



香港地產建設商會 CB(1)590/05-06(01)  
**THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG**

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20 December 2005

Clerk to Panel on  
Planning, Lands and Works  
Legislative Council Secretariat  
3/F Citibank Tower  
3 Garden Road  
Hong Kong

Attention: **Mr. Wong Siu Yee**

Dear Mr. Wong

**Panel on Planning, Lands and Works  
Tamar Development Project and  
Land-use Planning for Central Reclamation Phase III**

We thank you for your letter of 25 November 2005 and as requested, would like to offer our views on the above subjects as follows.

Regarding the *Tamar Development Project*, we support the Administration's proposal to develop the Tamar Site for the new Central Government Complex, Legislative Council Complex, Civic Place and associated facilities.

On *Land-use Planning for the Central Reclamation Phase III*, whilst not unanimous, the majority view of our members is against the proposed office/commercial use on the reclaimed land for the following reasons:

**Decision of Court of Final Appeal**

The Court of Final Appeal has ruled that any reclamation must be for an overriding public need which is compelling and present without a reasonable alternative. Office/commercial development cannot satisfy this criterion. To comply with the spirit of the judgment, no new office/commercial development should be provided on the reclaimed land. (Please refer to the attached plan on which the old seawall before the Central Reclamation Phase III is shown edged red).



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### Office Development

The proposed private office development in the form of groundscraper which will have a height of 50 m PD is within the CDA zone of 5.23 Ha., sitting partly on the reclaimed land. (The CDA zone is shown coloured yellow on the attached plan).

Provision of substantial private office space here is also contrary to the strategy of office decentralization as recommended in the Metroplan and the Territorial Development Strategy, which have provided the strategic planning guidance in recent years. The ongoing redevelopment of old industrial areas into new business zones has and will continue to provide a large amount of office space able to fully satisfy market demand for many years to come, with the added benefit of stimulating urban renewal.

### Commercial Development

Termed "OU – Waterfront Related Commercial and Leisure Uses" on the OZP and intended to be used as a festival market, cafés, restaurants and retail shops, the proposed area (total 7 Ha.) and height (ranging from 13 m PD to 25 m PD) are excessive to create vibrancy along the waterfront. (The OU zone is shown coloured blue on the attached plan).

There are already many established shopping centres and retail shops in the immediate vicinity and there is no justification to create more facilities in the magnitude proposed. Smaller, more intimate development sites are what is needed to complement the open air waterfront park and promenade.

### Traffic Impact

The provision of additional commercial development will further increase the traffic congestion problems within the existing Central Business District. Without the proposed new commercial developments, there will be scope to reduce the scale of Road P2 or redesign it altogether. As a result, more open space could be provided and public access to the harbourfront will be improved.

Yours sincerely

Louis Loong  
Secretary General

