



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

Reference Number: PAC/23/005

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By email: [harbouroffice@devb.gov.hk](mailto:harbouroffice@devb.gov.hk)

Development Bureau, Planning and Lands Branch

Planning Division, Harbour Office

Room 1106-07, 11/F, Wing On Kowloon Centre,

345 Nathan Road, Kowloon

Dear Ms. Leonie LEE, Comr for Harbourfront

Re: HKIUD's comments on "Proposed amendments to the Protection of the Harbour Ordinance"

On behalf of the Hong Kong Institute of Urban Design, we would like to submit the attached file for your consideration our comments on "Proposed amendments to the Protection of the Harbour Ordinance".

We are also pleased to meet relevant officers to further explain the contents therein if necessary.

Should further information be required, please kindly contact me or Ms. Cherry Lau, our Senior Administrative Officer at 2235 9057.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Cheung', is written over a horizontal line.

(Anthony CHEUNG )  
Chairman, Public Affairs Committee, HKIUD

Hong Kong Institute of Urban Design Limited

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**1) Victoria Harbour is a very important asset of Hong Kong**

The passage of the Protection of Harbour Ordinance in 1997 has saved our harbour from becoming a ditch left over from the government's massive reclamation plans at the time. HKIUD supports that there should be no large scale reclamation within Victoria Harbour.

However, the PHO as drafted was too simplistic and a complete "presumption of no reclamation" has rendered improvements of the harbourfront very difficult.

**2) To make Victoria Harbour more vibrant and enjoyable, moderate relaxation of PHO is imminent**

Victoria Harbour is for Hong Kong residents; for our residents to truly enjoy the benefits of Victoria Harbour, its waterfront must be very accessible, both from the hinterland and the water, and pleasant. Therefore, HKIUD agreed in principle with the amending of HPO to properly address and provide a mechanism for reclamation approval and allowing smaller scale and temporary reclamations to be exempted from the ordinance.

**3) Comments on the Legco Discussion Paper of 23.3.2023**

a) A credible public body as one of the deliberators of major reclamation projects

Reclamation projects are usually initiated by the government. It is not particularly favourable for CE as the only deliberator for the government's own reclamation initiatives. It may be more appropriate for a credible body with members of relevant expertise, like the Town Planning Board or the Harbourfront Commission, to become one of the deliberators.

b) Standardisation of the content for Cogent and Convincing Materials (CCM)

In order to improve the certainty of the approval process and reduce the waste of public funds, the content of CCM shall be clearly defined. The content of these requirements shall also be put forward for further public consultation.

c) Small-scale reclamation should be approved by a body with public participation

The government is proposing that Financial Secretary or above can approve exemption from PHO for those small-scale reclamations. Since the government themselves are the usual project proponents, we believe that any of these exemption requests should be reviewed and approved by a credible body with public participation instead. Proponents of these projects are also required to submit certain required assessment reports (e.g. EIAs, visual impact assessments, etc.) for exemption consideration.

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- d) There shall be a mechanism to avoid excessive and cumulative small scale Harbour improvement works.
- e) The list of "Exemption Items" may include the following:
  - Bridges for pedestrian and/or eco-friendly transportation;
  - Floating venues for food & beverage, public performance or leisure activities.

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