

Comments of the Public Affairs Committee of the Hong Kong Institute of Urban Design in response to the Home Affairs Bureau’s Public Consultation on Review of Private Recreational leases

1. There appears to be mainly 3 aspects that need to be considered in this public consultation, namely, the land value, the equity of usage, and competition for spaces in the city.
2. Firstly, as the review arises from a report of the Director of Audit, there is apparently an emphasis on the **land values** as to whether the sites were used to their maximum “potential”, in terms of intensity of development and number of users. Secondly, sites under Private Recreational Leases caused public concern may possibly be due to a lack of monitoring on their “under-utilisation” even for the well-meant “supportable” purposes and whether restriction on accessibility was already a built-in condition. Thirdly, it is the main issue we wish to comment on – i.e. about the spatial, planning and urban design implications. We would however comment on the issue in general instead of commenting on each site under review since each site has to be assessed in its locational context in detail.
3. **Land Value** versus other values -- In a city, the importance of each site should NOT be judged simply on its monetary value. Parks, streams, amenity areas and municipal services and facilities which have no or minimal “developments” on them may have justifiable causes for being retained. Chapter 4 of the Hong Kong Planning Standards and Guidelines (HKPSG) recognizes that “recreation” is an essential land use, and “recreation stems from a basic human need for activities which are essential to the mental and physical well-being of the individual and the community as a whole.” And “Recreation is accepted as an essential activity for which land must be allocated.”, although certain active recreation can be provided without the need to set aside exclusive land areas, for example, sports centres can be provided in multi-use buildings.
4. Furthermore, it is noted that the HKPSG distinguishes sports activities into “Core activities” like tennis, table tennis, badminton, squash, basketball, volley ball, etc. and “non-core” activities, which are specialized types of recreation which have fewer demand, including golfing, horse-riding, wall climbing and mountain biking, etc. (ref. Para.1.14.20 HKPSG Chap 4). However, there is no specific planning standard for the latter. It just states that for these non-core sports activities, “the provision is encouraged by Government.” Whereas Government only provides for the core activities and these are managed by the LCSD, it therefore transpires that there is a fundamental need for a review first of all on Hong Kong’s sports and recreation policies before discussion is

- made on their management and their site values site by site.
5. In response to the land search that Government is currently undertaking, we have recently commented that : “if large private recreational club sites are considered suitable for housing development, before they are resumed and rezoned, they should preferably be first relocated to sites less urgently demanded for urban development, for example, near to the fringe of country parks so that the training of players will not be disrupted.” “Recreational activities and sports contribute to wholesome personal development and health of the community as well as in promotion of civic pride, as can be witnessed in the successes of local athlete teams in the recent Asian Games.”
 6. **Equity of usage** – The current procedure for granting and renewal of PRLs as stated in para.2.2 of the consultation paper (Lands Department to check that the use is not incompatible with the land use zoning plans and lease conditions, etc.) is quite questionable. Essentially, it is for matters to continue with little questioning except when the site is immediately required for other developments. The land use zoning may not have been reviewed without a clear sports and recreation policy that is kept abreast with the times. Besides, it is wondered why in the cyber-age, and we are talking about developing a smart city, the information about the use of the recreational facilities could not be made more transparent and easily monitored through the application of information technology, and thereby allow the public more opportunities to share and enjoy the facilities.
 7. **Competition for Space** : The HKPSG has very elaborate classification and “definitions” of various types of recreational spaces by hierarchy (such as regional, district, local, amenity areas), their relationship with the number of population meant to be served, by function and types (such as active or passive) as well as in different locational contexts, such as urban areas, countrysides, coastal and inshore waters, urban fringe parks, etc. However, these are only spatial guidelines. Government should also inform the public how the visions and standards would be implemented.
 8. **Urban Design Aspects** – Recreation and sports facilities with relatively lower intensity and heights of development may also have the merit of serving as breathing spaces in the congested city fabric. Chapter 4 of the HKPSG points out that “open spaces also allows the penetration of sunlight and air movement as well as for planting for visual relief.” And is “an essential land use element in urban design. These functions are particularly important in a high density, high-rise built-environment like Hong Kong.”
 9. **Conclusion** –
 - (a) To sum up, it is considered that there is a fundamental need to review the overall sports and recreation policies and accord a proper priority of public interest

compared to other values like land values.

- (b) The spatial standards and zonings on the town plans should and could then also be reviewed.
- (c) More use should be made of information technology to monitor the use of the facilities, so as to promote more opportunities for the facilities be shared and enjoyed by the general public as far as possible.
- (d) A pragmatic approach should then be taken in the selection of specific sites for retention or change. We would illustrate why the site context is relevant, by citing as an example the case of the Fanling Golf Course on which we have recently commented. In our submission to the Task Force on Land Supply, we have commented as follows: “If the eastern part (32 ha) is to be developed for housing purposes, it can be considered as a logical extension to the FL/SS new town in view of its proximity to the Sheung Shui Railway Station. There are many mature trees of high amenity and even ecological value (subject to detailed study) in the western part (140 ha). It is not acceptable to bulldoze the site and develop for public housing. If the review of private recreational leases eventually recommends to terminate the current lease, it is suggested that an alternative site be identified for its relocation and the groups of trees should be conserved and the site turned into a park for public enjoyment.” Each site has to be assessed on its merits and locational context.

ENDS

**Public Affairs Committee of
Hong Kong Institute of Urban Design
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