

17 January 2022

Chairman and Members
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Email: tpbpd@pland.gov.hk
Fax: 2877 0245

**Re: Draft Stanley Outline Zoning Plan No. S/H19/15
(Amendments to the Approved Stanley Outline Zoning Plan No. S/H19/14)**

Designing Hong Kong objects to amendment item A for the following reasons:

- The amendment area was originally zoned as “Green Belt (GB)”. The planning intention of this zone is primarily for the conservation of the existing natural environment amid the built-up areas/at the urban fringe, to safeguard it from encroachment by urban type development, and to provide additional outlets for passive recreational activities. There is a general presumption against development within this zone. The proposed rezoning is against the planning intention of the “Green Belt” zone. It allows urban sprawl to take over the densely vegetated areas at Stanley.
- According to Google Earth’s satellite photo (Figure 1), the area is currently dense vegetated and functions well as a “Green Belt”. It is estimated that at least 1,442 trees would have to be removed and transplanted for the development, which hasn’t counted some young trees in the area. With such a large-scale vegetation clearance, it brings permanent destruction to the existing landscape and habitat.
- The steep natural terrain around the site will require extensive mitigation and stabilisation works to support the development permitted under this amendment. The proposed development would induce adverse landscape impacts. Slope works for this amendment item will damage the existing natural slope of Chung Hom Kok. Future residents will be required to bear the cost and responsibility for slope maintenance and repair.
- The road network in Stanley and Chung Hom Kok is sub-standard. Traffic is often halted due to accidents and large vehicles with difficulty passing each other. We worry the construction of the new private housing will bring in more traffic flow during construction and after its completion, and further worsen the transport capacity in the area.

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- The government should give priority to developing brownfield sites, rather than overriding the public consensus on halting development of the well vegetated countryside near urban conglomerations. The government has a responsibility to ensure the greenery of our city is being protected and eliminate all development threats to ensure a green and healthy living environment for qnearby residents.
- We urge the Board to consider the cumulative impacts of approval of these rezoning plans. The approval of the rezoning would set undesirable precedents for other rezonings of Green Belts.

Here we submit our concerns for your consideration.

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Figure 1: Google Earth's satellite photo (August 2021)

