

**HKIP Position Paper on**  
**The District Study for Yau Mong of Urban Renewal Authority (URA)**

**Introduction**

The Hong Kong Institute of Planners (HKIP) appreciates the objectives of the District Study for Yau Mong (the Study), which maps out a blueprint for regenerating the old districts and formulates new planning tools to incentivize both URA and the private sector to participate.

Urban decay and overcrowding have substantially affected the quality of living in the Yau Mong district (YM). Rapid ageing of buildings calls for timely effort from the URA and the government to expedite the pace of rehabilitation and redevelopment.

HKIP recognizes that the URA has made its best endeavour with three Master Urban Renewal Concept Plans (MRCP) as well as new mechanisms for redevelopment. We understand that the MRCP+ currently adopted is only a conceptual framework and further information will be announced for public engagement; hence only strategic directions are commented in this paper. We look forward to receiving more details on the proposals and design schemes to address our concerns. Planning, transport, environment, air ventilation, and socio-economic implications of the MRCP+ should be fully examined before proceeding further.

We acknowledge the significance of the Study in respect of the new planning tools and urban renewal mechanism it introduced, which could be adopted in other redevelopment projects and other districts where appropriate, as suggested in the 2021 Policy Address. The Government has also invited URA to commence similar studies in Tsuen Wan and Sham Shui Po.

HKIP is aware that these planning tools are efforts to resolve the problems of the lack of financial viability for sites already developed at or above permissible plot ratio, and down-zoned areas as well as the remaining single blocks of dilapidated buildings; and to induce private sector participation so as to step up the renewal momentum. Nevertheless, if such tools would result in substantially higher density in the Receiving Sites (RS) and Street Consolidation Areas (SCA), we have grave concern on their profound implications to YM which already has the highest density in Hong Kong (180 persons per 1,000m<sup>2</sup>).

With the information available at this moment, we have serious reservation on the potential increase in development intensity as follows.

### **Significant Increase in Development Intensity**

If we compare MRCP+ (growth scenario) and MRCP- (benchmarking existing development level), domestic GFA is targeted to increase from 4M m<sup>2</sup> to 4.7M m<sup>2</sup>. This is equivalent to an additional domestic GFA of 700,000m<sup>2</sup>. Not to mention the possibility of further reduction in flat size from redeveloping existing units, the 700,000m<sup>2</sup> additional domestic GFA would easily mean an increase in 15,000 to 18,000 units without control over flat sizes and an increase in population of some 40,000 – 50,000.

We do not understand how population could be capped at the existing level of 213,000. In the likely event of an increase in population density, we are concerned about how the quality of living could be ensured with sufficient G/IC facilities and infrastructures. We are also concerned that the target increases in non-domestic GFA of over 1.7M m<sup>2</sup> would aggravate the notorious traffic congestion of the district and the home-job imbalance of the Territory. Market demand for additional office and retail developments in YM is yet to be proven in view of the large upcoming supply at the High Speed Rail West Kowloon Station and in West Kowloon Cultural District.

### **Not In line with Strategic Planning Framework: HK2030+**

From the time of Metroplan to the latest Policy Address and final recommendations of Hong Kong 2030+ (HK2030+), the government has been championing the thinning out of the main urban areas to improve livability and to resolve the problem of home-job imbalance. The YM urban renewal and restructuring should be planned in line with the strategic planning objectives of HK2030+.

We have been given to understand that URA is planning to adopt MRCP+ for projects in what was described as Cycle One. If there is indeed significant increase in density in Cycle One, it may not be possible anymore to achieve MRCP0 or MRCP- in subsequent Cycles.

HKIP has the view that the currently proposed Transfer of Plot Ratio and the proven success of Linked Sites should effectively be deployed to sites in NDAs so that enhancement of financial viability and thinning out of YM could be achieved at the same time.

The HK2030+ also aspires for larger living space per person. It is hopeful that with the study on flat sizes to be launched by the Development Bureau, there will be opportunities for imposing control on minimum flat size and indeed on an overall average flat size in (re)development sites so that the aspiration for larger living space can be realized in both public and private housing.

### **Significant Urban Design Impact**

Receiving Sites (RS) may enjoy a much higher development intensity by incorporating adjacent roads and government sites for plot ratio calculations to increase financial viability. With transfer of plot ratio from Sending Sites (SS), development intensity could be further increased. The design and layout for RS will have significant urban design impacts on the district and local levels including building height, building mass, and air ventilation. Detailed planning briefs to guide the redevelopment at the RS is necessary.

In Street Consolidation Areas (SCA), it is understood that street areas will be distributed to pre-determined land parcels to increase the financial viability. Unlike comprehensive redevelopment areas, redevelopment of higher intensity within the original narrow street blocks in SCA would unlikely bring improvement to block layout and flat layout. It will just result in taller and bulkier buildings with likely adverse impacts on traffic, visual, and air ventilation. It might take a long time to complete the redevelopment of a whole SCA. Turning the closed streets into a well-designed green space will apparently come last.

Currently, on-street parking and loading/unloading in YM is very common, leaving very limited carriageway for commuting vehicles and traffic congestion is a daily phenomenon. It is hard to imagine how traffic impact could be acceptable by further closing down of streets in SCAs.

Furthermore, we do not know who would ensure an integrated design for the green space and who would take up the long-term management and maintenance, bearing in mind that such portions of closed streets are vested in different land leases. A holistic urban design plan and implementation framework for such provision of at-grade open space is outstanding.

## **Profound Social Impact**

Redevelopment is not just concerned about buildings. It affects a large number of residents and businesses. With the existing high population density in YM, massive decanting is expected. Disruption of social network and rehousing issues need to be addressed. Do we have enough public housing units in the broad main urban areas to rehouse the eligible people affected? Will the small traditional businesses survive upon large scale redevelopments? A recent survey conducted by district council members found that 90% of residents prefer to be rehoused in same district<sup>1</sup>.

We acknowledge that private sector participation is vital to implementation and appreciate the attempt to explore more financially sustainable mechanisms. But a comprehensive planning approach should not be compromised by the undue weighting on a single aspect: financial viability. HKIP would like to see more details from URA for a holistic planning vision, which caters for every aspect, including social and environmental considerations, envisioning a mutually beneficial solution for the government, private sectors, and the people.

## **Conclusion**

The Study has shed light on an area-based approach to retrofit the decaying urban areas. HKIP appreciates the efforts for a more financially sustainable urban renewal solution, but we must not lose sight of the strategic planning objective of thinning out the main urban areas and other planning objectives, including social and environmental sustainability. Amid the multiple land supply initiatives proposed by the Government, such as the Northern Metropolis and the Artificial Islands in the Central Waters, the substantial increase in the development intensity in YM is yet to be justified.

Rehabilitation is imperative to contain and mitigate the urban decay problems in the foreseeable future, given the enormous resource requirements in redevelopment. The Government and the URA should give full weight to rehabilitation, which helps prolong the lifespan of buildings and minimize social impacts. The URA has made remarkable contribution in rehabilitation in the past years. When more land in NDAs becomes available over time, there

---

<sup>1</sup> <https://www.scmp.com/news/hong-kong/society/article/3157669/hong-kong-housing-almost-all-residents-be-affected-renewal>

will be genuine opportunities to realize the aspiration of thinning-out through Linked Sites and Transfer of Plot Ratio.

The cost of acquiring properties within the redevelopment sites has been high particularly for owner-occupied flats (which is based on the unit price of a notional 7-year-old flat). Instead of adding density to increase financial viability, a review of the current compensation policies is certainly an alternative.

HKIP sincerely hopes that our comments could catalyse wider public discussion, with the shared goal to achieve a liveable and life-flourishing city for all.

**Public Affairs Committee**

**Hong Kong Institute of Planners**

**December 2021**