

9 January 2006

Mr. Wong Siu-yee
Clerk to Panel
on Planning, Lands and Works
Legislative Council Secretariat
3/F Citibank Tower
3 Garden Road
Central
Hong Kong

Dear Mr. Wong

Kai Tak Planning Review

We thank you for your letter of 30 December 2005 and as requested, would like to offer our views on the planning for the Kai Tak area as follows.

We believe it would be useful if this letter is read in conjunction with our previous submission to the Planning Department in relation to the Stage 1 Public Consultation of the Kai Tak Planning Review (copy attached) as the views we expressed then remain largely valid today.

Whilst three different development themes have been put forward for public consultation this time, we have noted that the actual scope for any meaningful variation seems limited as the cruise terminal (5 ha) and the multi-purpose stadium (24 ha) are found in each one of them.

Development Theme

- We remain of the view that the development theme of Kai Tak should be a predominantly high quality residential project, a Garden City within the City, based on sustainable development principles.
- To observe the Harbour Planning Principles of the Harbour-front Enhancement Committee, the residential development on the runway should be of low density. We would propose low rise residential buildings and the application of a limited mixed use concept, e.g. some moderate commercial use on the ground floor to add vibrancy to the neighbourhood. We do not support podium design in this area. Stepped development is favoured to maximize the enjoyment of the waterfront view.
- The average plot ratio for the entire planning area should be 3, with higher density in the vicinity of the railway stations and lower density along the waterfront.

Office Use

- Office development is neither necessary nor compatible with a high quality residential area and should be abandoned.
- There is a huge reserve of potential office land zoned OU(B) in the neighbouring areas of Ngau Tau Kok, Kowloon Bay and Kwun Tong which is more than adequate to meet any potential demand for decentralized offices in East Kowloon.

Population

- A higher overall population may be accommodated in the planning area if land currently earmarked for office use is released for residential use.
- A large portion of the GIC land is reserved for building schools in anticipation of the demand derived from the population projection of HK2030 Planning Vision & Strategy Study. Given the fact that the assumptions for population growth for that Study were considered grossly-overestimated by academics at the time of its focus meeting, we would question the need to set aside so much land for building new schools.

Transportation

- Good railway links are essential for the success of this project. We support the early implementation of the Shatin-to-Central Link. However, its station alignment would have to be reviewed in view of the latest planning assumptions on target population. For example, the To Kwa Wan Station should be better sited to serve the new planning area and the existing established area.
- Whilst we have stated unequivocally on various occasions our views on financing of railways by property development, it is worth reiterating that we are against using land as subsidy for railway construction for the reason that it will interfere with Government's land supply mechanism and weaken its ability to manage the supply side of the equation, as experience over recent years has so clearly illustrated.

Cruise Terminal

- The economic case for a cruise terminal is far from proven and, as with railway construction, should certainly not rely on associated property development. Furthermore, we have serious reservations on Kai Tak as the most suitable location for a cruise terminal as it is remote and distant from other tourism nodes. A cruise terminal at the tip of the existing runway will also have a very serious detrimental impact on land use planning.
- If it is decided that a cruise terminal has to be located at Kai Tak because there is a proven economic case and no alternative site, the cruise terminal will have to be supported by the necessary transportation network to service the cruise ships

and provide the means for passengers to travel to/from other areas, e.g., connection to other points of tourist attraction by railway link; and connection to Kwun Tong via a spur road or a tunnel.

Sports Facilities

- In our previous submission, we supported the construction of a stadium in Kai Tak. Since then, sports facilities have been proposed to be built in Tseung Kwan O to host the East Asian Games in 2009. This will obviate the need to build another stadium at Kai Tak and the proposed multi-purpose stadium would likely turn out to be a white elephant.
- We consider that the proposed multi-purpose stadium project is not commercially attractive to the private sector. If it is decided to go ahead, we are of the view that its construction and ongoing operation will have to be funded from the public coffers.

Reclamation

- We do not object to some form of reclamation if it can pass the “overriding need” test. There may be a case for proposing limited reclamation to enhance the transport network if no alternatives can be shown to be viable.

In the course of reviewing these three outline concept plans, we have dug out a report of a four-day workshop on Kowloon Bay Waterfront Development – Planning Policies and Issues, organized by the Department of Architecture of the Chinese University of Hong Kong in June 2001, which was attended by both international and local planning experts. While the planning parameters for Kai Tak have changed since, we are of the view that a lot of the concepts and recommendations contained in this report are still applicable today. We are therefore pleased to enclose a copy of this report for your reference.

Yours sincerely

Louis Loong
Secretary General

19 November 2004

Mr. Anthony Kwan
Assistant Director
Planning Department
17/F North Point Government Offices
333 Java Road
North Point
Hong Kong

Kai Tak Planning Review

We wish to thank you and your colleagues for presenting to our members recently the Kai Tak Planning Review.

In general, we believe the development theme of Kai Tak should be a predominately high quality residential project based on sustainable development principles. Important decision must be made on which uses are compatible with this development theme, and engender the greatest economic benefit to Hong Kong on a macro level. Incompatible uses must be given up or relocated elsewhere. We would therefore suggest that the factor of economic value should be brought into the deliberation process. The cost/benefit of each option should be carefully weighed and presented to the public to allow them to determine which particular option would be in the best interest of Hong Kong on a long-term basis.

Our views on the specific questions raised in the Consultation Document are as follows.

1. What is your vision for Kai Tak?

- Kai Tak presents a unique opportunity to build a high quality “garden city” within the city. It should be a quality residential project built on sustainable development principles, suitable for a world city service economy and complete with attractive public spaces.

2. In your opinion what kind of major development would be appropriate for Kai Tak? What should be the development scale?

- The development should be predominately quality private residential housing built on an “islands” theme which maximizes the availability of harbour views with stepped development rising up gradually the further one gets from the harbour front.
- Office development is not considered appropriate or necessary. The demand is not proven and in any event, there is more than sufficient untapped supply with some 200 hectares of land now zoned OU(B), some of them existing in nearby Kwun Tong, Kowloon Bay and San Po Kong where we should be encouraging urban renewal. There are also alternative existing office nodes which could be expanded based on the MTR/KCR networks. As long as the appropriate zoning is put in place and the planning system is flexible enough to implement changes efficiently, we should let market force operate according to demand.
- The potential of Kai Tak as a tourism node is open to question because of its relatively remote location from the existing tourism center. We should not create artificial nodes for tourism – they are seldom re-visited and hence not sustainable. Any proposal for a Cruise Terminal should have enough regard to its location so that the passengers can, ideally, walk into established tourism areas.
- The proposal for a 50,000 seats multipurpose stadium will only work if there is a proper and convenient mass transit rail access with the Shatin to Central Link built and Kai Tak Station open, otherwise it will suffer like the existing Hong Kong Stadium for lack of proper public access.

3. Are there other development components that the Study should consider?

- The principal focus should be on establishing this as a quality residential area that should not be mixed in with other uses. This will act as a long term reservoir of land supply to meet present and future demands.
- There is a need to get away from the standard LCSD style of public park. This area offers a unique opportunity to get the private sector involved in planning, building and operating an interesting, varied and vibrant waterfront promenade that should be fully open to the public.
- There is no need to consider other development components except the general theme of sustainability in the design, construction and eventual use of the completed projects.

- Views on proposed key development components are:
 - Cruise terminal – need not proven, may be a white elephant with huge and irrevocable implications on land use planning. Our preference is to locate it at either West Kowloon or Hung Hom using existing seawall facilities with minimal capital expenditure and planning implications, or focus on upgrading the facilities of the existing Ocean Terminal to enable it to receive bigger cruise ships.
 - Stadium – use supported, but needs to be considered together with “software” as otherwise may be under-utilised. For example, discontinue present football league in Hong Kong and form two principal teams based on the existing Hong Kong Stadium and the new stadium at Kai Tak, which could participate in the China league. This would ensure higher standard of play, sustainable patronage, increased revenue from proceeds generated from soccer betting.
 - New railway link – any rail infrastructure would be beneficial, but do not provide a depot in such a crucial location.
 - Heliport – no comment but not particularly appropriate.
 - Strategic roads – disagree. Waterfront land should *not* be used for road purposes. We should give people access to the harbour and create high land value with water frontage. We should not be “engineering-led”.
 - Vehicular and pedestrian connections – support use of tramway or light rail systems.
 - RTS/barging point – absolutely not, completely inappropriate.
 - Public housing sites – public housing policy should in any event be reviewed. Only use apron area if absolutely needed.
 - Metropolitan park – supported but in new location at tip of old runway.

4. What is your view on reclaiming Kai Tak Approach Channel?

- We consider it premature at this stage to decide on the question of reclaiming the Kai Tak Approach Channel, as no details have been provided on the various alternative plans. Suffice to say that any reclamation proposal will be subject to the “overriding public need” test as laid down by the Court of Final Appeal.
- A more challenging alternative is not to reclaim, but to upgrade the water quality to make it a good water feature within the “Garden City” which could enhance the open space quality in Ngau Tau Kok, Kowloon Tong and Kowloon Bay. Access to the adjacent areas can be provided by new bridges for pedestrians, trams or roads. The pollution problem will abate once the upstream factories are replaced. An “islands” theme will also create a self-flushing mechanism driven by tidal flows. Water frontage

creates amenity and high property values and offers the possibility of marina uses.

5. In your opinion are the existing typhoon shelters and public cargo working areas compatible with the future tourism and leisure/recreation developments in the vicinity?

- The existing typhoon shelters and public cargo working areas are incompatible with the quality residential theme of this area and should be relocated.

6. What are your views on the proposed public participation programme and do you have any suggestions on the public participation activities?

- Public participation is an essential process to obtain “buy in” by the community. Once ideas have been received, alternative layouts can be presented to the public for consultation.
- Given all the previous work done on the planning of this area, it is doubtful if a further 3 stages of consultation, taking 2 more years to complete, is really desirable or necessary. A shorter timetable is preferred.

Yours sincerely

Louis Loong
Secretary General