I write to set forth my objections to the Government’s Strategy to Enhance Land Supply Through Reclamation Outside Victoria Harbour and Rock Cavern Development (the “Study”).

I object to the current structure of the Study and the HK$300 million allocated to the Study. The Study is structurally flawed as it focuses solely on reclamations and rock cavern development as the only viable means of enhancing land supply, to the exclusion of redevelopment/rezoning, building directly on disused quarry sites and other methods. The Study and public consultation process should be immediately revised and funds reallocated to also consider the feasibility of all potential means of enhancing land supply (including the costs and benefits).

Under the current structure, the Study is designed to draw support for land supply methods designed to benefit special interests, rather than the greater public good. The current Study also evidences a complete disregard for the concept of stewardship in that careful and responsible management and preservation of Hong Kong’s natural environment, wildlife and marine habitats is sacrificed to create new land and to open undisturbed land for development, rather than focusing on idle and abandoned industrial and commercial sites.

**Failure to Consider Other Means to Enhance Land Supply**

The Land Supply Study fails to consider other viable land supply sources, including redeveloped/rezoned land and disused quarry sites. Before turning its attention to harbour reclamation or rock cavern development (which should be considered as last resorts given the potential significant negative impact on Hong Kong’s geography and environment), the Government should conduct a detailed feasibility study of other possible sources of land supply.

A comprehensive study of “brownfield” areas in the New Territories should be conducted to determine the availability of idle and/or abandoned industrial and commercial sites for development. By using these sites and consolidating existing dispersed cargo storage and container yard facilities, land formation work and relocation issues would be avoided and Hong Kong’s natural environment could be preserved.

A review of old buildings redevelopment, development of Kai Tak, data concerning the volume of current unoccupied apartments1 and development of disused quarry sites

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1 See Chief Executive Donald Tsang’s October 2011 Policy Address, which notes that there are currently 200,000 apartments in Hong Kong that are unoccupied.
should also be included in the Study. In relation to two disused quarries—Anderson Road Quarry and Mount Butler Quarry—the Government should undertake a feasibility study of actually building within and on the quarry sites, rather than developing around the quarries (which leaves the disused quarry destruction visible to residents).²

Faulty Population Growth and Housing Supply Assumptions

Further study of the population growth assumptions in the Study is necessary given the existence of contrary data. As noted by other commentators “the US Census Bureau projects that Hong Kong’s population will peak in the middle of the next decade and decline to 6.9 million by 2039. That’s two million fewer than the government’s forecast.”³ The latest Hong Kong Census and Statistics Department figures show that Hong Kong has experienced net emigration in two of the last three years.⁴ A further review of the current volume of unoccupied apartments is also warranted given the Study’s assumption that insufficient housing exists in Hong Kong.

Destruction of Natural Environment and Wildlife/Marine Life Habitat

Both reclamation and rock cavern development will lead to destruction of the natural environment and wildlife/marine life habitats as shorelines and the sea disappear and the existing natural land atop the rock caverns is developed. The resulting increases in construction pollution, construction vehicle traffic, noise pollution, blocking of natural sunlight, loss of fresh air and the cooling effects of the sea breeze, and changes in the topography will further destroy, rather than enhance, the quality of life in Hong Kong at a huge expense to the natural environment and the existing human and wildlife/marine life population.

Date: 10 March 2012

² Equally troubling is the Government’s reference in the 24 May 2011 Legislative Council Panel on Development discussion paper “Increasing Land Supply by Reclamation and Rock Cavern Development”, paragraph 8, to CEDD’s feasibility study to identify and develop even more new quarry sites in Hong Kong.
³ “Hong Kong’s government planners are out of control”, by Tom Holland, 6 January 2012, South China Morning Post.
⁴ See also “Shaky base for law of concrete jungle”, by Jake Van der Kamp, 23 February 2012, South China Morning Post (highlighting that the Hong Kong Census and Statistics Department has consistently over-estimated population growth).