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	Date Received 收到日期	

**TPB/R/S/TWW/20-
C1**

- 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/>.
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1. Person Making this Comment (known as “Commenter” hereafter) 提出此宗意見的人士（下稱「提意見人」）

Full Name 姓名 / 名稱 (Mr./Ms./Company/Organisation* 先生/女士/公司/機構*)

Toco Planning Consultants Ltd.

(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)



2. Authorised Agent (if applicable) 獲授權代理人(如適用)

Full Name 姓名 / 名稱 (Mr./ Ms./Company/Organisation* 先生/女士/公司/機構*)

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3. Details of the Comment 意見詳情

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 Tsuen Wan West Outline Zoning Plan
No. S/TWW/20

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/TWW/20-1

* 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)[#]
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

Please find attached reasons in the covering letter attached.....

[#] 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.
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Full Name of Representative 代表全名

(Only applicable to organisation/group as the authorised agent 只適用於獲授權代理人為機構組織)

(Mr./ Ms. * 先生/女士*)

(Note: full name shown on HKID Card/Passport must be provided)

(注意:須填上香港身份證/護照所載的全名)

First 4 Alphanumeric Characters of HKID Card/Passport (e.g. C668/CC66) #
香港身份證/護照首 4 位字母數字字符(例子: C668/CC66) #

Postal Address 通訊地址@

E-mail Address 電郵地址@

Tel. No. 電話號碼 (Optional 可選擇提供)

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如果代理人為機構組織, 須提供其代表的資料@ Please refer to point no. 5 of Important Notice
請查閱重要告示的第 5 點**Statement on Personal Data 個人資料的聲明**

1. In accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines, 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:
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 - 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
 - facilitating communication between the "commenter" and the Secretary of the Board/Government departments

城市規劃委員會就這宗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:

- 核實「提意見人」及獲授權代理人的身份;
- 處理這宗意見, 包括在公布這宗意見供公眾查閱時, 公布「提意見人」的姓名供公眾查閱; 以及
- 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" and the authorised agent in this comment may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

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TOCO PLANNING CONSULTANTS LTD.

TOWN PLANNING, ENVIRONMENT & DEVELOPMENT CONSULTANCY

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No. 651 King's Road,

North Point, Hong Kong

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Fax: 2577 2862

E-mail: tocoplanning@hotmail.com

Website: <http://www.tocoplanning.com>



達材都市規劃
顧問有限公司

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

Dear Sir,

21 March, 2023

**Objection Letter for Representation No. R1
on Draft Tsuen Wan West Outline Zoning Plan (TWW OZP) No. S/TWW/20**

We write to express our disagreement and object to the Representation No. TPB/R/S/TWW/20-1 (R-1) for the following reasons:

1. Amendment Items A1 and A2 reflect the Town Planning Board (TPB)'s previous decision on 12.3.2021 to approve the section 12A application (No. Y/TWW/5) to rezone the aforesaid private lots and adjoining government land for composite residential and commercial development with social welfare facilities (SWF);
2. We disagree with R-1 that there is no need for additional private housing. The Chief Executive's Policy Address 2022 already emphasised that "*Solving the housing problem tops the agenda of the current-term Government.*". The proposed residential development is in line with the Government policy for enhancing housing land supply;
3. The site has been zoned "Government, Institution or Community" ("G/IC") since the first TWW OZP gazetted on 3.2.1989, which was originally reserved for an ambulance depot. As the Sham Tseng Fire Station cum Ambulance Depot was subsequently built at another "G/IC" site in 1997, the Site was no longer required for the originally planned ambulance depot. Since then, the Site has not been designated for any G/IC use. Instead, the site is occupied by a single-storey commercial building since 2007;
4. Apart from Social Welfare Department (SWD) who expressed providing social welfare facilities within the site, other government bureau and departments were consulted and they had no comment/ objection to the application, and had no plan to utilise the site for "G/IC" use. Nevertheless, the subject development will provide a floor of SWF which had been accepted by SWD.

TED T. C. CHAN
MPIA, MHKIP, RPP

5. It is noted that many of the major residential developments in the area were built in the early 2000s, and many young families have moved into this community. The children of these families who lived in the area for more than 20 years have grown up to start new families. Usually adult children would like to live close to their parents which would be helpful in case of emergencies. This is the only new development in recent years that could provide social tie with the existing development and the new development; and

6. The site is mainly private land and is relatively small in site area to accommodate stand-alone "G/IC" use. Adequate regional and district facilities have been provided in Tsuen Wan area. If necessary, "G/IC" facilities such as Residential Care Home for the Elderly could be provided in other "G/IC" zone or zoning (i.e. "Residential (Group A)" or "Village Type Development" zone). The subject rezoning could achieve better site utilization with gainful use.

_____ Please accept our objection to R-1 and copy of Form No.S6A is enclosed for your attention.

Yours faithfully,

Toco Planning Consultants Ltd.



Ted Chan
Managing Director



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**TPB/R/S/TWW/20-
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Full Name 姓名 / 名稱 (Mr./Ms./Company/Organisation* 先生/女士/公司/機構*)

Sham Tseng Chan Kee Roasted Goose Company Limited
深井陳記燒鵝有限公司

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Full Name 姓名 / 名稱 (Mr./ Ms./Company/Organisation* 先生/女士/公司/機構*)

N.A

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與意見相關的草圖 (請註明草圖名稱及編號)

Draft Tsuen Wan West Outline Zoning Plan
No. S/TWW/20

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TPB/R/S/TWW/20-1

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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

We are the registered owner of Lot Nos. 99, 100, 101 RP, 110 RP, 171 S.C and 183 in D.D. 390 and we herein lodge an objection to Representation No. TPB/R/S/TWW/20-1 (R-1) for the following reasons:

(a) Amendment Items A1 and A2 reflect the Town Planning Board (TPB)'s previous decision on 12.3.2021 to approve the section 12A (s.12A) application (No. Y/TWW/5) to rezone the aforesaid private lots and adjoining government land for composite residential and commercial development with social welfare facilities (SWF). Various technical assessments had also conducted and had confirmed no adverse impact on the surrounding area.

(b) The Chief Executive's Policy Address 2022 clearly mentioned that "Solving the housing problem tops the agenda of the current-term Government.". The land supply was lag behind and the subject residential development is in line with the Government policy for enhancing housing land supply.

(c) The previous "Government, Institute or Community" ("G/IC") at the subject site was reserved for the development of an ambulance depot. Since the ambulance depot was developed at an alternative site, the subject site has a long history of non-GIC use under several temporary planning approvals. During the process of s.12A application (No. Y/TWW/5), relevant government bureaux and departments were consulted and they had no plan to utilise the site for G/IC use. Nevertheless, the subject development will provide a floor of SWF which had been accepted by Social Welfare Department (SWD).

(d) The subject site is mainly private land and is relatively small in site area to accommodate stand-alone GIC use. Adequate regional and district facilities have been provided in Tsuen Wan area. The proposal could help increase the housing supply whilst providing GIC facilities as per SWD's requirement. The subject rezoning could achieve better site utilisation with gainful use.

[#] 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.
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Full Name of Representative 代表全名

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**TSUEN WAN WEST OZP S/TWW/20**

24/03/2023 21:23

From:

To:

tpbpd <tpbpd@pland.gov.hk>

File Ref:

TSUEN WAN WEST OZP S/TWW/20

Dear TPB Members,

Since the consultation on the OZP was launched in late 2022 there have been significant changes to the world order brought about by war causing significant damage to both supplies of foodstuffs and materials and their delivery, climate change, unusual and deadly weather patterns, bank failures due in part to rising interest rates and the ever present danger of an economic meltdown.

Conditions have already impacted the residential market on the mainland and that Hong Kong will soon face similar conditions of a declining property market as those on the mainland is now inevitable.

Locally rising interest rates, emigration and bleak economic outlook are impacting the allure of property investment. Some local developers with high gearing will face difficulties in servicing their debt.

Developers can no longer tout the need for additional residential units to legitimize rezoning. Just a few days ago Cheung Kong launched Phase 2 of its Grand Jete development in nearby Tuen Mun in a crash sale with prices around 20% lower than those for Phase One last year.

The developer recognizes that the market has peaked and that there will be a glut in supply, predicted to reach almost 50,000 units by the end of the year. And this is in addition to the around 200,000 calculated vacant units when the Vacancy Tax was proposed a few years ago.

The need of land for private housing was always a myth and now reality must be embraced. The Emperor has no clothes.

On the other hand there is growing concern with regard to the impact the shortage of community and support facilities is having on our society with its ever increasing number of residents over 70 years of age. Finally the previously brushed under the carpet issue of the plight of carers for these elderly is receiving attention. Many carers are themselves of retirement age and beginning to suffer from the impact of ageing.

There has been an increase in the number of cases in which long time carers have broken under the strain of the incessant call on their time and energy.

Existing support services are limited and often not easily accessible.

Sham Tseng is a somewhat isolated community. Once this site is rezoned there are no more "GIC" zonings left to accommodate services such as the provision of 'respite care'.

Respite care means taking a break from caring, while the person requiring care is looked after by someone else.

This allows the carer to take time out to look after oneself and helps stop him/her becoming exhausted and run down.

There is an urgent need for day respite services and short term residential care to cater for the this growing segment of society. By shouldering the duty of looking after incapacitated relatives they are part of the Ageing in Place movement that relieves the burden of having to provide many additional RCHE facilities.

TPB members have a duty to consider the overall development of the city and the need for the provision of a diverse range of amenities in each district. That the only "GIC" site in this district that has no MTR service providing easy access is to be rezoned in order to line the pockets of the goose merchant is unacceptable.

Mary Mulvihill

