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From: Maggie [REDACTED]

Sent by: [REDACTED]

Date: 01/21/2015 07:38PM

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

TO

Legislative Council (pid@legco.gov.hk)

Mr. Paul Chan, Head of Development Bureau (sdev@devb.gov.hk)

Mr. Enoch Tin Sing Lam, Director, Water Supplies Department  
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CC: ABHK ([REDACTED])

Dear Sirs/Madams :

**I am writing to express my objection to the proposed relocation of Harcourt Road Fresh Water Pumping Station to Hong Kong Park at a projected cost of HK\$750 million. This action will encroach upon Hong Kong Park by permanently destroying 2,150 square meters of the Park.**

**- Destruction of the Park**

In connection with the proposed relocation:

- 91 trees will be felled;
- 35 meters of an important historic defensive granite wall that is about 169 years old will be dismantled;
- a section of historic classical balustrade will be totally destroyed;
- extensive underground 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;
- the context and meaning of the defensive wall with its loopholes or firing slits will be destroyed as the slope which it surmounted will be removed;

- the remaining shallow earth cover left after construction will preclude the growing of good replacement trees over it and the present lush tree cover will be destroyed;
- the pumping station will encroach underground well into what would have been the original grounds of Flagstaff House; and
- 2,150 square meters of the Park will be permanently taken away for the pumping station.
- 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 government departments did not conduct a public consultation prior to initially submitting the proposal to the Legislative Council's Panel on Development in May 2014.
- The government departments merely tabled 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.
- Submitting proposals to these sub-committees does not amount to public consultation.
- This lack of 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 submitted to Legco never states that the fresh water pumping station is to be *relocated inside the boundary of Hong Kong Park, as well as within the original boundary and present cartilage of Declared Monument, Flagstaff House.*
- The discussion paper 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.

**- Lack of Consideration to Redeveloping Pumping Station at its Current Site**

- The government departments state that the pumping station must be relocated from its current site at Harcourt Road as the Harcourt Road site is proposed for development as office space based on recommendations of the Urban Design Study for the New Central Harbourfront (“UDS”). However, the UDS does not discuss the Harcourt Road pumping station site at all.
- The government departments do not consider the alternative of redeveloping the pumping station at its current site.

**- Incompatibility with Sound and Proper Conservation Practice**

- Protection of the site of Declared Monument Flagstaff House should follow the terms of the ‘Principles for the Conservation of Heritage Sites in China’, as well as good international practice. Article 2 of the ‘Principles for the Conservation of Heritage Sites in China’ stipulates that *“[t]he aim of conservation is to preserve the authenticity of all the elements of the entire heritage site and to retain for the future its historic information and all its values”*.
- Authentic historic features such as the historic rubble masonry defensive wall, the classical balustrade and the slope should be preserved and retained intact.
- Article 12 of the ‘Principles for the Conservation of Heritage Sites in China’ stipulates the requirement to demarcate the boundaries of a historic site and that a *“buffer zone should also be established to control development around the site’s boundary and to preserve the natural and cultural landscape”*.
- Such a buffer zone to Flagstaff House should certainly comprise the supporting slope, as well as the trees and historic features thereon and no development should be permitted within such a buffer zone.
- Thus it can be seen that the proposed pumping station would be in utter and complete contravention of ‘Principles for the Conservation of Heritage Sites in China’ and would be outrageous for a Hong Kong Declared Monument.
- While a Heritage Impact Assessment (HIA) was prepared, it can be seen to be an afterthought as any proper heritage assessment of the

Declared Monument and adjoining areas of Hong Kong Park would have from the outset precluded and development in the area.

- The HIA can be seen to be inadequate in that it fails to identify the importance of the historic, squared, coursed rubble defensive wall with its loopholes. As a result, the HIA offers merely ‘window dressing’ or minor cosmetic ‘prettying works’ to an outrageous and unacceptable proposal.

#### **- Waste of Public Funds**

It is a waste of public funds to spend HK\$750 million to relocate a pumping station in good working condition and an optimal location to a location that will require additional relocation of water mains and pipes to distribute water on Hong Kong Island.

#### **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.

Yours sincerely,

Name : Maggie

Email :

Address :