

**VIEWS OF
THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG
ON SOUTH EAST KOWLOON DEVELOPMENT**

1. Introduction

1.1 The Town Planning Board published the following outline zoning plans in the Government Gazette on 4 September 1998:

- (a) Draft Hung Hom Outline Zoning Plan No. S/K9/9;
- (b) Draft Ma Tau Kok Outline Zoning Plan No. S/K10/8;
- (c) Draft Kai Tak (North) Outline Zoning Plan No. S/K19/1;
- (d) Draft Kai Tak (South) Outline Zoning Plan No. S/K21/1;
- (e) Draft Ngau Tau Kok and Kowloon Bay Outline Zoning Plan No. S/K13/11;
- (f) Draft Kwun Tong (South) Outline Zoning Plan No. S/K14S/4; and
- (g) Draft Cha Kwo Ling, Yau Tong, Lei Yue Mun Outline Zoning Plan No. S/K15/9.

1.2 The proposals on the land use and the extent of reclamation are shown on the above outline zoning plans. REDA is gravely concerned about the development proposals, in particular, the extent of the proposed reclamation. Our views on the South East Kowloon Development proposals are set out below for the consideration of the LegCo Panel on Planning, Lands and Works.

2. Proposed Development Premature

2.1 Development proposals for Southeast Kowloon, in particular the Kai Tak site, as shown on the above plans are premature as the Study on Sustainable Development (“SUSDEV”) are still in progress. The proposals will inject additional housing in the Kai Tak area, which will accommodate a population of 320,000. This is indeed another new town development—a development which, if implemented, will take place in the 21 Century and will have significant implications on our future generations. There is no reason why Hong Kong should commit to such large-scale development involving extensive reclamation in advance of the completion of SUSDEV.

- 2.2 SUSDEV will formulate, inter alia, indicators and criteria for the Government to evaluate and monitor the sustainability of future development. The scale of South East Kowloon Development definitely warrants prudent consideration of various aspects and the sustainability of the proposals has to be measured objectively and scientifically. REDA does not support the development proposals while SUSDEV is still in progress and the findings have not yet been known.
- 2.3 It is the common experience of REDA members that many of their development applications have been rejected by the Town Planning Board in the past on the ground of prematurity when certain planning studies are underway. Those projects may have a population ranging from a few hundred to a few thousand. Yet consideration of these applications has to be withheld pending the completion of the planning studies. How can the Town Planning Board adopt the development proposals for South East Kowloon when SUSDEV has not yet completed but the findings of it are so essential to evaluating whether the proposals are sustainable?

3. Excessive Reclamation

- 3.1 Regrettably most of the land covered by the Kai Tak (South) Outline Zoning Plan will have to be reclaimed from the Harbour. It has always been the stance of REDA that the Victoria Harbour is a precious natural heritage of Hong Kong and there should be a presumption against reclamation. REDA is particularly concerned about any further large-scale reclamation for commercial and residential purposes.
- 3.2 Land for housing can be identified elsewhere. There is great potential for further development in the Northwest New Territories and Northeast New Territories taking into account of the large number of infrastructural works to be provided. There is no reason why Hong Kong should sacrifice the world famous harbour for development purposes, which could be accommodated somewhere else in the Territory.
- 3.3 The proposed reclamation together with straightening of the coastline would damage irreparably the natural beauty of the Harbour. It would be a great loss to the attractiveness of Hong Kong causing adverse effects on our tourism. The Harbour should, therefore, be preserved as far as possible.

There are no justifications for the excessive open space and the large number of “G/IC” sites without designated uses. REDA is against reclamation for uses of such nature, which are neither necessary nor cost-effective.

- 3.4 We are also disappointed that the public are not given any information of the environmental impact to be caused by the proposed reclamation. It is understood that not even the Advisory Council on Environment has been consulted on the environmental impact caused by the proposed development and the proposed reclamation. The public are therefore kept in the dark as to the adverse effects brought about by the reclamation, whether they could be mitigated, and how they could be mitigated. It is entirely unfair that the public have to comment on such a large-scale reclamation without knowing the environmental impact. This is indeed contrary to the spirit of the Environmental Impact Assessment Ordinance where the proponent has to prepare and publish an environmental impact assessment for reclamation works.

4. Traffic

- 4.1 REDA is concerned about the large number of people to be accommodated in Kai Tak (North) (“KTN”) and Kai Tak (South) (“KTS”) areas, and in particular the traffic impact brought about by such population.
- 4.2 From the explanatory statements, it is gathered that the total population of KTN and KTS together is estimated to be about 320,000 people upon full development. However, there is only scanty information on the traffic aspect because only the road hierarchy of the two areas is described generally and briefly in the explanatory statements.
- 4.3 There is no mention about the capacity of existing roads and road junctions, the traffic to be generated from the planned uses in the two areas, and whether the existing roads and junctions could cope with the additional traffic and how. Whilst an MTR line was proposed in the South East Kowloon Development Statement, no such provision has been made on the relevant OZPs and no explanation has been offered. Needless to say, whether such line is to be provided would have tremendous bearing on the traffic conditions of the roads in and around Kai Tak areas.

4.4 In the absence of findings to prove that the existing and planned transport infrastructure is sufficient to cope with the proposed reclamation and land uses, REDA is opposed to the two OZPs.

5. Excessive “G/IC” Provision

5.1 In KTN and KTS, a total area of 97.06 ha is reserved for “G/IC” uses. This does not take into account the “G/IC” uses to be provided within the residential developments in the areas.

5.2 It is noted that certain “G/IC” uses are cited in the explanatory statements, e.g. an international school in the southwest of KTN, and the existing police station and electricity substation in the north of KTN. The location of the remaining “G/IC” uses is, however, not specified on the two OZPs. There is also no mention on the number and location of other “G/IC” facilities proposed such as clinics, electricity substations, sewage pumping stations, indoor recreation centres, Government depots and schools. As a result, there are no concrete facts based on which to evaluate whether the level of provision, the type and the location of facilities are appropriate or not.

5.3 We are concerned about the use of the Hong Kong Air Cargo Terminal 2 Building, which is said to be a site reserved to meet long-term demand for “G/IC” facilities. Such reservation for some unknown “G/IC” uses is understandable and would be less objectionable if there is plenty of surplus land in the area and there is no need for reclamation. However, if this is done at the expense of the Victoria Harbour, the proposal is not justifiable.

5.4 Whilst we appreciate the need for certain regional/territorial “G/IC” facilities, we are gravely concerned if reclamation is required to provide land for these facilities. Adequate justifications should be provided to support any reclamation for such purposes. However, we fail to see why the regional/territorial “G/IC” should be located in the area not elsewhere thus necessitates the reclamation.

6. Open Space

6.1 Open space provision in KTN and KTS will amount to 116.74 ha. It is noted that the provision will not only cater for the needs of the people living in

KTN and KTS, but will also help address the shortfall of open space in the adjoining districts. In particular, there will be the Metropolitan Park with a size of 50 ha. The Metropolitan Park is said to be the largest open space in the territory. There is no explanation at all why the Park needs to be of this size and why it should be located here. The main concern of REDA about this matter is its implications on the extent of reclamation required to provide such large amount of land for open space.

- 6.2 The disposition of the land uses surrounding the proposed Metropolitan Park would result in undesirable microclimate in the park area. There will be high-rise buildings on three sides of the Park. These buildings would create some kind of “wall effect” and block the sea breezes from the Harbour. On the other hand, the Park is bound by major roads on all sides. The traffic on these roads would generate both noise and air pollutants, which would be trapped in the park area encircled by the tall buildings. Such environmentally undesirable microclimate would have adverse effects on the users of the Park.

7. Conclusion

In view of the above, REDA would like to make the following suggestions for the Panel’s consideration:

- 7.1 The South East Kowloon Development proposals as shown on the aforementioned outline zoning plans including the proposed reclamation should be withheld pending the outcome of the Sustainable Development Study.
- 7.2 The proposed reclamation should be minimized. The proposed area to be reclaimed for long term population growth should be scrapped, as solutions should be found in other parts of the Territory in the course of 18 years.
- 7.3 There should be a traffic impact assessment to prove that the proposed development in KTN and KTS would have no significant adverse traffic impact both within Kai Tak area and in the adjoining areas. The assessment report should be made available to the public.
- 7.4 The proposed “G/IC” sites should be substantially reduced to avoid.

unnecessary reclamation.

- 7.5 The proposed amount of Open Space should be reduced to avoid unnecessary reclamation.