

**Letterhead of THE HONG KONG INSTITUTE OF LANDSCAPE ARCHITECTS**

23 October 1998

The Peoples Republic of China  
Hong Kong Special Administrative Region  
Legislative Council  
Legislative Council Building  
8 Jackson Road  
Central  
Hong Kong

**Urgent by Fax and Hand**

Dear Sirs,

**Kai Tak (North and South) Outline Zoning Plans Gazette No. 36/1998 Position Statement**

The HKILA would like to express its concern regarding the above Outline Zoning Plan (OZP) in relation to a lack of urban and landscape design criteria and control mechanisms within the Plan.

● **Planning Context**

Victoria Harbour forms a unique cultural and historic landscape resource, integral to Hong Kong's city context and further reclamation planning should be based on a sustainable directive, integrating social, cultural and physical planning principles.

Although the SEKD falls outside the area covered by the Inner Harbour Protection Ordinance, Government should nevertheless formulate a comprehensive policy to protect the Victoria Harbour as a natural heritage and set limits of development before proceeding with further reclamation on a piecemeal basis.

The HKILA acknowledges the need for future development within South East Kowloon and does not object to harbour reclamation per se. However, the HKILA is very concerned that the OZP should engender a planning framework to foster innovative urban design and landscape architecture.

● **Urban Design / Public Domain /Open Space**

Whilst the extent of open space appears proportionally high in the OZP, the level of detail indicated in a two dimensional plan is somewhat misleading, and further consideration of its intended content and implementation is required. The open space incorporates significant level changes, extensive decking / podium structure and severance through, at grade and elevated trunk road, corridors, and drainage channels.

The three dimensional impact of infrastructure combined or aligned with open space should be addressed within design objectives and implementation criteria. Areas of concern include;

- extent of elevated road structure.
- linear open space arrangement and intrusion of utility easements.
- open space zoned over the main drainage channel and potential poor water quality.
- lack of open space buffer and pedestrian linkages between the existing urban histerland and the proposed development area.
- zoning of open space adjacent to road corridors of potentially low environmental quality.

The Development Study has addressed some of these issues in part however the OZP should only be endorsed with detailed urban and landscape design objectives and implementation mechanisms incorporated.

### ● **Design Controls**

The OZP should be guided by a vision to create a unique urban waterfront environment, integrating mixed use development within the public domain. The OZP should also define the urban design control mechanisms to ensure the vision is maintained throughout the planning process.

The South East Kowloon waterfront is of such importance that these mechanisms must be included as part of the statutory planning procedures and guide the design process, in developing the OZP.

### ● **Visual Impact**

Broader planning control issues such as building height should be incorporated to reduce any potential visual intrusion from the development to distant views of the Kowloon Hills, in particular from Hong Kong Island.

### ● **Infrastructure**

The proportion of land allocated to roads compared to that of residential development and open space is considered extremely high. The following areas demonstrate that the infrastructure is serving a much larger area than that of the South East Kowloon Development.

<b>Land Use</b>	<b>Kai Tak (North) OZP Approximate Area Percentage (%)</b>	<b>Kai Tak (South) OZP Approximate Area Percentage (%)</b>
R(a)	26.77	14.54
R(b)	--	24.12
Open Space	9.99	21.170
Roads	39.50	31.54

Whilst the proportion of open space may be in accordance with HKPSG the location and arrangement adjacent to regional distributor roadways incurs a very poor environmental quality.

● **Recommendations**

The HKILA would request Planning Department to reconsider the OZP and integrate urban and landscape design objectives and control mechanisms to ensure;

- the open space provision serves its planning purpose.
- design criteria is committed due to the inherent statutory controls of an endorsed OZP.
- appropriate control mechanisms are in place for implementation.

The extent of reclamation is peripheral to the fundamental issue of achieving quality urban waterfront development, reflecting the ideals and aspirations of our community. The proposed Metropolitan Park represents an opportunity to reflect these values and should also be supported with appropriate design controls.

Yours faithfully,

**Public Affairs Committee**

Peter Duncan

Chairman

c.c. Ms. L.T. Au (President) HKILA

Mr. A. Chan (Vice President) HKILA

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