

Clerk to Panel on Development  
Legislative Council Secretariat  
2/F Legislative Council Complex  
1 Legislative Council Road  
Central, Hong Kong  
(E-mail: panel\_dev@legco.gov.hk)



By email only

香港觀鳥會

14 September 2018

THE  
HONG  
KONG  
BIRD  
WATCHING  
SOCIETY

Since 1957 成立

Dear Legislative Council members,

**Re: "Planning for land supply in Hong Kong"**

**Overview**

Hong Kong is facing the problem of unaffordable housing and inadequate public housing supply, causing the general public to suffer from increasingly expensive housing rental prices, a heavy burden of home mortgage repayments, long waiting times for public rental housing, or increasing numbers of people being forced to live in cramped and tiny subdivided flats.

The consultation document clearly admits the presence of all these problems but simplifies and blames it on the shortage of land supply, creating an illusion that increasing land supply is the ultimate solution. The Government irresponsibly delegated this highly sensitive issue to the Task Force on Land Supply (the Task Force) and encouraged the general public to "discuss", which has furthered fuelled the divisions and disaffection in our community. Yet, without fixing the loopholes and injustice in the current housing, economy and planning system, the urgent need for public and affordable problems would not be solved; but instead would intensify the unnecessary dilemma between social needs and nature conservation, damaging both the public interest and the natural environment.

As an environmental NGO with a vision of "people and birds together" and "nature forever", The Hong Kong Bird Watching Society (HKBWS) is particularly concerned with the environmental and ecological sustainability of the proposed land supply options. The strategic planning "*Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030*" released in 2016 aims to achieve the vision of Hong Kong becoming "a livable, competitive and sustainable Asian's World City" with a planning goal to "champion sustainable development with a view to meeting our present and future social, environmental and economic needs and aspirations"<sup>1</sup>. We consider the priority in the use of land should follow such principles to protect and respect our environment and for the sustainable development of our city.

<sup>1</sup> Page 20 of the consultation document for the "*Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030*"



However, among the proposed 18 land supply options, there are a handful of choices which would bring irreversible impacts to the natural environment, such as development of Country Parks, reclamation of marine habitats and reservoirs, and development of agricultural land. We are concerned these land supply options will inevitably accelerate the rate of ecological loss and other ecosystem services that provide public benefit to the whole community. This runs directly contrary to the intent of Hong Kong's own planning laws and Hong Kong's Biodiversity Strategy and Action Plan, but also the national direction under the Greater Bay Area initiative for a "green and healthy living environment" and the Ecological Protection Red Line system for conservation and the Convention on Biological Diversity at the international scale.

### Country Parks and Green Belts

In the January 2017 Policy Address the Government had already proposed to develop "*a small proportion of land on the periphery of country parks with relatively low ecological and public enjoyment value for purposes other than real estate development, such as public housing and non-profit-making elderly homes*"<sup>2</sup>. The current public consultation document echoed with the Government's proposal and included options to develop two sites at the "*periphery*" of Country Parks and even additional areas of the Country Parks in the future<sup>3</sup>. Yet, the development of Country Parks completely undermines and challenges the good intentions of the Country Parks Ordinance (Cap. 208) for conservation and public enjoyment.

Moreover, the term "*periphery*" is misleading as it obscures whether the sites are inside or outside the Country Park boundary. It should be made clear the sites are in fact fully located within the boundary<sup>4</sup>. The Government's track record in rezoning vegetated Green Belts of "*relatively low conservation value*" for development, which has led to a loss of well-wooded Green Belts with high or medium ecological value and buffering effect (please refer to our reports of "*Hong Kong Headline Indicators for Biodiversity and Conservation*"<sup>5</sup>), gives the public no cause for confidence that the Government's stated intention to develop the Country Parks would be limited to areas with "*relatively low*" ecological and public enjoyment value. Development of the Country Parks should be adopted as the solution of last resort only when all other options can be shown to have been exhausted, a public consensus is reached, and under rigorous application of all relevant legislation and international best practice.

<sup>2</sup> HKSAR Government. (2017, January 18). *Paragraph 117 of 2017 Policy Address*. Retrieved from <https://www.policyaddress.gov.hk/jan2017/eng/p116.html>

<sup>3</sup> P.66-69 of the consultation document

<sup>4</sup> HKSAR Government. (2017, June 28). *LCQ21: Study on two sites on the periphery of country parks* [Press Release]. Retrieved from <http://www.info.gov.hk/gia/general/201706/28/P2017062800421.htm>

<sup>5</sup> Hong Kong Headline Indicators for Biodiversity and Conservation 2011 - 2017 reports. Retrieved from <https://www.hkbws.org.hk/cms/index.php/reports>

### Agricultural land and Public-Private Partnership (PPP)

We are further concerned by the land supply option of tapping into the private agricultural land reserve in the New Territories. None of the ecological, social, economic, landscape, buffering values and functions of agricultural lands were mentioned, but instead directly proposed to use PPP as the mechanism between the Government and private developers for developing agricultural land. The proposal for an independent body to provide oversight eloquently highlights the lack of transparency of this process, which prevents public consultation. We see no reason why the Government should not pursue resumption of both brownfield and degraded agricultural land under the purview of the proven and more transparent Town Planning Board, which includes an established mechanism for public consultation.

### Summary

Hong Kong is indeed a unique city in China and as well as in the world, with such a high population density but yet also with a large number of country parks that are easily accessible from every part of the city. This is increasingly valued by a community living in confined spaces and concerned about declining quality of life and opportunity. The HKBWS considers that the current land supply public consultation cannot address the current severe housing problem in Hong Kong, but instead has encouraged more conflicts between different levels of the society and unnecessary dilemma between social needs and nature conservation. We consider the Government needs to recognize and secure housing as a basic necessity of Hong Kong people, rather than an investment asset. Determination to change the current system, legislation and practice is also needed, such that development of the city would not be in the expense of the environment and social needs and the harmony in the society can be restored. In this way, there is hope that our vision of becoming a livable, competitive and sustainable Asia's World City could be reached.

Yours faithfully,



Woo Ming Chuan  
Senior Conservation Officer  
The Hong Kong Bird Watching Society