

HONG KONG INSTITUTE OF PLANNERS – PUBLIC AFFAIRS COMMITTEE

Comments on the Enhancing Land Supply Strategy

1. The Invitation

The sub-title of the 'Public Engagement Digest' is somewhat misleading. Enhancing land supply should involve a range of possible measures as options, both individually and in combination. We do not understand why reclamation and rock cavern development are regarded as the only options. This also appears to contradict the statement on P4, that it is necessary to devise a good mix of supply options. 'Enhancement' and 'Existing' Options therefore need to be combined and properly evaluated. If other options are being considered this is not well articulated in the Digest. While it is acknowledged that such options as rezoning and land resumption have their limitations, an underlying factor in examining land supply is to accelerate this within a sustainable planning strategy for the ultimate benefit of the city - not merely to examine land supply as exemplifying a sustainable future in its own right, and justifying this on the basis of cost expediency.

2. The Vision

We are in accord with the Digest that there is a need to meet rising aspirations for quality development, and to meet objectives in a sustainable way. We also agree that adequate land should be provided for infrastructure, business use, services and support for Pillar Industries. However this should form part of a strategic approach as stated above. In this sense there might be some conflict between the CEDD led approach, and the more rounded objectives of the Development Bureau.

3. Population Growth

The population projection of 8.9 million by 2039 with commensurate and specific increase in the number of households, is stated as an absolute. There is no elaboration of how this is projected or the methodology involved, especially in light of Hong Kong's fast-aging population. The latest Census and Statistics Department figures also show that average household size is falling, and there is an increase in single-person households. There is as yet no proper government population policy, despite a steering committee on population policy being set up in 2007.

It would be sensible to present different population growth scenarios with the basis for each of them clearly spelled out along with the assumptions used together with impacts and constraints. A major issue here is that land supply should realistically reflect actual and projected public housing requirements and scenarios. This is of fundamental importance in critically examining the demand for land. It is therefore critical to first establish an overall Population Strategy before any land supply options can be realistically adopted.

A further issue is that Hong Kong is a city with one of the highest overall densities at an average of 125 sq m per head, and there is arguably a need to balance population growth through immigration with the need to counter the ramifications of an aging population. There is also a further factor, in that population growth should reflect the capacity of the SAR to properly accommodate it in a sustainable way. As population growth is likely to be linked to immigration, there appears to be no reason why growth scenarios cannot reflect realms of immigration control.

4. Options and Challenges

This is the point at which land supply options should interface with overall planning and development strategy. The public engagement on Urban Living Space conducted by the Council for Sustainable Development in 2004 concluded that new development outside major urban

opportunity areas such as Kai Tak should be in the New Territories. Redevelopment in the urban area simply to intensify technically under utilised sites should be secondary to urban regeneration, rehabilitation, conservation and improvement of local environment and distinctive urban neighbourhoods. The re-directed Urban Renewal Strategy (itself the result of a prolonged public consultation exercise) technically reflects these concerns through a “bottom up” rather than a “top down” approach. Notwithstanding this, new urban transport infrastructure is likely to catalyse a degree of land use intensification through redevelopment in areas such as Island South and Island West.

A further aspect that is widely recognised is the need, as well as the opportunity, to rationalise land use in parts of the NT, which is at present both wasteful of valuable resources and environmentally despoiling. It is recognised that much ‘agricultural’ land in the NT has already been acquired by property developers and it is hard to control the timing of development resulting from this. The Hung Shui Kui Study has for example noted that NT land acquisition by developers has resulted in sporadic pockets of development outside any wider planning framework resulting in significant diseconomies in the use of land. However with existing and committed major transport corridors through the NT, sites in association with stations could also be reviewed so as to achieve higher land use efficiency.

5. Progressive Development

We agree with the concept of “progressive development” that benefits society and the environment, and the necessity of catering for the uncertainties in land demand in reconciling population growth, quality of life and changing market conditions through an adequate land reserve. In seeking to achieve a quality/liveable environment, a further aspect for consideration is the strategic choice between homogeneity and variety. For example, statutory controls have to be introduced on OZPs to avoid excessive building density and/or height for purposes of enhancing the city’s ventilation, urban design, protection of important vistas/ridgelines and sensitive sites with amenity and/or conservation values etc. As such, not each site should be developed to its maximum limit allowed under the Buildings Ordinance. To balance this, whilst new land sources that are to be identified could make up for the opportunities forgone, the new sites should also be developed progressively with better built forms/configurations to suit our intended urban envelope and land uses with a variety of densities and heights to new dimensions that state of the art technologies and visions can take us.

6. Reclamation Outside Victoria Harbour

We agree that Reclamation outside Victoria Harbour at an appropriate scale and level of overall sustainability is a possible option, and agree in principle that this is a viable means of utilising surplus public fill. However in practice the sustainability and appropriateness of all potential sites would need to be measured against a large number of criteria – technical, environmental, ecological, political and local - which need detailed evaluation so that these could form part of holistic strategies. The guiding principles and criteria themselves would need to be weighted, and some would clearly outweigh others. An ultimate strategy would also have to carefully balance a large number of pros and cons.

The Digest states on Page 23 that Government wishes to ascertain views on options, site selection criteria, proposed uses and site locations, and on the basis of this will then work out a set of site selection criteria. Since the document is currently at the first stage of public engagement, it is both premature and unwise to propose a list of possible sites for reclamation before consensus is built upon the “Strategy” and its site selection criteria. The identification of 25 sites, prematurely released and belatedly presented, is confusing as to its status and whether or not it forms part of the consultation document. ‘Island’ sites in particular are extremely unlikely to be viable.

The list of sites also seems bereft of analysis which relates to initial site selection or evaluation criteria. In fact it has had the effect of alienating informed public opinion particularly as some sites, even at first glance, appear to satisfy virtually none of the initial site selection criteria outlined on P.21 and has diverted views away from options to specifics. Further, it is unclear whether the public engagement exercise is intended to encourage the public or professional groups to themselves evaluate these sites in an abstract sense in offering comments.

The major reclamation opportunity and potentially the one likely to cause the least disruption is to extend existing retained new town areas that have an interface with a relatively shallow water frontage. This would benefit from existing community and service infrastructure, and could be served by existing or easily extended transport links. However even this will clearly be open to some local and environmental concerns.

7. Rock Cavern Development

There is little reason not to support rock cavern development, as this should be a win-win situation. However its primary use is to locate suitable government facilities or relocate existing ones that might be both land extensive, unsightly or have adverse environmental impacts. Clearly this would then free up valuable surface land for other necessary development. However it does not necessarily mean that such development would be without impact at both a construction and operation level, and such initiatives would be long-term operations. It is however more than likely that this development would be cost-effective in that it would make way for more land-intensive uses, and recent studies have essentially shown that this would be the case.

8. Concluding Remarks

It is difficult to understand why this public engagement exercise aims to establish site selection criteria, most of which must be self-evident. All criteria must subscribe to overall objectives, but it is ultimately the weighting and balancing of social/community, environmental, practicability and cost effectiveness that is at the heart of this.

While we agree that it is sensible to have a land bank for various medium and long-term needs, and to identify the means to achieve this, we are of the opinion that this needs to be equated with different growth scenarios in a strategic sense in accordance with clear planning objectives.

In addition to the obvious criteria, there are more elusive ones. Housing for example is a significant issue for many, and this has a political side to it in terms of quantity, quality, the need associated with different sectors, and the priorities associated with this in considering alternative land supply options. There is evidence to suggest that a significant number of both public, HOS and private units are sitting empty. This issue should be followed up by Government to ascertain potential opportunities to make more productive use of housing stock.

All land supply options have technical benefits, but also shortcomings in different degrees.

Three overriding issues are:

- (i) That new land supply should achieve a 'fit' in every sense with existing or planned communities and cause the least disruption and negative impact;
- (ii) That land supply and the notion of land banks, should tally with different strategic growth scenarios; and
- (iii) That land supply scenarios should, wherever possible, take into account ways to improve the existing environment, together with alternative means to rationalise/rectify the wasteful and

poorly planned use of rural land in parts of the NT.

These should be addressed as part of this exercise.

9. General Points

We would like to make the following general points on this type of consultation process:

- (i) The Public Consultation process as it is carried out at present, and over the past few years, has become, in large part, discredited. While there is a strong need for properly orchestrated community planning that invites community participation in local and district development and regeneration exercises, the notion of prolonged 'consultation' on a range of strategic matters and broad policy is questionable. There are more direct means to ascertain broad public opinion, for example through focus groups and surveys. We are unsure what feedback government is getting on this, but at a professional and business level there is a general feeling that the process avoids rather than facilitates clear decisions making. At a recent debate between our constituency members and CE candidates, both the leading candidates professed a need to review this extensive consultation process. This needs to be addressed by Development Bureau.
- (ii) There are several reasons for this:
 - Consultation processes have become increasingly complicated and prolonged, with several rounds of consultation on one issue, that is both repetitive and massively time consuming;
 - The public are being consulted on a very wide range of issues at both a local and territorial level, but there is little real engagement, nor a clear means to reconcile benefits to the wider community in the face of local NIMBY attitudes that are largely to be expected. Important strategic issues such as the current exercise have wide-reaching ramifications, indicating a need for holistic understanding. These need to be treated as complicated issues in the first place, and not simplified to the point where an impression is created that all that Government requires is a simple choice;
 - The term 'public' is itself questionable in terms of actual attendees at public forums and presentations – the vast majority of attendees and respondents are from special interest groups. Far from being a democratic and representative process, it has become dominated by those who either have a complete mistrust of Government, or who have clear vested interests. For consultation to become credible so that realistic and informed views can be properly evaluated this entire process needs to be reviewed. Different means should be found to consult with professional bodies who should be neutral on these issues and consider issues in terms of their viability and for the wider public good;
 - Professional institutes through their Public Affairs Committees generally respond to consultation documents and attend presentations through an obligatory sense of professionalism. However as these are becoming increasingly frequent, it is becoming more difficult to keep up with changes that are introduced and consultation periods that are clearly stated in consultation documents and then arbitrarily extended. The Land Supply consultation is a case in point. This dilutes the extent to which informed professional bodies can assist in a positive way;
 - There is no feedback from Government whatsoever following these exercises – only a cursory receipt of comments. Institutes are never informed how many respondents there have been on a particular issue, how many of these represent different interest or professional groups, how different views have been reconciled, or indeed what percentage of the total views is taken as being representative of overall opinions on which to base a decision. The process is in fact increasingly perceived as simply going through the

motions, at considerable time and expense, which ultimately has little or no real influence on actual policy.

- (iii) We are of the opinion that if unbiased and unpaid professional expertise is considered desirable by Government, a proper and transparent mechanism should be set up at the outset, whereby single or joint professional panels representing one or more institution could be set up to facilitate this, as 'partners' in the engagement process. It would also be good to be reassured that unbiased and generally informed comments from professional institutes were given suitable weighting in this process.

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