

8 September 2023

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

**By Hand**

Dear Sir

**Comment on Representation in Respect of Draft Plan made under Section 6A(1) of the  
Town Planning Ordinance (CAP. 131) –  
Draft Kwu Tung South Outline Zoning Plan No. S/NE-KTS/19**

Reference is made to the captioned draft plan which was gazetted by the Town Planning Board (the Board) on 12 May 2023, and the representations received subsequently.

We act on behalf of Hinying Limited (the Commenter) to submit herewith the duly completed Form No. S6A to the Board for consideration.

Thank you for your kind attention. Should there be any queries, please do not hesitate to contact the undersigned at [REDACTED] or our Mr Arnold Koon at [REDACTED] / Miss Cody Yu at [REDACTED].

Yours faithfully  
for Llewelyn-Davies Hong Kong Limited

Winnie Wu  
Planning Director

**Llewelyn-Davies**  
Hong Kong Limited  
*Authorized Signature*

Encl  
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	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佈申述、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, 則委員會可把有關申述視為不曾提出論。

<b>1. Person Making this Comment (known as "Commenter" hereafter)</b> <b>提出此宗意見的人士(下稱「提意見人」)</b>	
Full Name 姓名 / 名稱 ( <del>Mr./Ms./Company/Organisation</del> * 先生/女士/公司/機構*)  Hinying Limited  (Note: for submission by person, full name shown on Hong Kong Identity Card/Passport must be provided) (注意: 若個人提交, 須填上與香港身份證/護照所載的全名)	
<b>2. Authorised Agent (if applicable) 獲授權代理人(如適用)</b>	
Full Name 姓名 / 名稱 ( <del>Mr./Ms./Company/Organisation</del> * 先生/女士/公司/機構*)  Llewelyn-Davies Hong Kong Limited  (Note: for submission by person, full name shown on Hong Kong Identity Card/Passport must be provided) (注意: 若個人提交, 須填上與香港身份證/護照所載的全名)	
<b>3. Details of the Comment 意見詳情</b>	
Draft plan to which the comment relates (please specify the name and number of the draft plan) 與意見相關的草圖(請註明草圖名稱及編號)	Draft Kwu Tung South OZP No. S/NE-KTS/19
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/NE-KTS/19-R2

\* Delete as appropriate 請刪去不適用者

Please fill in "NA" for not applicable 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)<sup>#</sup>**  
**意見詳情(續)(如有需要,請另頁說明)<sup>#</sup>**

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

It is noted that there are concerns on the accumulative impact brought by new developments in the Northern Metropolis. We would like to re-iterate that the residential development proposed under the approved Application No. Y/NE-KTS/15, which is reflected by Amendment Item B, has already taken accumulative impacts into consideration and sufficiently addressed all the comments from various Government departments.

The Applicant of Application No. Y/NE-KTS/15 has conducted various technical assessments for the proposed development, particularly for the aspects related to infrastructural capacity, e.g. Traffic Impact Assessment, Drainage Impact Assessment, Sewerage Impact Assessment, Water Supply Impact Assessment, etc. In these technical reports, accumulative impacts brought by the proposed development together with other nearby committed and planned developments have been considered. Besides, sensitivity tests have been carried out to ensure there are no adverse accumulative technical impacts anticipated. Before consideration of this application by the Town Planning Board on 28.10.2022, the technical assessments had been circulated to Government departments, which had no adverse comments on the proposed development. Given that comprehensive technical assessments have been completed, there will not be insurmountable traffic, noise, air quality and sewerage impacts. In particular, we would like to highlight that the completion of the Kwu Tung Station in 2027 would bring substantial benefit to the traffic in the relevant area. Moreover, the current zoning of "CDA(3)" imposed also requires submission of S16 planning application in future for the Town Planning Board's approval. Further updates of technical reports will be conducted to ascertain the technical feasibility of proposed residential development at the site under Amendment Item B.

# If supporting documents (e.g. colour and/or large size plans, planning studies and technical assessments) is included in the comment, 90 copies (or 40 hard copies and 50 soft copies) of such information shall be provided.  
 若意見附有支持其論點的補充資料(例如彩色及/或大尺寸的圖則、規劃研究及技術評估),則須提供 90 份複本(或 40 份印文本和 50 份電子複本)。

Please fill "NA" for not applicable item 請在不適用的項目填寫「不適用」

# Hinying Limited

Date : 5 September 2023

Llewelyn-Davies Hong Kong Limited

*By Hand*

For the attention of Mr Dickson Hui - Director

Dear Sir

**Comment on Representation in Respect of Draft Plan made under Section 6A(1) of the  
Town Planning Ordinance (CAP. 131) –  
Draft Kwu Tung South Outline Zoning Plan No. S/NE-KTS/19**

We write to confirm the appointment of Llewelyn-Davies Hong Kong Limited as our authorized agent to submit the captioned comment and to attend the hearing on our behalf.

Yours faithfully

For and on behalf of

HINYING LIMITED

*For and on behalf of*

興盈有限公司

HINYING LIMITED

*Authorized Signature(s)*

CLARENCE NG

Project Director

CN/LY/fy

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**AMENDMENTS TO KWU TUNG SOUTH OZP NO S/NE-KTS/19**  
15/09/2023 22:21

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

**AMENDMENTS TO KWU TUNG SOUTH OZP NO S/NE-KTS/19**

Dear TPB Members,

**Item B: SHK**

Lots 1027, 1029, 1030, 1034A, 1034B, 1039 (Part), 1040, 1042 RP, 1043 RP, 1044 RP (Part), 1045, 1047, 2233 (Part), 2251 S.A RP, 2256 RP, 2315 (Part) and 2316 RP (Part) in D.D. 92 and adjoining Government Land, Kwu Tung South

Site area : 19,700sq.m Includes Government Land of about 5,441sq.m

Rezone to "CDA 3" - 6 Blocks – 909 Units / Clubhouse / PR 2 / 70mPD / OS  
2.455sq.m / 144 Vehicle Parking

**ZERO INDICATION OF GIC FACILITIES. THE SITE IS ALMOST 30% GOVERNMENT LAND BUT NO INDICATION IN THE PAPER THAT THERE WOULD BE ANY COMMUNITY FACILITIES PROVIDED. MEMBER FAILED TO ADDRESS THIS ISSUE WHEN APPROVING aY/NE-KTS/15 DESPITE THE SIGNIFICANT AMOUNT OF PUBLIC LAND INVOLVED.**

Assessments were all carried out by Applicant:

- when the Site was first rezoned to "CDA" in 2011, **the applicant had undertaken** an EcolA to ascertain the ecological impacts
- **according to their in-house ecologist**, the species identified within the Site were commonly found in other areas of Hong Kong and there was no roost in the area
- Regarding the arrangement of the compensatory planting areas, **a site survey** had been conducted for the discharge of planning condition for the previously approved s.16 applications and it was found that the area was mostly occupied by shrubs or exotic plants
- under the air ventilation assessment (AVA) **conducted by the applicant**, the annual wind performance of the areas located to the immediate east, west and south of the Site had shown improvements with the implementation of the proposed development
- **BUT building gaps were recommended** based on the result of the AVA and the alignments were determined having regard to the prevailing wind directions as well as the building orientations of the neighbouring developments, including the Valais SO THERE ARE ISSUES

**SO NO INDEPENDENT ASSESSMENT. THEIR CONSULTANTS WOULD NOT BITE THE HAND THAT FEEDS THEM WITH NEGATIVE INPUT.**

Members obviously had their doubts and raised concerns re impact on wildlife, on the meander, light pollution impact on flora and fauna, that continuity of the natural habitat along Sheung Yue River should be preserved, the height of the buildings, tree compensation.

**THERE IS NO INDICATION THAT ANY OF THESE ISSUES HAVE BEEN ADDRESSED SO HOW COULD THE OZP AMENDMENT BE APPROVED?**

"in view of the changing planning circumstances of the neighbouring area and the Government's policy to expedite housing land supply, the applicant intended to further unleash the development potential of the Site by increasing the plot ratio (PR) from the previously approved 0.4 to 2"

Bit in view of the recent torrential rains and other weather phenomena married with the growing number of unsold private units, it is time to reassess applications like this and if the planned use for the city is in the best interests of the community.

Mary Mulvihill

