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Submission Number:

TPB/R/S/TW/38-S034

From: Cheng Elsa. [REDACTED]
Sent: 2025-02-05 星期三 12:56:22
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 圖則編號 S/TW/38 意見申述

您好，

本人是荃灣環宇海灣業主，現正就圖則編號 S/TW/38 改劃為住宅提出反對。由於這個項目非常靠近其他民居，會影響空氣，民生及居住環境，所以本人徹底反對，謝謝。

Name: Cheng Shuk Ching Elsa

ID no.: [REDACTED]

Submission Number:

TPB/R/S/TW/38-S035

就圖則作出申述

Representation Relating to Plan

參考編號

Reference Number: 250205-211828-59479

提交限期

Deadline for submission: 06/02/2025

提交日期及時間

Date and time of submission: 05/02/2025 21:18:28

「申述人」全名

Full Name of "Representer": 女士 Ms. YUK PING TSOI

「獲授權代理人」全名

Full Name of "Authorized Agent": 先生 Mr. 楊栢霖 YEUNG

與申述相關的圖則

Plan to which the representation relates: S/TW/38

申述詳情

Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
the land at the junction of Wing Shun Street and Rexaco Road is proposed to rezoned from a "Government, Institution or Community (9)" site to a "residential (Group A) 22" site	反對 Oppose	<p>I am a citizen living in Tsuen Wan and I have been here for only 3 years. Though I have been living in Tsuen Wan for only 3 years, I can see a lot of urban facilities that worth appreciation. I believe that the whole team of the district council has been doing such a great job. On the other side, still there is a list of problems appearing in Tsuen Wan, especially in Tsuen Wan West.</p> <p>In the following, I would like to reveal some of the problems including noise pollution, air pollution, seriously shortage in parking spaces and recreational facilities, and economic issues.</p> <p>First of all, a lot of Tsuen Wan residents point out that the noise generated from the Tsuen Wan road has made countless residents suffering especially those from City Point. The residential buildings constructed on the land concerned would similarly be affected by the traffic noise problem because the amendment item also face Tsuen Wan Road. Some expert commented that the inclusion of facilities</p>

such as noise barriers and acoustic balconies and windows could mitigate the impact of the traffic noise. Arranging noise barriers may be a good method but definitely it should be completed first before considering to build one more community of residential building. In addition, I think acoustic windows and balconies are not good method to tackle the problem as residents need fresh air and good ventilation. Acoustic windows and balconies only work and function well when they are closed tightly. Imagine what If you are the person living in a flat that all windows need to be closed tightly all the time just to stay away from noise. How would you feel?

Another sounding problem is all about air pollution. Building a high tower obviously results in a production of massive dirty dust. Tsuen Wan west is full of elderly and children. Since the construction of government building just next to Tsuen Wan Park has started, the air quality has been worsening. The road next to the constructing area is the crucial and only way that residents in City Point and the Pavilia Bay can walk in order to reach the market and other center places in Tsuen Wan. Still, there are dogs and a lot of school bus. The worsen air quality has already make a lot of residents feeling sick especially the children and elderly. After all, it would definitely be difficult to imagine how would it be if still one more big construction is waiting. In fact, I am the mother of 2 children, one of them has been sick and uncomfortable since the construction of that government building. The situation of asthma and eczema has been worsening due to the poor air quality. There were 2 episode of admission to the hospital for my son. These really bother me a lot and I believe, I am not the only suffering person. During last episode that my son was very sick, I felt stressed and helpless. I thought of jumping from height during the most difficult time.

The third issue I think of is about the serious shortage of parking spaces. Tsuen Wan has been renowned of its expensive parking price for any types of vehicles. In Tsuen Wan West, a space for car parking is as expensive as ~ HKD8000 monthly. Some residents turn to rent a cheaper space for their cars in the concerning land "Government, Institution or Community (9)" which is a public rental car park. If the concerning land " Government, Institution or Community (9)" is rezoned to "residential (Group A) 22" site, it would be really hard for residents to find other places to cater their vehicles. It is suggested that in the future, there will be a public car park under the Amendment Item (rezoning " Government, Institution or Community (9)" to "residential (Group A) 22" site), hoping that there would be 175 parking spaces for private vehicles and 32 for light good vehicles. However, the rent of the car parking spaces would definitely be much more expensive. As a result, this is

actually not a good news to residents nearby. Another issue is that, having a new residential building, with expected 2000+ increase of population, there must be a greater demand of car parking spaces. It is not really relieving the problem of serious shortage of car parking spaces but may result in a greater burden.

Another comparably minor issue that I also want to stat is the limited recreational facilities and the safety issue. As I point out that everybody in Tsuen Wan really appreciate the diversity of urban facilities in Tsuen Wan. Though, the demand of the facilities is all along great with the huge population in Tsuen Wan. Residents in Tsuen Wan have been longing for more recreational facilities. For example, building a public library, parks and maybe a swimming pool, whatever. For safety issues, lots of elderly and children and school bus pass by the street and road near the concerning land. A big scale construction there may result in dangers when people pass by, at the same time as frequent construction workers and engineering vehicles enter and exit the construction area.

Apart from the above issues, another very important thing we must think twice is all about economic issues. Before turning the concerning land to a residential land, all we need to think about is whether there will be any developer who is interested in that land. And, after the land really constructed to a residential building, would it be really popular to the public? Is there really lots of people hoping to buy a house just near to the high way, without good view and not really near to MTR station and bus terminal? After all, implementing new plan and changes during urban planning dose spend a lot of money that all from the taxpayer. We, as a citizen really hope our government will take our concerns into consideration.

After all, as a resident in Tsuen Wan, I know that my voice may be too little to let the involving planning officer to understand and take into consideration. Though, I still want to propose my opinion and need as I always believe that a good town planning and person in the district councils listen to the public and strive for excellence and better living quality of those maybe already suffering.

對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。

Any proposed amendments to the plan? If yes, please specify the details.

please build more recreational facilities.

From: [REDACTED]
Sent: 2025-02-06 星期四 12:29:20
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: AMENDMENTS TO THE APPROVED TSUEN WAN OZP NO. S/TW/37
Attachment: 2030+ GIC.pdf

AMENDMENTS TO THE APPROVED TSUEN WAN OZP NO. S/TW/37

Dear TPB Members,

Item A – (about 0.66 ha Government Land) Rezoning of a site at the junction of Wing Shun Street and Texaco Road from “G/IC(9)” to “Res (Group A) 22” (“R(A)22”)

2 Blocks / 790 Units / PR 6.2 / 150mPD / Retail / 3 floors Public Vehicle Park / 1 Home Care Services for Elderly / 30-place Residential Special Child Care Centre

STRONG OBJECTIONS

On a recent TVB Pearl Magazine, the Chair of JLL, who surely knows a thing or three about the property market, stated that there are around 100,000 vacant private residential units with more under development. He estimated demand of around 18,000 per annum, while the Long Term Housing Strategy 2024 target is 13,000 per annum. Hong Kong is now facing a scenario of oversupply and stress on developers on the lines of that of the housing market in China.

So, the urgent need of land for housing is now history. Therefore, one can conclude that the objective of this exercise is to provide a site for Land Sale in a popular district that would be attractive to developers. The latter will not live in the units so location not liveability is their focus. The administration on the other hand has an obligation to improve living conditions not encourage development of homes at inappropriate sites.

However, it is clear why this site was not zoned Res in the first place. Note Page 4 of the paper that underlines why:

Noise Mitigation Measures

- About 7.5m high vertical noise barrier atop podium
- Acoustic windows
- Enhanced acoustic balconies

That the administration is desperate to raise revenue cannot justify approval of a site for residential use when in an era of climate change and the possible outbreak of another infectious virus like Covid indicate that openable windows are an essential element of a healthy environment.

Moreover, the high noise barrier and enclosed windows would hinder evacuation in an emergency.

Proximity to the overhead highway also raises issues of poor air quality and exposure to contaminants. However the issue of the additional impact on local air quality while admitted "it may potentially affect wind penetration at its immediate surroundings" is as usual brushed under the carpet with the standard white wash conclusion that it "would not induce significant adverse air ventilation impact on the surrounding environment. IN OTHER WORDS, AIR QUALITY WOULD BE WORSE

That one of the proposed GIC uses is a Residential Child Care Centre, usually accommodation for traumatized children or those with special needs, is absolutely shocking. The location for this facility is not indicated on the plans.

The site is the only remaining GIC in the district that could cater for eventual emergencies. Its retention is in line with:

TPB PG-NO. 16 TOWN PLANNING BOARD GUIDELINES

1.1 "Government, Institution or Community" ("G/IC") zones are designated on statutory plans to reflect the existing Government, Institution or Community (GIC) uses and **to reserve sites for future provision of GIC facilities** in accordance with the Hong Kong Planning Standards and Guidelines (HKPSG) **to meet the present and future needs of the community.**

Some GIC developments, especially the low-rise and low-density ones, **also serve as "breathing space" within a high-rise and high-density environment.** Some areas/sites are also zoned "G/IC" **to cater for unforeseen future demands** and for which no specific GIC uses have been designated for the time being.

We saw during Covid that every district must have some space that can be quickly converted for emergency use. The 2030+ recognized this issue and the pledge to increase the provision of land for GIC facilities to 3.5sq.mts.

Provision of Open Space and GIC Facilities

5.1 Taking into account the proposed amendments as mentioned above, the planned population of the Tsuen Wan Planning Area would be **about 285,900**

BUT THE HKPSG TABLES ARE BASED ON PLANNED POPULATION OF 272,000???

If the site were to be developed, it should be for community use, for example:

Deficit of Divisional Police Station. Item A is quite a distance from Tsuen Wan Police Station.

This could be a low rise building and accommodate a public parking facility and community facilities.

Item B – Rezoning of a site at the junction of Ma Tau Pa Road and Texaco Road from “CDA(1)” to “Commercial (7)” / 150mPD (100mPD) max GFA of 52,513m²

Redevelopment of 3 low rise industrial buildings

OBJECT

This is an increase in BHR only. So why is it included in OZP when this could be achieved through an application for the grossly exploited Minor Relaxation of BH Sect 16 application? The planned redevelopment could then be considered on the merits of a Master Layout Plan, foto montages, etc and what benefits the increased height would bring to the district.

In view of climate change and unstable market conditions, it would also be more prudent to wait for concrete redevelopment plans so that they can be considered in line with prevailing conditions.

Amendments to the Notes of the Plan

(f) Incorporation of ‘Government Refuse Collection Point’ and ‘Public Convenience’ under Column 1 of the Notes for “Village Type Development” (“V”) zone; and corresponding deletion of ‘Government Refuse Collection Point’ and ‘Public Convenience’ under Column 2 of the Notes for the “V” zone.

OBJECT – DEPRIVES THE COMMUNITY OF HAVING A SAY IN BOTH THE LOCATION AND DESIGN OF THESE FACILITIES

(g) Incorporation of ‘Field Study/Education/Visitor Centre’ under Column 2 of the Notes for “V” zone.

OBJECT – THE INTENTION OF V ZONE IS TO PROVIDE HOUSING. THE PROPOSED USES CAN BE EXPLOITED TO PROVIDE A FRONT FOR COMMERCIAL OPERATIONS

Mary Mulvihill



(3) Government, Institution or Community (G/IC) uses, open space and transport and infrastructure facilities

The Task Force notes that according to the estimation of Hong Kong 2030+, there will be a land shortage of 720 ha for G/IC uses, open space and transport and infrastructure facilities, on top of a shortfall of about 670,000 square metres (m²) floor space. However, this projection has yet to include: (i) land demand arising from the latest policies (e.g. new demand for elderly service facilities proposed under the Elderly Services Programme Plan; additional demand for space arising from kindergarten policies); and (ii) certain uses of which the long-term land demand is not yet ascertained by the relevant policy bureaux during the assessment stage (e.g. tertiary education and certain healthcare facilities).

In addition, the Task Force notes that Hong Kong 2030+ proposes to enhance the land and space provision for G/IC uses and open space for the future additional population, by adopting a higher ratio of 3.5 m² per person and a minimum of 2.5 m² per person for the strategic planning of demand for G/IC facilities and open space respectively. However, it should be noted that this target of higher provision of G/IC land and open space per person is only adopted for the rough calculation of future land demand for relevant facilities from the new population growth. In fact, as the current population ages, there will naturally be greater demands for healthcare and elderly service facilities, as well as open spaces. As such, there is room for upward adjustment of the above-mentioned planning standard.

In general terms, the future land demand for the relevant facilities in Hong Kong will likely exceed the current estimation. If the future land supply fails to make up for the land shortfall of some 720 ha for G/IC uses, open space and transport and infrastructure facilities as estimated in Hong Kong 2030+ in a timely manner, coupled with the uncertainties of existing land supply projects, the shortfall of such land will aggravate, thereby affecting the livelihood of the people and the provision of necessary facilities and services to cater for the needs of the society.

There may also be insufficient space to meet the needs of new facilities and services arising from the demands of an ageing population. The public aspiration and long-term vision for more open space and spaces for recreational activities will also be un-met.

