



Clerk to Panel  
 (Attn.: Ms. Christina Shiu)  
 Legislative Council Secretariat  
 E-mail address: [panel\\_dev@legco.gov.hk](mailto:panel_dev@legco.gov.hk)  
 Fax: 2840 0797

23 February 2012

**By e-mail & fax**

Dear Ms. Shiu,

**Panel on Development**  
**The Government's strategy to enhance land supply through reclamation outside**  
**Victoria Harbour and rock cavern development**

We refer to your letter (Ref: CB1/PL/DEV) dated 30 January 2012 regarding the captioned.

Green Power will not be able to attend the Panel meeting to be held on 10 March 2012 but would like to provide our written submission on the subject. In fact, we have reviewed the captioned consultation digest and submitted our comments to the Director of Civil Engineering and Development Department (CEDD) on 23 December 2011. A copy of our original submission to CEDD is attached with this letter for the Panel Members' information and consideration.

If you have any questions, please do not hesitate to contact us.

Thank you for your attention.

Yours sincerely,

Dr. Karen Woo  
 Conservation and Education Manager  
 Green Power

名譽贊助人：行政長官夫人 曾鈺英女士  
 專業顧問：陳智思太平紳士 何強博士  
 李樂詩博士 劉靜怡教授  
 黃英琦女士 王敏幹太平紳士  
 Prof. Somwung Pitiyanuwat

Honorary Patron : Mrs. Selina Tsang, Wife of the Chief Executive  
 Professional Advisors : Mr. Bernard Chan, J.P. Dr. Tao Ho, J.P.  
 Dr. Rebecca Lee Prof. Liu Jing Ling  
 Prof. Somwung Pitiyanuwat Ms. Ada Wong  
 Mr. John Wong, J.P.



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Director of Civil Engineering and Development Department  
4/F, Civil Engineering and Development Building  
101 Princess Margaret Road  
Homantin  
Kowloon  
(E-mail: [landsupply@cedd.gov.hk](mailto:landsupply@cedd.gov.hk); Fax: 2714 2054)

23 December 2011

By e-mail & fax

Dear Sir/ Madam,

**Response to Enhancing Land Supply Strategy –  
Reclamation outside Victoria Harbour and Rock Cavern Development**

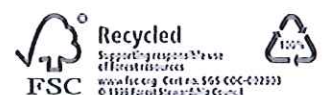
Green Power has reviewed the captioned consultation digest and would like to submit our comments as follows.

**Land Reserve**

1. We note that the Administration plans to enhance the land supply strategy so as to build a land reserve for Hong Kong. We opine that while the land reserve is established for meeting needs for housing and other public interests, environmental and living quality should not be compromised and important natural assets, even legally unprotected, must not be sacrificed.
2. The Administration should set up a committee 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).
3. The land reserve information, for example, areas, locations and timeline for the land availability, should be made transparent to the public.
4. 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.

名譽贊助人：行政長官夫人 曾鈺英女士  
專業顧問：陸智恩大平特士 鄧錫鴻士  
李奧特博士 吳錫培教授  
黃英玲女士 王敏軒大平特士  
Prof. Somwang Pinyanawat

Honorary Patron : Mrs. Sel'na Tsang, Wife of the Chief Executive  
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Dr. Rebecca Leo Prof. Liu Jing Ling  
Prof. Somwang Pinyanawat Ms. Ada Wong  
Mr. John Wong, J.P.



地址：香港九龍旺角登打士街58號裕裕商業中心23樓2314室  
Address: Rm. 2314, 23/F., Park-In Commercial Centre, 58 Dundas Street, Mongkok, Kowloon, Hong Kong

電話 | Tel : 3981 0200  
傳真 | Fax : 2314 2661

網址 | Website : [www.greenpower.org.hk](http://www.greenpower.org.hk)  
電郵 | E-mail : [info@greenpower.org.hk](mailto:info@greenpower.org.hk)



### Existing Land Supply Options

5. 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.
6. Existing haphazard land uses in the New Territories such as open storage and container storage sites can be resumed and rezoned to uses compatible with surrounding environments.
7. However, we have reservation about the re-zoning of green belt areas and agricultural lands for development. The Administration should assess the environmental, ecological and visual impacts of such re-zoning. Agricultural land should not be considered as a land bank for development.
8. The planning process for New Development Areas, including Hung Shui Kui, Kwu Tung, Ping Che, etc. should be sped up. The design of the future new towns should incorporate more green design and features so as to enhance the establishment of low carbon communities which will become good precedent for our future city development.
9. We support the use of ex-quarry sites for housing development provided that such development is compatible with the surrounding uses.

### Rock Cavern Development

10. We support cavern usage particularly for the NIMBY (Not-In-My-Backyard) facilities such as sewage treatment plants, waste treatment facilities and columbarium. However, the Administration needs to consider the environmental impacts, safety, radon and underground water hydrology issue.

### Reclamation outside Victoria Harbour

11. We strongly object any development, channelization and reclamation in Tung Chung river valley and estuary which is of high ecological and landscape values. We urge the Administration to provide promptly a statutory landuse framework to protect Tung Chung River and its estuary and to guide the planning and engineering study on the remaining development in Tung Chung.

名譽贊助人：行政長官夫人 曾鈺英兩女士  
專業顧問：陳智思大律師 阮汝博士  
李煥特博士 李詩筠新校  
黃英琦女士 王軒軒大律師  
Prof. Somwung Pityanuwat

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Dr. Rebecca Lee Prof. Liu Jing Ling  
Prof. Somwung Pityanuwat Ms. Ada Wong  
Mr. John Wong, J.P.



地址：香港九龍旺角登打士街56號裕裕商業中心23樓2314室

Address: Rm. 2314, 23/F., Park-In Commercial Centre, 56 Dundas Street, Mongkok, Kowloon, Hong Kong

電話 | Tel : 3981 0200  
傳真 | Fax : 2314 2681

網址 | Website : [www.greenpower.org.hk](http://www.greenpower.org.hk)  
電郵 | E-mail : [info@greenpower.org.hk](mailto:info@greenpower.org.hk)



12. 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 and marine ecology. Moreover, the re-creation of artificial shorelines should not be regarded as a mitigation measure for compensating the loss of natural shorelines and natural marine habitats due to reclamation.
13. Land reclaimed from contaminated sediment cannot provide a stable substratum for housing or infrastructure development. Therefore, we are dubious why the treatment of sediment is included in the captioned consultation digest.
14. 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.
15. The technical study for selecting reclamation sites should include environmental and ecological assessment, and evaluate the social and environmental costs and benefits for future land use of the sites.

Conclusion:

16. 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.
17. We recommend a wise and efficient use of land supply. In doing so, we need to formulate a population policy based on the environmental carrying capacity (ecological footprint) 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,

Dr. L. K. Cheng

Head of Scientific Research and Conservation

Green Power

名譽贊助人：行政長官夫人 曾鈺英女士  
專業顧問：陳晉恩大平特士 何錫博士  
李煥揚博士 吳錫禧教授  
黃英琦女士 王毅軒大平特士  
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Mr. John Wong, J.P.



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