

ITEM FOR ESTABLISHMENT SUBCOMMITTEE OF FINANCE COMMITTEE

HEAD 118 – PLANNING DEPARTMENT Subhead 000 Operational expenses

Members are invited to recommend to Finance Committee the creation of the following supernumerary post in the Planning Department with effect from the date of approval by the Finance Committee up to 31 March 2019 –

1 Chief Town Planner
(D1) (\$130,500 - \$142,750)

PROBLEM

The Planning Department (PlanD) needs additional directorate staffing to strengthen the provision of secretariat and technical support to the Town Planning Board (TPB) in handling statutory planning matters under the Town Planning Ordinance (TPO) (Cap.131).

PROPOSAL

2. The Director of Planning, with the support of the Secretary for Development, proposes to create a supernumerary Chief Town Planner (CTP) (D1) post in PlanD for around three years till 31 March 2019 to lead an additional team under its Board Division for strengthening secretariat support to TPB and handling statutory planning matters, including judicial reviews (JRs) associated with TPB.

/JUSTIFICATIONS

JUSTIFICATIONS

Increasing Workload on Statutory Planning Matters and Judicial Reviews

3. The Government has been stepping up efforts to increase land supply and build up a land reserve by adopting a multi-pronged land supply strategy and various short, medium and long term measures to help meet the public needs on housing and other land uses demand. It is reaffirmed in the 2016 Policy Address that in the short and medium term, the Government will continue to conduct holistic land use reviews to make optimal use of land and to take forward statutory plan amendments for rezoning housing sites and increasing development intensity. To ensure that the policy objectives can be accomplished, proper handling and timely completion of the statutory planning procedures would be essential.

4. The Board Division in PlanD provides secretariat and technical support to TPB in handling statutory planning matters, including related JR cases. In terms of statutory plan amendments, TPB has been preparing an increasing number of new/amendment outline zoning plans (OZPs)/development permission area (DPA) plans and receiving an increasing number of representations and comments in respect of such plans in recent years. During the past five years, the total number of OZPs and DPA plans handled has increased from 128 in 2011 to 142 in 2015 with an increasing number of amendments or complexity of plan-making process for each plan, and the total number of representations and comments handled by the TPB secretariat has increased from about 8 900 in 2011 to about 93 500 in 2015, an increase of more than ten times. Given the growing public aspirations and participation in the planning process, we anticipate that the trend of receiving large numbers of representations and comments in respect of new/amendment statutory plans will persist. The significant workload in terms of new/amendment statutory plans and the large number of representations and comments received in respect of these plans have strained the manpower resources of the Board Division.

5. We anticipate that over 30 new/amended OZPs/DPA plans are ready for gazetting in 2016, and more new/amendment plans are anticipated in the coming years as the Government's measures to increase land supply continue. They include new OZPs for new development areas and new town extension (e.g. the three OZPs covering the Tung Chung New Town and its extension areas published in January 2016), OZPs involving rezoning of 'Green Belt' and 'Government, Institution or Community' sites and increasing development intensity to provide more housing land supply in the short run, and OZPs for replacing some DPA plans covering country park enclaves which are about to lapse. Timely completion of the statutory plan-making process and preparation of

/submissions

submissions to the Executive Council (ExCo) are vital for the implementation of the Government's policy to increase land supply for housing and other development projects. Adequate manpower resources for the Board Division in PlanD are therefore essential to this end.

6. The number of planning applications in relation to individual development projects from government departments and the private sector as received and processed by TPB is also on a rising trend. During the past five years, the total number of section 16 applications¹, section 12A applications² and section 17 reviews³ processed/handled by TPB has increased from about 1 100 in 2011 to about 1 350 in 2015. Besides, the Board Division is also responsible for handling planning appeals to the Town Planning Appeal Board against TPB's decisions on section 17 reviews. In terms of other secretariat support for TPB, the number of TPB meetings including its Planning Committees (PCs) has increased from 84 in 2011 to 115 in 2014 and 96 in 2015; and the number of TPB/PC papers considered has increased from about 1 380 in 2011 to 1 510 in 2015.

7. Apart from increased workload on statutory planning matters, TPB Secretariat also handles an increasing number of applications for JR which challenge TPB's decisions. Since 2011, a total of 46 JRs concerning TPB's decisions have been brought about by various parties. The JRs involve an array of complicated issues including the power and functions as well as procedure and practice of TPB. Up to April 2016, 29 JRs are still on-going at various stages of progress, with ten cases pending the granting of leave by the court, 14 at the Court of First Instance level and five at the Court of Appeal/Court of Final Appeal level. This represents a more than two-fold increase compared with 12 on-going JRs as at 2011. Among the 29 JRs, eight were lodged within 2015 and 2016. In handling the JRs, substantial amount of professional and liaison work is involved including preparing affirmations for TPB, providing responses to JR applicants' affirmations/legal submissions, attending court hearings, and undertaking follow-up works arising from court rulings in respect of the JRs, etc.

Streamlining the Town Planning Board's Procedure and Practice

8. Given the wide implications of planning proposals for the community and growing public aspirations and participation in the planning process, proposals for rezoning, change in uses and/or increase in development intensity will continue to attract increasingly diverse and strong public opinion. TPB and its secretariat attach great importance to the due process and procedural propriety of the statutory

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¹ Applications for planning permission made under section 16 of TPO.

² Applications for amendments to statutory plans made under section 12A of TPO.

³ Review of Planning Committees' decisions on section 16 application by TPB under section 17 of TPO.

planning process to ensure that the statutory provisions of TPO are complied with and its functions and powers under TPO are properly discharged and exercised. This notwithstanding, the risk of legal challenges by aggrieved parties against the statutory planning procedures and decisions by TPB will unlikely fade. It is thus necessary for TPB to keep under review its procedures and practices, including in the light of certain court rulings that have implications on the operation of TPB and its secretariat, with a view to ensuring propriety and reasonableness, while enabling TPB to discharge its statutory plan-making functions in an effective and efficient manner.

Need for an Additional CTP

9. At present, there are two CTPs in the Board Division. They are fully engaged in coordinating and vetting submissions to TPB and PCs, and providing services to TPB/PCs including supervising the preparation of minutes of the meetings, the publication of statutory plans and the release of information and decisions of TPB/PCs; providing planning advice to and monitoring the operation of the statutory planning system; preparing submissions to ExCo in relation to approval of draft statutory plans and reference back of approved plans for amendment; and representing TPB on matters relating to planning appeals, JRs and other court cases. Given the increasing public participation in the planning process, the public has become more forthcoming in offering their views on town planning matters, which results in a substantial increase in the numbers of representations and comments with regard to gazetted statutory plans and public comments on planning applications. Hence, the workload in dealing with matters related to TPB and its PCs, which meet once every other week, is very heavy. Moreover, the two CTPs have to handle the increase in workload arising from the preparation of new OZPs to replace the DPA plans currently covering country park enclaves, the measures to increase housing land supply and to meet other development needs as well as the related OZP amendments and planning applications. Since the two CTPs are already heavily loaded with the secretariat work and do not have spare capacity to take up the additional workload including the large number of JRs, the follow-up work required and the review of procedures and practices of TPB (the Review), it is necessary to create an additional CTP post to cope with the ever increasing workload on statutory planning matters of the TPB Secretariat, to provide the necessary steer and professional input for handling the JR cases and to take forward the Review.

10. Given that the current workload in relation to statutory planning matters has already stretched the manpower resources of the Board Division to its limit at both the directorate and non-directorate levels, additional dedicated directorate inputs are required to cope with the heavy demand for directorate support in respect of increasing workload arising from statutory planning matters, the large number of JRs and the follow-up work required including taking forward

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the Review and coming up with measures to enhance TPB's procedures and practices. In view of the complexity of the statutory planning matters, JRs and the Review which will encompass the statutory planning process, power and functions as well as procedures and practices of TPB, we propose to create a supernumerary CTP post up to 31 March 2019. The proposed tenure of the supernumerary CTP post is based on the anticipated increase in statutory planning work including the progress of individual JR cases in the coming years; the number of forthcoming new/amendment statutory plans; and it is estimated that the Review and the follow-up work will take about three years to complete, including consultation with TPB members and other stakeholders before the recommended enhancement measures can be implemented. We will critically review the continued need for the post before it lapses. Upon creation of the proposed CTP post, the new CTP will lead a dedicated team in the Board Division which is responsible for handling JR related matters, the Review and the necessary follow up work to enhance TPB's procedures and practices, as well as sharing the heavy workload of the two existing CTPs in statutory planning work such as handling town planning appeal cases and preparation of minutes of meeting, particularly for the special TPB meetings. As for the two existing CTPs, each CTP would continue to lead an existing professional team in the Board Division set up on a geographical basis⁴ and responsible for the handling of routine statutory planning work of the TPB secretariat, including the preparation of minutes of meetings, tendering advice on statutory planning matters, publication of statutory plans, monitoring the operation of the statutory planning system, and preparation of submissions to ExCo in relation to the approval and reference back of statutory plans.

Non-directorate Support

11. The proposed CTP post will be underpinned by a dedicated team comprising four non-directorate staff, viz. two Senior Town Planners (STPs) and one Town Planner (TP) redeployed from two existing teams within the Board Division, and one newly created Survey Officer (SO) post. One of the STPs will be responsible for handling the daily statutory planning work including JR matters and the follow-up work, while the other STP and the TP will also share the statutory planning work including the Review and matters related to TPO, where appropriate. The SO will provide technical support to the professional staff.

12. The proposed job description of the proposed supernumerary CTP post is at Enclosure 1. The existing and proposed organisation chart of PlanD is at Enclosure 2.

Encl. 1
Encl. 2

/ALTERNATIVES

⁴ CTP/TPB1 is responsible for Hong Kong Island, Sha Tin, Tai Po, North District, Sai Kung and Islands; and CTP/TPB2 is responsible for Kowloon, Tsuen Wan, Kwai Tsing, Yuen Long, Tuen Mun, Fanling and Sheung Shui.

ALTERNATIVES CONSIDERED

Encl. 3

13. We have critically examined whether the existing CTPs in PlanD have spare capacity to absorb the additional workload associated with TPB. PlanD's directorate establishment has been streamlined following the deletion of two vacant CTP posts in July 2009 vide EC(2009-10)5. While one supernumerary CTP post was created for a period of five years with effect from 13 April 2012 to head the then new Housing and Office Land Supply Section focusing on the implementation of measures to increase housing and office land resource vide EC(2011-12)14, the incumbents of all existing CTP posts are already fully occupied with their existing portfolios. It is operationally not feasible for them to absorb the increasing workload of the TPB Secretariat and the additional workload arising from JRs concerning TPB's decisions and to conduct the Review. The work schedules of the existing 16 CTPs in PlanD are at Enclosure 3. An additional CTP is essential for coping with the ever increasing workload of the TPB Secretariat and handling the increasing workload on statutory planning matters, JRs and the review of TPB's procedures and practices in a professional, comprehensive and co-ordinated manner. We have also considered if the work can be outsourced, but this is considered not feasible given the confidential nature of JR cases and the specific expert knowledge and experience required for the statutory planning work.

FINANCIAL IMPLICATIONS

14. The proposed creation of the supernumerary CTP post will bring about an additional notional annual salary cost at mid-point of \$1,663,200. The additional full annual average staff cost, including salaries and staff on-cost, is \$2,338,000. The total notional annual salary cost at mid-point for the non-directorate posts concerned is \$3,569,460 and the full annual average staff cost, including salaries and staff on-cost, is \$5,639,000. We have included the necessary provision in the 2016-17 Estimates to meet the cost of this proposal and will reflect the resources required in the Estimates of subsequent years.

PUBLIC CONSULTATION

15. On 23 February 2016, we consulted the Legislative Council Panel on Development on the proposal. Members supported the proposed creation of the supernumerary CTP post.

ESTABLISHMENT CHANGES

16. The establishment changes in PlanD for the last two years are as follows –

/Establishment

Establishment (Note)	Number of posts			
	Existing (as at 1 May 2016)	As at 1 April 2016	As at 1 April 2015	As at 1 April 2014
A	25+(1) [#]	25+(1)	25+(1)	25+(2)
B	277	277	277	254
C	546	546	542	523
Total	848+(1)	848+(1)	844+(1)	802+(2)

Note:

- A - ranks in the directorate pay scale or equivalent
 B - non-directorate ranks, the maximum pay point of which is above MPS point 33 or equivalent
 C - non-directorate ranks, the maximum pay point of which is at or below MPS point 33 or equivalent
 () - number of supernumerary directorate posts created with the approval of the Establishment Subcommittee/Finance Committee
 # - as at 1 May 2016, there was no unfilled directorate post in PlanD

CIVIL SERVICE BUREAU COMMENTS

17. The Civil Service Bureau supports the proposed creation of the supernumerary CTP post. The grading and ranking of the post are considered appropriate having regard to the level and scope of responsibilities and the professional input required.

ADVICE OF THE STANDING COMMITTEE ON DIRECTORATE SALARIES AND CONDITIONS OF SERVICE

18. As the post is proposed on a supernumerary basis, its creation, if approved, will be reported to the Standing Committee on Directorate Salaries and Conditions of Service in accordance with the agreed procedure.

Development Bureau
May 2016

**Proposed Job Description
Chief Town Planner/Town Planning Board (3)**

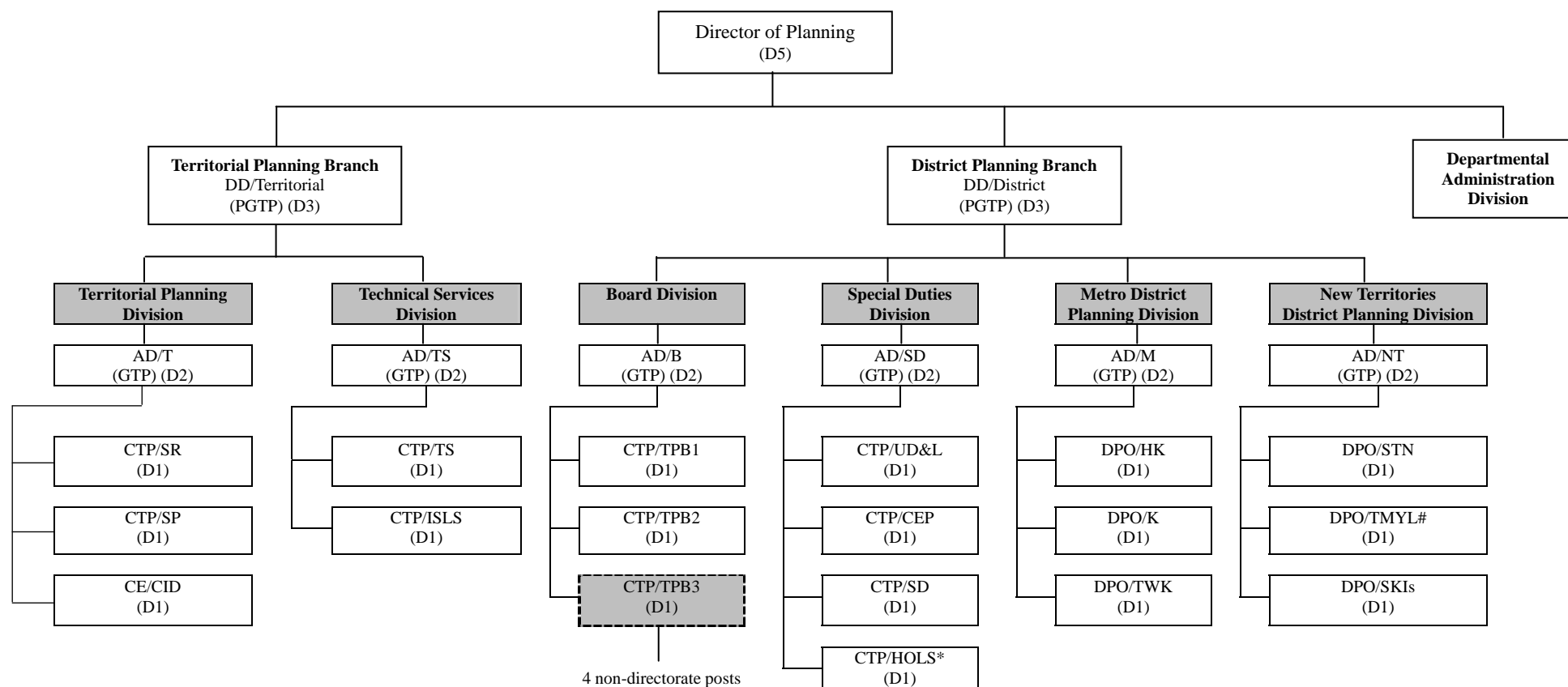
Rank : Chief Town Planner (D1)

Responsible to : Assistant Director/Board

Main Duties and Responsibilities –

1. To coordinate and vet submissions to the Town Planning Board (TPB) and Planning Committees (PCs) and provide secretariat services to TPB/PCs.
2. To represent TPB on matters relating to town planning appeals, judicial reviews (JRs) and other court cases.
3. To supervise and oversee the litigation and liaison work related to JR cases and supervise the timely preparation of responses and input to legal submissions and other documents.
4. To oversee the follow-up work arising from court rulings in respect of the JR cases.
5. To conduct a review on the procedures and practices of TPB.
6. To carry out any other duties as assigned by Assistant Director/Board.

Existing and Proposed Organisation Chart of Planning Department



Legend:

AD - Assistant Director of Planning
 B - Board
 CE - Chief Engineer
 CEP - Central Enforcement & Prosecution
 CID - Cross-Boundary Infrastructure & Development
 CTP - Chief Town Planner
 DD - Deputy Director of Planning
 DPO - District Planning Officer
 GTP - Government Town Planner
 HK - Hong Kong
 HOLS - Housing and Office Land Supply

ISLS - Information Systems & Land Supply
 K - Kowloon
 M - Metro
 NT - New Territories
 PGTP - Principal Government Town Planner
 SD - Special Duties
 SKIs - Sai Kung & Islands
 SP - Strategic Planning
 SR - Studies & Research
 STN - Sha Tin, Tai Po & North

T - Territorial
 TMYL - Tuen Mun & Yuen Long
 TPB - Town Planning Board
 TS - Technical Services
 TWK - Tsuen Wan & West Kowloon
 UD&L - Urban Design & Landscape

* Supernumerary post created to head HOLS Section from 13 April 2012 to 31 March 2017

 Proposed supernumerary CTP post to be created in 2016-17 to 2018-19

**Major Duties of the existing Chief Town Planner (CTP) posts
in the Planning Department**

Board Division

The two existing CTPs/Town Planning Board (i.e. CTP/Town Planning Board (TPB)1 and CTP/TPB2) are fully engaged in co-ordinating and vetting submissions to the Town Planning Board (TPB), Planning Committees (PCs) and providing services to TPB/PCs. The two CTPs do not have spare capacity to take up the additional workload arising from the large number of judicial review (JR) cases and the follow-up work required including the review on the procedures and practices of TPB. Each CTP is leading a professional team in the Board Division set up on a geographical basis and their main duties include –

- (a) preparing submissions to the Executive Council in relation to approval of draft plans and reference back of approved plans for amendment in accordance with the provisions of the Town Planning Ordinance (TPO)(Cap. 131);
- (b) coordinating and vetting submissions to TPB/PCs and providing services to TPB/PCs including overseeing logistic arrangements; supervising the preparation of agenda and minutes, publication of statutory plans, release of information/decisions to the media/public; taking follow-up actions required by TPB/PCs; and monitoring the submission of new/amendment plans and representations/comments to TPB for consideration;
- (c) monitoring the operation of the statutory planning system to ensure consistency in practice and liaising with the Department of Justice on legal matters related to the operation of the system; and providing advice on statutory planning matters to the various District Planning Offices; and
- (d) overseeing the handling of JR cases and town planning appeal cases.

Special Duties Division

2. The Special Duties Division tenders support to special planning tasks, urban design and landscape matters, and conducts work on enforcement and prosecution against unauthorised developments in the rural New Territories. We have also critically examined the existing workload of the four CTPs in the division

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as outlined below and considered that they cannot be redeployed to take up additional duties –

- (a) CTP/Urban Design and Landscape is responsible for overseeing the urban design and landscape inputs on submissions under TPO and Environmental Impact Assessment Ordinance (Cap. 499), other urban design, visual impact and landscape matters arising from planning and development proposals, studies, housing sites and amendments to statutory plans; and providing in-house support on air ventilation assessment matters. She also manages the Planning and Design Study on the Redevelopment of Queensway Plaza and oversees the overall management of term consultancies on air ventilation assessment.
- (b) CTP/Central Enforcement and Prosecution is responsible for overseeing the investigation, enforcement and prosecution of unauthorised development cases under TPO; formulating district enforcement strategies and guidelines; supervising the enforcement and reinstatement action against unauthorised developments and handling complaints and enquiries on enforcement matters. There are many enforcement and prosecution cases and public complaints requiring prompt and timely action.
- (c) CTP/Special Duties is responsible for managing planning tasks related to housing and office land supply, in particular the implementation of the North East New Territories (NENT) New Development Areas including the preparation of layout plans, drawing up land use zoning proposals, preparation of draft Outline Zoning Plans (OZPs), processing representations and comments to the draft OZPs, vetting land exchange applications and building plan submissions, supervision and management of planning studies undertaken by consultants. The CTP is also responsible for conducting land use reviews of potential development sites in NENT areas.
- (d) CTP/Housing and Office Land Supply is responsible for overseeing in-house land use reviews with a view to identifying suitable sites for housing, office and industrial land supply; supervising and managing consultants in undertaking major planning studies and in-house exercise on Area Assessments on Industrial land; conducting review on Government, Institution or Community (GIC) sites, public utility sites, vacant school premises and public open space; providing inputs and support to the committees and meetings relating to GIC sites, private recreational lease; coordinating planning input related to housing, office and industrial land supply with bureaux/departments;

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and supervising tendering of professional advice/comments to policy bureaux and departments, Legislative Council questions, media enquiries and the general public on all matters relating to housing, office and industrial land supply.

District Planning Officers (DPOs) in the Metro District Planning Division and New Territories District Planning Division

3. The six DPOs (pitched at CTP rank) under the two divisions oversee matters concerning forward planning, design and layouts, development control, land use reviews, planning studies and implementation of developments in their respective districts; the preparation and processing for approval of departmental plans and Planning Briefs for public housing and private sector comprehensive development/redevelopment projects; the preparation, updating and amendment of statutory plans; the reviews of statutory plans to incorporate restrictions on development intensity; the provision of planning inputs and advice in respect of urban renewal projects and other developments as well as planning appeals and judicial reviews; the management of district planning consultancy studies; and the preparation of papers and reports on objections/representations to statutory plans, planning applications etc. In discharging these duties, DPOs perform a pivotal role to ensure quality and efficiency, and take an active part in the meetings of the TPB, District Councils and other ad hoc meetings. They are already fully occupied with a wide spectrum of work which is subject to statutory time limits. Moreover, the DPOs of the New Territories regions are also busily engaged in the preparation of new OZPs to replace the Development Permission Area Plans covering the Country Park Enclaves.

Territorial Planning Division

4. The Territorial Planning Division undertakes territorial and strategic planning including conducting thematic planning studies of territorial and cross-boundary significance. Given the closer regional co-operation between the Mainland, Macao and Hong Kong, there has been increasing involvement of CTPs in various studies and researches, particularly those with a cross-boundary dimension. Moreover, with the launch of a new round of review of the territorial development strategy, i.e. Hong Kong 2030+, a lot of manpower resources have been devoted to the undertaking of the related tasks, which are mainly carried out in-house. Hence, the two existing CTPs and one Chief Engineer (CE) are unable to provide support to TPB. The major areas of responsibilities of the three officers are set out below –

- (a) CTP/Studies and Research is responsible for overseeing the undertaking of in-house and consultancy topical/thematic studies including studies on the Hung Shui Kiu New Development Area,

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Kwu Tung South and New Territories North; urban design study for Wan Chai North and North Point harbourfront areas; and the pilot study on underground space development in selected strategic urban areas. She also co-ordinates principal tasks in the implementation of proposals arising from the findings of planning studies and researches. In the course of these studies, the officer would be involved in extensive community engagement programmes. The officer also provides support to the work of the Harbourfront Commission as well as planning advice on various studies and reviews conducted by others, for example, review of the agriculture policy.

- (b) CTP/Strategic Planning oversees the conduct of Hong Kong 2030+ and the related consultancy services including the review of land requirements for market-driven economic land uses and the strategic environmental assessment. Hong Kong 2030+ is a comprehensive study involving many planning related topics, and most of the research work has been carried out by in-house staff in consultation with relevant bureaux/departments and external expert advisors through a hierarchy of committees and task groups which require substantial support of the Strategic Planning Section. The officer is also responsible for overseeing the undertaking of regional planning for Pearl River Delta (PRD) and infrastructures in the areas adjoining the boundary and providing planning advice to the Mainland side in the planning of co-operation zones within the free trade zones of Guangdong. Besides, she also oversees the Study on Consolidated Economic Development Strategy for Lantau and Market Positioning for Commercial Land Uses in Major Developments of Lantau and the formulation of the planning and conservation concepts for Lantau in supporting the work of the Lantau Development Advisory Committee, as well as providing secretariat support to one of its sub-committees.
- (c) CE/Cross-Boundary Infrastructure and Development is responsible for overseeing the conduct of transport research and studies relating to developments and infrastructures in the Mainland (in particular areas adjoining the boundary, the PRD Region and the Pan-PRD Region) such as the Cross-boundary Travel Survey; and provision of professional and technical support for various Hong Kong/Mainland/Macao liaison meetings on transport development and infrastructure projects, as well as organising discussion forums with Mainland officials and academics to promote regional co-operation and exchange of contemporary planning practices. With closer regional co-operation and the dynamic changes in factors affecting the planning and development of Hong Kong, Macao and the Mainland,

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there is an increasing and continuous need for researches with a cross-boundary dimension. Besides, the officer also oversees planning studies related to major infrastructure development for Hong Kong, for example, the study on the topside development at the Hong Kong boundary crossing facilities island of the Hong Kong-Zhuhai-Macao Bridge, study on the Yuen Long South development.

Technical Services Division

5. The Technical Services Division is responsible for providing professional/technical administration services, dissemination of planning information, co-ordination of grade management and training matters, promotion of community relations, formulation and revision of planning standards and guidelines, formulation of departmental information technology (IT) strategy, and assessment and forecast of territorial land supply. As the two CTPs are fully engaged in the following tasks, they have no spare capacity to take up additional responsibilities –

- (a) CTP/Technical Services is responsible for overseeing the preparation and updating of the planning manual, practice notes, technical circulars and technical matters relating to consultancies; implementation of training activities and co-ordination of grade management issues; release of planning information; managing the Planning Enquiry Counters and the Mobile Exhibition Centre; handling of public enquiries, complaints and referral cases of the Ombudsman and the Privacy Commissioner for Personal Data, etc.; implementation of outreach programme and publicity activities; formulation of departmental community relations programmes; and management of the City Gallery. The officer undertakes the formulation and revision of the Hong Kong Planning Standards and Guidelines. He also oversees a major research project in the history and development of town planning in Hong Kong and provides planning input to studies on cavern development and underground space development in the urban areas of Hong Kong.
- (b) CTP/Information Systems and Land Supply is responsible for preparation of Departmental IT Plan; implementation of IT projects; preparation of funding bids and tender documents for IT projects; maintenance and enhancement of the existing Computer-Aided-Design, remote sensing, digital photogrammetry, satellite positioning, Geographical Information Systems (GIS) and office automation systems; conducting researches on customising remote sensing, GIS, multimedia and 3D simulation technologies for

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land-use planning and presentation of planning studies; and updating of the Land Supply Database and application of IT in land supply related exercises. Some major IT projects include 3D GIS Planning System, Electronic Planning Application Submission System, Revamp of Core Planning Data Hub, Site Tracking Information System - Geoinfo OneStop, Statutory Planning Portal 2, Public Participation GIS for e-Engagement, revamp of Planning Submissions & Enforcement Cases Monitoring System and HK-Macao-Guangdong Information Database System, Mobile Computing and Site Information System and Aerial Photograph Information System. The CTP is also heavily involved in supervising the multi-disciplinary IT experts and planning professionals in the various IT projects to ensure that the various planning objectives could be met in an integrated manner.
