Harbour Business Forum's Comments on the HEC's Harbour Planning Guidelines for Victoria Harbour and its Harbour-front areas

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Secretary, HEC Sub-committee on Harbour Plan Review 16/F North Point Government Offices, 333 Java Road, North Point Hong Kong

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Dear Sir/ Madam,

Comments on HEC's Draft Harbour Planning Guidelines for Victoria Harbour and its Harbour-front Areas

We welcome the formulation of the Harbour-front Enhancement Committee (HEC) Harbour Planning Guidelines for Victoria Harbour and its Harbour-front areas. It is clear that much time and effort has gone into preparing these guidelines and we are in general, supportive of this initiative. Below, we have listed the Harbour Business Forum's specific comments to HEC's guidelines as requested.

In order to complement and expand the HEC's Harbour Planning Guidelines, the Harbour Business Forum (HBF) has prepared its own Guidelines for a Sustainable Harbour. We have done this to highlight select recommendations for the physical design and development of individual areas and to encourage broader planning efforts across the entire harbour. Although only suggestions and not binding, HBF's Sustainable Guidelines are intended to portray the perspective of the business community in an effort to positively enhance Hong Kong's competitive advantage in the region. Please find a copy of HBF's Sustainable Harbour Guidelines enclosed.

As a continuation of our response, we would like to request an opportunity to present our guidelines to you and your colleagues at your convenience. Please note that we will upload HBF's Guidelines to our website by the end of the month, and will also make the available to our stakeholders.

Yours sincerely,

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Ciara Shannon

On behalf of the Harbour Business Forum

Enc: HBF's Guidelines for a Sustainable Harbour

HBF's Comments on HEC's Draft Harbour Planning Guidelines for Victoria Harbour and its Harbour-front Areas

1. Language could be stronger throughout the Guidelines. The "could's" ought to be replaced with "should's".

2. More information needed on HEC in introduction

- (Page 1. 1.1): About HEC: Missing from the introduction are key elements of the work of the HEC, namely the Integrated Harbour Planning Framework "Temporary Land Use and Quick-win Enhancement Strategies", CHARM, and various submissions to hearings including the interpretations of issues pertaining to the Protection of the Harbour Ordinance, as well as work by others on the harbour related issues, such as the report by CE@H in 2003, Designing Hong Kong Harbour District report in 2004, the various submissions and publications by the Harbour Business Forum.
- (Page 1: 1.1): More information is needed on the funding of Harbour-front Enhancement and Institutional Arrangements for Harbour-front enhancement. As well as the relationship between HEC and TPB, or at least a clear definition of the role and function of the HEC.
- (Page 1:1.1): Need to describe how these guidelines will have an effect under the Town Planning Ordinance, the Road Ordinance and the Rail Ordinance.
- (Page 1: 1.2): States that the Guidelines "elaborate on the HPP", this should also include that the guidelines are "to elaborate on the work of the HEC and the aspirations expressed by the community".

3. Important aspects of HPP's not dealt with

- (Pg 2: 2.1): Rather than explaining in the appendix which HPP is impacted against each guideline, the 'body' of the guidelines should refer to each aspect of the HPP more often and more succinctly.
- HPP no 8 ("Land required for and the impact from infrastructure developments, utility installations and land uses incompatible with the harbour planning principles should be minimized.") has not been dealt with adequately. There is no guidance how this aspect of the Harbour Planning Principles can be made a reality for future infrastructure and utility projects.

4. Public Engagement should be carried out from project planning through to development stage

- (page 3) Paragraph (2.2a) should state clearly that public engagement is encouraged throughout the project planning and development stage.
- (page 3) The 20 hectares benchmark is too high and the public should be engaged in all projects and be given an opportunity to express their views.
- (page 4) Under (d) suggest land use and project development should be reviewed continuously for enhancement and the (changing) public aspirations.

5. Activities along the foreshore are vital to a vibrant harbour

- (page 5) Suggest to add at the end of paragraph (a): "Activities along the foreshore are vital to the success of a vibrant harbour. It is not sufficient to just plan for harbour access. These activities should be diverse and appeal to local population as well as tourists. Many of these activities should be free such as parks, sitting out areas, sculpture gardens, fishing areas etc."
- (page 5) Suggest to also include: "Land uses such as cargo working areas, maintenance depots, and other private or public industrial marine supporting facilities should be minimized. However, where possible marine supporting and water-dependent land uses compatible with harbour-front enhancement should be encouraged and prioritized".
- Suggest to also include at the end of paragraph (d): "A full audit of all of the available government land along the harbour should be undertaken to ensure that appropriate activities are located on the harbour-front".
- (page 7) Open space (k): Suggest to also include: "That existing incompatible uses should be minimized, as is set out in the principles".
- (page 17) Harbour-front Management (b) should ensure street markets, outdoor dining, street vendors, small commercial enterprises, and other commercial activities. An appropriate mix of public and private realm must be pursued.

6. <u>All</u> temporary land uses should be reviewed

- (page 18) Temporary land uses (a) should clearly state that all temporary and Government land uses should be reviewed for enhancement opportunities, including changes in temporary land uses.
- Important aspects of the Temporary Land Use and Quick-win Enhancement Strategies (for example, the removal of <u>existing</u> billboards, fences, car parking, etc.) have not been dealt with, and should be added.

7. Physical linkages should be at grade and cater to different users

- (page 15) Physical linkages (b) access to and from the harbour and along the water-front (not just along) should be primarily **at grade**.
- (page 16) Physical linkages (d) Linkages should also cater to different users. Additional elevated and subway connections should be used (but not replacing street level connections) to provide high-capacity connections under all weather conditions between major transport hubs and key destination areas.