricted to a maximum building height (BH) of 1 storey or the height of the existing building, whichever is the greater; and (b) provision for application for minor relaxation of the BH restriction
<b><u>Proposed Amendment</u></b>	To rezone the application site from “G/IC” and ‘Road’ to “Residential (Group A)” (“R(A)”) with a maximum BH restriction of 100mPD

**1. The Proposal**

- 1.1 The applicant proposes to rezone the application site from “G/IC” and an area shown as ‘Road’ to “R(A)” on the draft Aberdeen & Ap Lei Chau OZP No. S/H15/30 for a proposed public rental housing development at junction of Shek Pai Wan Road and Tin Wan Hill Road (**Plan Z-1**). The proposed development at the application site (the site) will serve as a decanting site for the existing tenants of Yue Kwong Chuen (YKC) which will be redeveloped in phases. The site is currently occupied by the Food and Environmental Hygiene Department (FEHD)’s pest control office.
- 1.2 According to the indicative scheme submitted by the applicant, the proposed development comprises one 25-storey residential block on top of a 3-storey podium providing retail facilities, a multi-function room for residents, relocation of an integrated family service centre (IFSC) and reprovisioning of FEHD’s pest control office. The BH of the proposed development is at

100mPD (main roof). Substantial slope works will need to be carried out at the west and the north of the residential block in support of the proposed housing project.

1.3 The major development parameters of the indicative scheme are as follows:

Rezoning Area	About 7,725m <sup>2</sup>
Gross Site Area	About 6,797m <sup>2</sup>
Net Site Area	About 2,591m <sup>2</sup>
Total PR (based on net site area)	About 10.5
- Domestic PR	About 9.8
- Non-domestic PR	About 0.7
Total Gross Floor Area (GFA)	About 27,414m <sup>2</sup>
- Domestic GFA	About 25,492m <sup>2</sup>
- Non-domestic GFA	About 1,922m <sup>2</sup> (including retail facilities, multi-function room for residents, IFSC and pest control office)
Site Coverage (SC)	About 38%
BH (main roof level)	100mPD
No. of Storeys	28 storeys (including a 3-storey podium)
No. of Units	600
Private Open Space	970m <sup>2</sup>
Car parking Spaces	
- Private car	19 (including 1 for disabled)
- Motorcycle	4
Loading/Unloading Facilities	
- Heavy goods vehicle	1
- Light goods vehicle	2

1.4 Vehicular traffic will enter from Shek Pai Wan Road and exit at Tin Wan Hill Road. The proposed run-in is located as far away as possible from two mature trees (**Drawing Z-12**) outside the site along Shek Pai Wan Road. Natural hazard mitigation measures will be carried out by the applicant on land zoned "Green Belt" ("GB") outside the site (**Drawing Z-22**) during the project implementation.

1.5 There is a strip of land shown as 'Road' on the OZP located to the southwest of the site serving as an access road to the site. As vehicular access to the site will not rely on this 'Road' and the 'Road' does not seem to serve any other purpose, the applicant suggests that this strip of land may be rezoned to "GB" corresponding to the nearby "GB" zone. This suggestion, however, does not form part of the current rezoning request.

1.6 In support of the application, the applicant has submitted the following documents:

(a) Application form received on 5.4.2016

(Appendix I)

- (b) Supplementary Planning Statement (SPS) (Appendix Ia)
  - (c) Further information received on 13.7.2016 providing responses to departmental comments with revised ground floor plan and swept path analysis, revised Landscape Proposal and revised technical assessment reports (*published on 5.8.2016*) (Appendix Ib)
  - (d) Further information received on 10.8.2016 providing responses to comments; revised floor plans and sections; revised compensatory tree plan and Landscape Proposal; and revised technical assessment reports to address departmental comments. (*published on 19.8.2016*) (Appendix Ic)
  - (e) Further information received on 29.8.2016 providing responses to comments; revised pages to the Landscape Proposal; and revised pages to the technical assessment reports to address departmental comments (*exempted from publication and recounting requirements*) (Appendix Id)
  - (f) Further information received on 13.9.2016 providing revised pages to technical assessment reports to address departmental comments (*exempted from publication and recounting requirements*) (Appendix Ie)
  - (g) Further information received on 14.10.2016 (*exempted from publication and recounting requirements*) (Appendix If)
- 1.7 The location plan, floor plans, sections, landscape plans and photomontages submitted by the applicant are at **Drawings Z-1 to Z-21**. The proposed development is anticipated for completion in 2022.
- 1.8 On 24.6.2016, the Committee agreed to defer a decision on the application as requested by the applicant pending the submission of further information from the applicant. The applicant submitted further information which was received on 13.7.2016 and 10.8.2016 in response to departmental and public comments. The application is now submitted for consideration by the Committee at this meeting.

## **2. Justifications from the Applicant**

The justifications put forth by the applicant in support of the application are detailed in the SPS and further information at **Appendices Ia to If**. They are summarised as follows:

### **In Line with Government Policy**

- (a) approval of the proposal would allow the applicant (HKHS) to take immediate action to provide much needed housing supply in Aberdeen, particularly for the low income families, which is in line with the Government policy. The redevelopment of YKC could provide an extra supply of about 1,400 flats taking into account of about 600 flats in the proposed development;

Decanting Site for YKC Redevelopment

- (b) YKC has been developed for more than 50 years and its facilities are aging. Redevelopment of YKC is necessary and relies on a suitable decanting site that is acceptable to the affected residents. Most of the YKC residents are elderly people and it would be most desirable if they could be rehoused in the vicinity so as to maintain their social ties in the neighbourhood. In fact, there were many local objections to HKHS's previous proposal to relocate the affected tenants to Kwun Lung Lau in Kennedy Town. As the site is about 900m away from YKC, it would likely be acceptable by most of the affected residents and thus is a suitable decanting site to facilitate YKC's redevelopment in phases;

Compatible Land Use and Building Height

- (c) the proposed public rental housing development is compatible with the surrounding land uses which are predominantly residential in nature under "R(A)" and "R(E)" zones. The BH of the indicative scheme is also compatible with the natural and built contexts of the surrounding areas including the natural slopes and residential developments, ranging from about 85mPD to 150mPD;

No Increased Pressure on GIC Facilities in the Area

- (d) the existing and planned GIC facilities within the area will be sufficient to cater for the increased population generated from the proposed development. The existing FEHD's pest control office is to be reprovided on site. In the interim, the existing facilities will temporarily be relocated to other FEHD's premises. The existing IFSC at Tin Wan Street will be relocated to the proposed development with additional floor areas to enable continued services to residents of the local community, including the future residents of the proposed development;

No Significant Adverse Impacts

- (e) technical assessments have been conducted to assess the potential impacts arising from the proposed development and, if necessary, formulate appropriate mitigation measures to ameliorate the impacts. The assessments have demonstrated that the proposed development will not induce undesirable traffic, environmental, visual, geotechnical and infrastructural impacts as well as landscape and ecological impacts with mitigation measures;
- (f) effort has been made to optimize tree preservation and greening opportunities where possible taking account of the existing topographical constraints of the site. Within the site, there are 231 existing trees of common species in fair to poor condition. Among them, 41 trees will be retained, 186 trees are to be felled (including 10 dead trees) and 4 trees are to be transplanted. 151 new trees will be planted for compensation;

Design Considerations

- (g) the development layout is highly constrained due to the unique features of the site including on and off-site slopes and environmental impacts from surrounding roads. To minimize slope cutting and associated impact on the existing trees and vegetation, the building footprint has been made as compact as possible. Single aspect building design is adopted for the residential tower to mitigate against traffic noise. In addition, noise mitigation measures such

as provision of podium, acoustic windows, fixed glazing, non-noise sensitive uses, etc. are proposed. There will be a minimum 5m buffer distance between the residential tower and the road kerbside to avoid adverse vehicular emission impact. The floor-to-floor height of the podium has also been minimized; and

Local Consultation

(h) two briefing sessions have been conducted on 20.1.2016 and 27.1.2016 to consult Tin Wan residents and YKC affected tenants respectively. The proposal was presented to the District Development and Housing Committee (DDHC) of Southern District Council (SDC) on 21.3.2016. The SDC in general supported the proposal.

**3. Compliance with the “Owners’ Consent/Notification” Requirements**

As the site involves Government land only, the “owner’s consent/notification” requirements as set out in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31) is not applicable to the application.

**4. Previous Application**

There is no previous rezoning request or application for amendment to the OZP covering the site.

**5. Similar Application**

There is no similar rezoning request or application for amendment to the OZP.

**6. The Application Site and Its Surrounding Areas (Plans Z-1 to Z-5)**

6.1 The site is:

- (a) located at the junction of Shek Pai Wan Road and Tin Wan Hill Road;
- (b) covered largely by natural and man-made slopes; and
- (c) partly occupied by a small 1-storey building at the southern corner for FEHD’s pest control office.

6.2 The surrounding areas have the following characteristics:

- (a) a shrine is located at the south-eastern corner immediately outside the site and will remain in-situ;
- (b) surrounded by the natural slopes to the northeast, north and northwest;
- (c) to its south across Shek Pai Wan Road is the Shek Pai Wan Road Playground;

- (d) to its east across Tin Wan Hill Road is the ex-Po Leung Kuk Wai Yin College, Tin Wan Market and Tin Wan Station Building;
- (e) to the southeast are private residential developments and some industrial buildings within the “R(A)” and “R(E)” zones and subject to maximum BH restrictions of 85mPD and 100mPD;
- (f) to its further northeast are Tin Wan Estate Playground, Multi-storey Carpark, Tin Wan Shopping Centre and Tin Wan Estate under “R(A)” zone and subject to stepped maximum BH restrictions of 100mPD, 130mPD and 150mPD.

## **7. Planning Intention**

The “G/IC” zone is intended for the provision of Government, institution or community facilities to serve the needs of local residents and/or a wider district, region or the territory. It is also intended to provide land or uses directly related to or in support of the work of the Government, organizations providing social services to meet community needs, and other institutional establishments.

## **8. Comments from Relevant Government Departments**

The following Government departments have been consulted and their views on the planning application and the public comments received are summarised as follows:

### **Policy Aspect**

#### **8.1 Comments of the Secretary for Transport and Housing (STH):**

policy support has been granted for the HKHS to construct no less than 600 public rental flats at the site in order to provide rehousing support for the redevelopment of YKC.

### **Land Administration Aspect**

#### **8.2 Comments of the District Lands Officer/Hong Kong West & South, Lands Department (DLO/HKW&S, LandsD):**

- (a) the site falls within unleased and unallocated government land, government land allocation to FEHD for pest control premises, and temporary government land allocation to the Civil Engineering and Development Department (CEDD) for landslip prevention and mitigation works. In the event of implementation of the project, the affected government land allocation facilities should be re-provisioned or relocated accordingly; and
- (b) upon receipt of land grant application, LandsD will consider the application under applicable practice and there is no guarantee that the land grant application will be considered and/or approved. The land

grant application, if approved, will subject to such terms and conditions to be imposed by LandsD at its sole discretion.

**Traffic Aspect**

8.3 Comments of the Commissioner for Transport (C for T):

- (a) no comment on the subject application from traffic engineering viewpoint; and
- (b) the traffic impact assessment submitted for the subject proposal is acceptable.

**Environmental Aspect**

8.4 Comments of the Director of Environmental Protection (DEP):

- (a) no objection to the application;
- (b) the Environmental Assessment (including Noise Impact Assessment (NIA) and Air Quality Impact Assessment) and Sewerage Impact Assessment are generally in order; and
- (c) it is understood that the proposed development scheme is preliminary in nature and may be subject to design change at a later stage. To allow design flexibility and to ensure suitable noise mitigation measures are properly designed and implemented, it is recommended a requirement for a NIA to be incorporated into the land grant conditions.

**Geotechnical Aspect**

8.5 Comments of the Head of the Geotechnical Engineering Office, Civil Engineering and Development Department (H(GEO), CEDD):

- (a) no objection to the application; and
- (b) it is understood that a detailed natural terrain hazard study will be carried out in detailed design stage of the development project.

**Visual and Air Ventilation Aspect**

8.6 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

- (a) the site is located at the foothill west of the Tin Wan area. Residential developments in the vicinity of the site are allowed to have maximum building height of 100mPD. The proposed development of 100mPD high as shown in the photomontages provided in the submission would not be incompatible with its surroundings. Notwithstanding, given the fringe location of the site in relation to the Tin Wan area, efforts should be made to reduce the visual impact of the future development by, for instance, maximizing the setback of the residential tower from Shek Pai Wan Road

and/or providing a lower building height towards the hillside to the west. Noting the further justifications put forward by the applicant on the design constraints for providing setback and height variation, he has no further comment on the application; and

- (b) on air ventilation perspective, under most of the prevailing wind directions (NE, E, SE and S), the downstream areas are mountain sides and no significant impact is anticipated under these prevailing wind directions. The building facade of less than 60m long could help alleviate the potential impact to the local wind environment under S and SW wind conditions. In general, while an increase in development intensity may induce slight adverse impact to the immediate vicinity of the site, no significant impact is anticipated.

8.7 Comments of the Chief Architect/Central Management Division 2, Architectural Services Department (CA/CMD2, ArchSD):

- (a) it is noted that the proposed development includes the reprovisioning of FEHD and SWD facilities. It is understood that the drawings presented in the submission are indicative only and the proposed government accommodations and facilities included in the development to be completed and handed over to the user departments will be subject to the applicant's detailed planning and design in accordance with the requirements from the relevant departments, and/or in accordance with the technical schedule included or to be included in the land grant, and in compliance with all statutory requirements;
- (b) some detailed comments on the indicative scheme which the applicant should take note of at the detailed design stage:
  - (i) part of the proposed communal open space at upper ground floor (**Drawing Z-5**) is recessed and in awkward shape, it may restrict the usage of this area;
  - (ii) it appears that a considerable number of flats are facing west. Orientation of the blocks and solar control devices should be considered to reduce solar heat gain and avoid glare as far as practicable;
  - (iii) the building block looks long, rigid and monotonous with wall effect. It is advised to review and articulate the building forms and the elevation design to break down the scale of the building; and
  - (iv) it is suggested that the high podium should be avoided as far as possible since it would block air permeability at the pedestrian level. Attention should be drawn to the sustainable building design guidelines under PNAP – APP-152.

### **Landscape Aspect**

#### 8.8 Comments of CTP/UD&L, PlanD:

- (a) no objection to the application;
- (b) according to the submitted information and aerial photo of 1.1.2015, the northern portion of the site consists of engineering slopes which is mostly hard paved with sporadic vegetation and the southern portion of the site consists of vegetated slopes with existing trees;
- (c) medium to high rise industrial and residential buildings are found to the east of the site. Whereas vegetated slopes under the “GB” zone are found to the north and west of the site. The proposed public rental housing development is considered not incompatible with the existing landscape character; and
- (d) the planting climbers on retaining wall as proposed by the applicant should be implemented where feasible.

### **Social Welfare Facilities**

#### 8.9 Comments of the Director of Social Welfare (DSW):

- (a) no objection to the application; and
- (b) it is noted that an IFSC will be incorporated into the proposed housing development. According to the established procedures, DSW will arrange with relevant Government departments for setting out the construction requirement of the IFSC in the land grant conditions.

### **Building Aspect**

#### 8.10 Comments of the Chief Building Surveyor/Hong Kong West, Buildings Department (CBS/HKW, BD):

- (a) no in-principle objection under the Buildings Ordinance;
- (b) to obtain GFA concessions for green/amenity features and non-mandatory/non-essential plant rooms and services in a domestic or composite development under Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers PNAP APP-151, it is a pre-requisite to comply with the requirements of PNAP APP-152 on sustainable building design guidelines;
- (c) the areas of the entrance and lift lobby on G/F serving residential tower shall be regarded as the domestic part of the building and is accountable under domestic GFA and PR;
- (d) temporary refuge spaces should be provided within the protected exit or fireman’s lift lobby of every fire compartment at every floor of the

building in accordance with Clause B30.1 of the Code of Practice for Fire Safety in Building 2011; and

- (e) detailed comments on the proposal could only be made at the formal building plan submission stage.

### **Fire Safety Aspect**

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

- (a) no in principle objection to the application. Fire service installations and water supplies for firefighting should be provided to the satisfaction of the Fire Services Department at the detailed design stage. Detailed fire safety requirements will be formulated upon receipt of formal submission of general building plans; and
- (b) the applicant should be reminded that arrangement of emergency vehicular access shall comply with Part D of the Code of Practice for Fire Safety in Buildings 2011 which is administered by BD.

### **District Officer's Comments**

8.12 Comments of the District Officer (Southern), Home Affairs Department (DO(S), HAD):

- (a) no comment on the application;
- (b) did not receive any comment from the public during the 3-week public inspection period; and
- (c) the proposal was presented to DDHC of SDC on 21.3.2016. SDC in general supported the proposal whilst hoping that HKHS could continue to consult the local residents concerned on the detailed design of the proposed development in view of its potential impacts on aspects such as traffic and community facilities.

8.13 The following departments have no comment on the application:

- (a) Commissioner of Police;
- (b) Chief Engineer/Construction, Water Supplies Department;
- (c) Chief Engineer/Hong Kong & Islands, Drainage Services Department;
- (d) Chief Highway Engineer/Hong Kong, Highways Department;
- (e) Director of Agricultural, Fisheries and Conservation;
- (f) Director of Electrical and Mechanical Services;
- (g) Director of Food and Environmental Hygiene; and
- (h) Project Manager/Hong Kong Island & Islands, CEDD.

## **9. Public Comments Received During Statutory Publication Period**

9.1 On 15.4.2016, the application was published for public inspection. During the first three weeks of the statutory public inspection period which ended on

6.5.2016, one public comment was received. On 5.8.2016 and 19.8.2016, two sets of further information were published for public inspection. During the first three weeks of the statutory public inspection period which ended on 26.8.2016 and 9.9.2016 respectively, three public comments were received for the first set of further information and no public comment was received for the second set of further information.

- 9.2 Among the total four public comments received, one was from a SDC Member supporting, two were from individuals objecting to and the remaining one was from an individual providing comments on the application. The public comments are summarized as follows:

Supportive

- (a) supports the proposal in-principle as it helps increase the long-term housing supply and shorten the waiting time for public housing;
- (b) out of the 1,175 replies received from a questionnaire survey of Tin Wan residents, 823 (about 70%) support, 235 (about 20%) object and the rest have no comment on the proposal;
- (c) during rezoning, consideration should be given to the concerns of local residents on traffic aspect and provision of community facilities;

Opposing

- (d) the proposed development will cause visual and air ventilation impacts to some local residents. There is no active outdoor recreational space or children's playground in the proposed development;
- (e) there will be an additional 600 households and 24 vehicles to the community. The proposed development will worsen the traffic congestion problem in Tin Wan area; and

Comments

- (f) the existing traffic congestion problems are already very serious. There are already many redevelopments, particularly residential, in the area but with insufficient supporting facilities. The supporting facilities should be provided first before considering any developments in Tin Wan area.

**10. Planning Considerations and Assessment**

- 10.1 The applicant (i.e. HKHS) proposes to rezone the site from "G/IC" (99.5%) and an area shown as 'Road' (0.5%) to "R(A)" for a proposed public rental housing development.

Land Use and BH Compatibility

- 10.2 The site is located at the western fringe of Tin Wan area. It is largely covered by natural and man-made slopes with a small 1-storey building at the southern corner for FEHD's pest control office. Except the pest control office, there is no designated or long term planned GIC use for the site. There is also no request from relevant bureau / departments to use/reserve the site for GIC uses.
- 10.3 The surrounding area is predominantly residential in nature with a cluster of GIC facilities. From the land use perspective, the proposed rezoning of the

site for residential use is compatible with the surrounding developments and could be considered as an extension of the residential clusters of the Tin Wan area. Being located about 900m away from YKC, the site is also considered a suitable decanting site to facilitate the redevelopment of YKC in phases. THB has granted policy support for HKHS to construct no less than 600 public rental flats at the site.

- 10.4 In terms of BH, the proposed development with a maximum BH of 100mPD is compatible with the BH restrictions set for the "R(A)" zones in Tin Wan area generally stepping up from 85mPD and 100mPD along the two sides of Shek Pai Wan Road towards 100mPD, 130mPD and 150mPD for Tin Wan Estate further up the hill. CTP/UD&L of PlanD considers that the proposed BH of 100mPD would not be incompatible with its surroundings. Both CTP/UD&L of PlanD and CA/CMD2 of ArchSD have no adverse comment on the application.

#### Provision of GIC Facilities and Open Space

- 10.5 The existing pest control office on site will be reprovided within the proposed development upon redevelopment. Besides, an existing IFSC at Tin Wan Street will be relocated to the proposed development with an enlarged premises to serve the local community. Both FEHD and SWD have agreed to the reprovisioning and relocation arrangements.
- 10.6 Should the application be agreed, the implementation of the proposed housing project will result in an additional population of about 1,600 persons, which will have no adverse implications on the current GIC and open space provisions in the Aberdeen and Ap Lei Chau area.

#### Technical Aspects

- 10.7 The proposed rezoning is considered acceptable in traffic, environmental and infrastructural terms. On traffic aspect, the applicant has submitted a TIA to demonstrate that the proposed development is acceptable in traffic terms. C for T considers the TIA acceptable and has no comment on the rezoning proposal.
- 10.8 DEP has no adverse comment on the submitted Environmental Assessment and Sewerage Impact Assessment. H(GEO), CEDD also has no adverse comment on geotechnical aspect. The requirements for a NIA and a detailed natural terrain hazard study would be incorporated into the land grant conditions of the site. Other concerned government departments, including CE/D(2) of WSD and CE/HK&I of DSD, have no objection to/no comment on the application.

#### Public Comments

- 10.9 Among the four public comments received, 1 supports, 2 object to and 1 provides comments on the application. On the grounds of objection and comments related to the traffic, visual, air ventilation and detailed design of the proposed development, the relevant comments of concerned departments

including C for T, CTP/UD&L of PlanD and CA/CMD2 of ArchSD in paragraph 8 and the planning assessment above are relevant.

## **11. Planning Department's Views**

- 11.1 Based on the assessment made in paragraph 10 and having taken into account the public comments mentioned in paragraph 9, PlanD has no objection to the proposed rezoning of the application site from "G/IC" and an area shown as 'Road' to "R(A)" with a maximum BH restriction of 100mPD.
- 11.2 Should the Committee decide to agree to the subject application by rezoning the application site to "R(A)", an amendment to the OZP will be submitted to the Committee for agreement prior to gazetting under section 5 of the Ordinance after reference back of the OZP for amendment by the Chief Executive in Council.
- 11.3 There is no strong reason to recommend rejection of the application.

## **12. Decision Sought**

- 12.1 The Committee is invited to consider the application and decide whether to agree, partially agree, or not to agree to the application.
- 12.2 Should the Committee decide not to agree to the application, Members are invited to advise what reason(s) for the decision should be given to the applicant.

## **Attachments**

<b>Appendix I</b>	Application form received on 5.4.2016
<b>Appendix Ia</b>	Supplementary Planning Statement
<b>Appendices Ib to If</b>	Further information submitted by the Applicant received on 13.7.2016, 10.8.2016, 29.8.2016, 13.9.2016 and 14.10.2016
<b>Appendix II</b>	Public comments
<b>Drawing Z-1</b>	Location plan submitted by the applicant
<b>Drawings Z-2 to Z-11</b>	Floor plans and sections submitted by the applicant
<b>Drawings Z-12 to Z-15</b>	Landscape plans submitted by the applicant
<b>Drawings Z-16 and Z-21</b>	Photomontages submitted by the applicant
<b>Drawing Z-22</b>	Preliminary Natural Terrain Mitigation Measures Scheme submitted by the applicant
<b>Plan Z-1</b>	Location plan
<b>Plan Z-2</b>	Site plan
<b>Plan Z-3</b>	Aerial photo
<b>Plans Z-4 and Z-5</b>	Site photos

**PLANNING DEPARTMENT  
OCTOBER 2016**

寄件者: John Batten [REDACTED]  
寄件日期: 15日11月2017年星期三 23:45  
收件者: Tpbpd  
主旨: Representation to OZP S/H15/32

TPB/R/S/H15/32-1

Dear Sir/Madam

Re: Representation to OZP S/H15/32

The Central & Western Concern Group OBJECTS to amendments to this plan. We object to Item A; Item B; Item C and Item D because the proposed residential developments are too intense, the heights of buildings are too high, there will be ecological damage to surrounding green areas and the transport and traffic arrangements are inadequate.

We will make a comprehensive objection at the 'comment' stage of the public consultation stage of this OZP.

Many thanks and kind regards

John Batten  
for Central & Western Concern Group

JOHN BATTEN  
[REDACTED]

tpbpd

寄件者: Mark Mak <[REDACTED]> TPB/R/S/H15/32-2  
寄件日期: 15日11月2017年星期三 19:25  
收件者: tpbpd  
副本: Roy Tam  
主旨: 有關：S/H15/32號分區計劃大綱草圖 及 S/H10/16號分區計劃大綱草圖 環保觸覺意見書  
附件: S-H15-32\_意見書\_20171115.pdf; S-H10-16\_意見書\_20171115.pdf

## Town Planning Board

Please see attached Green Sense's representation on S/H15/32 and S/H10/16.  
If there is any problem, please feel free to contact us.

**Green Sense**  
Tel: 8100-4877  
Fax: 3011-9577  
Website: [greensense.org.hk](http://greensense.org.hk)  
Facebook: [www.facebook.com/hkgreensense](http://www.facebook.com/hkgreensense)

致 城市規劃委員會

## 有關：S/H15/32 號分區計劃大綱草圖 環保觸覺意見書

環保觸覺（本會）就上述草圖意見如下：

- 1) 綠化地帶的規劃角色極之重要，本身就是保留土地不作發展，抑制市區範圍的擴展，以防止土地一面倒石屎化。過去被劃為綠化地帶的土地本質就不應改劃為住宅。當政府主動提出大幅「檢討」「綠化地帶」，以改劃為「住宅」（市區範圍的擴展），已是與設立「綠化地帶」的概念及過去一貫的規劃政策上的基本和重大改變。當中涉及重要保育、城市規劃方向的改變，具爭議且關係不同社會利益衝突考慮，一個良好施政的政府應全面諮詢，令市民了解大幅改劃對環境及社區的影響和利弊，以決定是否支持。當「市區邊緣」的「綠化地帶」「抑制市區擴展」原則被妥協，城市擴張（urban sprawl）的「骨牌效應」（domino effect）將會發生。市區環境及人類活動帶來的光、水、噪音等污染，會侵蝕連接的自然環境，使自然環境和生態隨之萎縮。然後又成為誘因和理由，供市區發展進一步侵入，最終整體環境會被摧毀。此模式在世界各地環保落後的國家隨處可見，最近香港的廣東珠三角地區就是典型例子，原始地貌和自然環境被城市發展徹底破壞。  
特別針對 D 項，除以上改劃規劃的原則問題，改劃面積更不小，而本身又是大片樹林，發展之下，除天然環境被侵蝕，許多樹木亦要被斬。
- 2) 城規會配合政府政策改劃土地多年，大面積土地被改劃，但香港的房屋問題不見改善，反映政策方向出錯，再繼續通過改劃並不理性。本會認為政府必須理應對問題源頭：為香港訂合理人口政策。1997 年主權移來，以單程證、大陸專才計劃及大學中的大陸留學生，源源不絕為香港帶來人口上升，超出房屋及社會設施的負荷，才令開發土地的壓力如此之巨大。
- 3) 本會於 9 月委託香港大學民意研究計劃早前進行的一項全港民意調查，市民認為時下房屋問題的最重要主因並不是土地不足，反而是大陸來港炒賣的「熱錢」及大陸新移民引致人口上升〔請參考後圖〕。結果更反映超過 8 成人認為香港人口已經超負荷，大部分人贊成應減少單程證應對。在這點上，城規會應考慮民意，要求政府當局立即考慮在土

地問題的源頭著手，減少移民數量，停止無限制的開發，確保良好規劃。

- 4) A 項改劃雖是「政府、機構或社區」，但一樣長有不少樹木，對社會做成負面影響。本會同樣認為在政府能夠訂出合理人口政策之前，這類土地不應被改劃。
- 5) 而即使無論如何要提供土地作房屋，政府及市民均心知有其他可善用的土地，例如棕土、軍營及高爾夫球場等，綠化地帶及政府、機構或社區這類高社會成本的土地不應被先使用。

本會反對修訂圖則，請城市規劃委員會 撤回 改劃。

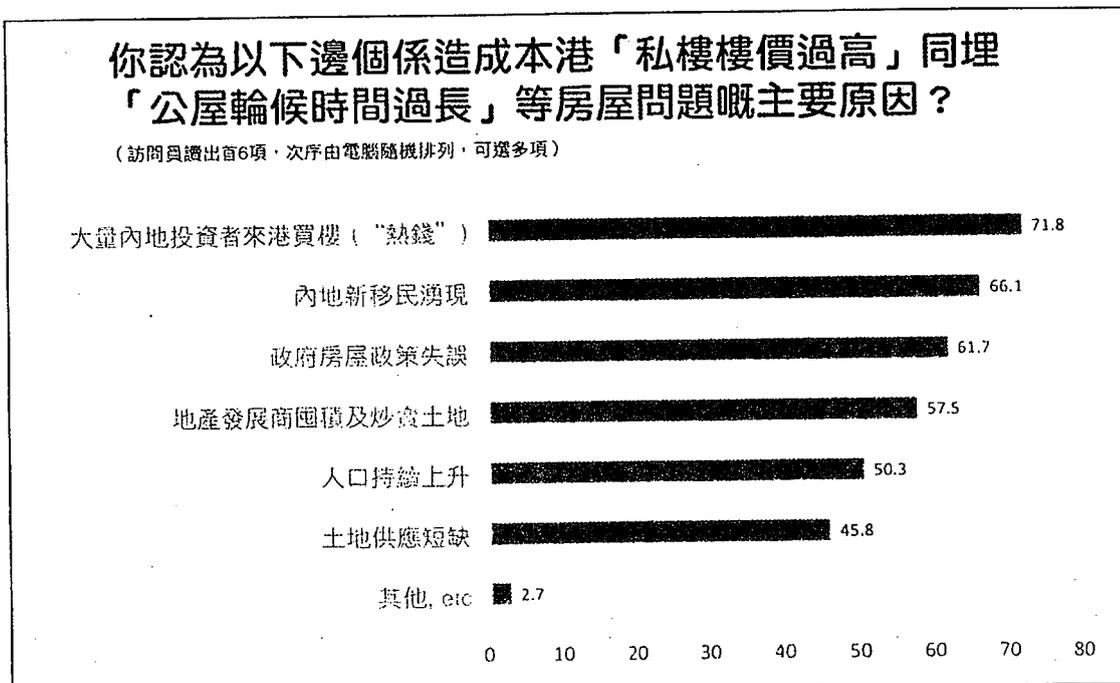
如有任何回覆，請致電 8100-4877 或電郵至 info@greensense.org.hk 與本會聯絡。

環保觸覺

二零一七年十一月十五日

#### 附圖 1.

本會委託香港大學民意研究計劃於本年 9 月進行的調查所得，市民認為房屋問題主要原因為大陸熱錢及大陸移民，土地短缺實際是所有提供選項中最少人認同一項



tpbpd

寄件者: [REDACTED]  
寄件日期: 14日11月2017年星期二 1:29  
收件者: tpbpd  
主旨: Aberdeen OZP S/H15/31

TPB/R/S/H15/32-3

**SCHEDULE OF AMENDMENTS TO  
THE APPROVED ABERDEEN & AP LEI CHAU  
OUTLINE ZONING PLAN NO. S/H15/31**

Dear TPB Members

When the previous Aberdeen OZP was approved it included the following statement:

***The areas adjoining the country parks and some other vegetated hilly areas in the area are zoned Green Belt covering about 128.6ha.  
The zoning is intended to conserve the natural environment and safeguard it from encroachment by urban-type developments.***

Item D – Excision of an area to the east of Wah Kwai Estate across Shek Pai Wan Road from the planning scheme area for incorporation into the draft Pok Fu Lam Outline Zoning Plan No. S/H10/16

Strongly object to a big chunk of green belt on the fringes of Aberdeen Country Park being transferred to Pok Fu Lam for development.

There is currently no residential estate north of Shek Pai Wan Road and the natural environment must be kept intact for the enjoyment of current and future residents and the community in general.

If approved this would open the way for development all along this road.

The artificial land shortage ruse is again being used to justify further trashing of our parks.

TPB must reject this inappropriate application.

Mary Mulvihill

就草圖的申述提出意見

TPB/R/S/H15/32-C1

Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

180105-205748-07476

提交限期

Deadline for submission:

05/01/2018

提交日期及時間

Date and time of submission:

05/01/2018 20:57:48

提出此份意見的人士(下稱「提意見人」)

Person Making This Comment

Alliance for a Beautiful Hong Kong

(known as "Commenter") hereafter:

與意見相關的草圖

Draft plan to which the comment relates:

S/H15/32

意見詳情

Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
Representation Nos 1-3	<p>We agree with the views detailed in these representations and oppose Items A and D on the ground that rezoning "Green Belt" sites at the urban fringe is inappropriate, particularly in this case as this land is intended to be rezoned as a Residential site in the Pokfulam district in order to extend the footprint of the Wah Fu public housing estate.</p> <p>The subject site lies in the "Green Belt" ("GB") comprises well-established forest habitat. GB zoning is important from a planning perspective to define the limits of urban and sub-urban development areas by its natural features and to contain urban sprawl so as to safeguard the natural country park environment which supports many wildlife species, including the largest known roost of the Black-eared Kite in southern China. It forms an important buffer to prevent the encroachment of urban-type development, such as the current proposal which will eventually entail rezoning the land to Residential for the expanded Wah Fu public housing estate. This construction will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen areas, which contain Hong Kong Trail and Aberdeen Country Park. The proposal, if approved, will set an undesirable precedent for other residential development in GB and Country Park areas. This will lead to further encroachment and complete loss of GB land and will undermine the buffer of the GB, leading to a general degradation of the natural environment and a reduction in the landscape value of the affected areas. Accordingly, we request Town Planning Board to reject these proposals.</p>

就草圖的申述提出意見

TPB/R/S/H15/32-C2

Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

180105-205041-64257

提交限期

Deadline for submission:

05/01/2018

提交日期及時間

Date and time of submission:

05/01/2018 20:50:41

提出此份意見的人士 (下稱「提意見人」)

Person Making This Comment

女士 Ms. Melanie Moore

(known as "Commenter") hereafter:

與意見相關的草圖

Draft plan to which the comment relates:

S/H15/32

意見詳情

Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
Representation Nos 1-3	<p>I agree with the views detailed in these representations and oppose Items A and D on the ground that rezoning "Green Belt" sites at the urban fringe is inappropriate, particularly in this case as this land is intended to be rezoned as a Residential site in the Pokfulam district in order to extend the footprint of the Wah Fu public housing estate.</p> <p>The subject site lies in the "Green Belt" ("GB") comprises well-established forest habitat. GB zoning is important from a planning perspective to define the limits of urban and sub-urban development areas by its natural features and to contain urban sprawl so as to safeguard the natural country park environment which supports many wildlife species, including the largest known roost of the Black-eared Kite in southern China. It forms an important buffer to prevent the encroachment of urban-type development, such as the current proposal which will eventually entail rezoning the land to Residential for the expanded Wah Fu public housing estate. This construction will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen areas, which contain Hong Kong Trail and Aberdeen Country Park. The proposal, if approved, will set an undesirable precedent for other residential development in GB and Country Park areas. This will lead to further encroachment and complete loss of GB land and will undermine the buffer of the GB, leading to a general degradation of the natural environment and a reduction in the landscape value of the affected areas. Accordingly, I request Town Planning Board to reject these proposals.</p>

就草圖的申述提出意見

TPB/R/S/H15/32-C3

Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

180105-205224-19268

提交限期

Deadline for submission:

05/01/2018

提交日期及時間

Date and time of submission:

05/01/2018 20:52:24

提出此份意見的人士 (下稱「提意見人」)

Person Making This Comment  
(known as "Commenter") hereafter:

先生 Mr. John Moore

與意見相關的草圖

Draft plan to which the comment relates:

S/H15/32

意見詳情

Details of the Comments:

申述編號	意見詳情
Representation No:	Details of Comments:
Representation Nos 1-3	<p>I agree with the views detailed in these representations and oppose Items A and D on the ground that rezoning "Green Belt" sites at the urban fringe is inappropriate, particularly in this case as this land is intended to be rezoned as a Residential site in the Pokfulam district in order to extend the footprint of the Wah Fu public housing estate.</p> <p>The subject site lies in the "Green Belt" ("GB") comprises well-established forest habitat. GB zoning is important from a planning perspective to define the limits of urban and sub-urban development areas by its natural features and to contain urban sprawl so as to safeguard the natural country park environment which supports many wildlife species, including the largest known roost of the Black-eared Kite in southern China. It forms an important buffer to prevent the encroachment of urban-type development, such as the current proposal which will eventually entail rezoning the land to Residential for the expanded Wah Fu public housing estate. This construction will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen areas, which contain Hong Kong Trail and Aberdeen Country Park. The proposal, if approved, will set an undesirable precedent for other residential development in GB and Country Park areas. This will lead to further encroachment and complete loss of GB land and will undermine the buffer of the GB, leading to a general degradation of the natural environment and a reduction in the landscape value of the affected areas. Accordingly, I request Town Planning Board to reject these proposals.</p>

就草圖的申述提出意見  
**Comment on Representation Relating to Draft Plan**

TPB/R/S/H15/32-C4

參考編號  
**Reference Number:** 180105-205421-08588

提交限期  
**Deadline for submission:** 05/01/2018

提交日期及時間  
**Date and time of submission:** 05/01/2018 20:54:21

提出此份意見的人士 (下稱「提意見人」)  
**Person Making This Comment** 小姐 Miss Evelyn Moore  
**(known as "Commenter") hereafter:**

與意見相關的草圖  
**Draft plan to which the comment relates:** S/H15/32

意見詳情  
**Details of the Comments:**

申述編號	意見詳情
Representation No:	Details of Comments:
Representation Nos 1-3	<p>I agree with the views detailed in these representations and oppose Items A and D on the ground that rezoning "Green Belt" sites at the urban fringe is inappropriate, particularly in this case as this land is intended to be rezoned as a Residential site in the Pokfulam district in order to extend the footprint of the Wah Fu public housing estate.</p> <p>The subject site lies in the "Green Belt" ("GB") comprises well-established forest habitat. GB zoning is important from a planning perspective to define the limits of urban and sub-urban development areas by its natural features and to contain urban sprawl so as to safeguard the natural country park environment which supports many wildlife species, including the largest known roost of the Black-eared Kite in southern China. It forms an important buffer to prevent the encroachment of urban-type development, such as the current proposal which will eventually entail rezoning the land to Residential for the expanded Wah Fu public housing estate. This construction will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen areas, which contain Hong Kong Trail and Aberdeen Country Park. The proposal, if approved, will set an undesirable precedent for other residential development in GB and Country Park areas. This will lead to further encroachment and complete loss of GB land and will undermine the buffer of the GB, leading to a general degradation of the natural environment and a reduction in the landscape value of the affected areas. Accordingly, I request Town Planning Board to reject these proposals.</p>

就草圖的申述提出意見

TPB/R/S/H15/32-C5

Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

180105-205535-37070

提交限期

Deadline for submission:

05/01/2018

提交日期及時間

Date and time of submission:

05/01/2018 20:55:35

提出此份意見的人士 (下稱「提意見人」)

Person Making This Comment

小姐 Miss Genevieve Moore

(known as "Commenter") hereafter:

與意見相關的草圖

Draft plan to which the comment relates:

S/H15/32

意見詳情

Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
Representation Nos 1-3	<p>I agree with the views detailed in these representations and oppose Items A and D on the ground that rezoning "Green Belt" sites at the urban fringe is inappropriate, particularly in this case as this land is intended to be rezoned as a Residential site in the Pokfulam district in order to extend the footprint of the Wah Fu public housing estate.</p> <p>The subject site lies in the "Green Belt" ("GB") comprises well-established forest habitat. GB zoning is important from a planning perspective to define the limits of urban and sub-urban development areas by its natural features and to contain urban sprawl so as to safeguard the natural country park environment which supports many wildlife species, including the largest known roost of the Black-eared Kite in southern China. It forms an important buffer to prevent the encroachment of urban-type development, such as the current proposal which will eventually entail rezoning the land to Residential for the expanded Wah Fu public housing estate. This construction will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen areas, which contain Hong Kong Trail and Aberdeen Country Park. The proposal, if approved, will set an undesirable precedent for other residential development in GB and Country Park areas. This will lead to further encroachment and complete loss of GB land and will undermine the buffer of the GB, leading to a general degradation of the natural environment and a reduction in the landscape value of the affected areas. Accordingly, I request Town Planning Board to reject these proposals.</p>

tpbpd

寄件者: John Batten [REDACTED]  
寄件日期: 05日01月2018年星期五 21:55  
收件者: Tpbpd  
主旨: Comment on Draft Aberdeen & Ap Lei Chau OZP S/ H15/32

TPB/R/S/H15/32-C6

Dear Sir/Madam

Further to my representation (R1) objecting to all Items of the Draft Pok Fu Lam OZP S/H15/32 - I make a further COMMENT by supporting my objections as R1 AND I wish to comment that this is NOT good planning! I will orally elaborate on my objections at the hearing to discuss this OZP.

Many thanks and kind regards  
John Batten  
for Central & Western Concern Group

JOHN BATTEN  
[REDACTED]  
[REDACTED]

JOHN BATTEN  
[REDACTED]  
[REDACTED]

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	TPB/R/S/H15/32-C7
	Date Received 收到日期	

- The comment should be made to the Town Planning Board (the Board) before the expiry of the specified period for making comment on the representation. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.  
意見必須於指定對申述提出意見的期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關意見的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.info.gov.hk/tpb/>.  
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：<http://www.info.gov.hk/tpb/>）。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The comment may be treated as not having been made if the required information is not provided.  
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出意見的人士須以打印方式或以正楷填寫表格，填寫的資料宜中英文兼備。倘若未能提供所需資料，則委員會可把有關意見視為不曾提出論。

<b>1. Person Making This Comment (known as "Commenter" hereafter)</b> 提出此份意見的人士（下稱「提意見人」）	
Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*)  任葆琳, 任葆琳議員辦事處	
<b>2. Authorized Agent (if applicable) 獲授權代理人 (如適用)</b>	
Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*)	
<b>3. Details of the Comment</b> 意見詳情	
Draft plan to which the comment relates 與意見相關的草圖	S/H15/32
Representation(s) to which the comment relates (please specify the representation number) 與意見相關的申述（請註明申述編號）	TPB/R/S/H15/32-1 中西區關注組

\* Delete as appropriate \* 請刪去不適用者  
Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

**3. Details of the Comment (Continued) (use separate sheet if necessary)**  
 意見詳情 (續) (如有需要, 請另頁說明)

Detailed comments on the representation(s) mentioned above 對上述所提及的申述的意見詳情

關於中西區關注組的申述, 就對香港仔及鴨利洲分區計劃大綱核准圖編號 S/H15/31 所修訂項目附表第 C 項「把毗鄰香港仔魚類批發市場的一幅土地由「休憩用地」地帶及顯示為「道路」的地方改劃為「政府、機構或社區」地帶」之修訂項目, 本人認為香港仔魚類批發市場毗鄰發展密度較高和交通設施不足, 所以應該在改變土地用途時考慮更有效的新用途。

由於南區民政事務署現正進行「香港仔整體交通情況研究」, 所以本人認為應該等待該研究有結果後才一併考慮是否需要改變用途、改變用途後的地帶和實際用途等等。

希望政府各部門能夠交換資訊、以香港仔區和毗鄰區域居民的利益為大前提作出最適合的修訂。

**4. Plans, Drawings and Documents 圖則、繪圖及文件**

Please list location plans, sites plans, other relevant plans, drawings and other documents submitted with the comment. For coloured drawings/plans or plans/drawings larger than A3 size, 90 copies each should be provided. For other supplementary documents, e.g. reports on impact assessment, 90 copies each should be submitted.

請列明連同意見一併遞交的位置圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有圖則/繪圖為彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

**5. Signature 簽署**Signature  
簽署

任葆琳

Name in Block Letters 姓名（以正楷填寫）

"Commenter" / Authorized Agent\*  
「提意見人」/ 獲授權代理人\*

Position (if applicable) 職位（如適用）

Professional

Qualification(s) 專業資格

Member 會員 / Fellow 資深會員\* of

 HKIP  HKIA  HKIS  HKIE  HKILA

Others 其他 .....

on behalf of  
代表

任葆琳議員辦事處

Company/Organization Name and Chop (if applicable)

公司/機構名稱及蓋章（如適用）

Date  
日期

28 DEC 2017

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

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

- (a) the processing of this comment which includes making available the name of the "commenter" for public inspection when making available this comment for public inspection; and
- (b) facilitating communication between the "commenter" and the Secretary of the Board/Government departments

in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.

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

- (a) 處理這份意見，包括公布這份意見供公眾查閱，同時公布「提意見人」的姓名供公眾查閱；以及
- (b) 方便「提意見人」與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the "commenter" in this comment may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

「提意見人」就這份意見提供的個人資料，或亦會向其他人士披露，以作上述第1段提及的用途。

3. A "commenter" has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.

根據《個人資料（私隱）條例》（第486章）的規定，「提意見人」有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道333號北角政府合署15樓。

\* Delete as appropriate

\* 請刪去不適用者

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

「✓」 at the appropriate box

請在適當的方格內加上「✓」號

寄件者: [REDACTED]  
寄件日期: 05日01月2018年星期五 21:29  
收件者: tpbpd  
主旨: Re: Aberdeen OZP S/H15/31

TPB/R/S/H15/32-C8

Aberdeen OZP S/H15/32

Dear TPB Members,

This plan is obviously nothing more than using the provision of public housing as an excuse to encroach and develop Green Belt. This at a time when the Chinese government is launching plans to greatly expand green coverage and plant hundreds of thousands of trees in order to improve the environment and tackle climate change. Unfortunately here in Hong Kong we are as usual way behind in our approach to good city planning. Many sections of The Peak have been given over to property development and now the administration is proposing to develop much of the green area to the North West of HK Island.

The moratorium on height limits in Pokfulham has been lifted and this will inevitably have a negative impact on green views. The plan to take over a big chunk of GB buffer zone of Aberdeen Country Park is a step too far.

Mary Mulvihill

---

**From:** [REDACTED]  
**To:** "tpbpd" <tpbpd@pland.gov.hk>  
**Sent:** Tuesday, November 14, 2017 1:29:12 AM  
**Subject:** Aberdeen OZP S/H15/31

**SCHEDULE OF AMENDMENTS TO  
THE APPROVED ABERDEEN & AP LEI CHAU  
OUTLINE ZONING PLAN NO. S/H15/31**

Dear TPB Members

When the previous Aberdeen OZP was approved it included the following statement:

***The areas adjoining the country parks and some other vegetated hilly areas in the area are zoned Green Belt covering about 128.6ha.  
The zoning is intended to conserve the natural environment and safeguard it from encroachment by urban-type developments.***

Item D – Excision of an area to the east of Wah Kwai Estate across Shek Pai Wan Road from the planning scheme area for incorporation into the draft Pok Fu Lam Outline Zoning Plan No. S/H10/16

Strongly object to a big chunk of green belt on the fringes of Aberdeen Country Park being transferred to Pok Fu Lam for development.

There is currently no residential estate north of Shek Pai Wan Road and the natural environment must be kept intact for the enjoyment of current and future residents and the community in general.

If approved this would open the way for development all along this road.

The artificial land shortage ruse is again being used to justify further trashing of our parks.

TPB must reject this inappropriate application.

Mary Mulvihill



就草圖的申述提出意見

TPB/R/S/H15/32-C9

Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

180105-231049-01497

提交限期

Deadline for submission:

05/01/2018

提交日期及時間

Date and time of submission:

05/01/2018 23:10:49

提出此份意見的人士 (下稱「提意見人」)

Person Making This Comment

先生 Mr. CHRISTOPHER CARLINE

(known as "Commenter") hereafter:

與意見相關的草圖

Draft plan to which the comment relates:

S/H15/32

意見詳情

Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
TPB/R/S/H15/32/3	I SUPPORT THIS REPRESENTATION AND OBJECT TO REZONING GREEN BELT LAND ON EDGE OF ABERDEEN COUNTRY PARK AND TRANSFER TO POK FU LAM FOR DEVELOPMENT THE NATURAL ENVIRONMENT WILL BE DAMAGED

14

就草圖的申述提出意見

TPB/R/S/H15/32-C10

Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

180105-232343-88117

提交限期

Deadline for submission:

05/01/2018

提交日期及時間

Date and time of submission:

05/01/2018 23:23:43

提出此份意見的人士 (下稱「提意見人」)

Person Making This Comment

先生 Mr. Luk Pang Kei

(known as "Commenter") hereafter:

與意見相關的草圖

Draft plan to which the comment relates:

S/H15/32

意見詳情

Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
TPB/R/S/H15/32-3	<p>Concur with R and Objection to Item D</p> <p>Strongly object to a big chunk of green belt on the fringes of Aberdeen Country Park being transferred to Pok Fu Lam for development.</p> <p>There is currently no residential estate north of Shek Pai Wan Road and the natural environment must be kept intact for the enjoyment of current and future residents and the community in general.</p> <p>If approved this would open the way for development all along this road.</p> <p>The artificial land shortage ruse is again being used to justify further trashing of our parks.</p> <p>TPB must reject this inappropriate application.</p>

寄件者: Tst Res [REDACTED]  
寄件日期: 05日01月2018年星期五 21:51  
收件者: tpbpd@pland.gov.hk  
主旨: Draft Aberdeen & Ap Lei Chau Outline Zoning Plan No. S/H15/32

Dear Chairwoman and Members,

Draft Aberdeen & Ap Lei Chau Outline Zoning Plan No. S/H15/32

This matter was brought to our attention when our group met for dinner this evening.

We are horrified that to learn that the administration is planning to build a high concrete wall on the edges of Aberdeen Country Park, removing hundreds of trees and fauna and destroying the natural habitat that supports many species in the process.

We believe that Wah Fu Estate can be redeveloped via some rezoning in Pokfulham and via a staggered in-situ programme. We have also read that the new blocks will be much higher than the current estate so more units can be accommodated in each one.

Please record our very strong objections to this plan to eliminate a very pleasing verdant landscape that we enjoy so much when we visit friends on Hong Kong Island west.

We take the opportunity to wish you a Happy New Year.

Regards  
Paul Kumar for  
Tsim Sha Tsui Residents Concern Group  
A registered NGO

寄件者: Chi Fu Fa Yuen <[REDACTED]>  
寄件日期: 04日01月2018年星期四 17:15  
收件者: tpbpd  
副本: [REDACTED]  
主旨: Aberdeen OZP S/H15/32

TPB/R/S/H15/32-C12

To: Town Planning Board ([tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk))

cc: Alliance for a Beautiful Hong Kong [REDACTED]

I object to the proposal to excise Green Belt land in Aberdeen to incorporate it into the Pokfulam district for future rezoning as a Residential site in order to extend the footprint of the Wah Fu public housing estate.

#### Green Belt Land Has High Conservation Value

The subject site lies in the "Green Belt" ("GB") zone in the Aberdeen Country Park and comprises well-established forest habitat. GB zoning is important from a planning perspective to define the limits of urban and sub-urban development areas by its natural features and to contain urban sprawl so as to safeguard the natural country park environment which supports many wildlife species, including the largest known roost of the Black-eared Kite in southern China. It forms an important buffer to prevent the encroachment of urban-type development, such as the current proposal which will eventually entail rezoning the land to Residential for the expanded Wah Fu public housing estate. This construction will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen areas, which contain Hong Kong Trail and Aberdeen Country Park.

#### Sets an Undesirable Precedent

The proposal, if approved, will set an undesirable precedent for other residential development in Green Belt and Country Park areas. This will lead to further encroachment and complete loss of GB land and will undermine the buffer function of the GB, leading to a general degradation of the natural environment and a reduction in the landscape value of the affected areas.

The loss of the green panorama will greatly impact public enjoyment of our natural habitat.

Besides, it is also related to Item E in Draft Pok Fu Lam Outline Zoning Plan No. S / H10 / 16.

Accordingly, I request that Town Planning Board reject this proposal. I would urge the Town Planning Board to reject the Government's amendment to The Approved Pok Fu Lam Outline Zoning Plan No. S / H10 / 15 on the matters shown in the plan, that is, Items D and Item E in Draft Pok Fu Lam Outline Zoning Plan No. S / H10 / 16, the additional reasons are as follows:

#### Three "Rehousing Sites" are Enough to Rebuild Wah Fu Estate, Why Five "Rehousing Sites" are Needed?

The Government has already been able to plan and build the first batch of 3,610 relocation units on three "Relocation Sites", that is Item A ( a site between Pok Fu Lam Road and Victoria Road), Item B (a site at Wah King Street), and Item C (a site at Wah Lok Path) of totaling 2.8 hectares. When these units are built for relocating existing Wah Fu Estates' residents, based on the 'Build New Housing then Demolish Old Housing' model, the phases of on-site Wah Fu Estate redevelopment can be kicked off.

There is no need to rezone Item D and Item E - Kai Lung Wan Greenbelts and to clear the greenbelts for rehousing usage by felling 2,400 trees. Depleting greenbelts should not be one and only one option to rebuild Wah Fu Estate, and it is not in line with the principle of effective use of the existing greenbelts' resources.

#### 2,400 Trees Felled by the Government Equivalent to Wiping Out 90% Trees in Victoria Park

The Government has planned to fell existing 2400 trees on the site of Item D and Item E - Kai Lung Wan Greenbelt. The consequences: a large number trees purifying polluted air will be lost in this densely populated district; the wildlife habitat connected to nearby country parks will be wiped out; the greenbelt's ecosystem services

for the well-being of residents will be disappeared; it will further intensify the heat island effect on Pok Fu Lam South.



The site of Item D and Item E - Kai Lung Wan Greenbelt's Functions be Retained

Trees are very important to ecosystem balance and are also important assets of nature. Retaining the original greenbelt functions (ecological conservation, natural landscape, buffering and recreational) not only protects the water sources of Aberdeen Reservoir, Country Parks and nearby ecological areas, but also reduce the heat Island effect on Pok Fu Lam South. The greenbelts are also essential to the physical health and mental well-being of residents.

Steve Sau

tpbpd

寄件者: JL [REDACTED]  
寄件日期: 05日01月2018年星期五 19:15  
收件者: tpbpd  
副本: [REDACTED]  
主旨: Aberdeen OZP. Aberdeen OZP S/H15/32:

TPB/R/S/H15/32-C13

Dear TPB members,

I object strongly to the proposal to excise Green Belt land in Aberdeen to incorporate it into the Pokfulam district for future rezoning as a Residential site in order to extend the footprint of the Wah Fu public housing estate.

Just look at the following attached news and you will see the reasons. I am proud to be part of a country that promotes healthy living, and I sincerely hope the Town Planning Board members will align their decision with the directions that our mother country is heading towards. The country parks and green belts are precious and invaluable assets of Hong Kong. A single reduction of even 1 hectare will send irreversible damaging wrong signal for the future.

I need not repeat the scientific evidences to support my objection, I will only plead members to have second thoughts on the concept of increasing the land for development through destroying the forests which are so hard to come by.

Wish all a great 2018 in protecting forests!

Lee Wai Kuen

China to increase forest coverage to 23 percent by 2020 - GBTimes  
<https://gbtimes.com/china-to-increase-forest-coverage-to-23-percent-by-2020>

1 hour ago - By 2050, and with **China** reaching the global average, it is estimated its **forest** volume will be 26.5 billion cubic metres. Additionally, the country's rural green coverage rate will be **increased** to 43 percent, with 100 percent of sand-covered **areas** controlled. Zhang said at a meeting on Thursday that 31.2 ...

Combating Climate Change: What Will China's Forestry Industry Do?

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3357702/>

by X Yang - 2010 - Cited by 7 - Related articles

May 13, 2010 - In **China**, six aspects of **forestry** management have achievable potential:

(a) **Increase** carbon sink storage by **increasing forest** area through afforestation. Compared with developed countries and some developing countries, **forest** coverage in **China** is relatively low. There are 57 million ha of mountainous ...

tpbpd

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寄件者: [REDACTED] TPB/R/S/H15/32-C14  
寄件日期: 03日01月2018年星期三 12:48  
收件者: tpbpd@pland.gov.hk  
副本: [REDACTED]  
主旨: COMMENTS ON REPRESENTATIONS SUBMITTED FOR THE DRAFT ABERDEEN & AP LEI CHAU OUTLINE ZONING PLAN NO. S/H15/32  
附件: hkhs\_spwr\_14new.pdf

Dear Sirs,

Please see the attached Comments on Representation Nos. 1 and 2 for the Draft Aberdeen & Ap Lei Chau Outline Zoning Plan No. S/H15/32 for your onward processing.

Kind Regards

Cindy Tsang  
Director  
TOWNLAND CONSULTANTS LIMITED

[REDACTED]

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Web site: <http://www.townland.com>



Our Reference: HKHS/SPWR/GL/14  
Date: 3 January 2018

By Fax and E-mail  
(2877-0245)

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

Dear Sir

**COMMENTS ON REPRESENTATIONS SUBMITTED FOR THE  
DRAFT ABERDEEN & AP LEI CHAU OUTLINE ZONING PLAN NO. S/H15/32**

On behalf of the Hong Kong Housing Society ("HKHS"), we hereby submit comments under Section 6(A)1 of the Town Planning Ordinance ("TPO") to Representations 1 and 2 on the Draft Aberdeen & Ap Lei Chau Outline Zoning Plan No. S/H15/32 ("Draft OZP") in regards to Amendment Items A and B.

The HKHS is a non-government organization aiming to serve the needs of the Hong Kong community in housing and related services. Whilst it is not responsible for housing policy, the HKHS provides a variety of subsidised housing (e.g. Rental Housing, Flat-for-Sale, and Sandwich Class Housing) and non-subsidised housing to enable people to have self-contained homes at affordable rates. The HKHS commits itself to constantly providing quality housing for the general public and to meet the expectations and aspirations of the broader Hong Kong community.

**1. Background to Amendment Items A and B**

- 1.1 Amendment Items A and B reflect the Board's decision on a S12A Application submitted by HKHS (TPB ref: Y/H15/11).
- 1.2 The "Residential (Group A)5" ("R(A)5") zone under Amendment Item 1 will provide a local decanting site for the redevelopment of Yue Kwong Chuen ("YKC"), an aging public rental housing estate built in the 1960s. At the District Development and Environment Committee of Southern District Council ("SDC") meeting on 30 September 2013, SDC members indicated their desire to see YKC's residents relocated within Southern District in familiar surroundings and to minimise impacts to residents of YKC. The site at the north-western junction of Shek Pai Wan Road and Tin Wan Hill Road ("Item A Site") has been identified as the only immediately available option for decanting in Southern District that allows for the redevelopment of YKC and enables the additional supply of PRHD in a timely manner.

城  
市  
規  
劃  
局

MAIN HONG KONG OFFICE  
18th Floor, 101 King's Road, North Point, Hong Kong  
Telephone : (852) 2521 2911 Facsimile : (852) 2521 6631  
E-mail address : tcitd@townland.com Website : www.townland.com

CHINA OFFICE (SHENZHEN)  
Room E 25th Floor, Daqing Building, 6027 Shennan Avenue, Futian District,  
Shenzhen City, PRC. Postal Code 518040  
Telephone : (86)(755) 8369 0780  
E-mail address : tcitd@townland.com

CHINA OFFICE (CHENGDU)  
Suite 801, Block C, Lanhai Office, 13 Changyi Road, Wuhou District,  
Chengdu City, Sichuan Province, PRC. Postal Code 610000  
Telephone : (86)(28) 8553 5759 / (86)(28) 8532 5287  
E-mail address : tcitd@townland.com

INDIA OFFICE  
CRD Samarth, 3rd Floor, 86 S.V. Road, Khar (W),  
Mumbai, 400 052, India  
Telephone : (91 22) 6455 0290 Facsimile : (91 22) 6455 0297  
E-mail address : tcpi@townland.com

INDONESIA OFFICE  
Granadi Building, Lantai 7 Tipikal Utara, Jl. H.R. Rasuna Said Blok X - 1,  
Kav. B - 9, Kuningan, Jakarta Selatan - 12950, Indonesia  
Telephone : (62 21) 2941 0621 Facsimile : (62 21) 2941 0622  
E-mail address : tcji@townland.com

ASSOCIATED COMPANIES

TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)

TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)

TOWNLAND CONSULTANTS (CHENGDU) LIMITED (China)

TOWNLAND CONSULTANTS PVT. LIMITED (India)

PT TOWNLAND INTERNATIONAL (Indonesia)

HOWARD & SEDDON PARTNERSHIP (United Kingdom)



ISO 9001:2008  
Certificate No: CC844

Our Reference: HKHS/SPWR/GL/14  
Date: 3 January 2018

The Secretary, Town Planning Board

- 1.3 In considering the suitability of the Item A Site for development, the HKHS commissioned a multi-disciplinary study in August 2014 to explore the development potential of the site with view to recommending a technically feasible and balanced solution. On the basis of the study findings, the HKHS proceeded with a S12A Application to rezone the site from "Government, Institution or Community" ("G/IC") and an area shown as "Road" to "Residential (Group A)" with maximum Building Height Restriction ("BHR") of 100mPD. Various technical assessments were submitted as part of the S12A Application (Y/H15/11) to demonstrate the technical feasibility of the Indicative Development Scheme. All Departments had either no comment or no adverse comment to the Application.
- 1.4 As the proposed run-in and run-out for the Item A Site shall be from Shek Pai Wan Road and Tin Wan Hill Road, respectively, there is no need for a new separate access road. Amendment Item B therefore rezones the strip of land along the south-western boundary of the Item A Site from "Road" to "Green Belt". There is no development associated with Amendment Item B.
2. **Comment on Representation 1 (Central & Western Group)**
- 2.1 Representation 1 ("R1") (TPB Ref: TPB/R/S/H15/32-1) is a general objection to Amendment Items A, B, C and D on the grounds of 1) density and heights of proposed residential developments being too high, 2) ecological damage to surrounding green areas, and 3) inadequate transport and traffic arrangements.
- 2.2 As mentioned in Para. 1.4, there is no development associated with Amendment Item B, which rezones an area from "Road" to "Green Belt"; thus the following comments on R1 are in relation to Item A only.
- 2.3 In responding to R1, there is a need to understand the competing demands for scarce land resources in Hong Kong. Given the keen shortage in public housing supply, it makes sense to redevelop YKC to its full development potential in order to 1) maximise housing supply, and 2) to improve living conditions for residents. To enable such redevelopment, there is need for a decanting site. SDC has wished for local decanting as YKC residents are mostly elderly persons who have formed a close relationship with their neighbours and are attached to the area.
- 2.4 In assessing the development potential of the Item A Site, due consideration has been given to the unique site constraints, including the existing landscape and topography (both natural and built slopes), infrastructural capacities and surrounding development context. A balanced approach has been adopted in arriving at the Indicative Development Scheme presented in Y/H15/11. As reflected in the proposed breakdown of Gross and Net Site Area, the development footprint will be confined to the south eastern portion of the site, whilst a majority of the slopes in the north and northwest will remain largely untouched. The proposed multi-storied form of development limits the building footprint, thus minimising impacts to the surrounding landscapes. At the same time, the maximum BHR of 100mPD is compatible with surrounding developments, which include Tin Wan Estate (subject to a maximum BHR of 150mPD) and Hung Fuk Court (subject to a maximum BHR of 130mPD) approximately 250m to the northeast. Whilst the primary intention for development on the Item A Site is to provide a decanting site for YKC, due to various factors having been taken into account, the flat supply from the Item A Site is limited to around 600 units (compared to 1,144 flats currently at YKC). In this regard, neither the development intensity nor development height are considered excessive.

Our Reference: HKHS/SPWR/GL/14  
Date: 3 January 2018

The Secretary, Town Planning Board

- 2.5 With respect to ecological impact, the Item A Site is a largely undeveloped piece of Government Land mainly covered with engineered slopes and trees, and accommodating a Pest Control Office of Food and Environmental Hygiene Department ("FEHD") in the southern portion. In accordance with the Ecological Assessment Report submitted in support of Y/H15/11, habitats are generally of low ecological value with disturbance-tolerant fauna. The Indicative Development Scheme presented in Y/H15/11 locates the development footprint at the foothill area and therefore losses to woodland and plantation habitats have been minimised. Notably, the Agriculture, Fisheries and Conservation Department ("AFCD") had no comment on Y/H15/11.
- 2.6 Adequate internal transport facilities are provided for both the domestic and non-domestic components of the Indicative Development Scheme for the Item A Site. A Traffic Impact Assessment ("TIA") was prepared for Y/H15/11. Based on a conservative traffic forecasting methodology and traffic generation estimate, the small amount of site-generated traffic was found to have negligible effect on road network capacities. Junction capacities of all the intersections that may be affected by the Indicative Development Scheme were assessed to operate satisfactorily. As Transport Department ("TD") had no objection to Y/H15/11, transport and traffic arrangements are considered adequate.
3. **Representation 2 (Green Sense)**
- 3.1 Representation 2 ("R2") (TPB Ref: TPB/R/S/H15/32-2) places strong emphasis in objecting to a general loss in Green Belt and fundamental Government Population Policy with resulting pressures on housing. In relation to Amendment Item A, R2 considers that such rezoning should not occur before a change in Government Population Policy given the numerous trees on the site. R2 also urges Government to fully consider use of alternatives sites (e.g. brownfield sites, golf clubs or ex-military sites) before considering Green Belt and G/IC sites, which have higher social value.
- 3.2 In view of the aging condition of YKC, the Item A Site provides an opportunity for local decanting of residents so that YKC can be redeveloped and facilities improved. This will enable a better living environment and quality of life for existing residents of YKC. The proposal for decanting of YKC residents to the Item A Site is supported by both Southern District Council and local residents. Therefore, due to local decanting requirements, there is an immediate need to develop the Item A Site that is unrelated to Government Population Policies.
- 3.3 Although a number of trees are required to be felled in the Item A Site due the extensive geotechnical works that are required for site formation west and north of the building footprint, the Indicative Development Scheme within Y/H15/11 has committed to providing a 1:1 ratio in terms of quantity of compensatory trees. In this regard the Landscape Unit ("LU") of the Planning Department ("PlanD") also had no objection towards the approval of Y/H15/11.

Our Reference: HKHS/SPWR/GL/14  
Date: 3 January 2018

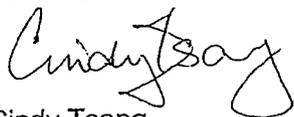
The Secretary, Town Planning Board

- 3.4 With regard to R2's suggestion that there should be priority development of brownfield and other sites, we note again that there are no other suitable sites that allow for decanting of YKC in a timely manner and/or allow residents to remain within familiar surroundings. According to a Fact Sheet on Brownfield Development by the Legislative Council Secretariat (January 2017), the term "brownfield" generally refers to agricultural or rural land in the New Territories which is deserted and has been changed for open storage, container yards, depots, rural industries, recycling yards etc., of which the uses are incompatible with the surrounding environment. Based on this interpretation, brownfield development is inconsistent with the intention for local decanting of YKC residents. Furthermore, there are no golf-clubs or ex-military sites in the near vicinity even if such lands were to be released for development.
- 3.5 The Item A Site currently houses a FEHD Pest Control Office. This will be reprovisioned on-site so there is no loss in existing G/IC facilities or services to the community. Moreover, the Indicative Development Scheme within Y/H15/11 includes an Integrated Family Services Centre ("IFSC") which intended to replace SWD's current facility at Tin Wan Street to continue to serve residents of the District. Thus, the amount of G/IC provisions to be supplied on the Item A Site will in fact increase as a result of the Indicative Development Scheme.

This letter provides specific responses to R1 and R2 in regards to concerns raised in respect of Amendment Items A and B. In continuing their mission of providing quality housing solutions for the general public, the HKHS is proposing to redevelop YKC. The Item A Site has been identified as the only viable option for local decanting in a timely manner. Following comprehensive study, the HKHS had prepared an Indicative Development Scheme for the Item A Site which was the basis for a S12A Application, Y/H15/11. Being fully justified on planning and technical grounds, the Application was approved by the Board at its meeting on 28.10.2016. In light of the unique merits of the scheme and the balanced approach taken to arrive at the Indicative Development Scheme, we trust the Board will maintain Amendment Item A. As Amendment Item B has no associated development which is the concern of R1 and R2, we trust the Board will also maintain Amendment Item B.

Should there be any queries, please do not hesitate to contact Ms Cindy Tsang or Miss Gladys Leung.

Yours faithfully  
FOR AND ON BEHALF OF  
TOWNLAND CONSULTANTS LIMITED



Cindy Tsang  
Director

CT/ GL

cc HKHS



**TOWNLAND CONSULTANTS LTD.**

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

Our Reference: HKHS/SPWR/GL/14  
Date: 3 January 2018

By Fax and E-mail  
(2877-0245)

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

Dear Sir

**COMMENTS ON REPRESENTATIONS SUBMITTED FOR THE  
DRAFT ABERDEEN & AP LEI CHAU OUTLINE ZONING PLAN NO. S/H15/32**

On behalf of the Hong Kong Housing Society ("HKHS"), we hereby submit comments under Section 6(A)1 of the Town Planning Ordinance ("TPO") to Representations 1 and 2 on the Draft Aberdeen & Ap Lei Chau Outline Zoning Plan No. S/H15/32 ("Draft OZP") in regards to Amendment Items A and B.

The HKHS is a non-government organization aiming to serve the needs of the Hong Kong community in housing and related services. Whilst it is not responsible for housing policy, the HKHS provides a variety of subsidised housing (e.g. Rental Housing, Flat-for-Sale, and Sandwich Class Housing) and non-subsidised housing to enable people to have self-contained homes at affordable rates. The HKHS commits itself to constantly providing quality housing for the general public and to meet the expectations and aspirations of the broader Hong Kong community.

**1. Background to Amendment Items A and B**

- 1.1 Amendment Items A and B reflect the Board's decision on a S12A Application submitted by HKHS (TPB ref: Y/H15/11).
- 1.2 The "Residential (Group A)5" ("R(A)5") zone under Amendment Item 1 will provide a local decanting site for the redevelopment of Yue Kwong Chuen ("YKC"), an aging public rental housing estate built in the 1960s. At the District Development and Environment Committee of Southern District Council ("SDC") meeting on 30 September 2013, SDC members indicated their desire to see YKC's residents relocated within Southern District in familiar surroundings and to minimise impacts to residents of YKC. The site at the north-western junction of Shek Pai Wan Road and Tin Wan Hill Road ("Item A Site") has been identified as the only immediately available option for decanting in Southern District that allows for the redevelopment of YKC and enables the additional supply of PRHD in a timely manner.

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- TOWNLAND CONSULTANTS (CHENGDU) LIMITED (China)
- TOWNLAND CONSULTANTS PVT. LIMITED (India)
- PT TOWNLAND INTERNATIONAL (Indonesia)
- HOWARD & SEDDON PARTNERSHIP (United Kingdom)





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- 1.3 In considering the suitability of the Item A Site for development, the HKHS commissioned a multi-disciplinary study in August 2014 to explore the development potential of the site with view to recommending a technically feasible and balanced solution. On the basis of the study findings, the HKHS proceeded with a S12A Application to rezone the site from "Government, Institution or Community" ("G/IC") and an area shown as "Road" to "Residential (Group A)" with maximum Building Height Restriction ("BHR") of 100mPD. Various technical assessments were submitted as part of the S12A Application (Y/H15/11) to demonstrate the technical feasibility of the Indicative Development Scheme. All Departments had either no comment or no adverse comment to the Application.
- 1.4 As the proposed run-in and run-out for the Item A Site shall be from Shek Pai Wan Road and Tin Wan Hill Road, respectively, there is no need for a new separate access road. Amendment Item B therefore rezones the strip of land along the south-western boundary of the Item A Site from "Road" to "Green Belt". There is no development associated with Amendment Item B.

## 2. Comment on Representation 1 (Central & Western Group)

- 2.1 Representation 1 ("R1") (TPB Ref: TPB/R/S/H15/32-1) is a general objection to Amendment Items A, B, C and D on the grounds of 1) density and heights of proposed residential developments being too high, 2) ecological damage to surrounding green areas, and 3) inadequate transport and traffic arrangements.
- 2.2 As mentioned in Para. 1.4, there is no development associated with Amendment Item B, which rezones an area from "Road" to "Green Belt"; thus the following comments on R1 are in relation to Item A only.
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Should there be any queries, please do not hesitate to contact Ms Cindy Tsang or Miss Gladys Leung.

Yours faithfully  
FOR AND ON BEHALF OF  
TOWNLAND CONSULTANTS LIMITED

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