

To: Legislative Council Panel on Development

Re: **Proposed Relocation of a Fresh Water Pumping Station to Hong Kong Park**

I am writing to express my objection to the proposed relocation of Harcourt Road Fresh Water Pumping Station to Hong Kong Park. This action will encroach upon Hong Kong Park by permanently destroying 2,150 square meters of the Park.

Destruction to the Park

In connection with the proposed relocation, 91 trees will be felled and 35 meters of an important historic, 150-year old granite wall will be dismantled. In addition, extensive slope excavation will come within 10 meters of Flagstaff House, a Declared Monument, which will require construction of a bored pile wall along the pumping station boundary in an attempt to minimize ground movement at Flagstaff House.

It is disappointing to see the needless destruction of yet more cherished public park space. Victoria Park has already been permanently reduced in size by approximately 20,000 square feet to make way for a road cutting through the park to connect to the new Central-Wan Chai bypass tunnel. It is truly a shame that the tranquility and natural aesthetic beauty of Hong Kong Park is now under threat.

Urban development in Hong Kong must be balanced to ensure that adequate green spaces are available and open to the Hong Kong public to enjoy. The existing slope that is to be excavated for the pumping station is a natural slope with dense tree cover. This extensive tree cover acts as a green buffer at the perimeter of the Park and the adjacent Cotton Tree Drive. Construction of a pumping station at this location will result in permanent loss of the natural green slope and its dense tree cover.

Hong Kong Park is a rare green oasis in the heart of a densely developed metropolitan area. It is akin to Raffles Place Park in Singapore, Da'an Park in Taipei, Hyde Park in London, and Central Park in New York City. These cities take great efforts to preserve such parks and to ensure that they remain protected and not encroached upon, and Hong Kong should do the same.

Lack of Public Consultation

The paper submitted by Development Bureau and Water Supplies Department (the "Discussion Paper") alleges that a "public consultation" was conducted by tabling the proposal to the "Development, Planning and Transport Committee" of the Wan Chai District Council and the "Food, Environment, Hygiene & Works Committee" of the Central and Western District Council on 15 October 2013 and 17 October 2013, respectively.

However, discussing the proposal with mere sub-committees of the affected district councils does *not* equate to a public consultation. This matter was not even raised to the attention of the full membership of the district councils, which is shocking given the proposal is to destroy a large portion of Hong Kong Park. Further, as a resident of the Central & Western District, I

know that this issue was never put to a true public consultation because residents' views were never sought on this issue by either the district council nor any government department. Finally, this issue was never raised to my District Councilor Joseph Chan because he is particularly attentive to informing his constituents of matters that directly affect our district, and Mr. Chan would have immediately alerted us by email, as well as by publishing details of the proposal in his quarterly newsletter.

No public consultation has ever been conducted relating to this proposal. This lack of public consultation only serves to highlight how little our government departments truly care about preserving our public parks and other open spaces and about our opinions and quality of life issues. The fact that this matter was *never* put forward to public consultation is reason alone that this proposal should immediately be halted at the Panel on Development stage. No project to destroy 2,150 square meters of Hong Kong Park or any other public park space should be put forward for Legco funding approval without a full public consultation being conducted.

Misleading Discussion Papers

The Discussion Paper is entirely misleading in that it never states that the fresh water pumping station is to be *relocated inside the boundary of Hong Kong Park*. Please note that paragraph 2(a) states only that the work comprises “construction of a new pumping station at a site near the Central Fire Station on Cotton Tree Drive.” Even in paragraph 14 when the Discussion Paper mentions Flagstaff House (which is located in the middle of Hong Kong Park), it merely mentions that Flagstaff House and a section of the old stone wall lie “within the boundary of the new pumping station site.” It does not state that Flagstaff House—a Declared Monument—is **located inside Hong Kong Park!** The design drawings and landscape layout plans attached to the Discussion Paper do not denote the boundaries of Hong Kong Park at all, which is utterly deceptive and meant to hide the fact that the pumping station will be built within park boundaries.

Finally, the only mention of the words “Hong Kong” and “Park” together are found in paragraph 22. However, please note that this reference is merely to the fact that a nursery belonging to Hong Kong Park is within the pumping station boundary—“*[t]here is an existing Hong Kong Park’s nursery within the new pumping station site.*” Again, this specific and willfully misleading wording is designed solely to hide the fact that the pumping station is going to be constructed within Hong Kong Park.

Lack of Consideration of Alternative Sites

I note that the Discussion Paper does not meaningfully address justifications for choosing Hong Kong Park as the site for the proposed pumping station, nor does the Discussion Paper provide any details as to alternative sites that were considered and why these sites were rejected in favor of Hong Kong Park.

The Discussion Paper only states that the current pumping station located at Harcourt Road is proposed for development as office space based on recommendations of the Urban Design Study for the New Central Harbourfront (“UDS”). However, if you actually read the UDS, the UDS does not discuss the Harcourt Road pumping station site at all. The site is correctly denoted on

certain slides as “G/IC” zoned, but there is no mention that the site is slated for office development. In fact, the UDS only references a site to the north of CITIC Tower as a proposed site for office and hotel development (see UDS slide 23, which shows CITIC Tower and the existing pumping station in the “Arts and Cultural Precinct”). A project cannot be justified as “based on recommendations of the UDS” when the UDS itself makes no recommendation to relocate the existing pumping station to make way for office development.

The Discussion Paper contains no details regarding alternative sites that were considered. The only discussion of site choice is contained in the Heritage Impact Assessment (“HIA”) prepared by AGC Design Ltd, a consultant hired by Water Supplies Department (“WSD”) after the Antiquities & Monuments Office requested that WSD hire a consultant to prepare a Heritage Impact Assessment.

The HIA discusses the “Choice of Site” in Section 2.2. The HIA lists out 3 constraints in choosing a suitable site:

- 1) Constraint 1: the level of the pumping station should not be too high, otherwise, water from Kowloon side will not have enough water pressure to reach the new pumping station;
- 2) Constraint 2: the delivery of mains of the new pumping station should be connected to the above-mentioned trunk mains in order to provide water supply to the existing service reservoirs while the suction mains from the Kowloon side should be connected to the new pumping station; and
- 3) Constraint 3: the pumping station cannot be relocated to the harbourfront area as the area will have other developments.

After listing the constraints, the HIA goes on to state that as the new pumping station cannot be relocated to the Peak or Midlevels in view of Constraint #1, only areas in Central and Wan Chai districts between the Midlevels and Harbourfront area are suitable. Without any analysis as to the possible alternatives that could be acquired or rezoned for a pumping station, the HIA then concludes that as these areas are already well-developed with congested commercial and/or residential buildings, the only possible area available is the *open space at the existing Hong Kong Park*.

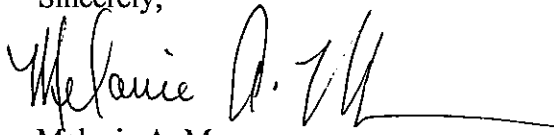
In light of this lack of consideration of all possible alternatives by Development Bureau and WSD, the Panel should halt consideration of this proposed project until Development Bureau and WSD provide a detailed analysis of all possible sites within the Midlevels to Harbourfront areas that could house a pumping station. In addition, the Development Bureau and WSD should provide justification as to why the existing pumping station needs to be relocated in the first place given that other harbourfront sites are being made available for commercial development.

Conclusion

In light of the points discussed herein, I ask the Panel on Development to object to this proposal and ensure that the proposal does not proceed further to the Public Works Sub-committee or the

Finance Committee in the absence of (1) details on alternative sites that were considered and (2) a full and proper public consultation on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Melanie A. Moore". The signature is written in a cursive style and is followed by a horizontal line that extends to the right.

Melanie A. Moore

May 26, 2014