



Environmental Integrity & Excellence

Hong Kong Institute of Qualified Environmental Professionals Limited (HKIQEP)
香港合資格環保專業人員學會有限公司 (香港環專會)

Views of the Hong Kong Institute of Qualified Environmental Professionals Limited on “How to tackle land shortage? Land for Hong Kong: Our Home, Our Say!”

General

The Hong Kong Institute of Qualified Environmental Professionals Limited (HKIQEP) welcomes the Land Supply Task Force (LSTF) putting forth 18 options for increasing land supply in Hong Kong. As a leading local environmental professional institute, we would like to contribute our professional environmental perspectives and join hands with the Government and the community to tackle our land shortage problem, with a view to building a sustainable Hong Kong with quality living environment.

The options proposed by the LSTF have different levels of environmental impacts, with some having the potential to significantly damage our environment and affect environmental sustainability. There are many factors, including social, political and economic ones, which need to be considered and balanced when identifying a land supply model that can meet our society’s best interests. HKIQEP believes that environmental sustainability must be amongst those that need to be given high weighting and expected to support and add value to the development that is necessary for sustaining Hong Kong’s economy.

The HKIQEP supports a multi-pronged approach to tackling the land supply issue, including the creation of land reserve, but all selected options should be pursued strategically with due consideration of all relevant factors including environmental impacts. Priority should be given to those options with environmental benefits and low or avoidable adverse environmental concerns, e.g., developing brownfield sites, to be followed by options with mitigatable environmental concerns, e.g., near-shore reclamation outside Victoria Harbour. On the other hand, those options with high environmental concerns and involve environmentally important areas which the government has committed to protect, such as developing areas on the periphery of country parks and reclamation of Plover Cove Reservoir, should be avoided.

Irrespective of what land supply options are chosen, the HKIQEP believes that due process with full observation of environmental laws and fundamental principles should always be followed. We urge the Government to initiate the relevant strategic environmental assessments and cumulative environmental impact assessments for the priority options as soon as possible and ensure strict compliance with the



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requirements set out in the environmental and related legislations, including the Environmental Impact Assessment Ordinance (Cap. 499), Country Park Ordinance (Cap. 208) and the Town Planning Ordinance (Cap. 131). It is also important that in meeting our land supply needs, the Government would honour its environmental commitments, both locally and internationally, including Hong Kong's own Biodiversity Strategy and Action Plan and the UN Convention on Biological Diversity.

To expedite the completion of due process in realizing the land supply options and to prevent unacceptable and environmentally unsustainable development, it is appropriate and necessary that the concerned environmental and ecological assessments are conducted by qualified environmental professionals. The HKIQEP would like to stress that any environmental assessment should strictly adhere to the environmental management hierarchy in the order of avoidance, minimization, mitigation and compensation. The HKIQEP will be glad to offer its professional inputs whenever necessary and appropriate.

Regarding specific options put forth by the LSTF, the HKIQEP would like to provide its views in the following sections.

Specific Comments

From an environmental professional's point of view, the proposed 18 options can be grouped and prioritized, from most to least preferred, according to the severity of the environmental impacts as follows:

(a) Options with environmental benefits or low environmental concerns

Short-to-Medium Term Options

1. Developing Brownfield Sites
3. Alternative Uses of Sites under Private Recreational Leases (PRL)

Medium-to-Long Term Options

3. Developing Caverns and Underground Space
5. Developing the River Trade Terminal (RTT) Site



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Conceptual Options

1. Developing the River Trade Terminal (RTT) Site and its Surroundings in the Long Term
6. Relocation of Kwai Tsing Container Terminals (KTCTs)

The above options would have low environmental impacts. The HKIQEP encourages the Government to proceed with these options first.

Among these options, the HKIQEP considers that the Government should give priority to the option of developing brownfield sites, given that the society and the environment as a whole have already been paying a significant price for inefficient land use and environmental pollution. Brownfield sites are abandoned agricultural land in the New Territories which have been converted to temporary container yards, temporary open storage, temporary open car parks, etc. Most of the brownfield sites have lost their natural value with their uses are often incompatible with the overall land use in the area and even causing environmental pollution problems.

The options of developing caverns and underground space, developing the RTT site and relocation of KTCTs could help release surface land for new development with low environmental concerns. They, in particular the RTT site which is already being used for logistic activities, may also help provide relocating sites to expedite decanting of the existing polluting brownfield businesses. The HKIQEP urges the Government to conduct the relevant feasibility studies and environmental assessments to help formulate the respective implementation plans as soon as possible.

(b) Options with some environmental concerns

Short-to-Medium Term Options

2. Tapping into Private Agricultural Land Reserve in the New Territories
4. Relocation or Consolidation of Land-Extensive Recreational Facilities

Medium-to-Long Term Options

1. Near-shore Reclamation outside Victoria Harbour
2. Development the East Lantau Metropolis (ELM)
4. More New Development Areas (NDAs) in the New Territories



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Conceptual Options

3. Increasing Development Intensity of “Village Type Development” Zones
4. Topside Development of Existing Transport Infrastructure
5. Utilising the Development Potential of Public Utilities Sites
7. Topside Development of Kwai Tsing Container Terminals (KTCTs)

These are viable land supply options with different degrees of environmental concerns. The HKIQEP supports serious consideration of these options and believes that the Government should expedite the technical feasibility studies of these options with due consideration of the associated environmental issues by conducting extensive environmental impact assessment studies. With proper planning, environmental impact assessment and mitigation, it is possible that potential ecological and environmental benefits can be incorporated to provide development of high quality living environments. The HKIQEP will be glad to offer further advice whenever appropriate.

The HKIQEP notes that some of these options including the tapping into private agricultural land reserve in the New Territories, more NDAs in the New Territories and development of the east Lantau Metropolis would involve areas with important ecological resources. The avoidance and mitigation of ecological impacts are important factors to be considered in the environmental impact assessments. It is necessary and appropriate to ensure the preservation of ecological integrity and that our environment will not be compromised.

For the options involving reclamation outside Victoria Harbour, the HKIQEP considers there is scope for some reclamation in locations with low ecological or environmental sensitivity provided that the environmental assessment process has been duly followed and that the potential environmental impacts, in particular, the threatening of marine lives and the eco-system in the area, are duly assessed, avoided, minimized and mitigated under the existing town planning and environmental legislation framework. The HKIQEP notes that the cumulative environmental impact assessment at strategic level for three nearshore reclamation sites at Lung Kwu Tan, Siu Ho Wan and Sunny Bay, a further technical assessment on reclamation at Lung Kwu Tan, and the preliminary technical assessment of the potential reclamation site at Ma Liu Shui have been completed and urges the Government to commission qualified environmental professionals to initiate the environmental impact assessment



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process for the above sites and other proposed reclamation sites to ascertain the feasibility and environmental impacts, including potential climate change and extreme weather event-related impacts, such as storm surge and sea level rise implications, as soon as possible.

Regarding the option on relocation or consolidation of land-extensive recreational facilities, the HKIQEP notes at the site of the Fanling Golf Course, while a large quantity of pesticides and fertilizers are used that have the potential of causing water and land pollution to our environment, it has coincidentally preserved old and valuable trees as well as habitats with potential ecological significance. The HKIQEP urges the Government to conduct a proper ecological survey using the same criterion as in the ecological evaluation framework resulting in Government's 2004 New Nature Conservation Policy and an environmental assessment to ascertain its ecological value and avoid any development that would undermine its ecological significance or pose significant pollution to the environment of the area.

(c) Options with high environmental concerns

Medium-to-Long Term Options

6. Developing Two Pilot Areas on the Periphery of Country Parks

Conceptual Options

2. Developing More Areas on the Periphery of Country Parks

8. Reclaiming Part of Plover Cove Reservoir (PCR) for New Town Development

These options undermine the Government's commitment to maintain and enhance biodiversity and could have the potential to pose significant threats to our environment. The HKIQEP urges the Government to continue its commitments, both local and international, including the UN Convention on Biological Diversity, to protect the natural ecology and conserving our environmental resources.

Country Parks are designated in accordance with statutory procedures as laid down in the Country Park Ordinance (Cap. 208). They are invaluable and are unique public assets which provide very important habitats to the flora and



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fauna of Hong Kong and have special conservation value, landscape and aesthetic value, as well as recreation potential. As their demarcations are made with due consideration of all relevant factors, the HKIQEP considers that all country parks are integrated entities and no part of the country parks should be considered as having higher or lower ecological values. It is not appropriate for the Government to change the land use for other development in any part of the country park.

Similarly, reclaiming Plover Cove Reservoir, even only a part of it, is not acceptable. As a crucial part of the Plover Cove Country Park, the reservoir is integrated into the surrounding environment to provide a scenic landscape. It is also a strategic reserve of fresh water, which is one of the most precious natural resources that has been depleting and becoming increasingly scarce in the Pearl River Delta region and throughout the world as a result of rapid urbanization and climate change.