



THE HONG KONG INSTITUTE OF
SURVEYORS

香港測量師學會

13 October 2017

By Fax (2523 9187) & Post

Mr Chan Fan, Frank, JP
Secretary for Transport and Housing
Transport and Housing Bureau
22/F, East Wing, Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

Dear Mr Chan,

Re: Review of Loading and Unloading and Car Parking Requirements for Private Non-Residential Developments in the Kowloon East Area

We write to suggest a review of the loading and unloading and car parking requirements for private non-residential developments in the Kowloon East Area with an aim to encourage private redevelopment.

We have been given to understand that the Transport Department has required in various land exchange/lease modification application cases to adopt the "high end" loading and unloading and car parking requirements ("high end requirements") according to the Hong Kong Planning Standards and Guidelines ("HKPSG"). We have received feedbacks that such requirements have made the design of some proposed developments very difficult in particular for sites which are not large like those with site areas below 2,000 sqm. The consideration of accountability of plot ratio of car parking spaces above ground and the "high end requirements" drive the construction of many levels of basements in new developments. For development sites with small areas, say less than 1300 sqm, the "high end requirements" could mean the construction of 5 or more levels of basements with ramp access. If there are other planning and traffic complications like set back of site for traffic improvement and ingress/egress restrictions, then the number of basement levels could increase further.

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The high number of basement levels and the design constraints resulted from the “high end requirements” would mean significant increase in construction cost and time. This could lead to a “no go” situation for such proposed development having regard to financial viability and uncertainties related to land premium negotiation. Both the increase in development costs and the delay in the delivery of new non-residential floor space (including no go for development projects) are not good for the Hong Kong economy nor the government initiative to turn the Kwun Tong / Kowloon Bay areas into CBD2.

There has been a significant increase in car parking spaces in the Kowloon East area given the completion of various commercial/office developments in recent years. There are also various government initiatives to improve the accessibility / connectivity / walkability in the Kowloon East area with the intention to encourage sustainable development. By adopting the “high end requirements” could potentially lead to more vehicular traffic in the future which would not serve the planning intention. A comprehensive survey and review of the utilization of car parking spaces within these developments would be helpful for the government in its decision making.

We trust that appropriate level of loading and unloading and car parking provisions required for new developments in the Kowloon East would help the transformation of the area into CBD2.

Please feel free to contact myself and /or the HKIS Secretariat on 2526 3679 if you require more information or would like us to elaborate on the above views.

Yours sincerely

Sr Thomas Ho
President
The Hong Kong Institute of Surveyors

cc Chief Secretary for Administration, Mr Matthew Cheung, GBM, GBS, JP (by fax)
Secretary for Development, Mr Michael Wong, JP (by fax)