



香港建築師學會
The Hong Kong Institute of Architects

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By Fax and By Post
Fax No. : 2522 8524

Director of Planning
Planning Department
Territorial Planning Division
Studies and Research Section
16/F North Point Government Offices
333 Java Road
Hong Kong

Attn : Mr Raymond W M WONG, Assistant Director of Planning / Territorial

Dear Mr Wong

**Stage Three Public Engagement
North East New Territories New Development Areas Planning and Engineering Study**

Thank you for your letter dated 19 June 2012 from both Planning Department and Civil Engineering Development Department informing the launch of stage three public engagement seeking public views on the Recommended Outline Development Plans for the North East New Territories New Development Areas.

The Institute is pleased to deliver our views and comments on the subject. Please find enclosed the written submission of the Institute for your consideration.

Thank you for your kind attention.

Yours sincerely

Dominic Lam *FHKIA RA*
President

Encl

Patron : The Honourable Leung Chun-ying, Chief Executive, Hong Kong Special Administrative Region

A Member of The International Union of Architects (UIA), Commonwealth Association of Architects (CAA), Architects Regional Council Asia (ARCASIA) and Asia-Pacific Economic Cooperation, Architect Project

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Position Paper on Stage 3 Public Engagement
The North East New Territories New Development Areas
Planning and Engineering Study

The Hong Kong Institute of Architects (HKIA) welcomes the planning of the North East New Territories (NENT) New Development Areas (NDAs) to help promote visionary social and economic developments in Hong Kong and to address the growing demands for housing and employment.

Hong Kong should not turn its back to Shenzhen and we should enhance the intercity relationship in urban design and planning terms. The Stage 3 Public Engagement however sparked a lot of heated controversies in the society. It is important to review our planning technicalities as well as to investigate into the cause for social discontent that cannot be light-mindedly relegated into disregard.

After much deliberation within the Hong Kong Institute of Architect (HKIA), we would like to submit herewith our consolidated views as follows:

A) Delinking Planning Issues from Administrative / Immigration Issues

The Public Consultation was intended to be a stage milestone for an on-going planning exercise of many years. While the Institute acknowledges the need for demographic profiling, so as to enable the various subsequent forecasts and technical studies, the notion of “Visa-free” or “Multiple-visa” entry to Hong Kong are pure administrative late-additions that complicate the discussions in planning terms. It also introduces unquantifiable projected “worries” into the public discussion domain which are hard to rebut in any meaningful terms. The HKIA therefore urges the Government to delink the two agenda and remain focus on the technicalities of the planning exercise.

B) Population Profile and Social Strata

While HKIA holds a positive view on encouraging multi-cultural / multi-facet society for Hong Kong, and therefore supports the idea of closer social integration with mainland in principle, there is however a legitimate concern in the opposing voices that we must also acknowledge the factual land scarcity in Hong Kong. Given the record-high property prices in the Territories now, there is a general impression by the concerned groups that the future property developments in the NDAs would be affordable only to the resource-rich investors, be they local or overseas, rather than helping to satisfy basic local housing need. Core to this problem stems from years of polarization of private/public sectors in our housing policy. It is a matter of “choice”, or the lack of it prompted by economics to be precise, that breeds the current discontent. The Government should take this opportunity to explore multiple private/public development models to cater for different needs from different social strata. The published 43% public housing needs not be entirely developed by Government Authorities. Example can be seen in Britain where



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it is now required that 25% of any private development must be socially affordable housing. Singapore also prides itself for good quality public housing designs. The world trend, as it seems, is to lower “class distinction” to allow different sectors of the society to ease in with each other. From this perspective, the HKIA opines that now may be a good opportunity to review our policies on standard public housing provisions under the Hong Kong Housing Authority and to research into derivatives of it.

C) Ensuing Good Private / Public Housing Mix

The HKIA supports an increase in Public Housing proportion in the NDAs. Nevertheless, good mix of public and private housing should be encouraged to avoid repeating the dismal experience of Tin Shui Wai where singularisation of any particular social strata is paid with heavy social costs. The mix of public and private housing units can be encouraged under one development through good designs. Also, PSPS and other private-public partnerships should be proactively explored.

D) Public Housing Development Programme

Apart from improvements on the appearance of public housing to avoid a “labeling effect”, due to various administrative bureaucracies nowadays public housing development programmes are not much faster than those of the private developments. The benefit from mass production is literally lost. In order to meet the pressing housing need the HKIA urges the Government to take bold steps in streamlining the current planning/building approval procedures.

E) Farming

A responsible Government should respect its citizen’s individual choice. Therefore, The HKIA opines that farmers should be allowed to stay farming locally, if they so wish. However, respecting individual’s choice does not equate to lack of governance or enforcement. Many farmlands in Hong Kong have indeed fallen into misuse as container car parks. The Government should consider administrative measures to ensure farmlands are preserved, managed and protected. At the same time, centralized container car park sites should be identified and developed to resolve this haunting problem in the longer term.

More importantly, the Government should not eliminate any opportunities for development of organic farming and greenhouse farming in Hong Kong, which are now gaining momentum in a world-wide innovative green industry boom.

Some members of the public suggest swapping farm sites for better planning. The HKIA supports the idea only when there is no other alternative, as we believe through better design efforts farmland can be planned to mingle within the NDAs to create new and successful habitats without any need for relocating / regrouping them to specific areas in north and south of Long Valley.



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F) Other Uses

Shenzhen is among the world's top cities on the booming green technology industry. While HKIA does not object in principle to closer tie with Shenzhen the current plans give little detail on industrial and commercial co-operation, and how such could be facilitated in planning terms. The three NDAs should not be planned to tackle the short-term shortage of housing units only. They must also be visionary in community-building. More commercial and special industrial uses can create more diversified employment opportunities in the areas. Same-district employment can be facilitated without repeating the mistake of Tin Shui Wai. It is suggested to increase the percentage of land assigned for special industrial uses, OU zones, and the six innovative industries.

G) Intercity Planning

Appropriate school sites should be planned within the NDAs to address the needs of cross-border students, which will inevitably increase in numbers as a result of tighter social integration. Also, in the current plan, Lok Ma Chau Loop and Liantang / Heung Yuen Wai are linked to the NDAs only in terms of traffic engineering master plan for better traffic streaming. There is however little social-economic vision along this new East-west corridor. The relationship of NDAs and Lo Wu, the historic border gateway with Shenzhen, should be capitalized and reinforced.

H) Building Heights and Development Densities of NDAs

Uniform building height should be avoided, and this must be applied to public housing site too. The rationale for working out the different proposed plot ratios and population mix for the three NDAs should be fully explained. While the HKIA supports the idea of predominantly lower plot ratios across the board in the NDAs, there could be areas specifically developed as "Town Centres" where public transport interchange network is readily provided. In which case, higher plot ratios might be appropriate. The poor planning of Ma On Shan (lack of any sense of town centre) should be avoided.

I) Encouraging Sustainable Design

The Government should take this opportunity to promote sustainable living and to develop a new model of 21st century habitat based on sustainable principles. In this regard, district-wide concepts that were "argued" to be difficult to implement elsewhere should be seriously considered for the three NDAs, such as district-wide refuse collection, centralized cooling, renewable or bio-diesel fuels, comfortable pedestrian walkway networks and cycle-track networks , etc.

J) Minimizing CDA Sites

While it is acknowledged that for rural areas CDA planning approach might be a convenient means in project execution for the Government, based on past examples in new towns such as Ma On Shan, Tseung Kwan O, etc. CDA approach often results in self-centred development pockets that offer the least integration and connectivity with the town proper. Urban environment and quality of street life are often hampered. Same mistakes should not be repeated again in the NDAs. Smaller plots of land will engender



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a more varied and interesting townscape. Small businesses should be actively encouraged along the ground pedestrian level in residential zones to reinforce proper street lives.

K) Village Houses

According to official reports from the Government, the available land reserved for “V Zone” is approx. 1200ha as compared to only 400ha reserved for residential developments. Should these figures be correct, the Government would be in dire need for a major policy-shift on village houses, which appears to have contradicted with our core social values on equalities and opportunities as it now stands.

L) Resumption of Land

Under Section 3 of Chapter 124 Lands Resumption Ordinance, The Chief Executive in Council is empowered to resume any land if it is for a “public purpose”.

With regards to the proposed NDA land resumption by Government, while the HKIA agrees to the intention of more effectiveness, comprehensiveness and better coordination on the NDA development planning, the Government must be cautioned that re-packaging land lots “for sale” by way of land resumption may subject to legal challenges as the notion of “public purpose” is threading on fine line of misinterpretations. Land resumption can only be imposed on lands for *bona fide* public facilities. Also, the effectiveness of resumption is doubtful under the current political situation. The resumption might take many years and hamper the NDA development programmes.

The HKIA shall be delighted to meet with you to explain the above in more detail, should this be required.

The Hong Kong Institute of Architects
October 2012