

The HKIUD's Comments on the "Hong Kong 2030+ : Towards a Planning Vision and Strategy Transcending 2030" Public Engagement

Enhancing Liveability :

1. In envisioning the future development and how Hong Kong could sustain its economic development to remain in a leading position as a global city in the region by 2030 and beyond, in general, we can appreciate the socio-economic and environmental issues ahead as well as the difficulties of finding a spatial solution or options to best meet the needs of such continual growth vis-à-vis the problems of an ageing population and spatial constraints. In this endeavor, we do have quite a number of values in common, including the overarching sustainable, green and resilient development principles, and the desire for improvements to living qualities and the built environment, instead of just to meet demands in terms of quantity. However, the strategy should not stop at the envisioning of the spatial framework at a theoretical level but should also address institutional mechanisms and the effectiveness of implementation, with elaboration on structural and organizational changes as appropriate since many of the proposals would require to be policy driven and to be followed up by meticulous inter-disciplinary coordination lacked in the current systems.
2. In pursuit for greening, although some extension of urbanized areas cannot be totally avoided, it should be remembered that we have in fact been enjoying the benefits of having our city in a "park" – viz. surrounded by the country parks, instead of trying to build a park within the city. The future style of living may be one of living together with nature as far as possible instead of trying to build back nature artificially after development took place. In connection with this and recent talks about building at fringes of Country Parks which have little ecological significance, elaboration should be made on the proposal of "*fostering rural-nature integration*" to alleviate likely concerns.
3. We have a wealth of the Country Parks, whilst we are living in a congested city. To enable enjoyment of more open space physically and psychologically, there is a need to connect the city with the Country Parks, which are currently not very accessible by public transport. There should also be adequate facilities support for such accessibility

(such as dining and leisure facilities). Also, as advocated by the EPD, supported by HKIUD and other institutes, there is a need for mainstreaming "Biodiversity" and bringing the nature into the city through consciously and strategically linking the nature (Country Parks) into the city's open spaces.

4. Human resources are the most vital if not the only assets of Hong Kong. It is most important to make the environment clean and safe and the accommodation and transport facilities affordable and accessible, in order to retain the valuable talents and attract new ones. Liveability relies on Quality of spaces. To enhance the living qualities of the city, due regard should be given to good urban design practice at both territorial and local levels, which are elaborated below. Urban Design should be mainstreamed in the future urban developments, including the New Development Areas and the revitalization of old districts.
5. We should STOP all uncoordinated infrastructure developments that are against the main direction of creating more quality open spaces. One example we recently encountered is the proposal by an engineering department of building a gigantic elevated walkway of 500m long, 10m wide, covering the Yuen Long nullah which is intended to be beautified by another engineering department. Other common examples are the unsightly and unfriendly noise barriers which would have been unnecessary if the design had minimized the intrusion of large volumes of vehicular traffic.
6. Whilst we appreciate the proposal to increase the per person spatial standard of GIC facilities and open spaces, just increasing the spatial standards of GIC facilities may not necessarily make the city more livable. Besides, streetscapes and walkability improvements would have a much greater impact on the liveability of older areas than simply adding more parks and GIC facilities. A quick-win proposal could be to brush up the street management arrangements, by smartening how our street signposts and bus-stop posts, etc. are integrated, as is being done already in most other cosmopolitan cities. Livable cities should be socially equitable and inclusive to both the elderly and the younger generations. The gaps of wealth should be reduced, essential facilities are to be made easily accessible and affordable, and ample opportunities should be provided for citizen participation, especially in local level

improvements. A livable city could be manifested in the community's respect for heritage, the return of disappearing street life and quality public buildings connected by walkable networks through sensitive urban design, and not just through commercial decisions. Whilst we welcome the emphasis on walkability and the related recognition of the benefits of urban permeability, including the recommendation that blocks longer than 100m should be avoided as much as possible, permeability at street level is more important than lavish additions of bridges and subways, which should only be the last resort. Development of physical structures should also be future proof to allow for changing circumstances. Smart Cities technologies may possibly help to regulate and legitimize local community initiated participation and sharing of various communal services, and even render some trips unnecessary as the services could be brought to the users on line.

7. Urban Designers support design of cities in 3-dimensional form, particularly where space is indeed limited and we have inherited and maintained a compact city form through many years. However, it does not necessarily follow that the future development should be dictated by engineering feasibility alone. The concurrent study on Underground Space Development in Selected Strategic Urban Areas has yet to convince us and the community at large that the proposals are fully justified.
8. As a related issue, the current Statutory Outline Zoning Plans are mainly two dimensional although they could be supplemented by the Notes and descriptions in the annotations and Explanatory Statements. Since the HK2030+ is not a statutory document, to achieve the desired city form would require the proposals to be duly incorporated into the OZPs and lease conditions. At present, development control parameters on OZPs are often reflective of the limits permitted under the Buildings Ordinance. For achieving building height variations and particular building forms, the differential plot ratios designated to different sites on an OZP were challenged by judicial reviews for alleged impacts on the full development potential. There appears to be a lack of provision for laws and funds to cater for compensation if variations in development intensities are required.

9. For old buildings, on the other hand, representing a memorable link with the past, are sometimes flexible and could be adapted for different uses, or have become adapted as such through a spontaneous process over time. Whilst the Study mostly sought for new development areas, it should also take into consideration the opportunities associated with conservation of heritage buildings, which could extend the useful life of the building and help to contribute to the livability and attraction of the city.
10. Whilst the Study emphasized that the Hung Shui Kiu NDA development would provide for pedestrian precincts together with air ventilation and urban design considerations, we should not forget making improvements to the older urban areas where the conflict between pedestrian and vehicular traffic is more acute. Two years ago, some NGOs and professional bodies have proposed the closure of part of Des Voeux Road Central to become largely a pedestrian precinct with an environmentally friendly transport corridor including the tram. Government should take the lead and carry out more studies to win back the streets for pedestrians, considering such public spaces as a mixed-use eco-system in a new way of urban life. Currently, the public would be consulted on footbridge or pedestrianisation proposals in a piecemeal manner, but it would be helpful if consideration could be given to how the overall network, above ground and underground would be coordinated and connected.
11. As a strategic planning vision, the Study should take into consideration the advance of new technologies such as self-driving vehicles, and alternative transport modes, like vehicle and bicycle sharing being done in other cities. Effort should be made to connect up the round NT cycleway system as soon as possible, although large scale cycleway networks in the main urban area may not be suitable or entirely feasible. In the meanwhile, to improve the pedestrian environment, a review should be made on the often uncoordinated street furniture and obstructive railings in the rather chaotic streetscapes.
12. The Study also mentioned the provision for “mixed uses” and “inclusive economy”. However, it is wondered whether the “mixing” would largely be limited to mixing within individual buildings. To enhance vibrancy within the community, it may be useful to review the zoning system and also its schedule of permitted uses in 3-Dimensional sense to enable

mixed uses within a neighbourhood area and not just within a building.

13. The above views and examples complement our advocacy for local place making for the community. The word “city” is derived from the root word for civilisation, meaning ‘befitting a citizen’. Cities are primarily about people, and we therefore need to concentrate on how the city is perceived, used and enjoyed – its streets, places and spaces. HKIUD professionals are in fact partners with the Planners in this process, both striving to make the future living environment a better place to live and work in.

Embracing Economic Challenges :

14. Furthermore, as the Study is a Planning Vision and a long term development strategy, there should be clearer directions on the future role of Hong Kong in a regional context in the GPRD, although mention was made about placing Hong Kong spatially in a 3-hour living circle and a 1-hour traffic circle in the GPRD. Apart from excellent international connectivity, Hong Kong has inherent and unique asset of a fine deep water port and locational advantages of being situated at the southern tip of the PRD – one of the world’s biggest mega-city regions. We should strive to extend these strengths accordingly, and not be overly conservative about the possible increasing interactions and cooperation, including employment and investment opportunities, between HK and neighbouring centres in the GPRD, such as with the fast developing Nan Sha and the quite well established Shenzhen. The proposed links (including the links through Lantau) could then be planned accordingly. Whilst considering the future of the logistics trade, has removal of the Kwai Chung container terminals as a potential source of development land supply been examined ?
15. Currently a lot of rural land in the NT is being used for port back-up and logistics uses as well as informal sector business. However, in the possible event of decline of the logistics industry, given keen competitions from other ports in the region, huge amounts of both prime city land and new territories back-up sites could / should become available to meet future development needs. Whilst “brownfield sites” could be used for development, suitable alternative accommodation needs to be provided since some of the informal sector businesses do

have important functions in serving the community. On the other hand, the axis of “Eastern Knowledge and Technology Corridor” may need to be further substantiated – as to whether it should compete with or complement the counterparts in Shenzhen. Such justification is important since other more imminent uses would supersede some of these proposals, as reflected in the reduction of Area 137 in Tseung Kwan O, being proposed to be rezoned for housing development.

16. In an even wider context, it would be useful to explore what are the roles of Hong Kong in the Belt Road initiative, the opportunities for employment and the land requirements. There is no reason why Hong Kong being a maritime city should not play a significant role in this field.

Creating Capacity for Sustainable Growth :

17. Appreciating the advantages of a compact city form vis-à-vis the forecast need for 1,200 ha or more development sites in future, from an urban design point of view it is hoped that there are some variations in building profiles and gradations, particularly at the transitions with the rural hinterland. Also, impacts to the local people, e.g. how the massive public and private housing developments in HSK NDA might affect the village community should be adequately addressed. On the other hand, has the possibility of changes to the Small House policy within the planning horizon been examined?
18. In respect of the old urban areas, the urban redevelopment process with increased densities and resultant stereotyped building blocks often undermines the local characters and fine grained urban fabric and the community is uprooted in the process. High density developments would also render redevelopment more difficult in the future. The process should be reviewed critically by possibly replacing “urban redevelopment” by “urban regeneration” – heeding community participation and equity, allowing for mixed uses and retention of the local character, where smaller projects could still be viable. Alternative means of financing and changes to land policies and building regulations including non in situ land exchanges and transfer of plot ratios should be explored further. This also applies to tackling of Nature Conservation and Heritage Conservation issues.

19. The Harbour Protection Ordinance and the court ruling of overriding public need stifled improvements to the water front in Victoria Harbour even if it involves only very minor encroachment on the water surface. A review to the PHO through a test case should be pursued under a “proportionality principle”, since Hong Kong, as a world city should deserve a much more vibrant waterfront of highest quality. .
20. There should be a lot of opportunities for implementing “place making” in the city. Each district has its intrinsic, natural, economic, historical and cultural amenities, apart from those events, festivals, celebrations common to others. Urban design studies should be carried out to identify such possibilities while respective District Councils could actively participate and initiate various proposals as appropriate. However, the Resource Allocation System should also be reviewed. Priorities of different departments often do not converge, and their criteria in assessing various projects are affected by maintenance costs and standardization considerations and would thus end up with mediocre designs. To be fair to the various departments, they do need human and other resources, but more importantly better coordination and alignment of efforts and innovative ideas.
21. The strategic spatial development pattern features a multi-nodal city form, with CBD2 and CBD3 and suggestions of introducing more jobs in the NDAs. The intention is appreciated, but in general, as shown in past experience, town planning were dominated by transport policies and engineering driven. Outline zoning plans would simply take on board road proposals if they have passed through the Roads Ordinance procedures. More planning innovation and urban design contents are warranted.
22. To increase land supply, reclamation outside Victoria Harbour is an effective way, but it should not be limited to the West Waters. We have strong reservations on the proposed East Lantau Metropolis (ELM) reclamation. Specific comments on the East Lantau Metropolis (ELM) are : New ways of reclamation could be considered, like the empoldering method used in Singapore - building dykes around the area to be reclaimed and draining water from it, instead of using a lot of sand. Other possible options are reclamation of a series of separate small

islands – with waterways between so that there are more interesting urban design opportunities instead of reclaiming one mega island. Could Green Island reclamation be reactivated despite the PHO ? since there needs to be land to accommodate the landing for the proposed transport links from Lantau and ELM.

23. There are also concerns about the NTN development and how the Country Parks may be affected at all. More elaboration is needed. A quick stock-taking on the quantity and state of brown-field sites should be carried out so as to help making of a conscious strategy of development priorities. More detailed information about the land ownership patterns could also help to substantiate why some sites are not chosen for development, compared to the choice of NTN and ELM. .
24. The notion of Urban PLACE is an acronym for Planning, Landscape, Architecture, Conservation and Environment, and incidentally relates to the wide variety of expertise that is needed to deal with the complexities of the modern city. This also implies the need for experienced and responsible urban designers who can think ahead in the planning stage instead of coming in too late at or after the implementation stage. Urban Design is not cosmetics for improving a poorly conceived plan after it has been made. HKIUD and its members are happy to offer urban design advice and help with the training of urban design skills in the Government at different levels of decision making and implementation if necessary.
25. The conception of HK2030+ also transpires a need for new policies, innovation and a change of mindset in the Government to drive matters forward in view of new ways of living in the years to come. In the meanwhile, comprehensive district master plans with due urban design considerations should be prepared prior to carrying out infrastructure projects in a piecemeal manner as in the past. To help mainstream in the community the appreciation and pursuit for good urban design, urban design competitions should be carried out more often as opportunity arises.