



2 February 2024

Ms. LINN Hon Ho, Bernadette, *JP*
Secretary for Development
Development Bureau

By Email
sdev@devb.gov.hk

Dear Ms. LINN,

HKIA's Views on Northern Metropolis (NM) Action Agenda

The Hong Kong Institute of Architects in general supports the Government's broad planning visions presented in the Action Agenda. Nonetheless, we would like the Government to consider introducing more transparency and inclusivity in the planning process, including the disclosure of the public consultation results and allowing public input to help shape the industry-led and infrastructure-led planning activities.

It's undeniable that careful and thorough examination of the relationship between housing, job creation, integration with the Greater Bay Area, and innovation and technology hubs are vital for the successful development of the Northern Metropolis. We would greatly appreciate the opportunity to discuss these matters further with you and your team. Our suggestions are attached in the Appendix below for your consideration.

Should there be any enquiries, please contact Mr. Nick KONG of the HKIA Secretariat at 3155 0407 or email to council@hkia.org.hk.

I look forward to receiving your favourable reply.

Yours Sincerely,

Benny CHAN Chak Bun, *CHKIA, R.A.*
President
The Hong Kong Institute of Architects

Cc: Mr. Vic YAU, *JP*, Director of Northern Metropolis Co-ordination Office d.nmco@devb.gov.hk



The Hong Kong Institute of Architects (HKIA) would like to offer the following comments on the Northern Metropolis (NM) Action Agenda announced in November 2023

VISION

1. The Action Agenda covers an introduction of the broad planning visions across the northern New Territories but has stopped short of mentioning the planning process that will be used in developing and integrating the existing communities and environment to the target visions of the Northern Metropolis. There have been public consultations and professional group self-initiated forums on the Northern Metropolis, including the HKIA hosted Joint Institutes' Forum and workshop in June 2023. The Action Agenda has not revealed the result of the public consultation, nor has it described how public input will contribute to the industry-led and infrastructure-led planning. It is hoped that government will be more transparent and inclusive in the making of the Northern Metropolis plans.

2. Vision 1 - Providing land and housing

This vision is generally supported in principle, but the % split between public and private housing is unclear. Is it still 70 / 30%? Is there scope for allowing public or private elderly housing (not RCHE) to be developed in NM to meet future demand from an aging population?

Vision 2 - Industry-driven planning and a better home-job balance

For 500,000 jobs to be created, office / industry space need would be approximately 5 million m² (assuming 10m² per employee on average, 5 million m² is roughly equivalent to total office supply existing for Central + Admiralty + Kowloon East + Wanchai CWB + Island East = 5.3 million m²). This would take many years to build, meanwhile nearby Shenzhen office rent is much cheaper and abundant. We hope to understand the assumptions behind the 500,000 figure.

Vision 3 – Promoting Integration of the GBA

This vision is generally supported in principle, but the Action Agenda is short on details of what projects and industries are being planned or developed on other side of Border in Shenzhen that correlates to NM's 4 zones positioning. The HKIA would wish to learn more in this regard.



Vision 5 – Developing a “Northern Metropolis University Town”

This vision is generally supported in principle. It will:

- Increased access to higher education for students from both Hong Kong and Shenzhen.
- Create greater collaboration between universities and businesses in both cities, leading to innovation and economic growth.
- A more diverse and vibrant cultural environment in the Northern New Territories.
- Improved transportation and infrastructure in the area, benefiting both residents and businesses.
- Increased opportunities for cultural exchange and cooperation between Hong Kong and Shenzhen.

Our post-secondary institutions are part-and-parcel of the R&D aspect of the I&T and creative industries. As such, the planning of these campuses should allow for maximum flexibility to cater for industry changes. With the increase of foreign student quota as announced in the 2023 Policy Address, it is expected hostel demand will increase significantly, unless, with more efficient border crossing facilities, mainland students are to commute on a daily basis from Shenzhen where accommodation is less costly. This will impact on the final retention of talents and knowledge. A clear policy for the future planning of new post-secondary institutions in NM is needed.

In addition to the proposed establishment of Northern Metropolis University Town in Ngau Tam Mei, Hung Shui Kiu/Ha Tsuen, government should also provide further details of the planned framework for the Eastern Knowledge Belt that would connect HKUST, HKSTP with the Northern New Territory Economic Belt as outlined in 2030+

Vision 6 – Preserving Local Cultural Heritage

This vision is generally supported in principle. Yet the conservation of the rich cultural and heritage assets within the NW area was not mentioned, such as the traditional villages of various sizes and clans, buildings functioned to sustain the old remote rural life in the New Territories, old religious premises like temples and churches, old local industries heritages, the pre-war and early modernist heritage buildings that witness early developments of the New Territories, defense facilities and natural landscape within the past frontier close area and coastal areas, etc.



The HKIA encourages the Government to conduct detailed cultural and heritage mapping and study to identify the sites and buildings worthy of conservation, especially the non-graded buildings and the 8,800 historic buildings included in the 1996-2000 territory-wide survey pending for further assessment. Also, the Government should set up planning strategies that respect and are proportionate to the villages of heritage value, such as urban form strategies of urban corridor / green axis, building height restriction / setback, heritage trails, etc.

HIGH-END PROFESSIONAL SERVICES AND LOGISTICS HUB

3. It is stated that Hung Shui Kiu (HSK)/ Ha Tseun (HT) will be developed with 2 million m² of commercial floor area for high-end finance professional and logistics services. However, there is currently an overabundance of commercial areas in the existing and planned CBDs for the Harbour Metropolis. With only 1/10 the size of Qianhai, what are the incentives for the commercial sector to anchor in HSK/HT? A clearer commercial sector business positioning and incentive scheme are needed.
4. It is disappointing to note that the San Tin Technopole public consultation report is not completed or released before Outline Zoning Plan is already scheduled to be put forward to Town Planning Board for approval this year. This arrangement is bypassing the public consultation and should not be allowed.
5. Likewise, we look upon the Government to do better in Lau Fau Shan than San Tin Technopole, for it is rich in history and ecology with existing communities. The other NDA studies have provided details of the proposals and allow adequate consultation period to collect and reflect public opinions into their plans, it is also hoped that the government maintains an open mind before the finalizing the development proposal to be released in 2024.
6. Government has planned for Lau Fau Shan as a digital technology hub and to develop its eco-tourism industry. With SanTin Technopole being the I&T hub, why would Lau Fau Shan also develops I&T facilities? Sha ling is also changed to have 2 Ha of I&T use. Why are I&T uses dispersed all over the NM instead of concentrating for a larger critical mass to gain economy of scale? We expect the Development Bureau, and ITIB in particular, to seriously re-consider the logic for dispersing the I&T infrastructure investments.



7. Similar to previous comment on Lau Fau Shan, it is also hope that government maintains an open mind before the finalizing the development proposal for Ngau Tam Mei to be released in 2024.

INNOVATION AND TECHNOLOGY HUB

8. As the Action Agenda outlines the development blueprint of the NM in more details for the four zones of the Northern New Territories, amalgamating previous NDAs studies, it is hoped that government will extend the study areas to cover the gaps in between to have a more holistic review of the 300km² NM rather than using a piecemeal approach. An area that should be included in the study of the San Tin NDA is the Tit Hang highland. It is adjacent to the HSITP between SanTin and Kwu Tung North, but has not been studied as an alternative or a potential growth area of the San Tin Technopole. The highland is mostly government owned land that need not be resumed thus saving development cost and time. It is also less controversial ecologically than the wetland nor does its development impact the Shenzhen River hydrology.
9. It is noted that Govt acknowledges the wealth of cultural heritage including traditional villages and monuments / graded buildings related to the ancestral lineage of Wen Tianxiang.

BOUNDARY COMMERCE AND INDUSTRY ZONE

10. It is noted that a portion of the Lung Yeuk Tau Heritage Trail is within the proposed NDA, further cultural heritage and mapping is required to uncover other relics that relate to the early North New Territories development but not yet graded or assessed, e.g. Queen's Hill Camp related fabrics other than just the graded Hindu Temple, relics relating to the Fanling-Sha Tau Kok railway line, etc.
11. N.T. North has rich historical values that relate to social sustainability. Upon the solid foundation of rich Chinese heritage in the region, religious groups such as Catholics and Christians have established schools & assembly halls (e.g. the eclectic Fanling Lutheran Middle School, Former Ellis Garden, the graded St. Joseph Church, Pui Ling School of Precious Blood of convent school setting), hospitals (modernist Fanling Hospital) and orphans' home (Precious Blood Children's Village) which add



to the historic complexity of the region and empower the development of education, healthcare and social sustainability over the past century. They serve the community and exemplify the unique cultural urbanism and landscape. The buildings are neither graded or pending assessment, but they are valuable examples showing the harmonious blending of western culture into Chinese society.

12. Besides the north and south relationship, it is also suggested government to examine the east and west relationship across the NM making the interdependence across the 4 zones be developed intrinsically using the road and rail infrastructures that connect them.

BLUE AND GREEN RECREATION, TOURISM AND CONSERVATION CIRCLE

13. It is encouraging to note government has considered to incorporate urban farming elements into planning, making good use of urban spaces such as parks and government buildings into the NM. The focus, however, should not be only to modernize crop farms for commercial agricultural production, but as an option to preserve existing farmland into urban planning as passive open space
14. The shophouses clusters in Sha Tau Kok and other remote villages around Starling Inlet bear witness to the early rural development of the New Territories. Multiple studies by universities for some abandoned villages (e.g. Fung Hang, Kuk Po, and Nam Chung) have revealed their rich heritage history and relation to Hong Kong's story and its relation with the Mainland.
15. The ancestral halls and homes in N.T. North exemplify the antique Royal order of building (營造法式). HKIA encourages Govt to preserve the identified antiques, which are evidence of the well-established Chinese settlements in the region. The intangible cultural heritage therein also encourages cultural tourism. Packaged cultural tour and experiential trip within authentic historical settings could be explored.
16. HKIA encourages Govt in their exploration of potential for enhancing eco-tourism with respect to the loosening of frontier close area restrictions. HKIA also encourages Govt to explore means other than eco-tourism to revitalize these rural areas, such as exploring and allowing other land uses that are compatible with the existing fabric e.g. religious monasteries, retreats, eco-farms, etc.



17. The redevelopment of Huangang Port to I&T related development is supported. While we support government to allow flexibility in land use in the OZP for the I&T development, development control framework or guideline should be in place to ensure the adjacent environment and ecology is not impacted in the sensitive wetland area. In addition, the new development should well consider urban integration of the historic indigenous villages.
18. The existing boundary control point is mostly hard paved for vehicular clearance. Its redevelopment should be required to increase the green coverage on multilevel to replenish the previous lost green resources in bridging the wetland of Sam Po Shue with that of Lok Ma Chau.
19. HKIA has previously commented on the lack of a Masterplan for San Tin Technopole. In order to attract I&T industries and investors, it is suggested that I&T companies, VC and R&D/Education are all in close proximity (like Silicon Valley model).
20. The Northern Link Spur Line to Shenzhen port via Lok Ma Chau Loop and Chau Tau from San Tin city centre is far from the proposed technopole and its alignment seems forced. The existing Lok Ma Chau Spur line from Sheung Shui to Lok Ma Chau BCP already run beside Lok Ma Chau BCP. To minimize cost and encroachment to the wetland, has the design team considered a new station be built along the existing Lok Ma Chau spur line at Lok Ma Chau BCP? The Northern Link Eastern Extension can instead connect to HSITP at Lok Ma Chau Loop and Shenzhen via Kwu Tung North. Kwu Tung North thus become an interchange station of NOL spur line, Lok Ma Chau spur line and NOL Eastern Extension. For future and potential development at Tit Hang, another station can be built along the NOL Eastern Extension.

