

THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

香港中環德輔道中19 號環球大廈1403 室 1403 World-Wide House, 19 Des Voeux Road Central, Hong Kong Tel 2826 0111 Fax 2845 2521 www.reda.hk

Representation to Draft Fanling North Outline Zoning Plan No.S/FLN/1

Representor: The Real Estate Developers Association of Hong Kong

1. Introduction

- 1.1 The Town Planning Board gazetted the Draft Fanling North Outline Zoning Plan No. S/FLN/1 (the Draft Plan) on 20 December 2013.
- 1.2 This 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 Fanling 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 Fanling 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

REDA generally supports the approach to the comprehensive planning for the extension of Fanling North New Town. In general, the proposals on the Draft Plan provide the basis for the development of a high quality environment for the future residents of Fanling North with a good mix on 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 NDA 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.

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

Note:

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 floorspace, maximum domestic plot ratio will be reduced according to the provisions of the B(P)R composite building formula.



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- 5.5 The Explanatory Statement to the Draft Plan identifies such constraints as potentially hazardous installation, overhead power lines, water mains, Deep Bay catchment, ecological resources, permitted burial grounds and flooding risks in the NDA. While these constraints may restrict development capacity at certain areas, govern land use distribution and require mitigation design, they are not considered so grave as to prevent plot ratio provision up to HKPSG standards. The proposed plot ratios at 2, 3.5 and 4 to 6 (including domestic and non-domestic floor area) in the respective residential zones, are 1, 1.5 and 2 to 4 plot ratio below the HKPSG standards and are considered an unreasonably low development intensity. There is also no justification provided as to why the HKPSG standards have not been applied.
- 5.6 Reference is made to the CEDD and the Planning Department's response to the public comments in this regard, in the Stage Three Public Engagement Report for 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. No details as to how this was derived have been provided. It is considered that infrastructure capacities at the NDA could be technically improved accordingly, and have not been shown to be a constraint. As such, it is considered that the development capacity of the Draft Plan has not been optimised.
- 5.7 Transport constraints which the Draft Plan identifies as the Sha Tau Kok Road and Po Shek Wu Road as busy road corridors, and Po Shek Wu Interchange as near its capacity limits. The Draft Plan should include traffic improvement measures to cater for the optimum potential, instead of restricting the development capacity. Further, the NDA could be better served by mass transport facilities to help address the issue.
- 5.8 When compared with the RODP, the Draft Plan includes a reduced population in an increased residential land area. In other words, it has previously been possible to accommodate more people in a lesser land area i.e. significantly greater intensity. A greater increase in intensity should be applied in the Draft Plan. In particular, the development intensity in the District Centre should be increased to accommodate for more housing units



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- 5.9 The strategic planning context for this NDA is to provide housing land for Hong Kong in the medium to long term. There is no reference to the HKPSG or the recent Policy Address 2013 and 2014 advocating for increased housing supply and increased densities. While the NDA is not the only solution to the housing supply shortage, it should nevertheless accommodate as much population growth as possible.
- 5.10 In summary, the unreasonably low plot ratio below the HKPSG is a misuse of the scarce land resources, given the difficulties in land assembly, and a lost opportunity to provide a long term solution to housing land supply.

Artificially Low Building Height Restriction

- 5.11 The urban design concept in the HKPSG to step down building heights from the centre to the surrounding medium to low rise development is appreciated. In this case, the stepping down to the river generally along the northern boundary of the NDA will provide for the amenity of the open space. However, the step down towards the south-eastern periphery of the NDA, on the interface with the existing high rise development across the four lanes Ma Sik Road is neither justified nor will have any significant visual amenity merit. It is considered better to suitably relate to the existing high density development, rather than to unnecessarily reduce building heights.
- 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 rise development. However, the building height restrictions for the development behind are considered unnecessarily restrictive.
- 5.13 A general increase in the permissible building heights is necessary which will give room for site formation at the flood prone low lying land beside Ng Tung River. Secondly, the maximum building height at 35 storeys is arbitrarily low. This is compared with the more common height of residential building about 40 storeys high in Hong Kong. The artificially low building height restriction also affects the development capacity resulting in a misuse of the scarce land resources and lost opportunity to provide additional housing land for Hong Kong.



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The Low Commercial Plot Ratio

- 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 "Residential (Group B and C)" zone on application to the Town Planning Board. These are considered inadequate to create vibrancy in the Town Centre, to generate employment opportunities and to support the day-to-day living of the local population. Whilst the NDA is to form an extension and be integrated with Fanling and Sheung Shui, it should nonetheless be self-sufficient. 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 to be imposed.
- 5.15 Given that the facilities in the NDA are to be shared by the residents of the NDA, Fanling and Sheung Shui, there should be adequate commercial functions to achieve vibrancy. Commercial uses should be scattered throughout the NDA to diversify the character, and to facilitate social interaction.
- 5.16 With regard to the commercial floor area at the centre, whilst outdoor pedestrian movements at the green spine should be encouraged, it is considered that there should also be provision for weather protected connections of the commercial floor areas, and the public transport interchange. This will provide for convenient pedestrian access and reduce vehicular transport.

Planned Shopping Streets

5.17 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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Open Space Design and Non Building Areas

- 5.18 There is a large integrated public open space provision within the Draft Plan. One of the benefits of the proposal is that it will ensure that the area will have a high level of amenity once it is developed, which will also enable the population capacity to be increased. Large portions of the open space provision in the NDA are in strips along the riverside promenade, or form part of the green spine at the focal points. They are not considered to be functional recreational space for the health benefits of the population. Instead, they are more like mere landscaped area contributing to the general amenity of these areas which themselves should be landscaped. Open spaces should be of such dimensions, area and character suitable for community activity to cater for the health benefits of the population.
- 5.19 There are also Non Building Areas (NBAs) proposed inside development sites, some of which are fronting open space zones. All NBAs should be deleted as they place unnecessary restrictions on design. If spaces between buildings are required, they should be rezoned as "Open Space".

Inefficient Layout

- 5.20 The NDA is much traversed by roads, open space and non building areas. Its morphology is considered to have particularly high presence of non-developable land in relation to the development sites. Roads serving small number of sites and cul-de-sac are particularly inefficient use of the infrastructure.
- 5.21 In aggregate, the maximum plot ratio of 6, and the various urban design elements including stepped building height and considerable amount of green space and pedestrian environment are inefficient use of the scarce land resources and part of a lost opportunity to provide best use of land for housing.

Connectivity with the adjacent existing Developed Areas

5.22 The facilities and open spaces in the NDA, Fanling and Sheung Shui will be shared by the residents of the three areas. The Explanatory Statement to the Draft Plan states that there will be public transport and road networks



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connecting to Fanling and Sheung Shui. Yet, it also identifies that the road network around Sheung Shui area as reaching its capacity. In this regard:

- (a) The pedestrian walkway system, above and under-ground, and cycle track network should be adequate to encourage and promote their usage, and to reduce vehicular traffic. These networks should also be designed to provide for active frontage and a sense of security. Additionally, cycling parking facilities should be improved not only at the NDA, but also at Fanling and Sheung Shui;
- (b) The services available at the public transport interchange should be studied in detail. Feeder service to Fanling/Sheung Shui will add pressure to the Sheung Shui road network congestion, and on the Fanling and Sheung Shui MTR stations. Whilst the Draft Plan relies on connections with the East Rail Stations, it does not recognise that the Fanling and Sheung Shui MTR stations and their vicinity are saturated.

Missing Mass Transport Provision

- 5.23 Sha Tau Kok Road and Po Shek Wu Road are busy road corridors, and Po Shek Wu Interchange and Fanling and Sheung Shui MTR stations are near or at their capacity. The transport arrangement for the NDA predominantly relies on road based feeder services to the two MTR stations. A traffic study of the impact on the surrounding road networks and the two stations' capacity in catering for the increased usage appears to have not been carried out.
- 5.24 It is considered that mass transport in form of a railway should be provided for the Plan area, for the following reasons:
 - (a) Railway based mass transit facilities compared with the two proposed transport interchanges allows for a more efficient use of the land resources.
 - (b) The MTR Northern Link, which will run from Kam Sheung Road Station to the neighbouring Kwu Tung North, should be extended to serve the Fanling North.



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- (c) In spite of being on two different rail lines (Northern Link and East Rail), mass transit facilities at the Fanling North will supplement the existing Fanling and Sheung Shui MTR Stations. This will help alleviate the congestions at Fanling and Sheung Shui MTR Stations and their vicinity.
- (d) More stations and greater convenience will be afforded to the residents and visitors of the Fanling North, Fanling and Sheung Shui to suit their commuting needs, thereby facilitating movements and interactions in the local region that is consistent with the planning objective.

Public and Private Housing Distribution

- 5.25 There is an apparent segregation between the public and the private housing, where the private and the public housing dominate the eastern and the western parts of the NDA respectively. This will possibly result in concentrated populations of similar socio-economic background and large scale identical buildings with little design differentiation.
- 5.26 With regards to the public and private housing land distribution, the convention previously was 30-70% to a maximum of 50-50%. The recently announced 60-40% approach is of concern. In this case, the proposed split is 68-32% and is considered too great a concentration of public housing. It does not provide for a balanced mix of private housing for social interaction, social mobility, and variety of building design for visual amenity and interest.
- 5.27 The proposed 68-32% ratio appears to be arbitrary and lacking consideration of the consequences. This ratio is also contrary to Government's response to the public comments in the Stage Three Public Engagement Report recommending a balanced community (balanced housing mix). The response to Housing Authority for an increased public housing supply in the NDA to meet "urgent public needs for public rental housing" and "public aspiration for more public housing" is not justified (page 31). The reduced number of private units for sale will stifle housing market expansion and public aspirations for home ownership. It will also result in a long term under supply and high housing costs affecting affordability. Diverse housing types are fundamental so that people may opt for their desirable housing type according to their individual needs.



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Implementation Considerations

- 5.28 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.
- 5.29 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:
 - 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. The 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.
- 5.30 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 administrative matters, with no time for premium appeal. The target time frame should be amended and revised periodically.
- 5.31 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.



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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.

- 5.32 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.
- 5.33 In the past, the Government would only plan and construct public facilities when the population reached a certain threshold. This arrangement is considered inadequate as public facilities should be made available prior to the population's arrival. Given the various Government departments involved in the implementation of Fanling North, all with different levels of resources and priorities, it is considered that an 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:-

Notes to the Outline Zoning Plan

Increase in development intensity

6.2 To meet the strategic planning context of the Draft Plan in providing housing land for Hong Kong, the development intensity should be maximised. This includes increasing density in form of plot ratio and building height in the following manners:

Plot Ratio Increase

6.3 The current residential plot ratios which are below the HKPSG have potential to be increased without adversely affecting the quality of the proposed development. Proposed plot ratio increases are indicated on the plan at Appendix 1. They could be optimised to 3, 5 and 8 for the respective



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residential zoning groups with respect to the currently planned stepped development intensity in the following manner:

	Maximum Plot Ratios (maximum non-domestic plot ratio)			
	Currently planned	Proposed		
R(A)1	6 (5)	8		
R(A)2	5 (4)	8		
R(A)3	5	8		
R(A)4	4	8		
R(B)	3.5	5		
R(C)	2	3		
OU (Commercial/	5 (4.5)	8		
Residential				
Development with				
Public Transport				
Interchange) (1)				
OU (Commercial/	3.05 (2.18)	5		
Residential				
Development with				
Public Transport				
Interchange) (2)				

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"s correspond to that of the residential zoning groups.

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

Plot Ratio	Flats (approx.)	Residents
		(approx.)
Currently planned	25,300	73,450
Proposed, for maximum increase	36,020	104,460
	(+10,680)	(+31,010)



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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.

6.4 According to the HKPSG maximum residential plot ratios of 3, 5 and 8 for the respective residential zoning groups, the Draft Plan is capable of accommodating about 36,020 flats and 104,460 residents, or 10,680 additional flats and 31,010 additional residents than currently planned.

Building height increase

6.5 The current residential building heights at 35 storeys maximum have potentials to be increased, to accommodate the proposed residential plot ratio increase in the following manner:

	Building height restrictions			
	Currently Planned	Proposed		
R(A)1	105-115mPD	130-140mPD (+25m)		
R(A)2	120mPD	155mPD (+35m)		
R(A)3	·110mPD	145mPD (+35m)		
R(A)4	90mPD	140mPD (+50m)		
R(B)	60-90mPD	80-110mPD (+20m)		
R(C)	55mPD	70mPD (+15m)		
OU (Commercial/	105-125mPD	140-160mPD (+35m)		
Residential				
Development with				
Public Transport				
Interchange (1)				
OU (Commercial/	80mPD	105mPD (+25m)		
Residential				
Development with				
Public Transport				
Interchange (2)				

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.



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- 6.6 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.
- 6.7 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 16,090 to 51,420 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 Fanling North, incurring large public costs, to address the housing demand for just over a year is not considered justified.

Commercial Land Uses

- 6.8 The maximum land use plot ratio alone should be adequate control, and the maximum domestic plot ratio where specified should be removed. This will allow the flexible mixed domestic and non-domestic plot ratios in the Building (Planning) Regulations composite building formula to apply.
- 6.9 Commercial use should be allowed flexibly on three floors (including basements) with a maximum non-domestic plot ratio of 2, should such restriction be retained.
- 6.10 With regards to the commercial floor areas at the centre around the transport node and towards the southeast at the "Other Specified Uses" zoning cluster, there should be provisions for weather sheltered pedestrian linkages.

Explanatory Statement to the Outline Zoning Plan

6.11 With regards to the housing mix, public and private housing lands should be interspersed throughout in the Draft Plan when site allocation is made.



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- 6.12 The public and private housing lands distribution should be 60-40%. 8% of the public housing land, or about 27,000 square metres in area should be reverted to private housing.
- 6.13 With regards to communications, provisions for railway stations at Fanling North should be made with the proposed Northern Link connecting West Rail Kam Sheung Road Station and the proposed Kwu Tung Station under study in the context of the RDS-2 Review. In this regard, the two public transport interchange sites may be integrated with a rail station, and railway line reserve indicated on the Draft Plan.
- 6.14 With regards to the phasing and packaging of public works for the development, including detailed design for site formation and engineering infrastructure works, and disposal of land, an overarching taskforce should be formed.
- 6.15 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.

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



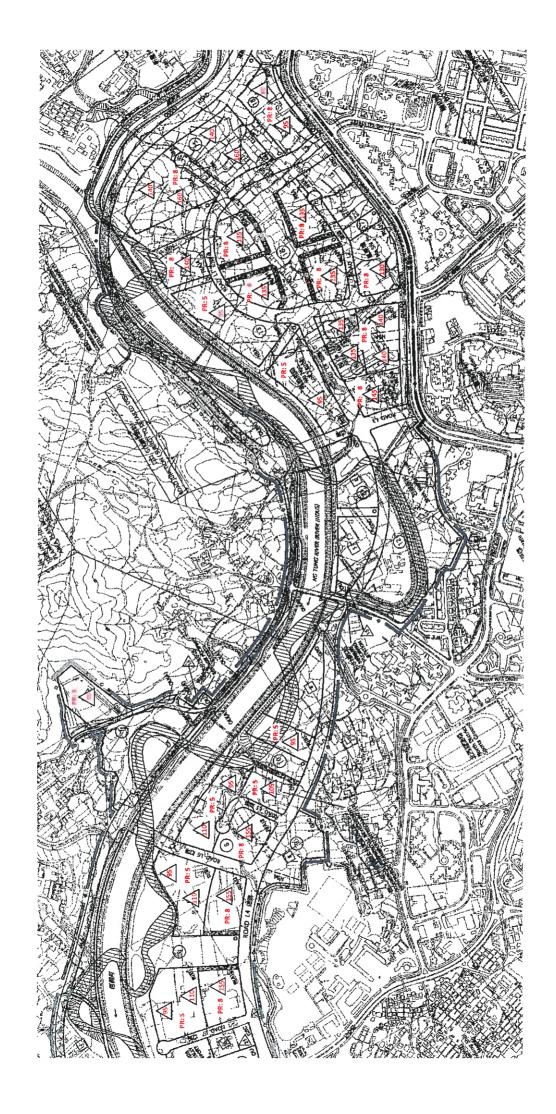
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to long term. Specifically, the proposed development intensity increase is the minimum desirable in relation to the Long Term Housing Strategy's recently announced annual target of 47,000 flats, and to justify the large public costs incurred in the creation of Fanling North.

The Real Estate Developers Association of Hong Kong February 2014





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Currently Pla	Zoning	Area (m²)*	Maximum Plot	Max. Domestic	GPA (2)	Assumed flat size (m ²)*	N	Assumed no. of residents per	Total no. of
Planning Area	R(B)		Ratio	(if specified)	GFA (m²)		No. of flats	flat*	residents
-		18,731	3.5	1.0	65,559	54	1,214	2.90	3,521
	R(A)2	12,983	5.0	4.0	51,932	54	962	2.90	2,789
	R(B)	18,591	3.5	1.0	65,069	54	1,205	2.90	3,494
<u> </u>	R(A)2	12,372	5.0	4.0	49,488	54	916	2.90	2,658
	R(C)	12,432	2.0	+	24,864	54	460	2.90	1,335
	R(B)	17,070	3.5	140	59,745	54	1,106	2.90	3,209
3	R(A)2	11,969	5.0	4.0	47,876	54	887	2.90	2,571
0	R(B)	8,771	3.5		30,699	54	568	2.90	1,649
3	R(B)	18,988	3.5		66,458	54	1,231	2.90	3,569
3	R(B)	22,193	3.5		77,676	54	1,438	2.90	4,171
3	R(A)4	12,293	4.0		49,172	54	911	2.90	2,641
4	R(A)3	23,724	5.0		118,620	54_	2,197	2.90	6,370
4	R(A)1	14,432	6.0	5.0	72,160	54	1,336	2.90	3,875
5	OU	45,425	5.0	4.5	204,413	54	3,785	2.90	10,978
6	R(A)1	9,268	6.0	5.0	46,340		858	2.90	2,489
6	R(A)1	12,473	6.0	5.0	62,365	54	1,155	2.90	3,349
6	R(A)1	12,355	6.0	5.0	61,775	54	1,144	2.90	3,318
6	R(A)1	11,589	6.0	5.0	57,945	54	1,073	2.90	3,112
7	R(A)1	15,265	6.0	5.0	76,325	54	1,413	2.90	4,099
8	R(B)	16,446	3.5		57,561	54	1,066	2.90	3,091
0	OU	9,894	3.1	2.2	21,569		399	2.90	1.158
	ļ					Total Flats	25,326	Total Residents	73,446
Proposed									
Planning Area	Zoning	Area (m²)	Maximum Plot Ratio	Max. Domestic Plot Ratio	GFA (m²)	Assumed flat size (m ²)	No. of flats	Assumed no. of residents per flat	Total no. of
5	R(B)	18,731	5.0		93,655	54	1,734	2.90	5,030
	R(A)2	12,983	8.0	7.0	90,881	54	1,683	2.90	4,881
	R(B)	18,591	5.0		92,955	54	1,721	2.90	4,992
	R(A)2	12,372	8.0	7.0	86,604		1,604	2.90	4,651
	R(C)	12,432	3.0	1.0	37,296		691	2.90	2,003
	R(B)	17,070	5.0	1	85,350	54	1,581	2.90	4,584
	R(A)2	11,969	8.0	7.0	83,783	54	1,552	2.90	4,499
0	R(B)	8,771	5.0	7.40	43,855		812	2.90	2,355
3	R(B)	18,988	5.0	1	94,940	54	1,758	2.90	5,099
3	R(B)	22,193	5.0		110,965		1,758 2,055	2.90	5,959
	R(A)4	12,293		 	98,344				
3			8.0	-		54	1,821	2.90	5,281
A	R(A)3	23,724	8.0	60	189,792		3,515	2.90	10,193
	R(A)1 OU	14,432	8.0	6.0	86,592	54	1,604	2.90	4,650
1	11 11 1	45,425	8.0	6.0	272,550		5,047	2.90	14,637
1			8.0	6.0	55,608		1,030		2,986
5	R(A)1	9,268	0.0		74,838	54	1,386	2.90	4,019
1 5 5	R(A)1 R(A)1	12,473	8.0	6.0					12 001
4 5 5 5 6	R(A)1 R(A)1 R(A)1	12,473 12,355	8.0 8.0	6.0	74,130		1,373		3,981
4 5 5 5 6 6 5	R(A)1 R(A)1 R(A)1 R(A)1	12,473 12,355 11,589	8.0 8.0 8.0	6.0 6.0	74,130 69,534	54	1,288	2.90	3,734
4 5 6 6 6 6 6	R(A)1 R(A)1 R(A)1 R(A)1 R(A)1	12,473 12,355 11,589 15,265	8.0 8.0 8.0 8.0	6.0	74,130 69,534 91,590	54 54	1,288 1,696	2.90 2.90	3,734 4,919
4 5 6 6 6 6 6 7	R(A)1 R(A)1 R(A)1 R(A)1 R(A)1 R(B)	12,473 12,355 11,589 15,265 16,446	8.0 8.0 8.0 8.0 5.0	6.0 6.0 6.0	74,130 69,534 91,590 82,230	54 54 54	1,288 1,696 1,523	2.90 2.90 2.90	3,734 4,919 4,416
4 4 5 6 6 6 6 6 7 8	R(A)1 R(A)1 R(A)1 R(A)1 R(A)1	12,473 12,355 11,589 15,265	8.0 8.0 8.0 8.0	6.0 6.0	74,130 69,534 91,590	54 54 54 54	1,288 1,696 1,523 550	2.90 2.90 2.90 2.90	3,734 4,919 4,416 1,594
4 5 6 6 6 6 6 7	R(A)1 R(A)1 R(A)1 R(A)1 R(A)1 R(B)	12,473 12,355 11,589 15,265 16,446	8.0 8.0 8.0 8.0 5.0	6.0 6.0 6.0	74,130 69,534 91,590 82,230	54 54 54 54 Total Flats	1,288 1,696 1,523	2.90 2.90 2.90 2.90 Total Residents	3,734 4,919 4,416