



# THE HONG KONG INSTITUTE OF SURVEYORS



29<sup>th</sup> November 2004

Mr Donald Tsang  
Chairman  
Council for Sustainable Development  
The Sustainable Development Unit  
M/Floor, Murray Building  
Garden Road  
Central  
Hong Kong

Dear Mr Tsang

## Sustainable Development – Making Choice for Our Future

The Hong Kong Institute of Surveyors is in support of the Administration in seeking community feedbacks to the document "Invitation and Consultation on Sustainable Development – Making Choice for our Future". Upon perusal of the paper we believe matters highlighted in Chapters 2 and 4 of the document are most relevant to our profession and are pleased to submit our comments as attached for your review. The institute would also welcome opportunity to discuss with you and/or your colleagues and further elaborate our submission.

Should further information be required please feel free to contact our Secretary General, Mr. Gordon Ng at 2526 3679.

Yours sincerely

  
Tony Tse  
President

Encl.

c.c. Gordon Ng, Secretary General, HKIS

## **Summary of HKIS Comments on Sustainable Development – Making Choices for our Future (Chapters 2 & 4)**

### **Chapter 2 Solid Waste Management**

Households and businesses should be charged directly for the waste management services provided. The Polluter Pay Principle ("PPP") should be followed. This charge can be a flat rate for all as long as it is a fair system.

Having said that, the needy people should be taken care of and exemptions from charges should be provided. It can be handled via the Management Company or the Incorporated Owners of the Buildings. To be fairer, charges can also be based on volume of waste generated by each individual household or business premises but this method may involve huge administrative costs. A balance is needed between administrative and practicable considerations together with the PPP principle

Given that land is rather scarce in Hong Kong, landfills are considered unsustainable means of disposing solid waste. Hong Kong should plan to build alternative waste disposal facilities. Singapore and Japan have adopted thermal treatment plants for waste disposal. These can be used as references for Hong Kong. Composting facilities need an effective waste separation system. These may not be suitable for Hong Kong for the time being.

Given that locating new waste facilities is going to be challenging, in general, we should endorse that incentives should be considered to encourage communities to accept such facilities. But factors like ownership of the facilities, types of incentives such as monetary incentives, infrastructure incentives, etc., mode of operations (e.g. franchise) should be carefully considered. A large amount of input is needed from experts in the concerned areas.

The Government should put in place more progressive arrangements to stimulate the recovery and recycling industries. Capital outlay, infrastructure expenditure, programmes and plans should be considered. Payback period, internal rate of return, profit and loss should be calculated. Possible difficulties should be anticipated.

We suggest that a single authority be set up to plan and manage all aspects of our solid waste management. It is considered that experts from various government departments such as EPD, Lands Dept, FEH, CED can join together to work it out. This can be coordinated by the existing Council for Sustainable Development. Public participation is a must. Different scope of administrative functions such as education, planning, environmental impact assessment, collection, facilities management, enforcement, etc. should be considered. It is also suggested that the authority should be constituted by various stakeholders, e.g. developer, Friend of the Earth, etc.

In summary, HKIS supports the PPP but we need to take care of the needy. A fair system should be set up to make the sharing of cost burdens and economic gains more equitable to all sectors of the society especially disadvantaged communities.

#### **Chapter 4 Urban Living Space**

Urban and NT-based developments are not mutually exclusive, a suitable balance should be kept between them. People should have the freedom to choose whether to live in a lower density area or live closer to the downtown.

It is envisaged that there will be greater demand on commercial activity at areas around the Victoria Harbour and at the CBD of Shenzhen. Further massive residential developments should not be encouraged. Also we do not support the land using zoning of R(A) in new towns as the retail podium floors can cause a lot of problems like noise and traffic to the surrounding neighbourhoods.

Country parks are the most valuable heritage of Hong Kong and we fully support their preservation for public enjoyment. In this regard, we support brownfield site developments to provide the necessary accommodations for the population of Hong Kong e.g. relocation of Kai Tak Airport to allow for more space for future developments. Population density for these brownfield redevelopments and the old urban areas should be monitored closely. For example, there is an impression that Shamshuipo is highly populated. This should be reviewed under the planning perspectives. Proper and careful planning is of paramount importance for NT developments. Furthermore, planning without implementation is abortive. We need a proper implementation plan as well to put the scheme or developments into action.

We need to strike a balance between residential and commercial developments. A rail-based transport policy is supported for Hong Kong, as proposed by CTS-3. More space should be provided for park-and-ride facilities. Railway line should terminate at downtown areas: point-to-point journey to reduce interchanging facilities for commuters. Residential development in NT must reinforce usage of existing road and rail infrastructure. Generally speaking:-

- Mid and high rise around rail, plot ratio can be slightly over 5. Other areas not more than 5.
- Low rise in areas of lesser accessibility (and perhaps of low amenity value)
- R(A) site allows the lower floors for commercial activities. Since commercial activities attract traffic and create a feeling of high density, commercial activities should be carefully allocated. (e.g. most commercial activities are allocated in shopping centres). Catchment area is important to the survival of shopping centre.

- Land resumption by Government or facilitation of land assembly in such areas is a necessity.

Initial subsidy / Incentive is very important to encourage revitalisation of old neighbourhoods. Proper utilization of urban land would obviate the need for the development of virgin land in the NT, e.g.

- Development of "Greenfield" land viz Kai Tak and West Kowloon
- Urban renewal / revitalization

For "greenfield" development creative planning solutions are required to provide high quality living environments focused on harbour, not the sterile, repetitive development characteristic of "new towns". This is almost exclusively Government land and can be developed with lower densities without infringing private property rights.

For "brownfield" development, e.g. blighted industrial land, more innovative strategy is needed for their rejuvenation into uses that will cater for the demand of GIC and related amenities by the local communities.

We suggest some basic principles for urban renewal/revitalization : for instance, it should be a mandatory requirement for private owners to upkeep their buildings. Incentives such as rate relief can be provided. Respect for private property rights is a fundamental principle for Hong Kong. Plot ratio should not be mandatorily reduced to achieve a lower density zoning for certain congested areas of Hong Kong without proper consultations. By reducing the plot ratio and thus the development potentials of existing sites, this will curtail the incentive for urban renewal.

#### Strategy for Preservation of Historical Heritage:-

- Allow non-insitu land exchange. The policy should be endorsed by ExCo as the future direction for historical preservation.
- An independent organization e.g. "Conservation Trust" should be set up to take up the work, to be managed by dedicated group of experts. It can be kick-started through donations by philanthropists. They should be properly run based on commercial principle but not profit-making.

We suggest the Government carry out rehabilitation, revitalisation and preservation in order to create more sustainable neighbourhoods but understood that there is no such thing as free lunch. Government can contribute to urban revitalization by selectively vacating old HA estates to new HOS or HA developments and by rezoning them in whole or in part for open space uses. Also we may acquiring old/obsolete, especially those sub-strata titled industrial buildings in industrial zones, and then re-zoning them for open space. It would provide open space for old districts like Kwun Tong and Kowloon Bay.

We suggest that mandatory requirements should be imposed for new land / district, the private development rights for old / existing lands should be respected. Planning should be people-oriented, not engineering-led. Greater public involvement should be enhanced by way of consultation at the planning stage. It is proposed that the Building (Planning) Regulations are to be overhauled to remove those outdated requirements. More green features by way of bonus plot ratios should be encouraged.

On the issue of sustainable urban design, much still needs to be done. Recently, the Buildings Department initiated some welcome strategies but unfortunately these were reluctantly and grudgingly accepted by other departments concerned such as the excessive development volume and public revenues, etc. Whilst these are issues which cannot be ignored, priorities must be agreed at a senior policy level and government policies be implemented cohesively i.e. it cannot be left to the individual effort of a few far-sighted officials. A less prescriptive building code, a more flexible approach to site coverage versus height, financial incentives through additional plot ratio or tax allowances are a few of the basic initiatives which can be explored and they would allow more creativity than simply following the mandatory requirements which, in practice, often proved to be rigid and inflexible.

Maximum ceiling height of 2.8m for residential units is considered insufficient and should be increased to 3.1m for the enhancement of internal living environment for the public. Cityscape – subjective design should not be circumscribed by rigid planning guidelines. More flexibility and creativity should be allowed to encourage innovative building design. Tighter height control in high-density areas is appreciated but more flexibility with building height should be allowed for lower density areas. Waterfront area – how to make it vibrant and accessible to local and international tourists. Design, implementation and ongoing management of the promenade area should be handed over to the private sector for better provision of facilities and more creative use. Clarke Quay in Singapore is a good example. More pedestrian precincts are supported.

29 November 2004

The Hong Kong Institute of Surveyors