



# 香港地產建設商會

## THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

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29 April 2017

Planning Department  
16/F North Point Government Offices  
333 Java Road  
North Point  
Hong Kong

Dear Sirs

**Public Engagement on  
“Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030”**

We are pleased to enclose a HK2030+ View Collection Form completed with our comments together with an Executive Summary.

Our comments are based on the broad interests of Hong Kong, and the interests of achieving an efficient and sustainable urban development system. They relate to general matters and principles which we consider to be important in achieving a high quality liveable and economically vibrant city. Specifically, we would like to highlight the following two issues:

Flexibility to achieve a great city

In many previous submissions we have urged the Government to remove unnecessary restrictions on urban development to allow flexibility to cater for economic and social changes, and to provide innovative responses. The following are necessary to achieve the HK2030+ objectives:

Hong Kong should continue to showcase the way how a high density, liveable and sustainable “World City” can be achieved. Development densities should be optimised with the removal of unnecessary and subjective restrictions, as land is in short supply. Only proposals that will enable the best and optimal use of our scarce land resources can justify the large public costs, disruption to existing communities, and extensive infrastructure provision in the creation of the potential development areas.



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Transport and infrastructure limitations should never be used as reasons to cap development intensity. Instead, technical solutions and improvement measures should be explored and identified at the outset of the conceptual spatial framework so as to enhance development potentials. Good urban design at the skyline and pedestrian level can also complement vertical intensification.

It is necessarily to instil greater flexibility in the development process, from planning, buildings to land administrative, in order to stimulate innovative solutions in the urban complexity of Hong Kong. Development controls such as building height restrictions, the Hong Kong Planning Standards and Guidelines, the Sustainable Building Design Guidelines, and economic sub-sector zonings in the potential development area are all found to be overly restrictive. They will create unintended constraints and prevent other desirable outcomes for the amenity of the city.

The long established approach is that most things should be permitted as of right, and this philosophy should be retained. Only in cases of significant potential problems of incompatibility should applications be required.

### Implementation involving the private sector

The Court of Final Appeal has recently upheld the need to balance the imposition of controls for public benefit with the respect for private property rights. The HK2030+ mechanism need to be weighed in relation to the effect on private land so as to avoid disproportionate and excessive burden on private property rights. For instance, the Enhanced Conventional New Town Approach being adopted in the NENT NDAs could be further enhanced as means of achieving the HK2030+ objectives.

Further, a stronger role should be played by the private sector. Their resources, experience and expertise should be capitalised to provide better and more diversified products in the market in a speedier and more efficient manner. Public-private partnership will facilitate timely implementation of infrastructure and housing supply with equally significant contributions.



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### Conclusion

In conclusion, the implementation of the Hong Kong 2030+ vision should continue to adopt the established strength of Hong Kong, giving confidence to the long term investment in achieving a high quality city. Partnerships can help improve timely delivery to realise the vision, and ease broad goals into actionable undertakings. We applaud the Hong Kong 2030+ vision in tackling the challenges arising from the past successes, and capitalising on the competitive advantage of Hong Kong. However, mechanisms need to be in place to ensure that it can be achieved in an efficient and effective way.

Yours sincerely

Louis Loong  
Secretary General