

Hong Kong, 4 November 2013

Chairman and Members  
Panel on Housing  
Subcommittee on the Long Term Housing Strategy  
Legislative Council Complex  
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Dear Sirs,

Designing Hong Kong is a non-profit organization which promotes the health, safety, convenience and the general, social, and economic welfare of the community of Hong Kong today, without compromising the future. The aim of Designing Hong Kong is to increase public awareness and to improve Hong Kong's collective ability to plan and deliver a sustainable and a 'beautiful' city. We advocate the adoption of sustainability, quality of life and good design as core values in planning and development.

The Long Term Housing Strategy Steering Committee recommended some measures to increase housing supply. We would like to comment on some of the measures as follows.

1. Increasing development density

The Steering Committee suggested that the Planning Department should review the development intensity of existing sites for private housing and public housing developments. Increasing development density will bring environmental, visual and air ventilation impact to the developing area as well as the community. Traffic capacity and demand for road space should be considered when the government is increasing the development density in the community. Moreover, living in over-intensive areas may affect the living quality and personal privacy of the residents, and it may impact the use and crowding the nearby public realm and space available for pavements, open spaces and pedestrian walkways.

2. Relaxing or Lifting the Pok Fu Lam and Mid-Levels Moratorium

The outline zoning plan for Pok Fu Lam shows large tracts of unleased and unallocated land earmarked for development and infrastructure. The use of these areas can be reviewed. The government needs to conduct transport impact assessment in Pok Fu Lam and Mid-Levels before relaxing or lifting the moratorium. We are extremely concerned especially over any further increase of density in the Mid-Levels given the many substandard pedestrian facilities.

3. Review of Government, Institution or Community Sites, Green Belt Sites and Industrial Sites

The Government, Institution or Community Sites (G/IC), Green Belt Sites (GB) and Industrial Sites serve for different purpose in the community. The G/IC sites provide areas for recreation and public services in the community. GB sites are mainly used for conservation of natural environment and act as boundaries between urban and suburban areas to inhibit urban sprawl. We are concerned about incompatible land uses if the G/IC sites and GB sites are all rezoned to residential use, and the potential harm to the quality of the existing living conditions.

#### 4. Reclamation outside Victoria Harbour and building artificial islands in the central waters between Hong Kong Island and Lantau

This suggestion will damage the environment, and it is not a priority solution for housing demand. Hong Kong needs a holistic and sustainable marine spatial planning to conserve marine ecological resources. The government needs to conduct a strategic environmental assessment of all planned developments around the western waters, the noise, air quality, human health, carbon emissions and ecological impacts should be included in the scope of the assessment.

#### 5. Rock cavern developments for relocating the Sewage Treatment Works

We fully support this recommendation.

#### 6. New Development Areas at NENT, Ping Che/Ta Kwu Ling, Hung Shui Kiu

The size of potential farmland is diminishing and small house developments continue to impact land available even when zoned for agriculture uses. Agriculture offers an opportunity for diversification of culture and lifestyles, and enhances Hong Kong competitiveness. Although limited, the resurging interest in agriculture will contribute to food safety and security. All NENT consisted of numerous villages and majority of farmland in Hong Kong. The current living style and farmland should be enhanced and appreciated. A strategic plan including environment impact assessment and social impact assessment should be done to review the direction of NDA development.

#### 7. Developing the brownfields at North District and Yuen Long

To optimise the use of degraded land for housing of the brownfield at North District and Yuen Long should ensure destructive land uses are not pushed to other areas in the New Territories including the land has high agriculture potential and green belt. A clear identification of business-residences pattern at the district is required through survey of the number of residents locally employed as well as where current employees and business owners actually reside.

Furthermore, development projects should focus on improve the overall living conditions, environment and economic infrastructure of the New Territories. Government must strengthen their enforcement powers and resources to address the many breaches of environmental, hygiene, buildings, planning and lands regulations in the New Territories.

#### 8. Tung Chung New Town Extension and the Development of Lantau Island

The ecological value of Tung Chung River Valley and coast has been studied and recognized. Also, Lantau Island has extensive land designated as country park which are popular for the public to enjoy the nature beauty.

The process of case by case planning has resulted in a chaotic urban plan for the developments on the Kowloon West Reclamation, and this now looks to be repeated at Lantau and around the western waters. To optimize the use of land resources and to minimize the environmental impacts, the government needs a comprehensive planning for the Tung Chung New Town extension, developments on and along Lantau Island, and those on and along the western waters. Developing Tung Chung merely as “important transport hub to overseas destinations and the Pearl River Delta region” appears limited in nature and may not adequately reflect the labour market.

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In order to conserve our marine ecological resources, the government needs to follow the best practices in marine spatial planning and conduct comprehensive assessment of the environment, development plans and the many uses of the western waters. The current plans and projects, including the Tung Chung New Town extension and other developments on and along Lantau Island and around the western waters lack a comprehensive and long term plan which has been well assessed for all impacts including among others fisheries, shipping, noise, air quality, human health, carbon emissions and ecological impacts.

To conclude, the measures of increasing housing supply should focus on the sustainability, quality of life and good design in planning and development, in order to achieve a health, safety, convenience and the general, social, and economic welfare of the community of Hong Kong.

Here we submit our comments for your consideration.

**Designing Hong Kong Limited**  
**November 2013**