

The Secretariat
Task Force on Land Supply
17/F, West Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

Dear Task Force on Land Supply,

Response to the Task Force on Land Supply Public Engagement

Since 1983, Friends of the Earth (HK) (FoE (HK)) has led the environmental dialogue by engaging government, business and community with equitable solutions to protect our local and regional environment. With the vision to promote a healthy and sustainable environment for all, we now submit our views to the Task Force on Land Supply (Task Force).

FoE (HK) envisions Hong Kong as a progressive eco-city. Our submission is as attached and makes the following overarching recommendations:

- **Protection, conservation, and enhancement of the environment should be prioritised first and foremost;**
- **Land supply should be sourced from the resumption of brownfields;**
- **Urban density should be the core consideration in urban planning and housing development;**
and
- **Hong Kong should pursue sustainable development, not ‘sustainable growth’**

Conserving the natural environment and meeting future needs are not and should not be mutually exclusive. We hope the Task Force, and consequently the Government, will duly consider the recommendations made in this submission.

If there are any queries on the submission, please contact me at cwcheung@foe.org.hk.

Yours Sincerely,
Mr. Cheung Chi Wah



Chief Executive Officer
Friends of the Earth (HK)

- 1. Protection, conservation, and enhancement of the environment should be prioritised first and foremost.** About 40% of Hong Kong has been designated as country parks or special areas under the Country Parks Ordinance (Cap. 208)¹. Both the past government and some stakeholders have raised the possibility of opening up country parks to meet housing demand in recent years^{2,3}. Country parks however must not be used for housing development for multiple reasons.

The health and wellbeing of a community is underpinned by a well-functioning ecosystem that is reliant on its biodiversity⁴. The subtropical climate and unique topography of Hong Kong support a rich diversity of flora and fauna – over 3,300 vascular plant species, 50 mammals, 80 reptiles, 20 amphibians, 240 butterflies, and 116 dragonflies⁵. Some species are endemic to the city, such as the Romer’s Tree Frog, Hong Kong Blind Snake, and Bogadek’s Burrowing Lizard⁶. Nearly all Parties to the Convention on Biological Diversity agree that habitat loss is the greatest threat leading to the loss of biodiversity⁷. Habitat degradation and fragmentation, as a result of urban sprawl and land use changes, too put pressure on ecosystems⁸.

While there have been suggestions to develop periphery of country parks with “low ecological value”⁹, it encourages stakeholders to underestimate and undervalue the land’s local biodiversity and its associated ecological functions¹⁰. It also creates a perverse incentive to intentionally reduce ecological value through sabotage or arson¹¹. Further, the ecological impact of developing “low-value” lands such as country park enclaves and fringes extends beyond the area¹². Urbanisation can fragment a continuous habitat into smaller patches, changing species richness and interactions¹³. Erosion of green belts – intended to protect the nature from urban sprawl¹ – would expose country parks to anthropogenic impacts¹⁴.

It should be stressed that country parks are not solely designated for nature conservation, but also for other pragmatic considerations to protect Hong Kong’s watersheds and to provide a venue for recreation and outdoor education to the community¹⁵. Country parks are well-recognized as one of the best recreational choices in the city. 13 million visitors were recorded in 2017¹⁶. Most of them engaged in outdoor activities such as hiking, biking,

¹ [Legislative Council, Country Parks and Protected Areas in Hong Kong](#)

² [Office of the Chief Executive, The 2015 Policy Address](#)

³ [Our Hong Kong Foundation, Maximizing Land Use to Boost Development Optimizing Housing Resources to Benefit All](#)

⁴ [Convention on Biological Diversity, Health and Biodiversity](#)

⁵ [AFCD, About Conservation](#)

⁶ [Hong Kong Reptile & Amphibian Society, Reptiles and Amphibians of Hong Kong](#)

⁷ [Convention on Biological Diversity, TARGET 5 – Technical Rational Extended](#)

⁸ [Grimm *et al.*, Global Change and the Ecology of Cities](#)

⁹ [SCMP, Turn parks into housing: Areas with ‘low ecological value’ could be used for new flats, CY says](#)

¹⁰ [Apple Daily, 大窩坪擬建屋 環團發現珍貴生物 港府低估綠化地價值 \(Chinese only\)](#)

¹¹ [WWF, Fixing the holes: the need to repair Hong Kong’s country park system](#)

¹² [SCMP, Green groups warn of damage from developing Hong Kong park enclaves](#)

¹³ [Benitez-Malvido and Arroyo-Rodríguez, Habitat fragmentation, edge effects and biological corridors in tropical ecosystems](#)

¹⁴ [California Department of Parks and Recreation, Urban Edge Effects](#)

¹⁵ [Wong, F.Y., A Short History of Hong Kong Country Parks](#)

¹⁶ [AFCD, Agriculture, Fisheries and Conservation Department Annual Report 2016-2017](#)

mountain climbing, and more. Beyond these, they provide useful and critical ecosystem services to the city. This includes but not limited to water and air purification, erosion prevention, carbon sequestration, microclimate regulation, and improving physical and mental wellbeing¹⁷. It is estimated that these direct and indirect benefits are valued at HK\$1.8 billion to 6.5 billion annually¹⁸. Given the above reasons and the fact that Hong Kong is committed to developing its own city-level Biodiversity Strategy and Action Plan, country parks and special areas should not be sacrificed for housing development.

Due to Hong Kong's mountainous terrain, land reclamation has long been considered as a general practice of increasing land supply. About 3,700 hectares of land were reclaimed since 1985¹⁹. Land reclamation modifies the topography and hydrology of the marine environment, reducing marine biodiversity and changing community structure²⁰. Moreover, the effects of land reclamation extend well beyond the region. The sand required for reclamation has to be mined from somewhere. This often comes from countries with weak environmental regulations, where sand is dredged illegally or from protected areas^{21,22}. Sand mining erodes coastlines, pollutes the marine environment, destroys fishers' livelihood, and more²³. In 2000, Chinese authorities have imposed a ban on sand mining on Yangtze River after noticing the negative impacts it had on the river²⁴. Countries like Indonesia, Vietnam, and Cambodia have also followed suit over similar environmental concerns²⁵. Land reclamation destroys natural habitats and threatens biodiversity. Hong Kong's waters should be protected from land reclamation.

- 2. Increase land supply through the resumption of brownfields.** Compared to tapping into the countryside, it is more rational to exploit existing built-up areas. Hong Kong has approximately 1,300 ha of brownfields, sufficient to meet the short-term target of 1,200 ha²⁶. Many of these were converted from agricultural lands into open-air car parks, garages, and container storages²⁷. Though some may provide valuable services with economic contribution, they are often poorly utilised and inefficient²⁸. Such functions should instead be consolidated and relocated to multi-storey buildings or terminals to make better use of both space and infrastructure²⁹. Some brownfields house polluting industries such as open-air vehicle or electronic waste scrapyards³⁰. Currently, there are around 150 recycling yards that handle

¹⁷ [Mexia et al., Ecosystem services: Urban parks under a magnifying glass](#)

¹⁸ [Civic Exchange, Wild But Not Free: An Economic Valuation of the Benefits of Nature Conservation in Hong Kong](#)

¹⁹ [The Standard, Five spots eyed for housing reclamation](#)

²⁰ [Li et al., Effects of Reclamation Projects on Marine Ecological Environment in Tianjin Harbor Industrial Zone](#)

²¹ [UNEP, Sand, rarer than one thinks](#)

²² [The Straits Times, Cambodia bans sand exports to Singapore after pressure from environmental groups](#)

²³ [National Geographic, See How Sand Mining Threatens a Way of Life in Southeast Asia](#)

²⁴ [People's Daily, China Bans Illegal Sand Mining on Yangtze River](#)

²⁵ [Sixth Tone, The Environmental Costs of Sand Mining on the Mekong](#)

²⁶ [RTHK, Task force submits land options for public views](#)

²⁷ [Legislative Council, LC Paper No. CB\(1\)214/17-18\(01\)](#)

²⁸ [SCMP, As Hong Kong brownfield site saga rolls on, calls rise to banish 'wasteful use of land'](#)

²⁹ [Development Bureau, Developing brownfield sites](#)

³⁰ [Task Force on Land Supply, Brownfield Sites](#)

electronic waste in Hong Kong – some of which are located within green belts or agricultural lands³¹. These sites should be immediately resumed and remediated to prevent further environmental pollution. Though the government has claimed difficulties in resuming brownfields for housing development³², they are often a matter of resolve than technical³³.

Private Recreational Leases (PRLs) are granted to organisations to provide recreational facilities. Today, there are 66 PRLs occupying a total of 408 ha, of which private sports clubs hold 341 ha³⁴. The Audit Commission has criticised the clubs for their exclusiveness and the operation of commercial facilities in the premise in the past³⁵. While there have been calls to resume golf courses³⁶, they can be unexpected sanctuaries for indigenous or rare species^{37,38}. As mentioned above, the government should prioritise the resumption of underutilised brownfields, which is sufficient to cover the projected land requirement for housing development. Land under PRLs should be considered after assessing their ecological value.

3. Urban density should be the core consideration in urban planning and housing development.

Pursuing low-density housing developments runs counter to Hong Kong's long-term sustainability as a compact, high-density city. With limited space for expansion, Hong Kong should build upwards instead. The domestic plot ratio of development areas could be increased to make smarter use of existing built-up land. Raising the plot ratio does not necessarily lead to high population density and crowding nor make a city less pleasant to live in^{39,40}. The negative aspects of high density can be mitigated with appropriate urban design, planning and management. Some major factors that contribute to liveability include a healthy environment⁴¹, urban green spaces⁴², public open spaces⁴³, walkability⁴⁴, and access to facilities and services (schools, dining, transportation, etc.)⁴⁵. However, higher density development will impose greater human disturbance on the countryside. The importance of safeguarding the greenbelts becomes even more apparent.

4. Hong Kong has to pursue sustainable development, not sustainable growth. The UN World Commission on Environment and Development defined sustainable development as, "development that meets the needs of the present without compromising the ability of future

³¹ [Government Information Centre, LCQ19: Regulation of electronic waste recycling sites and combat of associated illegal activities](#)

³² [SCMP, Study on clearing Hong Kong's brownfield sites won't be ready for nearly two years](#)

³³ [Hong Kong e-Legislation, Cap. 124 Lands Resumption Ordinance](#)

³⁴ [Task Force on Land Supply, Private Recreational Leases & Land-extensive Recreation Facilities](#)

³⁵ [Audit Commission, Direct land grants to private sports clubs at nil or nominal premium](#)

³⁶ [SCMP, Residents want public housing built on Hong Kong golf course site, survey finds](#)

³⁷ [Hong Kong Golf Club, Facts and Figures](#)

³⁸ [Legislative Council, LC Paper No. CB\(1\)977/17-18\(20\)](#)

³⁹ [Haarhoff, E., Does higher density housing enhance liveability? Case studies of housing intensification in Auckland](#)

⁴⁰ [Yeh and Ng, Planning for a Better Urban Living Environment in Asia](#)

⁴¹ [The Standard, Pollution hits HK liveability](#)

⁴² [Aldous, D.E., Greening South East Asian Capital Cities](#)

⁴³ [HKILA, Comments from Hong Kong Institute of Landscape Architects in response to the public engagement document](#)

⁴⁴ [Civic Exchange, Measuring and Improving Walkability in Hong Kong](#)

⁴⁵ [SCMP, Time for Hong Kong to think out of the box to solve its liveability crisis](#)

generations to meet their own needs⁴⁶.” The public engagement document repeatedly stressed ‘sustainable development’ and increasing land supply. Land however is a finite resource, and also in decline as a result of land degradation and sea level rise⁴⁷. Through rezoning country parks and reclaiming land from the sea, what the Task Force attempts to pursue is ‘sustainable growth’ – an oxymoron⁴⁸.

Contrary to the government’s stance⁴⁹, increasing land supply will not be enough to resolve the housing issue⁵⁰. It is more sensible to take a smarter and more holistic approach in formulating long term housing strategy. Unused private land could be resumed where necessary for public development and to limit land speculation⁵¹. Existing built-up land that is poorly utilised should be remediated and redeveloped to provide greater public utility⁵². Ageing districts should be regenerated by the Urban Renewal Authority on a coherent, district scale, such that they will meet the needs of today and of future generations⁵³.

Housing is regarded globally as one of the greatest challenges with urbanisation⁵⁴. Hong Kong’s city planning agenda need to move beyond from just increasing land supply. Other policies that would inadvertently affect housing supply and demand – such as economic and transport policies – should also be re-examined. The environment should not have to pay for mistakes resulting from poor policies⁵⁵.

⁴⁶ [UN Documents, Our Common Future, Chapter 2: Towards Sustainable Development](#)

⁴⁷ [European Commission, Land as a resource](#)

⁴⁸ [Daly and Townsend, Valuing the Earth: Economics, Ecology, Ethics](#)

⁴⁹ [GovHK, LCQ2: Measures to address demand for housing](#)

⁵⁰ [The Conversation, Just building more homes won’t fix the housing crisis – here’s why](#)

⁵¹ [NLB eResources, Land Acquisition Act is enforced – Singapore History](#)

⁵² [AUMA, Redeveloping Brownfields](#)

⁵³ [Development Bureau, Urban Renewal Strategy](#)

⁵⁴ [McKinsey & Company, Tackling the world’s affordable housing challenge](#)

⁵⁵ [Global Institute For Tomorrow, Finding sufficient land won’t solve Hong Kong’s housing crisis on its own, and it may not even be the most pressing issue](#)