



香港城市設計學會  
Hong Kong Institute of Urban Design

Reference Number: PAC/25/011

14 April 2025

By email: tpbpd@pland.gov.hk

Town Planning Board Secretariat  
15/F, North Point Government Offices  
333 Java Road, North Point, Hong Kong

**Subject: Objection to Amendments in Tseung Kwan O Outline Zoning Plan (OZP) – Areas 132 and 137**

Dear Sir / Madam,

On behalf of Hong Kong Institute of Urban Design (HKIUD), I write to formally submit our objection to the recent amendments made to the Tseung Kwan O Outline Zoning Plan (OZP), announced by the Town Planning Board on February 14, 2025. This objection is submitted in addition to our previous letter dated February 11, 2025 to Environmental Protection Department (copy attached), in which we raised significant concerns regarding the development of Area 132.

This development sits at the East entrance to Victoria Harbour. For all Cruise ship passengers arriving in Hong Kong and departing, Lei Yue Mun and Pak Sha Wan Shores are the gateway to their arrival in Victoria Harbour, the east entrance to the Harbour Metropolis, the natural equivalent of the beautiful arrival on the designed west side of the Victoria Harbour with ICC and IFC landmarks. What would the tourists think of this new industrial complex, which is hardly a welcoming sight and a poor reflection of Hong Kong's image as a harbour renowned for its natural and designed beauty? The scale and industrial nature of the proposed facilities don't belong here. We suggest relocating most of the facilities within a cavern with a marine frontage in the form of a pier that does not obviate the natural East entrance of Victoria Harbour.

We note that the current amendments, particularly the proposed reclamation and rezoning in Areas 132 and 137, have not adequately addressed the above core issues raised in our earlier objection. These ongoing concerns warrant further attention, and we urge the Town Planning Board to reconsider the proposed changes.

We also refer to the following key documents:

1. **Annex B of ACE Paper 5/2025:** This contains the draft minutes of the EIA Subcommittee meeting held on March 17, 2025. The meeting raised concerns about shoreline reclamation and marine habitat disruption from the development in Tseung Kwan O Area 137, which may also affect Area 132.

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2. **ACE Paper 5/2025 (For advice on April 7, 2025):** This report from the 160th Environmental Impact Assessment Subcommittee meeting emphasized the need for a comprehensive review of the development's impact on both Areas 137 and 132, particularly regarding shoreline destruction and marine life.

**Key Concerns from Our Initial Objection and Relevant EIA Responses:**

**1. Destruction of Natural Shoreline**

- *Our Concern:* The proposed reclamation of the coastline in TKO 132 could harm a natural environment of significant value, especially due to its proximity to Victoria Harbour.
- *EIA Response:* The EIA acknowledges the environmental impact but proposes mitigation measures, such as marine transportation to reduce congestion. However, it does not directly address the destruction of the shoreline.

**2. Missed Opportunity for Urban Design**

- *Our Concern:* The development focuses too much on infrastructure and not enough on creating spaces that connect people to nature, particularly along the waterfront.
- *EIA Response:* The EIA mentions plans for a waterfront promenade and cycling tracks, but there is no strong emphasis on human-centred urban design or making the waterfront more accessible and engaging.

**3. Incompatibility with Surrounding Areas**

- *Our Concern:* The scale and industrial nature of the facilities in TKO 132 are incompatible with the surrounding recreational spaces and the view of Victoria Harbour's eastern entrance.
- *EIA Response:* The EIA acknowledges the visual impact on nearby landmarks but does not suggest changes to the scale of development or the relocation of industrial facilities to reduce this impact.

**4. Damage to Hong Kong's Iconic Landscape**

- *Our Concern:* The development could disrupt Hong Kong's iconic landscape, particularly at the eastern entrance to Victoria Harbour.
- *EIA Response:* The EIA recognizes the visual disruptions caused by the development, but it does not fully address the significance of the impact on Victoria Harbour's landscape or propose a more visionary approach to its preservation.

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## 5. Suggestions for Relocation and Cavern Development

- *Our Concern:* We suggest relocating the facilities to caverns with marine frontage to protect the natural shoreline and avoid blocking the entrance to Victoria Harbour.
- *EIA Response:* The report does not consider cavern development but mentions low-carbon construction methods as a potential alternative innovation.

### Conclusion:

While the EIA report acknowledges certain environmental concerns, such as dust control and visual impacts, it does not adequately address the core issues we raised regarding the destruction of the natural shoreline, the scale of industrial development, and the need for a more thoughtful and integrated approach to the waterfront. The suggestion of cavern development to preserve the shoreline is not considered, and the visual impact on Victoria Harbour remains largely unaddressed.

We urge the Town Planning Board to carefully review and reconsider the proposed amendments to the zoning plan. A more comprehensive and sustainable approach is essential to protect the environment and ensure the development enhances the community while preserving the area's natural beauty.

Yours sincerely,

Benny Chan Chak Bun  
President of HKIUD

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