



# 香港地產建設商會

## THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

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Civil Engineering and Development Department  
11/F Civil Engineering and Development Building  
101 Princess Margaret Road  
Homantin  
Kowloon

Dear Sirs

### **Pilot Study on Underground Space Development – Stage 1 Public Engagement**

REDA supports, in principle, the goals to develop underground space with a view to (a) enhancing underground pedestrian connectivity to alleviate street level congestion and providing comfortable and all-weather walking environment, (b) creating an attractive underground public realm for people to walk, gather and play, and (c) creating space to optimise the use of valuable land resources in Hong Kong.

In a highly urbanized city like Hong Kong, especially in the older urban districts with narrow streets and pavements where above ground traffic, on-street parking, loading and unloading activities are jeopardizing pedestrian safety and confining any scope for improvement, the Government should explore ways to encourage the use of underground spaces to connect buildings and developments so as to create more passageways and carpark connections, which will help alleviate the severe pedestrian and traffic congestion at ground level.

We have reservations, however, on the successful implementation of these goals, having regard to critical factors including financial viability, huge construction costs upfront, multiple land ownership, and possible disincentives that may be imposed, such as the payment of a premium for development involving Government land. To ensure an early implementation of underground space development for public interest,



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the Government should to adopt a clear “nil land premium” policy so as to provide sufficient incentive to encourage private sector participation.

The study has highlighted four Strategic Urban Areas for consideration and each one of them has certain development constraints. In the next round of public consultation, the Government should provide more information on the possible users and also seek the collaboration of the private land owners so as to facilitate the implementation of underground space development.

Lastly, we believe the policy and principles developed from this Study should not be limited to just those four Strategic Urban Areas but open to any other areas where schemes and projects of a similar nature proposed by private land owners should be encouraged, for the sake of facilitating the much needed urban renewal in the older districts.

Yours sincerely

Louis Loong  
Secretary General

c.c. Planning Department