

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

**View Collection Form -
The Real Estate Developers Association of Hong Kong**

<p>BUILDING BLOCK 1 PLANNING FOR A LIVEABLE HIGH-DENSITY CITY</p>
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Q1 How would you rate the liveability of Hong Kong?

Good.

However, in most cases, the currently restrictive Outline Zoning Plans with micro-planning restrictions have affected better design. The liveability of the high density character of Hong Kong could be enhanced by good urban design, such as:

- i. More flexible Building Design Guidelines which will not rigidly control façade length, building separations and podium bulk.
- ii. Vertical intensification by relaxing building height correspondingly will improve air ventilation, create open spaces to enhance pedestrian experience at street level and facilitate urban-rural-nature integration.
- iii. Flexible built form controls with priority given to facilitating visually interesting built environment and skyline rather than imposing rigid stipulations, and allowing deviation from norms, such as punching through ridgelines at certain locations, if justified with good reasons, and achieving best utilization of development potential.

Those space left between buildings and roads can, with good urban designs, also contribute to creating livable extensions to private premises. The point is to capitalise on the readily available shared space with opportunities for social interaction, while instilling organic improvised bottom-up use by not overly regulating such activities. For instance:

- i. Seating and weather protection to retain passers-by and enliven the space, rather than for mere thoroughfare. This is in line with the rationale behind the creation of plazas and green spines in the recent New Development Areas, with the view of promoting foot traffic and vibrancy, rather than merely meeting open space requirement.
- ii. Alfresco dining at restaurants.
- iii. Seating and trampling on lawn to extend the usable and enjoyable open space.

- iv. Access and activities at podium roof/roof top of public premises, including housing estates and G/IC facilities.

Q2 In overall terms, how much do you agree with Building Block 1: Planning for a Liveable High-density City? It means to plan for a city with the following eight attributes: compact; integrated; unique, diverse, and vibrant; healthy; leveraged green and blue assets; enhanced public space and public facilities; rejuvenated urban fabric; and inclusive and supportive.

Agree.

These attributes are all basic and fundamental, but the challenges ahead are the competition for limited assets, space and facilities available, and the suitable preservation of established artefacts and fabric treasured by the public by adopting a sensitive approach in renewal or redevelopment.

It is considered that a central committee should be established to coordinate and fast track the implementation of HK2030+. It is important for HK2030+ to motivate relevant government bureaux and departments into actions with the right priority and resources, to encourage concerted effort for a synergised outcome. The central committee, government bureaux and departments may each need to promulgate respective practice notes based on the recommendations of HK2030+. Relevant guidelines such as Hong Kong Planning Standards and Guidelines (HKPSG) and Sustainable Building Design Guidelines (SBDG) should be reviewed and revised to reflect the latest aspirations. These are further discussed in Q12, Q13 and Q15.

Q3 Please rate the importance of providing more land for public spaces and community facilities.

Important.

Emphasis should be on quality public spaces and community facilities rather than mere quantity, such as the landscaping details and user friendliness discussed in urban design and operations in Q1, so that the available public spaces and community facilities are put to good use by serving their intended purpose and not left vacant.

G/IC zoning generally allows the market to decide the type of facilities, ranging from residential institutions, schools for children, to social welfare facilities for elderly.

Public-private partnership should be promoted to bring about a harmonious integration of public spaces and community facilities, residential care homes for

elderly, and private land and private developments into a whole. Private sector resources should be utilised through innovative planning and lands administrative means to enable timely and quality provisions, for example by entrusting them to private landowners as part of their developments. This is further discussed in Q15. Detailed design should be left to the private sector in order to achieve a more harmonious design and integration with the overall development context.

Q4 Please rate the importance of adopting universal design in residential flats in an aging and inclusive society.

Important. The current building code has allowed for safe and independent accessibility for the elderly. The private sector has provided the widest choice to the community.

Q5 Please rate the importance of stepping up the Government's urban regeneration efforts and policies to address the large bulk of aging building stock in addition to the continual reliance on private initiatives.

Very important.

In stepping up its urban regeneration efforts Government should accord the private sector with a stronger role by facilitating their participation and respecting private ownership right. At the same time, there should be measures to facilitate early renewal and redevelopment. The current requirement of 100% ownership proof for building plan submission should be relaxed to facilitate early redevelopment of dilapidated buildings. The Government should set up a high level committee to address the problem of aging building stock and unlock the development potential of under-utilised sites with provision of necessary infrastructure. Transfer of plot ratio to encourage redevelopment should be supported.

<p>BUILDING BLOCK 2 EMBRACING NEW ECONOMIC CHALLENGES AND OPPORTUNITIES</p>

Q6 In overall terms, how much do you agree with Building Block 2: Embracing new economic challenges and opportunities? It means to plan for adequate land for addressing existing shortfalls and future demand of economic land; to promote a diversity of economic sectors and quality jobs of a range of skills; to foster innovation and technology; to nurture/retain/attract human capital; and to provide adequate supporting infrastructure.

Strongly Agree.

The Government has been working hard in the past few years to increase land supply in the short, medium and long term through changing land uses, increasing development intensity and proposing various new development areas. However, it is noted that a high level committee is lacking to steer the implementation of the various initiatives. While some potential development sites have been zoned residential use, the lease modification and land exchange process has virtually come to halt in recent years, thus affecting housing supply from this important source. The Government should direct more resources to facilitate the processing of lease modification and land exchange by a dedicated team.

With regards to HK2030+ promotion of cross border interaction to capitalise on the region, the frontier along the border should be equipped with suitable and adequate infrastructure facilities for cross border visitors. Considerations include:

- i. The economic uses at New Territories North will attract foreign companies and foreign employees. It is unclear if this incoming population and their housing needs have been accounted for in the population projections. New Territories North should be planned with stronger land use functions and with higher population capacity, hence more housing opportunities than currently envisaged under the 2030+ plan in order to sustain the regional competitiveness.
- ii Land use should be flexible enough to allow provision of facilities in response to market demand, such as shopping mall differentiated from the traditional retail shops.
- iii Planning for transport connection 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.
- iv Even at the small scale conceptual spatial framework, the commercial, residential and greenery land use mix around San Tin and Lok Ma Chau Development Nodes appear to be at random and scattered at fragmented locally unwanted land use.

It is noted that some housing developments have been affected due to the lack of adequate supporting infrastructure. The Government should enhance the timely provision of such infrastructure with a view to facilitating early population intake.

Large scale resumption of private land in the New Territories has proved to be costly, ineffective, time consuming and socially/politically disturbing. Yet brownfield sites under private ownership should be considered for housing development subject to suitable private arrangements with the occupiers. Adopting the multi-pronged approach, reclamation in less environmental and biodiversity area should be considered a better option in providing long term land supply reserve to meet the demand.

Q7 Please rate the importance of providing more of the following types of land / premises to enhance the long-term economic competitiveness of Hong Kong.

Prime office premises (e.g. Grade A Offices), General business premises (e.g. non Grade-A offices), Land for the innovation and technology industry, (e.g. science park and industrial estate), Co-working spaces for start-ups, Land for special industries, Modern logistics centres, Data centres, Workspaces for creative industry, Facilities for Meetings, Incentive travel, Conventions and Exhibitions (MICE), Facilities for alternative tourism, (e.g. ecotourism, cultural tourism, heritage tourism, sports tourism)

All being important.

The conceptual spatial framework identifies localities for specific subsector of economic activities, including Science Park/ Industrial Estate, New Industrial Productions, Enterprise Park, Logistics, Tourism/ Leisure. The specific sub-zones are overly deterministic regarding the types of land uses and employment opportunities. They unnecessarily restrict and interfere with market mechanism. Instead, a broader zoning such as “Other Specified Uses (Business)” should be applied where a wide range of economic activities are always permitted. This is to instill responsiveness to changing economic and industrial needs and aspirations, by transferring land and GFA amongst the scientific research and new industrial use. The green industries and the advancing environmental mitigations technology together with good urban design will unlikely have interface problems amongst the various economic activities in the same zone.

Further, the demand for land for scientific research and new industrial use is questioned. There is land already reserved for similar uses in Kwu Tung North and Fanling North New Development Areas (22 hectares), Hung Shui Kiu New Development Area (83 hectare) and Lok Ma Chau Loop area (87 hectares). These are yet to be realised and their success is yet to be gauged, in the medium to long term. Furthermore, the recent rezoning of the Science and Technology Park site to residential development in Pak Shek Kok and the industrial use to public housing in Fanling raises doubt on the need for expansion in this economic sector.

The following general economic uses should also be reconsidered:

- i. Rationalising brownfield use in multi storey development may not be functional, economical or convenient in serving the specialised logistics needs.
- ii. Hong Kong should continue to supply Prime Office Premises. Prime Office Premises and ancillary MICE, while preserving the permissible GFA, have been unnecessarily restricted by the building height restrictions. Their floor-

to-floor heights are also often challenged by the Buildings Authority. A review of commercial building height restriction and buildings regulations are necessary to keep in pace with international expectations.

BUILDING BLOCK 3 CREATING CAPACITY FOR SUSTAINABLE GROWTH
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Q8 In overall terms, how much do you agree with Building Block 3: Creating Capacity for Sustainable Growth? It means the adoption of a vision-driven capacity-creating approach to plan sufficient and timely development capacity to meet various social and economic needs, to provide manoeuvring spaces to improve quality of living, and to cater for unforeseeable opportunities and challenges, and at the same time to enhance the environmental capacity for the sustainable growth of Hong Kong

Strongly agree.

As per the comment on the attributes to Building Block 1 in Q2, a central committee should be established to coordinate and fast track implementation. HK2030+ should motivate relevant government bureaux and departments into actions with the right priority and resources, to encourage concerted effort for a synergised outcome. The central committee, government bureaux and departments may each need to promulgate respective practice notes based on the recommendations of HK2030+. HKPSG and SBDG should be reviewed and revised to reflect the latest aspirations.

Q9 Under the above vision-driven capacity-creating approach, how much do you agree with the creation of a reasonable land reserve such that unforeseeable land use needs could be responded to swiftly if required?

Strongly agree.

Land reserve should have timely plan for infrastructure provision, in advance of population intake, and with buffer for density increase, for both public and private developments. Situations such as when development of land is constrained by lack of government infrastructure capacities and innovative on-site provisions initiatives stifled should be avoided. There are existing land use zonings for comprehensive development and flats left vacant for over a decade, as a result of the apparent infrastructure constraints such as provision of sewerage and water supply which are resolvable engineering matters.

Reclamation, as one of the multi-pronged land supply approaches, could provide a sizeable land reserve to meet the long term supply of land for various purposes.

An overall review of Green Belt and their potential for rezoning is necessary, given the general presumption against development under the relevant Town Planning Board Guidelines. Under current practice, “Green Belt” use appears to be assigned to undevelopable slope, development of village house and infrastructure, or land swap in rezoning of adjacent land. Green Belt with valuable ecological resources should be preserved with certainty like Conservation Area. For those Green Belt sites deemed suitable for development, their new designation should not be confined to village house and infrastructure but more substantial forms of development as well. As such, a high priority is supported to review degraded areas and sites at fringe of built up area that are deserted with low conservation and public enjoyment value as mentioned in HK2030+.

Q10 Please rate the importance of enhancing the capacity of the following aspects
Land for meeting housing needs, Land for open space and government, institution and community (GIC) facilities to meet the needs and aspirations of the population, Land for meeting economic needs, Increasing supporting transport and other infrastructure capacity, Enhancing and regenerating environmental capacity, (i.e. biodiversity enhancement and environmental improvement)

All being important.

We support a conceptual spatial framework for guiding land reserve for mix of housing, employment and community facilities and other special land needs for ongoing growth. The framework should at the same time be instilled with flexibility for ongoing review for a dynamic land use mix.

Q11 Please rate the importance of the following land supply sources to provide more developable land.
Strategic growth area, (i.e. sizable, comprehensively planned new towns or districts)
Urban fringe, (i.e. greenfield sites with low ecological/buffering/recreation values at the edge of urban area and new towns, Infill of built-up area, (i.e. vacant or under-utilised land within built-up areas)

All being very important.

There is a general recognition and acknowledgement amongst the public of the optimisation of land supply resources for all types of use necessary to meet our long term growth. All land use development intensity should also be upscaled.

Specifically for residential land use, the HKPSG provides the maximum domestic plot ratio in the main urban areas and the New Towns, summarised in Table 1:

Table 1: HKPSG maximum domestic plot ratio

Density Zone	Area/ Location	Maximum Domestic Plot Ratio
R1	Existing Development Area in Hong Kong Island	8/ 9/ 10
R1	Existing Development Area in Kowloon and New Kowloon	7.5
R1	Existing Development Area in Tsuen Wan New Town (covers Tsuen Wan, Kwai Chung & Tsing Yi Island) and New Towns	8
R1	New Development Area and Comprehensive Development Area	6.5
R2	Urban area	6
R2	New Towns	5
R3	Urban area/ New Towns	3.6
R4	New Towns	0.8

Notes:

The Table only gives an indication of the maximum plot ratio which may be allowed for a particular area. However, where there are significant constraints on development capacity (such as transport or infrastructure limitations, environmental, topographical or geotechnical conditions, or heritage and nature conservation), other planning principles and urban design considerations (including local character and setting, building height profile and massing of the neighbourhood, air ventilation and visual impacts on the surroundings, protection of important physical features such as ridgelines), or special design considerations, a lower plot ratio may be specified when considered appropriate and possible.

In the making of Outline Zoning Plans and the considerations of Town Planning Board applications, constraints are often quoted as reasons for capping development intensity below the permissible maximum. The following should be considered:

- i. Government should commit to upgrade transport and infrastructure. Transport, infrastructure, topography and geotechnics are engineering issues which can be overcome with dedicated commitment of time and financial resources. And they should be properly addressed to compensate for the inevitable social and financial interference in attaining the land resources, and to postpone future search for land. As such, the saturated traffic

capacity at Tai Lam Tunnel and Tolo Highway raised in the conceptual spatial framework are not reasons for restricting development options at the proposed New Territories North.

- ii. Plot ratios are differentiated in urban areas and new towns, e.g. 8 and 6.5 for R1, and 6 and 5 for R2. The differentiation is considered to be unnecessary, urban areas and new towns should both be designed to the higher plot ratio. Overtime, the newly developed area regardless of whether New Development Areas and New Towns, would become established.
- iii. The artificial cap is underutilising the air space of land that is a waste of the scarce resources, with no real justifications. This is especially the case with the 1,200+ hectares shortfall estimated in the conceptual spatial framework. The current restricted development intensity is inadequate to provide for the ever increasing housing demand, as a result of the population increase and household size reduction, and the wish for larger unit size for living standard.
- iv. The maximum domestic plot ratio should be allowed in all development.

Q12 How much do you agree with the following means to reduce new requirement for transport infrastructure?

Boost the usage of public transport, Curb private car growth, Reduce private car use, Promote walking, Promote non-motorised modes of transport, More balanced spatial distribution of homes and jobs.

Partly agreed.

Transport oriented development in recent New Development Areas is limited to the form of higher density mixed use development immediately above or adjacent to MTR stations. Higher density mixed use development should be consistently encouraged within the 500 meters radius of mass public transport hubs in order to fully achieve the Transit-Oriented Development (TDD) objectives and sustainability principles.

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, together with park and ride facilities. However, there is an apparent shortcoming in political will, sense of urgency and resource priority to complete the transport network for Hong Kong, specifically:

- i. Some of the arterial roads, interchange and MTR stations in New Territories North are near or at their capacity.
- ii. MTR Northern Link alignment and Kwu Tung Station designation.
- iii. Intermediate station such as Ngau Tam Mei and San Tin.

- iv. Extension to serve Kwu Tung North, Fanling North and Ping Che.
- v. Connection to MTR East Rail and Lintang/ Heung Yuen Wai Border Control Point.
- vi. The Development Railway Strategy should include better network coverage.

The NOL railway currently under study in NTN should be implemented as soon as possible together with the intermediate rail stations at Ngau Tau Mei and San Tin in order to create faster housing land and to execute the TOD for sustainability.

Transportation, being under the purview of Transport and Housing Bureau, has been neglected by the devotion to housing supply in the past few years and need to be refocused. It is fundamental that mass public transportation be made available in line with development for population intake, it cannot wait for critical mass but to attract the critical mass for operations.

Traffic congestion would defeat economic growth which is an objective of HK2030+ and is an important issue to be addressed. Measures are also required for stopped cars. This includes suitable and adequate provision of on-street and off-street spaces for loading and unloading of goods and passengers, and parking. A review of the carparking provisions under the HKPSG, for both residential and non-residential uses, is needed to address the imbalanced demand and supply and the divergent needs of the specific development mix in individual districts. An approach of greater flexibility and variation rather than rigid requirement imposed by the Transport Department should be adopted.

With regard to the spatial distribution of homes and jobs, the designated economic activities are isolated from housing land within the respective potential development areas. Housing can be provided closer and interspersed amongst the designated economic activities. This is especially the case with the green economic use and the advancing environmental mitigations technologies so that interface problems are unlikely.

Similarly, the broad “Other Specified Uses (Mixed Use)” zone allowing market demand to decide between commercial and residential should be broadly applied. The public hygiene and fire safety issues can be suitably addressed by buildings regulations and there are no apparent interface issues, and is commensurating the vibrant character established and accepted in Hong Kong previously achieved under the “Commercial/ Residential” zone.

Pedestrian linkages through footbridges and subways to mass transit nodes should be encouraged. Nil premium to be payable to Government should be adopted by Government as a long term policy.

Q13 How much do you agree with the following focuses of the proposed smart, green and resilient (SGR) city strategy?

Minimise demand for and use of land resources, Promote low-carbon smart living, Promote low-carbon smart economy, Promote smart mobility, Promote integrated smart, green and resilient infrastructure

Agree.

Government should commit to lead SGR strategy, so that it does not become cliché. With regards to the green and resilience components the ecological footprint externalities of the local activities should also be taken into account.

There is an urgent need to overhaul SBDG in order to make them capable of facilitating a truly environmental friendly and sustainable built environment in Hong Kong's high density context. SBDG is long overdue for a review and improvements to make them more practical. Aspects demanding immediate attention include the provision of underground car parks which has resulted in less parking provisions, and given rise to various adverse environmental issues, such as the material created by excavation and the extra energy burden for ventilation and lighting.

CONCEPTUAL SPATIAL FRAMEWORK

Q14 How much do you agree with the following components of the conceptual spatial framework in meeting the future land, transport and environmental needs and demand?

Preserving conservation areas, One Metropolitan Business Core, (Comprising the traditional Central Business District (CBD) at and around Central, CBD2 at Kowloon East, and CBD3 at the East Lantau Metropolis), Two Strategic Growth Areas (East Lantau Metropolis, New Territories North), Three Axes (Western Economic Corridor, Eastern Knowledge and Technology Corridor, Northern Economic Belt), Transport Corridors (NWNT-Lantau-Metro Transport Corridor, North-south Transport Corridor between NENT and West Kowloon,)Extended North-south Transport Corridor from West Kowloon to East Lantau Metropolis

Agree.

We support the conceptual spatial framework for capitalising on the opportunities in the regional context, where the three axes are capable of extending to form closer linkage with Mainland.

However, there is the unbalanced distribution of employment and housing at the broader scale. There appears to be the focus on Science Park/ Industrial Estate, New Industrial Productions, Enterprise Park, Logistics, Tourism/ Leisure at the potential development areas, compared with the predominant residential buildings in the New Development Area and New Towns. It is considered that the economic activities and housing supply should be interspersed and traversing the area boundaries. The potential development area should be planned in consideration of the New Development Areas and New Towns, in support with each other and create synergy to contribute to the success of the city.

More importantly, the implementation strategy should accord development priority to the available land in the NT than to await for the strategically planned reclamation of the costly ELM/CBD3. Early development in NTN will provide greater certainty for new housing land, will boost existing communities capacity and capability, and will ensure a more efficient use of infrastructure and GIC provision. The Three Axes, capturing the regional economic dynamics in the NT and across the boundaries will, however, generate enormous traffic demands between New Territories East (NTE) and New Territories West (NTW). The “Ring” highway pattern i.e. Tuen Mun Highway, Yuen Long Highway and Tai Po Highway will be overloaded beyond 2030 and a new regional transport corridor whether road or rail will be needed connecting NTE & NTW somewhere between Tai Po and Kam Tin and/or Ngau Tam Mei as alternative movement link.

Q15 Please share with us any comments on the proposed territorial development strategy of Hong Kong 2030+. You are also welcome to submit separately.

Implementation involving the private sector

The conceptual spatial framework is just a framework without actual implementation to bring about the desired result. It needs to utilise private landowners’ resources effectively in developing new urban areas and new development areas. While Government focuses on providing infrastructure and public housing, it should also enable strengthened role by the private sector to supplement housing in the private market to supplement market demand and creating diverse housing types in the market. Private units for transactions allow individuals to accumulate family wealth. It helps meet public aspirations for home ownership and individual needs for social mobility, who are not eligible for public housing or who opt for better form of accommodation to move up the housing ladder. There should be better opportunities for timely and quality private provisions.

Central Committee

There are examples of approved Outline Zoning Plans still at the drawing board waiting for the provision of necessary infrastructure by relevant Government departments.

HK2030+, while having been carried out by Planning Department, is an important blueprint for the long term growth of Hong Kong, and should not be restricted to the Development Bureau and the Planning Department in its implementation. A high level central committee attended by senior officials from relevant Government departments should be re-established to drive its implementation for all development projects, in the following ways:

- i. Oversee and provide directive to the relevant Government bureaux and departments in their priorities and resources. They may each need to promulgate respective practice notes based on the recommendations of HK2030+.
- ii. Review HKPSG and SBDG to meet the latest aspirations, and determine their status as “guideline for good practice”. It is critical to instill government department’s discretion in decision making on case by case basis, so as not to stifle or sterilise use of land resources, and to encourage private initiatives and innovations.
- iii. Simplify and streamline planning, buildings and lands applications. Align key development parameters in consultation with the industry.
- iv. Monitor the progress of all lease modification/ land exchange applications, premium valuations and appeals, applications for the various approvals required under the lease, and applications for certificate of compliance.
- v. Resolve conflicting views amongst Government departments and provide solutions, directives and resources to the related Government departments.
- vi. Maintain regular dialogue with the development industry, for ways to enhance the efficiency and effectiveness of the development approval mechanism.
- vii. Allocate more resources to speed up the processing of lease modification and land exchange so as to increase housing supply.
- viii. Shorten processing time by streamlining and parallel processing of applications under various departments, and centralise application processing within a single department.
- ix. Remove arbitrary and unnecessary criteria to facilitate land conversion, e.g., flexible exchange of intervening Government land.

New Development Areas

While the Enhanced Conventional New Town Approach (ECNTA) has been applied in recent New Development Areas with a view to increasing housing supply, the process has been very slow in the past years. Suggestions for improvements of its application in future potential development areas include:

- i. No restriction of a required minimum site area for land exchange. This would encourage participation of private owners and developers from a wider spectrum of market size, and can help bring in developments of greater variety to suit different market segments. (Government land sale sites have no such requirement.)
- ii. Greater flexibility and pragmatic attitude in the consideration of site boundary, private land ownership pattern and intervening Government land plots. Land exchange application for a site straddling over two different planning zones should be allowed.
- iii. Reasonable and practicable target, not deadline, for land exchange application, set in relation to the approval of the first Outline Zoning Plan and the completion of infrastructural facilities, as the provision of infrastructure is out of the control of developers.
- iv. Strict conformity by Government departments to processing deadlines so as to facilitate quick implementation of developments.

In order to overcome the issue of timing-mismatch between Government's funding program and development progress, infrastructural facilities such as public road, footbridge, open space and underground utilities could be entrusted to concerned developers as part of the private developments.

**The Real Estate Developers Association of Hong Kong
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