



BY EMAIL ONLY

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Task Force on Land Supply
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Dear Sir/ Madam,

**Response to Public Engagement for
Land for Hong Kong: Our Home, Our Say!**

1. Green Power, a local charitable green group, is gravely concerned about the living quality of Hong Kong people, including the housing conditions, environmental quality and their opportunity to be benefitted by local natural resources (e.g. free access to enjoy Country Parks) and favourable environmental conditions.
2. Under the above-captioned public engagement, the government launched a “great debate” on 18 options to explore lands to provide the land supply for housing, economic and other purposes. While concurring to improve Hong Kong’s living quality, we are highly concerned about the adverse impacts on the natural resources, ecology and environmental quality of the territory brought about by developments options and adopted approaches listed and mentioned in the consultation document. We opine that important natural assets, even legally unprotected, must not be sacrificed.
3. We urge, recommend and remind the Government our general viewpoints as follows:
 - (a) The results of the consultation should not jeopardise any ordinances and legal procedures.
 - (b) Any environmental and conservation issues must be consulted, reviewed, analysed, commented and recommended by knowledgeable, relevant and independent experts and/or organisations.
 - (c) Environmental and conservation considerations should accord a high priority to avoid permanent loss of natural assets and irreversible impacts on living quality, economy and public health.
 - (d) The government have to face the imminent but realistic challenge of land supply because availability of developable lands with few constraints becomes scare.



Brownfield Sites (Section 5.1)

4. We urge the Government to accelerate the development of Brownfield sites. Existing haphazard land uses in the New Territories such as open storage and container storage sites degrade the living quality of neighbouring residents, generate air, water and noise pollution and unmanageable traffic issues. These sites are mostly incompatible with the existing statutory land use planning and impede orderly, well-planned and efficient land use but prompt enforcement is mostly infeasible. Therefore, we opine to resume and rezone these brownfield sites as a high priority option in future land supply.
5. However, proper measures should be in place in prior to redevelopment of brownfield sites to relocate the existing activities. Sufficient quantity of multi-storey buildings, statutorily zoned industrial lands or other measures are required to relocate the affected brownfield operations and prevent further proliferation of these environment-damaging activities to nearby unspoiled areas in the New Territories, especially on Lantau.
6. Developing brownfield sites is superior to many other options in view that associated pollution, incompatible developments and road access can be rectified and redeveloped effectively in terms of scale, and the land use efficiency can be optimized consequently.

Develop the Country Parks (Section 5.8)

7. We strongly object to develop Country Parks as proposed by the consultation document. The feasibility study of two pilot areas on the periphery of Country Parks allow the Administration to restrict the legal functions of Country Parks down to ecological value only. This violates the intent of Country Parks Ordinance (Cap 208)(CPO) which mentions the functions protected by the CPO also include *public enjoyment, recreation and tourism, landscape quality*.
8. Section 10.(1) of CPO is clearly against development: “*After the publication of a notice by the Authority under section 9(1), no new development shall be carried out within the area of the proposed country park shown in the draft map without the prior approval of the Authority.*” In legal context, the consultation document holds a double standard compared with Protection of the Harbour Ordinance (Cap 531).
9. In this regard, the consultation document omits the legal status and legislative impacts of developing Country Parks. The dangerous implication of this study is breaking down the “Rule of Law”, a core value of HKSAR, through a tricky tactic of scientific study and deceitful consultation of stakeholders.



10. The feasibility study mentioned in paragraph 7 is to lower the threshold of developing Country Parks to simply “low ecological value”. If such “low-ecological-value tactic” to jeopardise legal protection of Country Parks adopted by the Administration is accepted generally, inconsistency will be raised between public perception and ordinance. The government should conduct formal statutory procedures to consult the public regarding any uses of Country Parks which is legally prohibited, and should not distort the legally protected functions of Country Parks to mislead the public and conceal the legal status of Country Parks.

Reclaiming Plover Cove Reservoir (Section 5.12)

11. We strongly object to reclaim or partly reclaim Plover Cove Reservoir for New Town Development because this option breaches CPO, reduce domestic water supply security, create irreversible impacts to neighbouring Pat Sin Leng Country Park, Geo Park, rural and natural coastal areas through road and utility infrastructure construction, pollutions and lure proliferation of brownfields and flytippings in neighbouring farmlands and ponds.
12. Potable water supply for Hong Kong is vital for livelihood of citizens and economic development of Hong Kong. However, the weather patterns, especially the rainfall and evaporation, are undergoing drastic change that South China, including Hong Kong, may not be capable of retrieving sufficient potable water from reservoirs and rivers to endure dry season or “occasional droughts”.
13. To least extent, Hong Kong should have sufficient storage capacity of local reservoirs to collect rainwater in wet season (usually 6 months from May to October) as reserve to support the domestic freshwater consumption in dry season (usually 6 months from November to April). This may be quite a basic domestic water security consideration to cope with any fluctuation in supply of Dongjiang water due to climate change or operational failures. In this regard and in terms of its capacity, Plover Cove Reservoir must be retained.
14. Moreover, any development in Plover Cove will violate Country Park Ordinance that our comments stated in paragraph 7 to 10 should also be considered.

Reclamation outside Victoria Harbour (Section 5.4)

15. Reclamation irreversibly alters not only the topography, hydrology and ecology of the reclaimed coastal areas, but also the environment far beyond the boundary of reclamation through change in marine current, generation of pollutants and transport load from the reclamation sites.



16. Appropriate scale of reclamation at precisely assessed locations outside Victoria Harbour may be considered only if this option is to meet genuine social needs after extensive public discussion. Such reclamation should not cause adverse impacts on the environment particularly the natural shoreline, fishery and marine ecology.
17. Moreover, the provision of artificial “eco-shorelines” should not rationalise reclamation which cannot compensate the loss of original natural shorelines, seabed and natural marine habitats due to reclamation.
18. The technical study for selecting reclamation sites should include environmental and ecological assessment, and evaluate the social and environmental costs and benefits for future landuse of the sites.

East Lantau Metropolis (ELM) (Section 5.4)

19. We object to ELM development because the reclamation work, New Development Area and transport infrastructure associated with ELM, with a designated scale and location, have not undergone any feasibility study, environmental and ecological impact assessment to demonstrate its feasibility, effectiveness and sustainability.
20. The fact that ELM will connect to Lantau via Mui Wo contradicts and jeopardizes the Administration’s pledge to conserve South Lantau. The subsequent traffic and transport load will destroy the pristine and tranquil South Lantau by deteriorating the air quality with vehicular exhaust, facilitating flytippings of wastes transported from ELM and encouraging unplanned, chaotic and incompatible developments in South Lantau.
21. According to Environmental Protection Department’s Air Quality and Health Index (AQHI) data of 2014-2017, Air Quality Monitoring Stations in Western territory, i.e. Tung Chung, Tuen Mun and Yuen Long ranked amongst the most polluting districts in terms of number of hours with AQHI ≥ 7 and days with daily maximum AQHI ≥ 7 . Therefore, residents or people work on ELM will be very likely vulnerable to higher health risk due to air pollution.
22. The situation is anticipated to worsen with additional emission sources will come into operation in the near future, including: Expansion of Hong Kong International Airport into a Three-Runway System, Hong Kong-Zhuhai-Macao Bridge and Boundary Crossing Facilities and Tuen Mun-Chek Lap Kok Link.



Private Agricultural Land Reserve in the New Territories (Section 5.2)

23. Regarding the development option of private owned agricultural lands in the New Territories, involved lands have obviously regarded as land bank for development in the document, and the discussion is restricted to development mode, constraints and provision of infrastructures.
24. We are concerned that the other values of these agricultural lands (and fishponds) are neglected, such as preservation of arable land for local agriculture and fish culture, ecological, relieving flood risk and urban heat island effect.
25. Also, other issues such as development or re-zoning of agricultural lands in “enclaves” are not considered which has a huge implication on local nature conservation, biodiversity, and rural and countryside planning.
26. The Administration should assess the environmental, ecological, hydrological, landscape and landuse impacts of such re-zonings and development applications. Agricultural land, whatever actively farmed or fallow, should not be presumed as a land bank for development without undergoing related administrative and legal procedures.
27. This consultation should not alter the legal rationales or criteria and professional or technical judgements of government bureaux and departments to assess and approve the rezoning and development applications of agricultural lands in different relevant administrative and statutory processes.

Land Reserve for Unforeseeable Needs (Section 2.3)

28. The approach to develop a land reserve to cater for unforeseeable needs may not be practicable nor feasible. An unforeseen development site or strategy may be location-specific, size-specific or require particular support of infrastructures. Most importantly, if such developments need public consultation, feasibility study and comprehensive planning before relevant works commenced, early formation of developable lands may not necessarily provide flexibility.
29. If we review the past development of Northeast Lantau, container terminals, trunk road and theme park have been planned at different times. The exact location, size, site boundary and required infrastructures are different for these development options. Only when public consultation, feasibility study and planning had been conducted could the reclamation and related works be commenced for finally decided theme park development.



30. In a long run, the Administration should set up a statutory advisory body with members representing different sectors of the society for building and managing the land inventory, and making regular review of the land demand estimate based on the most updated situation (e.g., population and housing demand).
31. The land reserve information, for example, areas, locations and timeline for the land availability, should be made transparent to the public. The Administration should consult the public on the potential uses of the land reserve in order to achieve consensus for the long-term development of our society.

Existing Land Supply Options

32. We support urban renewal to redevelop the older urban areas. Old or abandoned industrial buildings can be re-planned and/or re-built to fulfill demand for lands in certain developed districts.
33. We support the use of ex-quarry sites for housing development provided that such development is compatible with the surrounding uses.
34. The treatment of fill material generated from cavern formation should be clearly stated to avoid fly-tipping. Also, it should not be an excuse to rationalise any reclamation project.

Sustainability

35. Hong Kong's resources, such as lands, are not inexhaustible. We need to recognise our environmental and social limits and must not overload our limits.
36. We recommend a wise and efficient use of land supply. In doing so, we need to include environmental carrying capacity (ecological footprint) when formulating the population policy of Hong Kong. We also need to act quickly to conserve ecologically important areas which are outside our protected area system.

Thank you for your attention.

Yours faithfully,

CHENG Luk-ki
Director, Green Power