

January 6, 2006

Kowloon District Planning Office
Planning Department,
14/F, North Point Government Offices,
333 Java Road,
North Point, Hong Kong

Email: kdpo@pland.gov.hk

Re: Kai Tak Planning Review : Stage 2 - Outline Concept Plans

Dear Sir/Madam,

It is with considerable disappointment that we perceive the Harbour-front Enhancement Committee's efforts to gather community visions and views have not been given support by Government and that many of the views expressed during the Stage 1 consultations have not been fully reflected in the Outline Concept Plans now under review.

We refer to HBF's comments raised at our session with the Planning Department 25 July 2005:

Ineffective Process

- i. As HBF has consistently stated since its inception, the lack of any visible "Big Picture" thinking by Government as regards the planning vision of the harbour as a whole is reflected in this whole debate about Kai Tak. Holistic and integrated planning for the assessment of all territorial needs, both on and around the harbour are essential to ensure optimisation of land uses.
- ii. Again, as HBF have stated in the past, it is unclear how Government makes decisions on, for example, feasibility, need, cost, financial viability and location in the planning of large-scale infrastructure projects (e.g. sports stadium and cruise terminal). Such comments relate to Kai Tak and other Harbour projects.
- iii. There is an ongoing lack of affirmative endorsement and support for the Harbour Planning Principles (HPP) by the Government. It is therefore impossible to determine the value framework against which Government makes any harbour-related decisions and Kai Tak is a case in point.
- iv. Projects of significant impact, such as the proposed sports stadium and cruise terminal, are being "presumed" thereby undermining the whole consultation exercise.

Additional Views

Regarding the *Public Participation Digest*, our previous points still stand and we have the following additional views:

- i. The inclusion of two major elements does not seem to be optional as stated at the beginning of the consultation process, but rather mandatory. The stadium and the cruise terminal show up in all three options in the same configuration and in the same location. Additionally, as mentioned above, there is a lack of transparency in this presentation which hinders a rational approach to making value comparisons.
- ii. The three options are too similar and do not present for consideration many of the public's contributions to the consultation, failing to achieve three distinct potential roles for Kai Tak.
- iii. A short-term prioritisation and implementation plan should accompany the visions, to allow

'early wins' but also to allow flexibility over time – a "living plan" that can and should adapt over time to changing market conditions and public aspirations.

As mentioned above, HBF strongly endorses the use of the Harbour Planning Principles ("HPP") as a framework for the analysis of all available options. We believe that each Principle needs evaluation for applicability and relative importance at each location around the harbour.

Harbour Planning Principles

We have attempted below to frame a set of preliminary principles from a business perspective for planning and development on Kai Tak. These have been developed as part of a consultation study:

i. HONG KONG PEOPLE FIRST

Waterfront edges and open spaces should be active and accessible to the Hong Kong public – whether for recreational, commercial or other social and community uses. The runway offers a uniquely tranquil waterfront away from the tourist and retail hubs of the city and should not accommodate uses that would unduly eliminate this unique low-density environment. Parks and open space, if appropriate, should be prioritized for use by the general public with significant emphasis on the avoidance of large scale infrastructure. Options other than open space may in some instances be appropriate – but public infrastructure per se is unlikely to fall into any acceptable category under this Principle.

ii. WATERFRONT VALUE

Waterfront should be recognized as a core source of value to the community. The methods of retention and improvement of water bodies and Harbour perimeter should be prioritized by the amount of value-add that each brings to the community, rather than that which incurs the lowest cost. An open space system should, as an example, be used as a means to extend the value of the waterfront into those areas that lack public amenity. Value needs to be measured in social, community and environmental terms and not just by way of economic or financial models.

iii. TRANSIT ORIENTED DEVELOPMENT

Transport plans should reflect the natural advantages and disadvantages of the site, building upon mass transit and alternative transit modes. The inclusion of trams, bicycles and ferries will help to avoid the over dedication of transport infrastructure at the cost of usable land. Programming of large scale projects should be coordinated with the construction of the Shatin to Central rail link to make full use of rail access and to avoid additional and unnecessary road traffic.

iv. CONNECT TO SURROUNDINGS

Development should positively impact the surrounding neighbourhoods and link them to the Harbour's edge

- Recognise the context – the 5 districts in Hong Kong with the highest population density are all in Kowloon: Kwun Tong, Wong Tai Sin, Yau Tsim Mong, Sham Shui Po and Kowloon City in descending order; three of these directly border the Kai Tak site. These areas are some of the most densely populated in the world. Centres of business and social activity should create spill over effects across the boundaries of the site.
- Street and pedestrian networks that bring people flows and traffic through the site in many places. The need to design and allow for appropriate accessibility and scale for the context of surrounding districts as well as to minimise any negative visual and environmental impact to Hong Kong.
- Uses that complement the diversity of economic activity around the Harbour rather than compete, especially directly with adjacent areas already under established redevelopment schemes.

v. SHORT-TERM GOALS

Long-term planning should accommodate short-term dedication of accessible, usable space along the Harbour's edge to public use in order to achieve continual contribution to the public good of Hong Kong, thereby raising the attractiveness of the Kai Tak resource.

Vision

These Principles are a part of the development of HBF's Harbour-wide Guidelines which will be the foundation of our Harbourwide Vision. Most importantly they will include demonstrable/measurable criteria to guide the long term improvements that will shape the identity of the Harbour, and thus of Hong Kong. Such a Vision is essential to the holistic planning of the harbour and we strongly advocate that this should be the immediate priority for the Government – concept plans for specific areas and districts should then follow once the community as a whole has accepted and agreed the Vision.

These are our preliminary thoughts and we may offer further supplementary comments from our membership in the future. We note your offer to consult HBF and we are currently collecting views from the membership.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Thomson', with a horizontal line underneath the name.

Andrew Thomson

On behalf of the Harbour Business Forum

c.c. Chairman of HEC <enquiry@harbourfront.org.hk>