



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

Reference Number: PAC/25/001

11 Feb 2025

By email: [eiaocomment@epd.gov.hk](mailto:eiaocomment@epd.gov.hk)

The EIA Ordinance Register Office  
Environmental Protection Department  
27th floor, Southorn Centre,  
130 Hennessy Road,  
Wanchai, Hong Kong

**Subject: Objection to Tseung Kwan O Area 132 Development**

Dear Sir,

On behalf of the Hong Kong Institute of Urban Design, we express our deep concern regarding the development proposal for Tseung Kwan O Area 132, as detailed in the Environmental Impact Assessment (EIA) Report. While Area 137 is also part of the plan, we are particularly concerned about what is proposed for Area 132.

**Why This Matters**

Since March 2023, there has been growing concerns on the impact of this project. Many stake-holders and concern groups have spoken out, warning that the environmental and geological value of the natural coastline in Area 132 must be preserved for future generations. In our collective view, the shoreline in this prominent location close to the Victoria Harbour and TKO has significant value in terms urban design, and must be sensitively respected and preserved in the process of urban development.

The proposed reclamation threatens this priceless resource, and the shoreline's loss would be permanent and irreversible, and therefore Government should assess the environment impacts prudently.

**Key Concerns**

**1. Destruction of a Priceless Natural Shoreline**

- The proposal for Area 132 involves reclaiming the coastline, which would damage an unspoiled natural environment. Other environmental groups have argued that this cannot be justified. Government should consider their views with an open mind.
- 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.

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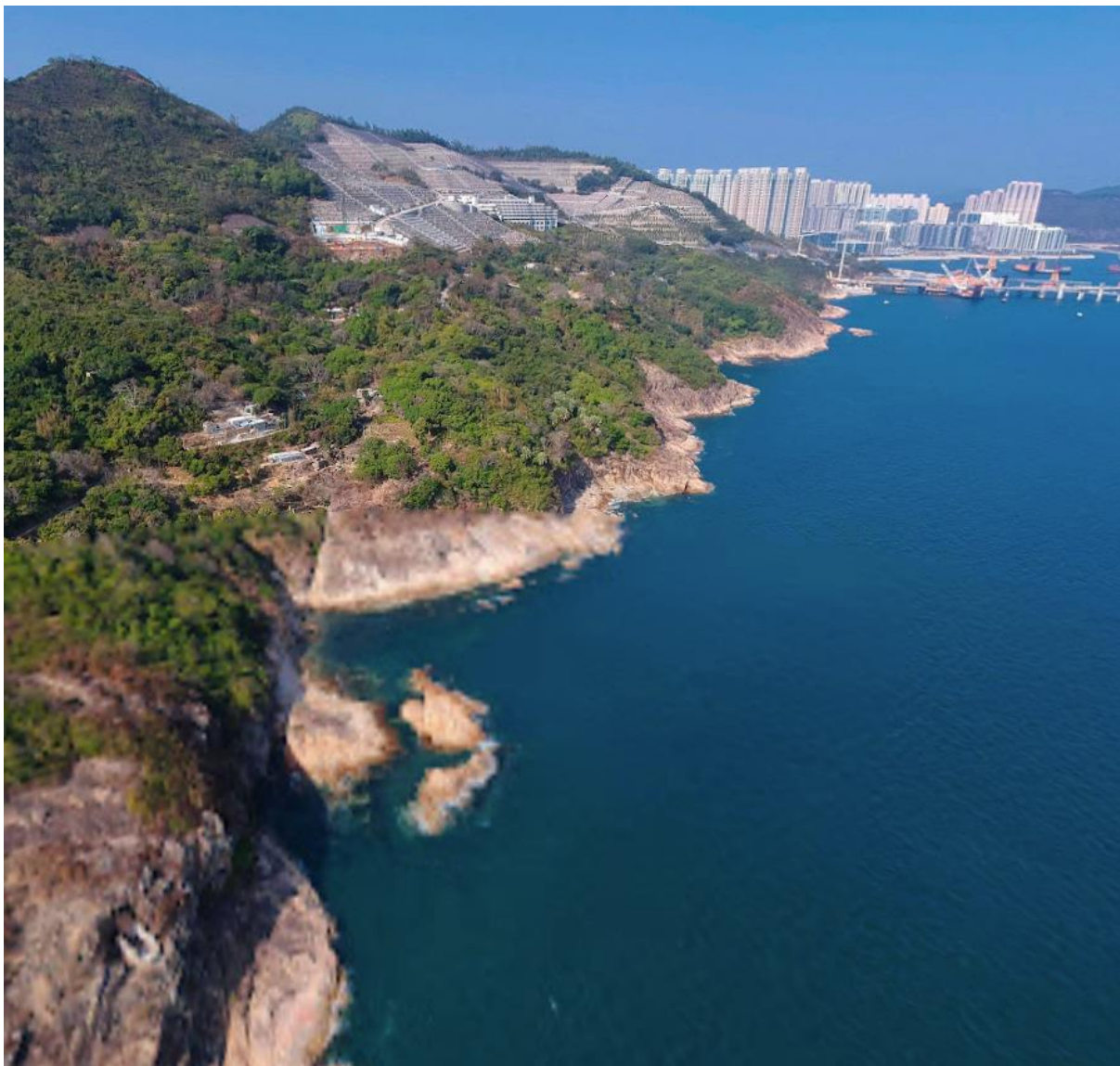
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## 2. Missed Opportunity for Urban Design

- The current plan seems to focus purely on infrastructure—waste facilities, refuse stations—without any thought given to the people who will live and work nearby. Area 132 should be a place that connects with the waterfront and contributes to a sustainable future. It should be human and nature-centred.



Victoria Harbour East entrance, its last remaining natural shoreline.

## 3. Incompatibility with Surrounding Areas

- Recreational spaces surround area 132. The scale and industrial nature of the proposed facilities don't belong here. In addition, this development sits at the

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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?



Arriving at Hong Kong Victoria Harbour, East entrance.

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- The proposed reclamation 132 and its complex will also be an eyesore for all visitors to Junk Bay Chinese Permanent Cemetery and its columbarium, which currently enjoys an unadulterated view of the shore and the sea. We think showing such a lack of regard to ancestors' ritual visits is a disgrace.
- To the many Devils Peak and Lei Yue Mun Point visitors, the shore is a sightseeing attraction with many photos posted on social media.

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

- The EIA Report rightly admits that the visual disruption to surrounding natural landmarks—like the ridgelines of Chiu Keng Wan Shan and Tin Ha Shan—will be substantial.
- We disagree with the EIA's attempt to compare this development to other urbanized surrounding areas. Area 132, as the East gateway to Victoria Harbour, is unique and irreplaceable, and it cannot be treated like just another industrial plot.
- To call this area “relatively obscure” (LC Paper No. CB(1)44/2023(05)) shows a complete lack of understanding of the potential of this area as the East gateway to Victoria Harbour. Area 132 adverse development would pre-empt and obviate such potential and need to be rethought. The 2030+ policy calls the Harbourfront “the foremost natural asset of our city.” The Victoria Harbour east entrance's natural shoreline deserves to “adopt a vision-driven and forward-looking approach.” It should not just be an ad hoc, thoughtless fix for developing area 137 and locating facilities needed for Hong Kong East.

#### **What We Recommend**

- We strongly urge the government to preserve the natural shoreline of Area 132 as a natural enhancing asset to the value of the Victoria Harbour east entrance.

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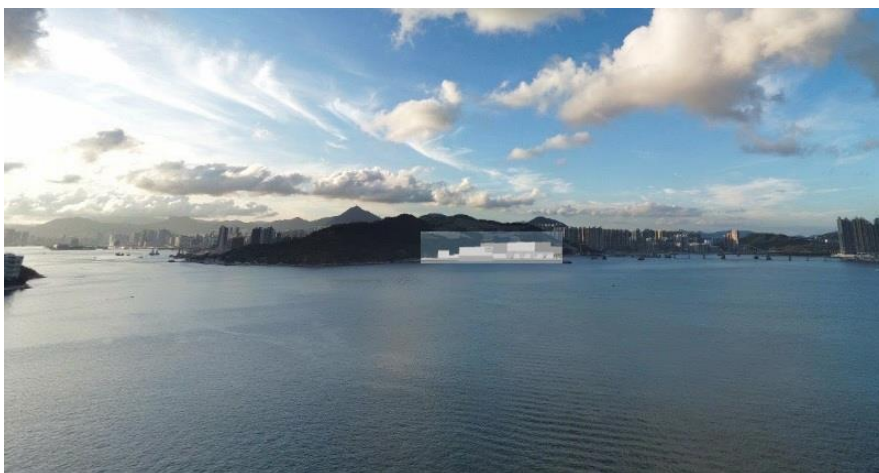
- We suggest relocating most of the facilities within the cavern with marine frontage elsewhere that does not obviate the east entrance of Victoria Harbour. Provision of utility facilities inside cavern is a mature technology worldwide, and has been promulgated vide Development Bureau Technical Circular (Works) No. 2/2024 after a study on the long-term strategy for cavern development. A strategic cavern area close to site 132 has been identified by Government, which might be suitable for relocation of those planned facilities in Area 132.
- We call for a rethinking of the location of these facilities to prevent further damage to the iconic Victoria Harbour, the city's visual identity and the foremost asset of the city.

We urge the government to review if there is an absolute need to locate the proposed facilities within Area 132 and if there can be other alternative locations.

We trust that you will consider these points carefully before moving forward. We appreciate your attention to this matter.

A handwritten signature in black ink that reads 'Benny Chan'. The signature is written in a cursive, flowing style.

Sincerely,  
Mr. Benny Chan  
President  
Hong Kong Institute of Urban Design



CC: Development Bureau, Culture, Sports and Tourism Bureau, Civil Engineering and Development Department, Planning Department, Tourism Commission, Tourism Board, Town Planning Board, Association for Geoconservation, Hong Kong

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