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Hong Kong, September 22, 2015

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Dear Sirs,

## **Re: Planning and Engineering Study for Hung Shui Kiu NDA**

Our concerns expressed on 15 September 2013 remain valid. Further, please note the following:

1. We support the plan to redevelop Hung Shui Kiu. The work involved is a test for the Government's ability to improve the overall living conditions, environment and economic infrastructure of the New Territories.
2. Prior to development, and to ensure destructive land uses are not pushed to other areas in the New Territories, Government must strengthen their enforcement powers and resources to address breaches of environmental, hygiene, buildings, planning and lands regulations in the New Territories. An effective economic strategy is required taking account of the number of residents, business operators, and employees within the affected area. A mere land use proposal identifying land for commercial is not enough.
3. In addition, land should be set aside for facilities required by new and modern logistics and distribution industry operators – minimum floor plates, ceiling heights, and supporting infrastructure required by operators in different sectors of the logistics and distribution industry. For example, pharmaceutical repacking industry has very different requirements than air cargo consolidators.
4. We are concerned that there is still no clear economic development policy in place which justifies the estimated jobs – all we can find is a land use proposal. The estimated employment is 150,000 in the Stage 3 proposal which is 1.5 times than the Stage 2 proposal based on "Logistics facilities" (37ha) and "Port Back-up, Storage and Workshop Uses" (24 ha) which cover 57 % of the economic area. There are no logistics and port industry strategies which demonstrate that the proposed land changes will indeed meet the logistics industry future requirements.
5. The lack of detailed plans demonstrating how the proposed zoning will benefit existing operators and employees beyond simplistic land use statistics. The officers in the public forum held on 8 August 2015 were unable to confirm details of the relocation of existing open storage and logistic operators, and whether indeed new land and developments are realistic opportunities which meet their needs. We are thus very concerned that open storage and logistic facilities will move to more ecologically sensitive areas, such as Nam Sang Wai and San Tin.

6. The Advisory Council on the environment also worried that the 107 ha of economic area will not be able to provide 150,000 job opportunities.<sup>1</sup>
7. We are concerned that the Hung Shui Kiu New development area will increase the demand for long-distance commuting in North-west New Territories, like Yuen Long and Tin Shui Wan, and further burden the public transport system.
8. We note that the traditional villages will be surrounded by high residential buildings, “logistic facilities”, “port back-up storage and workshop uses” zone and “enterprise and Technology Park”. The plan will have a negative impact on the air flow within villages.
9. We propose that for areas adjacent to new developments (including the village environs) are recognized as “*Enhancement and Urban Design Areas*”. A public works program including infrastructure, amenities, greening, stream revitalisation, enhancement of streets, paths and trails, lighting, clearing of illegal structures, bus shelter improvements, and other public space enhancements should be implemented to address blight, improve standards, resolve informal provisions and to revitalise and upgrade the degraded rural and village landscape.
10. All residential, commercial, industrial and other areas should be interlinked with cycling ROUTES, not limited to cycling tracks, and detailed plans for such ROUTES including tracks, shared roads, trails and supporting facilities should be mapped early. We are concerned over the ‘ring-road’ network and segregation of communities. How this will be avoided? The government should publish detailed plans showing walking routes and cycling routes, not just tracks, but all forms of cycling provisions including roads on which cycling is permitted on to ensure the network is complete.
11. The proposed “Industrial” zone at the western fringe of the NDA across KSWH is adjacent to “Conservation Zone” and now covered with dense woodland. The industrial activities may cause an adverse impact to the conservation area. These will also generate air pollution and noise which impact the future health of residents in the proposed residential developments.
12. A new policy has been proposed in 2014 to ensure sustainable development of agriculture in Hong Kong. The Board should reserve quality farmland to support the policy. Most of the “agricultural” zones in Stage 2 proposal are zoned as “Open space”. According to a site visit on 8 August 2015, there are some active farmlands on the South-west of San Sang Tsuen. The farming area will be surrounded by enterprise and Technology Park. In order to create a sustainable and liveable neighbourhoods between the villagers, farmers, future employees and residents, the government should preserve the existing farmlands and set up community farming and farming market in the area. In the proposal, the government will provide proactive and priority assistance in matching of farmers and agricultural land owners. The government should provide more details on the scheme.

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<sup>1</sup> [http://hk.on.cc/hk/bkn/cnt/news/20150907/bkn-20150907173710322-0907\\_00822\\_001.html](http://hk.on.cc/hk/bkn/cnt/news/20150907/bkn-20150907173710322-0907_00822_001.html)

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13. We note that three shopping streets lined with retail frontages are proposed, and the previous suggestion of outdoor dining and open markets were ignored. The government should encourage small commercial development and medium- small enterprises by providing outdoor dining and open markets. The areas for commercial use of public space including outdoor seating, shop extensions, hawker pitches, etc should be clearly identified taking into account prevailing FEHD, LandsD, BD, and LCSD regulations and practices. These will provide job opportunities suitable for low educated families in Tin Shui Wan, and make the area more vibrant and dynamic. If not planned for, they will either not happen, or alternative they do happen and cause obstruction, nuisance and hygiene concerns.

We look forward to your feed-back and we may make further comments accordingly.

**Designing Hong Kong Limited**  
**September 2015**