"Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030" - Submission by The Real Estate Developers Association of Hong Kong

Executive Summary

Support for the strategic planning framework

We support the approach to HK2030+, consisting of the three high level building blocks for liveability, economic opportunities and environmental considerations, and giving consideration to:

- i. Guide land reserve for housing, employment and community facilities and other special needs for long term growth, and at the same time instilled with flexibility for ongoing review.
- ii. Capitalise on the opportunities in the regional context, where Northern Economic Belt, Eastern Knowledge and Technology Corridor and Western Economic Corridor form closer linkage with Mainland.
- iii. The preservation and conservation of valuable ecological resources.
- iv. Green, smart, resilient initiatives, including Transport Orientated Development while locating jobs and recreational opportunities closer to home.

Flexibility to achieve a great city

We reiterate the need for HK2030+ to adopt a broad brush approach, to open up new and feasible land supply sources, to instil greater responsiveness in the planning system to the changing economic and industrial needs and aspiration, and to promote practical sustainability.

With regards to the anticipated demand for all types of land-use space in meeting the HK2030+ objectives, releasing the existing Green Belt sites deemed suitable for development will enable more substantial forms of development. Broadening the existing development permissibility at brownfield sites will encourage their removal and redevelopment for higher and better uses. In particular, the specific economic sub-zones in NTN potential development areas should be general irrespective of the types of land uses and employment opportunities.

It is important to upscale and optimise all land use development intensity. This will compensate for the inevitable social and financial costs in attaining such land resources in the first place, and postpone future search for land. Transport and infrastructure are engineering matters resolvable with dedicated investment of time and financial resources, and therefore should never be turned into reasons to cap development. The maximum domestic plot ratio under the Hong Kong Planning Standards and Guidelines (HKPSG) should be consistently applied, whilst the differentiation between urban areas and new towns can be omitted and both designed to higher intensity. High density

mixed use development should also be consistently encouraged within the 500 meters radius of mass public transport hubs in order to fully achieve the Transit-Oriented Development objective. Specifically, corresponding building height restrictions and floor-to-floor heights to the permissible GFA will promote Prime Office Premises and ancillary MICE.

For practical sustainability, housing supply can intersperse with economic activities. Carparking provisions under the HKPSG can be adapted to the divergent needs of specific development mix in individual districts. Pedestrian linkages provisions through footbridges and subways to mass transit nodes can be emphasised.

Liveability requires a refocus on the quality of public spaces and community facilities rather than mere quantity. This can be achieved through an overhaul of the Sustainable Building Design Guideline (SBDG), building height restriction, and built form controls. This can also be supplemented by private sector filling in the fine grain detail design in the overall development context.

Implementation

We propose a higher priority be accorded to the more readily available land in NTN rather than to await the strategically planned reclamation of the costly ELM/CBD3.

A central committee should be established to drive departmental priorities and resources for a focused and fast tracked implementation of NTN. The central committee will review and revise HKPSG, SBDG and practice notes based on the recommendations of HK2030+. This will simplify and streamline planning, buildings and lands applications. The Central Committee will also monitor development progress and resolve conflicting views amongst Government departments. Further, there should be regular dialogue with the development industry.

In order to address the almost standstill lease modification and land exchange mechanism which has significantly stifled supply from this very important land supply source in recent years, the Government should allocate more resources to improve the processing of applications. The Enhanced Conventional New Town Approach being adopted in the NTN needs to be enhanced to allow greater flexibility, and applications should be evaluated with a more practical and pragmatic attitude. Participation of private owners and developers from a wider spectrum of market size should be encouraged. All these initiatives will ensure timely implementation of planning sites with a greater variety of products to cater for different market demands.

Infrastructure

It is fundamental for land reserve to be supported by infrastructure provisions which has a concrete plan and timeframe for implementation in advance of population intake as well as a sufficient capacity as buffer for density increase. It is unacceptable for the potential of any valuable land reserves to be constrained by the lack of adequate infrastructure capacities.

To fully capitalise on the NTN as the frontier for cross border interaction, the region should be equipped with suitable and adequate infrastructure facilities for cross border visitors. The enhanced infrastructure facilities will also allow stronger land use functions and higher population capacity to create more development opportunities and housing supply in this area.

Transportation infrastructure is as important as adequate land supply which will complement each other to ensure the sustainable development of Hong Kong. The transport principles in New Development Areas have relied on the schematics of backbone railway alignment, intermediate stations, supplementary multi-model infill feeder connection, and Environmentally Friendly Linkage System. They should be studied with the view of formulating a concrete plan and timeframe for implementation at the outset of the strategic planning stage and be followed through vigilantly. The NOL should be implemented as soon as possible together with the intermediate rail stations at Ngau Tau Mei and San Tin. Transport corridor should be improved for the developments along Man Kam To Road between Lo Wu and Man Kam To Border Control Point with future Lin Tong/Heung Yuen Wai, Lin Ma Hang Road and Lo Wu.

Public-Private Partnership

The success of the HK2030+ planning visions hinges not only on the Government's commitment but also the greater participation of the private sector, which can be encouraged by according it with a more proactive role in the planning stage, by facilitating their participation through a streamlined application process, by respecting the property right of private land while releasing their development potentials. While Government should focus on providing public housing and infrastructures, the private sector can contribute in providing housing supply in the private market. This complementary partnership will ensure a market with diversified products to satisfy various demands and a harmonious integration of public-private spaces and community facilities. Moreover, infrastructural facilities associated with private developments can be entrusted to developers for timely implementation. An open mind, a pragmatic attitude and a facilitative approach by the Government departments will enable timely and quality provisions by the private sector, creating the greatest possible interests to the community.

The Real Estate Developers Association of Hong Kong April 2017