



# 香港地產建設商會

## THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

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22 December 2014

Development Bureau  
17/F West Wing  
Central Government Offices  
2 Tim Mei Avenue  
Tamar, Hong Kong

Dear Sirs

### **Proposed Establishment of a Harbourfront Authority (“HFA”)**

We support in principle the establishment of a dedicated agency for the comprehensive management of the waterfront in the form of a Harbourfront Authority, and are pleased to append below our comments on the proposals in the Phase II Public Engagement Consultation Digest.

#### ***Governing Board and Executive Office***

We believe there should be a balanced representation of the interests of the various stakeholders on the Board of the HFA. Its members should have expertise and experience in management, project development and project finance. Representatives from the development industry should be included.

We note that the current Harbourfront Commission (“HFC”) has a well-balanced composition and has served the community well. We would propose that the composition of the HFA to follow a similar model as the HFC’s. We also agree with the proposal that, to enhance efficiency and cooperation with Government departments, the executive office of the HFA should initially be made up of experienced staff seconded from the Government.



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### ***Land Allocation and Financing***

We believe it is prudent for the HFA to be initially vested with a modest allocation of land made available by reclamation. This will allow it to test its new role as a facilitating and overseeing agent, and accumulate the experience of working with Government departments.

We have reservation however with the proposed financing model though it was noted in the Consultation Digest that during the first phase of the Public Engagement Exercise, there were views that the HFA should “maintain a suitable balance between social objectives/public enjoyment and commercial principles/financial return.” The allocation of funding by LegCo should ensure that the HFA will use its financial resources judiciously, exercise prudence in managing its projects and be held accountable to the public. Yet besides the financial indicators, we believe there are other less tangible indicators, including the overall worthiness of project initiatives, the long-term social benefits to the community, and the answering to public aspiration for a “people’s harbour”, that are of equal importance in the assessment of the performance of the HFA. It is therefore not necessary for each project undertaken by HFA to be profit-making, as that would make it difficult to implement a holistic approach to harbourfront planning.

### ***Role and Powers***

To enable the HFA to achieve its goals, it must have powers and a clearly defined role in the processing of development proposals but it should not be allowed to become another layer of bureaucratic control. We note that the vetting and approval of development projects will continue to be vested with the Town Planning Board and that the HFA’s role in private sector projects, on both new and developed sites, will be that of facilitation and advice.

We believe the HFA can make significant contribution in the enhancement of the vibrancy, sustainability and accessibility to the public of the harbourfront in three separate areas.

First, for development projects, the HFA can provide incentives and facilitate public-private partnerships between itself, the Government, NGOs and the private



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sector. From time to time, innovative ideas from the private sector on the use of sites have to be abandoned due to difficulties encountered in the approval process. The HFA can step in and facilitate such initiatives.

Second, for strategic planning of the harbourfront, the HFA can engage with local residents, professionals and other stakeholders to develop community consensus on planning issues and designation of public and private facilities.

Third, for overseeing and managing harbourfront sites, the HFA can advise on the operational details as well as the detailed design (layout of footpaths, roads, and greenery etc).

As a concluding thought, we trust you are conscious of the fact that the public is holding a high expectation of the HFA, which makes it all the more important for the composition, role and operation of the HFA to be carefully thought through.

Yours sincerely

Louis Loong  
Secretary General