

18 January 2023

Chairman and Members

Town Planning Board

15/F, North Point Government Offices

333 Java Road, North Point

Hong Kong

Fax: 2877 0245;

Email: tpbpd@pland.gov.hk

**Re: Draft Kwai Chung Outline Zoning Plan No. S/KC/31
(Amendments to the Approved Kwai Chung Outline Zoning Plan No. S/KC/30)**

Dear Chairman and Members,

Designing Hong Kong objects to amendments items A1, A2 and A3 in the rezoning proposal with the following reasons:

- All of the amendment items in the rezoning proposal were originally zoned as “Green Belt (GB)”. The planning intention of this zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone. The rezoning proposal against the planning intention of the “Green Belt” allowing urban sprawl to take over from the densely vegetated areas at Kwai Chung.
- The proposed residential development is near to the Kam Shan Country Park. Any human activities in the area will bring negative impacts to the natural environment and habitat of the nearby country park. The possible damages to the valuable but natural assets of the city should be considered prior to development approvals.
- 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. Future residents will be required to bear the cost and responsibility for slope maintenance and repair.
- The high-rise and huge building mass of the proposed development may affect the air ventilation for the community.
- There are also other vacant brownfield sites that suitable for housing development in Kwai Tsing District such as the vacant land on Kwai Ho Street near Lot GLA-KT 1094 and the vacant land in Kwai Fuk Road opposite to Lot GLA-TW 245. These land has a better public

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transportation connection with walking distance to the MTR station. Development should be prioritized in these options.

- The government should give priority to developing brownfield sites in the New Territories, rather than overriding the public consensus on halting development of the countryside. The government has a responsibility to ensure country parks are being protected and eliminate all development threats to country parks.
- 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 and fringes of country parks.

We call on the Town Planning Board to protect our city's grand natural environment for our future generations, and to ask Government and the Planning Department to revise the plans.

Here we submit our concerns for your consideration.

Yours,

Designing Hong Kong Limited