Secretary, Town Planning Board Fax: 2877 0245 or 2522 8426

15/F, North Point Government Offices E-mail: [tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk)

333 Java Road, North Point

Hong Kong

Dear Sir/Madam,

**Draft Central District Outline Zoning Plan No.S/H4/17**

**Public Comment on Representation No.R31**

I refer to the above Draft OZP and Representation No.R31 by Hong Kong Sheng Kung Hui, and make a Public Comment (Objection) below:

1. This site is not suitable for the development of any large building, including a massive hospital, due to its steep terrain, narrow road access and its location within an important low-rise heritage area. The construction of the hospital will destroy the heritage and garden setting of Bishop Hill and Government Hill, one of the most important heritage areas in Hong Kong.
2. There is no information on the potential visual impact from/on Government House, or on Wyndham Street, and no traffic impact as a result of the draft 135mPD BHR provided at the time of the TPB discussion. TPB members were given limited choices and were pressured to agree to the draft 135mPD BHR because of the development’s so-called advanced design stage.
3. R31 appears to consider the 293 no. bed provision and 135mPD development at the site as a fait accompli. There is no apparent consideration of alternative G/IC facilities such as district welfare facilities for children, elderly or persons with disabilities. A scale similar to the former Central Hospital would be more appropriate for this historic low-rise G/IC zoning.
4. There is already another private hospital close to this site (Canossa Hospital on Old Peak Road) which is operating well-below full capacity (average hospital bed occupation rate is 39% in 2017). There is no need for another private hospital within such a short distance.
5. There is currently a hospital bed surplus on Hong Kong Island (the existing surplus is 1181 no.). The shortfall in Central and Western District (existing -422 no.) can be met by the Wanchai and Southern District (existing 2941 no. in total). Hospital provisions and needs are based on the aggregate in the TOTAL Hong Kong Island cluster. Consequently, there is no imminent need for a hospital required to be built specifically in Central and Western District.
6. R31 wants unlimited or greater building height restriction and mentions the potential redevelopment of the Vicarage, Alford House and Ridley House, in addition to the hospital. This will lead to even more development pressure on this site and it is unacceptable. In view of the heritage significance of the site and the existing traffic pressure in the area, the TPB should cap the height of the entire site at 80mPD BHR if not lesser (80mPD already greater than the existing buildings).
7. (Other comment):

Yours Sincerely,

My full name shown on HKID Card/Passport is: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

The first four characters of my HKID Card/Passport number (e.g. C668): \_\_ \_\_ \_\_ \_\_

My email contact is: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_