

Submission from Mr C M MO**(A) General Comments**

The Bill gives one the feeling that it is trying to complicate the issue by introducing rather unnecessary inventions and drafting. A case in point is Sec 24 Subsec 3(b) and Sec 24 Subsec 3(c), which are identical except for the name of the scheme. Certainly some of them could be simplified. For example, why is it necessary to have two different kinds of schemes? From perusal of the contents, it appears that the only difference is that the Authority wants to save the time of having two objection periods due to the necessity of the Development Scheme being required to go through the Town Planning Board (TPB) consideration process. However, this is inconsistent with the intention of calling for objections in the first place, as the TPB only considers planning issues. It seldom takes into account matters such as land issue, human factors, etc which perhaps is the reason why the Bill is proposing to give a chance to those affected to object.

The Bill also gives no indication as to how owners affected by the schemes can serve purchase notice. This is a long-standing problem and is unfair to the owners whose land is sterilized because of the Authority's action, or rather, non-action. Should the current administrative arrangement continue, or should the Bill address this point?

It should be emphasized that urban renewal is an expensive activity. The good old days of making a profit (The Pilot Scheme is a typical example!) by resuming and selling has gone. Even in those days, the Urban Renewal Scheme and the Environmental Improvement Scheme had to be dropped due to two main reasons - lack of funding and lack of rehousing units. It is presumed that Government will now at least commit sufficient funds and resources so as to enable a reasonable scale of urban renewal to be carried out by the Authority. This means that Government must be prepared to commit enough funds, not only for the next five years, but also for the many years that follow, as urban renewal is a lengthy process and five years may be too short a period. In fact the Urban Renewal Authority (URA) should state its goals and objectives within a reasonable time frame (say 10 years) once the amount of resources has been given or guaranteed to them.

With regard to implementation, it is noted that the currently lengthy procedure of the LDC has not been repeated. This is a great improvement over the existing one and will certainly help to speed up the process. However the detailed requirements for submission of proposals may cause delays and the URA should be given as much as flexibility to do the job so as to react to market changes.

(B) Specific Comments on the Bill

- Sec 18(1): As stated in (A), the detailed requirements, such as exact dates, might hinder the progress of implementation. For instance, if there is change of programme to that already approved, there will be a need for a resubmission and this means delay. It is therefore suggested that URA should only be required to submit its proposals in broad terms.
- Sec 18 (4): The Financial Secretary has only two choices: either approves it or disapproves it. Can he approve it with conditions? What happens when he refuses to approve it.
- Sec 18 & 19: It is noted that the Corporate Plan and Business Plan are new inventions. The former covers a period of five years and the latter covers one year.
- What is the use of the Board if everything is to be approved by the Financial Secretary. It is suggested that the Business Plan should be approved by the Board instead.
- Sec 21(2)(b): Withdrawal of the objection may not be limited to alteration of the boundaries. There could be other reasons, such as the proposed user or building height. It is suggested that this be suitably amended to reflect this.
- Sec 22 & 23: See comments made in Part A
- Sec 22(3)(b): What happens if later there are changes from the intentions? This may happen especially for those plans which have to go through the town planning process.
- Sec 22(5): Again as it is worded, the Town Planning Board may not be able to approve it with conditions, which is always the case.
- Sec 22(7): As stated earlier, consideration of objections, if required, will be done by the Town Planning Board, not URA. Affected parties therefore will have no chance of being heard by the URA on issues that may not be planning related
- Sec 25: The intention is understood. However, as it is worded, land would include vacant land, building, and other interests in land. Accordingly there will be a need for the URA to go to CE in Council even if later URA wants to sell flats or units.
- The rationale for such a requirement for land assembled is not understood.
- Sec 26: If it is the intention that the Authority should do the job, why not spell it out in Subsec (2).