

24 March 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

**Comments on Representations in respect of Draft Kwai Chung Outline Zoning Plan
(Plan No. S/KC/31)**

Dear Chairman and Members,

Designing Hong Kong **supports** the representations TPB/R/S/KC/31-7, TPB/R/S/KC/31-8, TPB/R/S/KC/31-10, TPB/R/S/KC/31-11, TPB/R/S/KC/31-12 and TPB/R/S/TY/31-14.

We agree with the above representations for the following reason:

- The site does not in line with the government's "Green Belt" rezoning principle while the existing site acts greatly as a buffer to provide physical barriers to separate the human development and the Kam Shan Country Park. The rezoning will cause the loss of the Green Belt, affects its existing function of the zoning and damage the habitats of the species rely on the site.

We would also like to provide further comments regarding to the above representations:

- Different representations also provided strong evidences that the ecological baseline study is inadequate in this rezoning. The missing survey in dry season has underestimated the ecological value of the site. Departments should conduct survey in dry season to provide comprehensive data for the Board members to make decision.
- It is doubted that the effectiveness of the mitigation measures proposed by the Departments. There is lack of alternatives and actions to prevent direct impacts to the site and the natural streams.
- As mentioned by some of the representatives, there are record of Danaid Butterflies near the rezoning site. We concern the proposed development may bring threat to the potential important habitat to the butterflies.

We have to make our point clear that there is a public consensus that the government should give priority to developing brownfield sites in the New Territories rather than overriding the public consensus on halting the development of the countryside.

We urge the Board to consider the cumulative impacts of approval of these rezoning plans. The approval of the rezoning would set an undesirable precedent for other rezonings of Green Belts and Country Parks.

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Here we submit our comments for your consideration.

Yours,
Designing Hong Kong Limited