



香港地產建設商會

THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

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Representation to Draft Kwu Tung North Outline Zoning Plan No.S/KTN/1

Representor: The Real Estate Developers Association of Hong Kong

1. Introduction

- 1.1 The Town Planning Board gazetted the Draft Kwu Tung North Outline Zoning Plan No.S/KTN/1 (the Draft Plan) on 20 December 2013.
- 1.2 The Representation to the Draft Plan is made by The Real Estate Developers Association of Hong Kong (REDA) in pursuant to Section 6 of the Town Planning Ordinance. It comments on some general planning principles adopted in the Draft Plan, proposes some amendments and comments on the implementation process.

2. The Representor

- 2.1 REDA participated in the public engagement exercises carried out during the Planning and Engineering Study for the North East New Territories New Development Areas Recommended Outline Development Plan (RODP), which includes Kwu Tung North. REDA has raised issues on some general planning principles adopted in the North East New Territories New Development Areas and their implementation, and made written submissions. Some of the issues have been addressed during the consultation process. Others remain to be addressed and have been carried through to the Draft Plan.
- 2.2 REDA wishes to reiterate the unresolved issues, and address additional matters that have arisen, with specific reference to the Draft Plan, and proposes amendments for the Town Planning Board's consideration.
- 2.3 This representation relates to general matters and principles that REDA considers to be important in achieving a high quality form of urban development in Kwu Tung North New Development Area (the NDA). The submission is made in the broad interests of Hong Kong as a whole, and in the interests of maintaining an efficient and sustainable urban development system.



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3. Representation

- 3.1 The Representation comments on some general planning principles adopted in the Draft Plan and its implementation.
- 3.2 This submission is made in the broad interests of Hong Kong as a whole, to maximise the use of the land resources available to help address the housing land shortage in Hong Kong.
- 3.3 Reference is made to the documents in the public engagement exercises of the Planning and Engineering Study for the North East New Territories New Development Areas, and the submissions made by REDA in response.

4. General Comments made during the NENT NDAs Public Engagement Process

- 4.1 During the public engagement process REDA raised some points of general application and these are re-stated here so as to provide a context for the points which follow:-
 - (a) Private land holdings should be respected in preparing the layout of the area. Much of the area is in private ownership and relating the planning zoning to the private land ownership pattern as far as possible would facilitate the development process, enabling housing to be provided more quickly;
 - (b) Land-use mix should facilitate choice by the public for housing. There should not be an over-dominant reservation of sites for public housing to avoid problems identified in Tin Shui Wai, to provide a more varied urban form and to maintain market prices for housing at a reasonable level;
 - (c) Opportunities for employment should be provided in parallel with population build up. However, the provision of employment should be largely market driven, and sites should not be reserved for specific uses to cater for economic growth but best be left to the market to determine in response to changes in the economy over time.



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- (d) Rail-based urban planning is supported as well as the use of other forms of environmentally-friendly modes of transport. However, they must be provided in a timely manner in sync with population build-up;
- (e) Preservation of natural and historical heritage is important in the planning of this area. However, it cannot be achieved by zoning alone and must be supported by adequate funding and effective management; and,
- (f) There is a concern over the implementation mechanism to be adopted, and this should be given due respect to the private land holdings. Coordination of planning proposals with consolidated land ownership will facilitate the implementation process through private sector participation.

5. The Nature of and Reasons for the Representation

The nature of and reasons for the Representation, including planning and implementation considerations, are set out below:

Support for the General Approach

- 5.1 REDA generally supports the approach to the comprehensive planning for the creation of a New Town at Kwu Tung North. In general, the proposals on the Draft Plan provide the basis for the development of a high quality environment for the future residents of Kwu Tung North with a good mix of land for housing, open space, employment and community facilities. Importantly, this comprehensive form of plan provides a good basis for the planning and implementation of various forms of public infrastructure. This must be coordinated with the increase of new residents moving to the area, and should not lag behind as happened before in other places.

Unreasonably Low Development Intensity

- 5.2 REDA considers that the development potential of the plan area should be optimised, given the overall shortage of development land in Hong Kong, the



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large public costs in providing infrastructure and the potential for achieving a high quality well planned urban environment.

- 5.3 More specifically, under the Draft Outline Zoning Plans for the Kwu Tung North and the Fanling North NDAs, only about 60,000 housing units in total (including both public and private housing) will be produced, which are not much more than the Long Term Housing Strategy's recently announced annual target of 47,000 flats. The creation of the New Towns at Kwu Tung North and Fanling North, incurring large public costs, disruption to existing communities and clearance of existing residents, and infrastructure provision, to provide just one year's targeted housing supply is not considered justified. Greater production of flats should be achieved. The proposed development intensity is inadequate to address its strategic context for providing housing land for Hong Kong in the medium to long term.

Unreasonably Low Plot Ratio

- 5.4 The Hong Kong Planning Standards and Guidelines (HKPSG) provides the following plot ratio for residential developments in new towns:

	Maximum domestic plot ratio
R1	8.0 (i) (iii)
R2	5.0
R3	3.0
R4 (iv)	0.4

General : 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, or environmental, topographical or geotechnical conditions), or special design considerations, a lower plot ratio may be specified when considered appropriate and possible.

- (i) Domestic PR8 should only be permitted where there are no infrastructure constraints, e.g. close to high capacity transport systems. Elsewhere, the plot ratio should be determined according to local circumstances.
- (iii) If there is non-domestic floor space, maximum domestic plot ratio will be



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reduced according to the provisions of the B(P)R composite building formula.

- (iv) Sites in New Towns should only be designated R4 if there are special justifications such as severe geotechnical or infrastructural constraints.

- 5.5 The Explanatory Statement to the Draft Plan identifies such constraints as potentially hazardous installation, Fanling Highway traffic noise, Firing Range noise, overhead power lines, water mains, Deep Bay catchment, ecological resources, recognised villages and permitted burial grounds in the Plan area. While these constraints may restrict development capacity in certain areas, govern land use distribution and require mitigation in design, they are not considered so grave as to prevent plot ratio provision to be set up to HKPSG. The permitted plot ratios at 0.4, 3.5 and 5 to 6 (including domestic and non-domestic floor areas) in the respective R(C), R(B) and R(A) residential zones are at 2.6, 1.5 and 2 to 3 plot ratio below the respective plot ratio for R3, R2 and R1 in the HKPSG, and are considered to be unreasonably low development intensities. There is also no justification provided as to why the HKPSG standards have not been applied.
- 5.6 In particular, the 0.4 plot ratio in the “R(C)” zone is not considered justified. It may be relatively small in area and located on the foothill, but there are no severe geotechnical or infrastructural constraints. Similarly, the 0.4 plot ratio in the “Comprehensive Development Area” for residential use with open space and supporting facilities is not optimising the land resources available. It is considered that there are no significant constraints on development capacity or special design considerations to justify the 0.4 plot ratio at these two areas of the Draft Plan.
- 5.7 Reference is made to the CEDD and the Planning Department’s response to the public comments in this regard in Stage Three Public Engagement Report in preparation of the RODP. The Departments have apparently reviewed and conducted detailed planning and technical assessment on infrastructure capacities, environmental constraints, urban design, and considered the development intensity has been maximised. However, it is considered that infrastructure capacities at the NDA could be technically improved accordingly, and is not shown to be a constraint. It is therefore considered that the intensity of development has not been optimised.



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- 5.8 The Stage Three Public Engagement Report makes reference to the earlier public comments which considered the density as too high. However, despite this, the Draft Plan shows a slight increase in density which should be further increased.
- 5.9 There is no reference to the HKPSG or the recent Policy Address 2013 and 2014 advocating for housing supply. While the proposed Kwu Tung North OZP is not the only solution to the housing supply shortage, it should nevertheless accommodate as much population growth as possible as it is not compromised by existing development constraints.
- 5.10 In summary, the generally unreasonably low plot ratios below the HKPSG is a misuse of the scarce land resources, given the difficulties in land assembly, and a lost opportunity to provide a significant contribution towards the long term solution to housing land supply.

Artificially Low Building Height Restrictions

- 5.11 The urban design concept in the HKPSG to step down building height from the centre to the surrounding medium to low rise development is appreciated. However, the step down towards the southern periphery is not considered justified. The 6 lanes wide Fanling Highway and Castle Peak Road are about 40 metres wide, effectively separating the low rise development across the road as two localities, such that it is not considered necessary to relate the building height profile to the southern interface. The building heights in the areas along this fringe could all be increased.
- 5.12 The two storey terraces on both sides of the Town Park are considered to relate to the human scale and adequately set back the high rises. However, the building height restrictions for the development behind are considered unnecessarily restrictive and should be increased. The building general level of building height restrictions at 75mPD to 135mPD are too low, given the relatively high formation levels of these areas
- 5.13 Increase in the permissible building heights is necessary. The maximum building height at 35 storeys is arbitrary. This is compared with the more common height of residential building about 40 storeys high in Hong Kong.



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The artificially low building height restriction also prevents good quality building design and is also affecting the overall development capacity. The building height restrictions therefore are a misuse of the scarce land resources and a lost opportunity to provide housing land and good quality development for Hong Kong.

Open Space Network and Non Building Areas

- 5.14 The large number of open spaces of substantial area scattered around the Draft Plan is an inefficient use of land. While they may add to the general quality and character of the area, they are largely undevelopable in term of providing opportunities for active and meaningful public recreational facilities. These include the open spaces through the town centre and open space spines at Planning Area 24 and 26 that do not contribute significantly to the townscape or to long distance views. These non-developable areas are not considered justified. There are also Non Building Areas (NBA) proposed inside development sites but fronting open space zones in Areas 23. These NBAs should be deleted as the open space zones should provide adequate space between buildings.

Inefficient layout

- 5.15 The Draft Plan is much traversed by roads, non-building areas and open spaces. Its morphology is considered to have a particularly high presence of non-developable land in relation to the development sites. Roads serving a small number of development sites and cul-de-sac are particularly inefficient use of the infrastructure.
- 5.16 In aggregate, the maximum plot ratio of 6, and the various urban design elements, including stepped building height and considerable amount of green space, NBAs and pedestrian environment is considered inadequate to address the strategic planning context for this area which is to provide housing land for Hong Kong in the medium to long term. The overall development density is therefore quite low, and high development on individual development sites is necessary.



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Low Commercial Plot Ratio

- 5.17 The commercial uses in the NDA are restricted to the lowest two floors of the “Residential (Group A1 and A2)” and “Other Specified Uses (Commercial/ Residential Development with Public Transport)” zone at plot ratio of 1 and 0.5 respectively, or in the “Residential (Group B and C)” zone on application to the Town Planning Board. These are considered inadequate to create vibrancy in the Town Centre. These restrictions are also inconsistent with the flexible mixed residential and commercial plot ratios provided in the Building (Planning) Regulations composite building formula. A greater degree of flexibility in design and in response to market forces should be provided. Commercial use should be allowed flexibly on three floors (including basements) with a maximum plot ratio of 2, if such restriction is imposed.
- 5.18 The “Other Specified Uses” zoning cluster towards the southeast NDA are conceptually linked to the future development of the Lok Ma Chau Loop and the proposed Development Corridor reserved for commercial, research, office and hotel. These are generally higher level commercial activities not supporting the day-to-day living of the local population or providing job opportunities for the local population. Commercial functions should primarily focus on the day-to-day commercial activities and cater for the job opportunities for the local population.
- 5.19 With regards to the commercial floor area at the centre around the transport node and towards the southeast at the “Other Specified Uses” zoning cluster, there should be provisions for covered walkways and linkages for convenient pedestrian access, to facilitate pedestrian traffic, street activities and to reduce vehicular traffic.

Planned Shopping Streets

- 5.20 The planned shopping streets are intended to be a part of a network of public open spaces to be designed, constructed, managed and maintained in a holistic manner. Consideration should be given to encourage a coherent integration at grade and at basement levels with adjoining private land development in the land grant.



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Overly specified commercial land uses

- 5.21 The commercial uses in the Draft Plan are under the “Other Specified Uses” and the following sub categories:-

Land use sub zonings under “Other Specified Uses”	Specific commercial provisions
“Commercial/ Residential Development with Public Transport Interchange”	Maximum 1 plot ratio on the lowest two floors of a building or in a free standing purpose designed building.
“Mixed Use”	Mix of commercial/office, hotel, residential uses and social welfare facilities. Maximum 3 plot ratio which domestic not more than 1.
“Business and Technology Park”	Mix of commercial, offices, design, research and development uses. Maximum 3 plot ratio.
“Business and Technology Park(1)”	For hotel, exhibition and conference facilities. Maximum 3 plot ratio.
“Research and Development”	For design, research and development uses. Maximum 1.76 plot ratio.

- 5.22 The commercial uses are all for economic growth and development of Kwu Tung North. According to the Stage Three Public Engagement Report, it envisages a wide range of office, research and development purposes and space for competitive industries. However, the numerous commercial sub-zones are considered overly specific and unnecessarily restrictive interfering with market mechanism to quickly meet and respond to changing social and economic needs of the community. It is considered that the respective planning intentions for the sub-zoning themes could adequately capitalise on the geographic advantage, while the specific types of commercial uses could generally be left to be determined by the market for effective early implementation. The plot ratios of these zones at between 1 and 3 are so low as to be a very poor use of scarce land resources.



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Public and Private Housing Distribution

- 5.23 There is an apparent segregation between the public and the private housing land distribution, where the private and the public housing dominate the eastern and the western portion respectively. This will possibly result in large concentrations of people with similar socio-economic backgrounds and large scale identical buildings with no particular features and design. Geographically the distribution should be much more mixed so as to promote social diversity and variation of building forms and types.
- 5.24 With regards to the public and private housing land proportional split, the convention has been 30-70% up to a maximum of 50-50%. REDA has expressed concerns over the recently announced 60-40% approach in its previous submissions as it will result in less production of private housing to meet the evident demand for home ownership. It may also result in a long term under-supply and high housing costs affecting affordability levels. A diverse mix of housing types is fundamental so that people may be able to choose the type of housing according to their individual needs.

Implementation Considerations

- 5.25 Some land under consolidated ownership is traversed by the proposed roads, open spaces and G/IC zones, and requires resumption and clearance, preventing an efficient implementation. Instead, the planning layout should generally align with land ownership patterns to avoid the need for resumption and clearance for a timely delivery of land.
- 5.26 Reference is specifically made to the implementation proposals in paragraph 17 of the Explanatory Statement for the Draft Plan. As REDA has been reiterating, the Conventional New Town Approach in land assembly, without a mechanism of land exchange entitlement, will affect the delivery of land. With 60% of the developable land in the New Development Areas in private ownership, there will be the need for land resumption and clearance. Additional approaches to the Conventional New Town Approach in land assembly should be considered and adopted, such as:-



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- i. The minimum site area for land exchange application should provide the opportunity to include any interspersed Government land amongst the private land holdings.
 - ii. Clear guidelines should be devised in the application of the Land Resumption Ordinance.
 - iii. New Territories Ordinance should be amended to lower the administrative threshold of unanimous agreement in the sale of Tso/Tong lands, which the Absentee Owners and defective titles are problematic, to facilitate site assembly.
- 5.27 The two years target time frame for preparation is unrealistic, effectively allowing 1 year for the Outline Zoning Plan process and 1 year for considering land administration matters, and no time for premium appeal. The target time frame should be amended and refined periodically.
- 5.28 The Lands Department has indicated that it would only accept applications for Phase 1 of the Draft Plan. It is considered that there is nothing preventing applications for Phase 2 and 3 to be accepted for processing from the outset. Lands Department's processing of Phase 2 and 3 land exchange applications now would ensure their early consideration within the given time frame. Consideration could be given on the basis of the draft OZP unless there are adverse representations, and with either temporary or permanent access road provision.
- 5.29 Similarly, Lands Department has indicated that it would not accept surrender of lots involving roads, open spaces and G/IC until resumption, potentially affecting their early delivery in the NDA for the population intake. Lands Department's acceptance of lands involving roads, open spaces and G/IC would ensure their timely provision.
- 5.30 In the past, the Government would only plan and construct public facilities when the population reached a certain threshold. This arrangement is considered inadequate for the first arriving residents. Adequate public facilities should be made available prior to the population's arrival. Given the various Government departments involved in the implementation of the Kwu Tung North, all with different level of resources and priorities, it is considered that an



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overarching taskforce should be formed to ensure a coordinated and fast tracked implementation.

6. Proposed Amendments to the Plan to Meet the Representations

- 6.1 The proposals to meet the Representation are generally indicated on the plan at **Appendix 1** and consist of the following elements in the Notes and Explanatory Statement to the Outline Zoning Plan:-

Notes to the Outline Zoning Plan

Increase in Development Intensity

- 6.2 To meet the strategic planning context of the NDA in providing housing land for Hong Kong, the development intensity in the NDA is to be maximised. This includes rezoning the unjustifiable non building areas and open spaces to make available developable land, and increasing density in form of plot ratio and building height in the following manners:

Rezoning the unjustifiable open spaces

- 6.3 The unjustifiable open spaces at Planning Area 24 and 26 are of the following sizes:

Open Space	
Planning Area 24	8,055m ²
Planning Area 26	8,485m ²
Total area	16,540m ²

- 6.4 Accordingly, rezoning of the abovementioned open spaces to residential use will result in an additional 16,540 square metres site area for development. At a plot ratio of 6-8, this will accommodate about 1,700/-2,250 units and 4,850-6,450 residents. (Assumptions of 59.2 square metres flat size and 2.88 persons per flat derived from the figures in the Draft Plan.)
- 6.5 In rezoning the open spaces, the created development sites should generally align with land ownership patterns.



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Plot ratio increase

- 6.6 The current residential plot ratios which are below the HKPSG have potential to be increased. Proposed plot ratio increases are included on the plan at Appendix 1. They could be maximised to 3, 5 and 8 as per the HKPSG for the respective residential zoning groups with respect to the currently planned stepped development intensity in the following manner:-

	Maximum Plot Ratios	
	Currently planned (maximum domestic plot ratio, where specified)	Proposed
R(A)1	6 (5)	8
R(A)2	5 (4.5)	8
R(A)3	5 (4)	8
R(B)	3.5	5
R(C)	0.4	3
OU (Commercial/ Residential Development with Public Transport Interchange	6 (5)	8
Comprehensive Development Area	0.4	3

Note:

- i. The proposed maximum plot ratio includes both domestic or non domestic uses, which should be subject to Building (Planning) Regulations composite building formula.
- ii. The proposed plot ratios for "OU (Commercial/Residential Development with Public Transport Interchange)" and "Comprehensive Development Area" correspond to that of the residential zoning groups.

- 6.7 These plot ratios are equivalent to the following number of flats and residents (detail calculations in **Appendix 2**):



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Plot Ratio	Flats (approx.)	Residents (approx.)
Currently planned	35,330	101,750
Proposed, for maximum increase	53,480 (+18,150)	154,030 (+52,280)

Note: In spite of the proposed application of the Building (Planning) Regulations composite building formula in configuring domestic and non domestic uses, this estimate assumes 1 and 2 non domestic plot ratio out of the proposed plot ratio in Residential A(2), and A(1) and OU respectively.

According to the HKPSG maximum plot ratio of 3, 5 and 8 for the respective residential zoning groups, the Draft Plan is capable of accommodating about 53,480 flats and 154,030 residents, or 18,150 additional flats and 52,280 additional residents than currently planned.

Building Height Increase

- 6.8 The current maximum residential building height at 35 storeys maximum have potentials to be increased, in relation to the common 30-40 storeys high residential buildings in Hong Kong, to accommodate the proposed residential plot ratio increase in the following manner:

	Building height restrictions	
	Currently Planned	Proposed
R(A)1	115-120mPD	140-145mPD (+25m)
R(A)2	125-135mPD	160-170mPD (+35m)
R(A)3	110-125mPD	145-160mPD (+35m)
R(B)	75-95mPD	95- 115mPD (+20m)
R(C)	Not applicable	
OU (Commercial/ Residential Development with Public Transport Interchange	120mPD	145mPD (+25m)
Comprehensive Development Area	3 storeys (9 metres) including 1 storey of carpark	55mPD (+30m, +1 carpark storey and 15 mPD site formation)



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Note: The proposed building height restrictions correspond to the proposed plot ratio increase, assuming site coverage of 30% and floor-to-floor height of 3.4 metres. It also includes an assumed site formation i.e. ground level at 15mPD.

- 6.9 The proposed building height restriction is a consistent increase to the currently planned, and will maintain the building height profile across the Draft Plan. The proposed building height restrictions are marked on the plan at Appendix 1.
- 6.10 It is considered that the proposed development intensity increase is the minimum to achieve the strategic context for the area in providing housing land for Hong Kong in the medium to long term. In this regard, the proposal will increase the number of flats by 18,150 to 53,480 which is still insignificant in relation to the Long Term Housing Strategy's recently announced annual target of 47,000 flats. The creation of the New Town at Kwu Tung North, incurring large public costs, to address the housing demand for just over a year is not considered justified.

Commercial Land Uses

- 6.11 The maximum land use plot ratio alone is adequate control, and the maximum domestic plot ratio where specified should be removed. This will continue to allow for the application of the flexible mixed domestic and non-domestic plot ratios in the Building (Planning) Regulations composite building formula.
- 6.12 Commercial use should be allowed flexibly on three floors (including basements) with a maximum non-domestic plot ratio of 2, should such a restriction be retained.

Other Specified Use Zones

- 6.13 The plot ratios of 3 for the various types of commercial uses in the "Other Specified Uses" ("OU") zones should be increased to plot ratio 5 so as to enable the land to be used effectively.
- 6.14 The "OU" (Mixed Use) and (Business and Technology Park) zones should be rezoned to "OU (Business)" and the standard use under the Notes applied.



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This will ensure that the development can accommodate changes in market needs and allow flexibility for use. Should Government decide that any of these sites be reserved for a special purpose then this could be determined at the land sale/land exchange stage and the uses be determined within the flexibility that the “OU(Business)” zone provides for.

- 6.15 The building height for the “OU” zones along the south-eastern periphery of the NDA should be increased to 140mPD. This will also provide a noise buffer between the residential development and Fanling Highway.

Explanatory Statement to the Outline Zoning Plan

- 6.16 The Explanatory Statement should be amended to expand on the various proposals in this representation. With regards to the housing mix, public and private housing lands should be intermixed within the planning area.
- 6.17 To assist in achieving an early delivery of land, clear and practicable guidelines on the application of the Land Resumption Ordinance should be provided.
- 6.18 Regarding paragraph 17.1., actual program for implementing the development on a practical basis should be provided. The development of housing and provision of community facilities and services should be clear so that the facilities are made available prior to population intake.
- 6.19 With regards to the phasing and packaging of works for the NDA development, including detailed design for site formation and engineering infrastructure works, and disposal of land, an overarching taskforce should be formed.
- 6.20 With regards to the flexibility for modification of lease, the minimum site area for land exchange application should provide the opportunity to include any interspersing Government land amongst private land holdings. Additionally, the deadlines having regard to the phased development of the area should take into account the time taken in the planning process and be revised to be more realistic. Lands Department should process Phase 2 and 3 land exchange applications, and lands involving roads, open spaces and G/IC from the outset.



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7. Conclusion

- 7.1 It is considered that no identified infrastructure capacity as an absolute constraint to the development intensity of the Draft Plan has been identified. Adequate capacity should be provided at the outset in the planning of the Draft Plan that is currently in progress.
- 7.2 Similarly, the broad brush urban design rationale restricting the development parameters in the Draft Plan are considered damaging, and leading to underutilisation of the development potential of the area and misuse of the scarce land resources available to address the land shortage in Hong Kong. The proposed amendments to the development parameters and rezoning to residential land are necessary and desirable to achieve the strategic planning intention of the area in providing housing land for Hong Kong in the medium to long term. Specifically, the proposed development intensity increase is the minimum desirable in relation to the Long Term Housing Strategy's recently announced annual target of 47,000 flats, and to justify the large public costs incurred in the creation of Kwu Tung North.

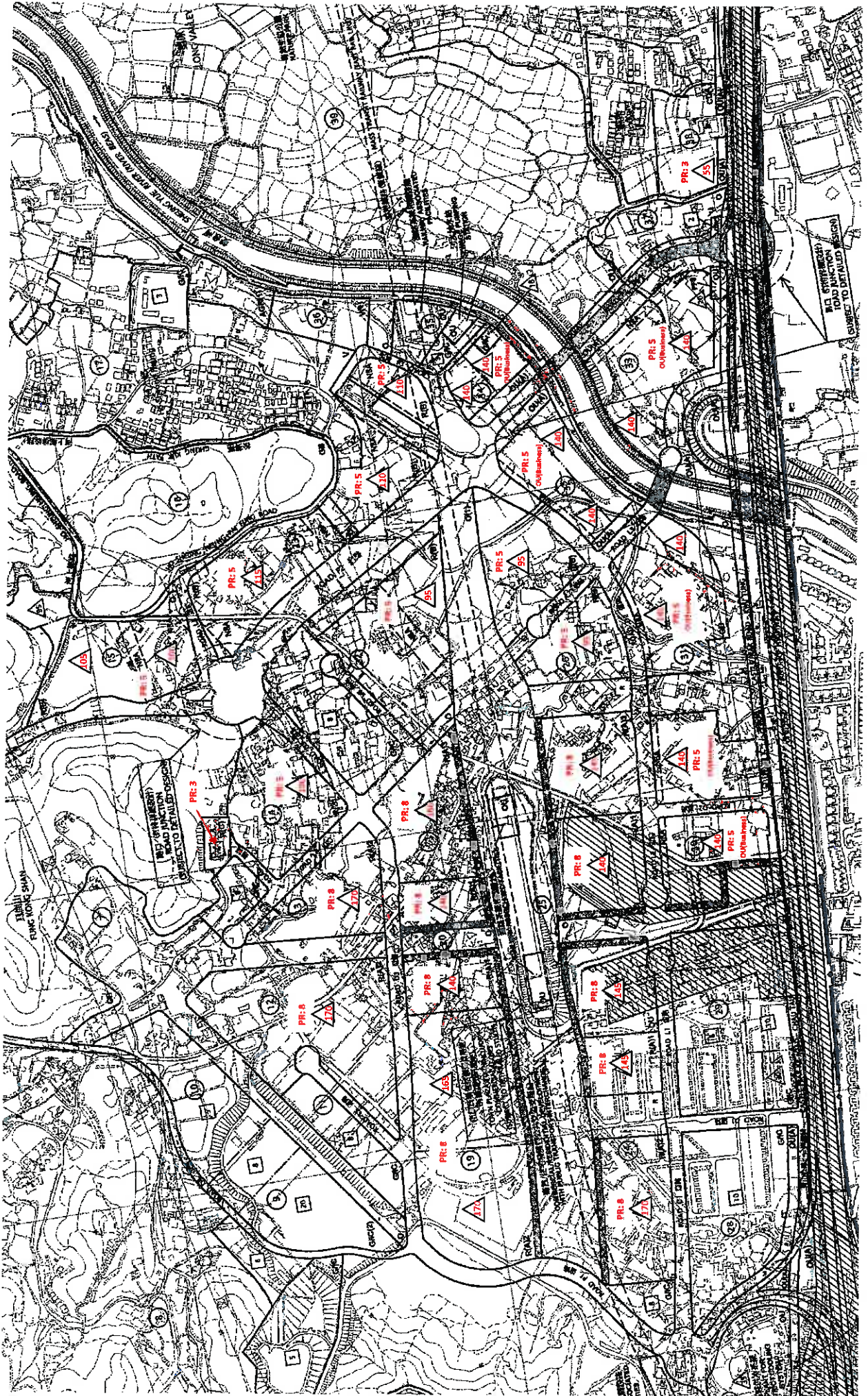
**The Real Estate Developers Association of Hong Kong
February 2014**

Representation to Draft Kwu Tung North Outline Zoning Plan No. S/KTM/1
Appendix 1: Proposed amendments generally indicated on the Draft Plan



PR: 5 Proposed Plot Ratio

▲ Proposed Building Height in mPD



Representation to Draft Kwu Tung North Outline Zoning Plan No.S/KTN/1									
Appendix 2 Estimated increase in the number of flats and residents as a result of the proposed plot ratio increase									
Currently planned									
Planning Area	Zoning	Area (m ²)*	Maximum Plot Ratio	Max. Domestic Plot Ratio (if specified)	GFA (m ²)	Assumed flat size (m ²)*	No. of flats	Assumed no. of residents per flat*	Total no. of residents
12	R(A)2	53,873	5.0	4.5	242,429	59	4,095	2.88	11,794
13	R(A)2	22,931	5.0	4.5	103,190	59	1,743	2.88	5,020
14	R(C)	3,144	0.4		1,258	59	21	2.88	61
14	R(B)	29,010	3.5		101,535	59	1,715	2.88	4,940
15	R(B)	37,078	3.5		129,773	59	2,192	2.88	6,313
19	R(A)2	70,406	5.0	4.5	316,827	59	5,352	2.88	15,413
20	R(A)1	14,967	6.0	5.0	74,835	59	1,264	2.88	3,641
20	R(A)1	11,423	6.0	5.0	57,115	59	965	2.88	2,779
21	R(A)3	25,860	5.0	4.0	103,440	59	1,747	2.88	5,032
22	R(B)	38,151	3.5		133,529	59	2,256	2.88	6,496
23	R(B)	28,312	3.5		99,092	59	1,674	2.88	4,821
23	R(B)	16,180	3.5		56,630	59	957	2.88	2,755
23	R(B)	8,088	3.5		28,308	59	478	2.88	1,377
24	R(A)2	27,265	5.0	4.5	122,693	59	2,073	2.88	5,969
24	R(A)1	10,299	6.0	5.0	51,495	59	870	2.88	2,505
25	OU	21,130	6.0	5.0	105,650	59	1,785	2.88	5,140
25	R(A)1	23,456	6.0	5.0	117,280	59	1,981	2.88	5,706
26	R(A)3	24,596	5.0	4.0	98,384	59	1,662	2.88	4,786
26	R(B)	18,136	3.5		63,476	59	1,072	2.88	3,088
26	R(B)	24,194	3.5		84,679	59	1,430	2.88	4,120
						Total Flats	35,331	Total Residents	101,754
Proposed									
Planning Area	Zoning	Area (m ²)	Maximum Plot Ratio	Max. Domestic Plot Ratio	GFA (m ²)	Assumed flat size (m ²)	Assumed no. of flats	Assumed no. of residents per flat	Total no. of residents
12	R(A)2	53,873	8.0	7.0	377,111	59	6,370	2.88	18,346
13	R(A)2	22,931	8.0	7.0	160,517	59	2,711	2.88	7,809
14	R(C)	3,144	3.0		9,432	59	159	2.88	459
14	R(B)	29,010	5.0		145,050	59	2,450	2.88	7,056
15	R(B)	37,078	5.0		185,390	59	3,132	2.88	9,019
19	R(A)2	70,406	8.0	7.0	492,842	59	8,325	2.88	23,976
20	R(A)1	14,967	8.0	6.0	89,802	59	1,517	2.88	4,369
20	R(A)1	11,423	8.0	6.0	68,538	59	1,158	2.88	3,334
21	R(A)3	25,860	8.0		206,880	59	3,495	2.88	10,064
22	R(B)	38,151	5.0		190,755	59	3,222	2.88	9,280
23	R(B)	28,312	5.0		141,560	59	2,391	2.88	6,887
23	R(B)	16,180	5.0		80,900	59	1,367	2.88	3,936
23	R(B)	8,088	5.0		40,440	59	683	2.88	1,967
24	R(A)2	27,265	8.0	7.0	190,855	59	3,224	2.88	9,285
24	R(A)1	10,299	8.0	6.0	61,794	59	1,044	2.88	3,006
25	OU	21,130	8.0	6.0	126,780	59	2,142	2.88	6,168
25	R(A)1	23,456	8.0	6.0	140,736	59	2,377	2.88	6,847
26	R(A)3	24,596	8.0		196,768	59	3,324	2.88	9,572
26	R(B)	18,136	5.0		90,680	59	1,532	2.88	4,411
26	R(B)	24,194	5.0		120,970	59	2,043	2.88	5,885
38	CDA	16,100	3.0		48,300	59	816	2.88	2,350
						Total Flats	53,481	Total Residents	154,026
						Increase	18,150	Increase	52,272

* Derived from information provided in the Explanatory Statement to the Draft Plan. These may be approximate.