

To: H18 Project Conservation Advisory Panel

CC Chairman of H18 Project Conservation Advisory Panel, kamnaiwai@yahoo.com.hk

CC Chairman and Members of the Board of the Urban Renewal Authority, inquiry@mail1.ura.org.hk

CC Secretary for Development, devbenq@devb.gov.hk

CC Secretary for Food and Hygiene, fhb@ghb.gov.hk

CC Chair and Members of the Town Planning Board, tpbpd@pland.gov.hk

CC Legislative Council, Panel on Planning, Lands and Works, cshiu@legco.gov.hk

CC Legislative Council, Panel on Home Affairs, Heritage Subcommittee, ftai@legco.gov.hk

CC Legislative Council, Panel on Food Safety and Environmental Hygiene, ftai@legco.gov.hk

CC Chairman and Members of Antiquities Advisory Board, hspkwok@lcsd.gov.hk

Dear Sir/Madam,

Immediate action should be taken to review URA's plan for Graham Street market*
As it involves the most historic functioning market at the heart of the "**Old City Area**" (舊城區) of Hong Kong, **conservation** and **regeneration** should be the starting point of this project.

A Historic Area

Historical references and maps have indicated that Graham, Peel and Gage streets, together with Gutzlaff and Staveley, are some of the oldest streets in the territory where a market was in operation as early as 1845. The street outlook, in terms of pattern, gradient, scale and size, and the general height of the surrounding buildings, have been preserved and only adapted gradually throughout the last 150 years.

There are international guidelines which stipulated the conservation of such historic urban areas. The Washington Charter, adopted by UNESCO International Council on

Monuments and Sites (ICOMOS) in 1987, has set out various principles and objectives, the most relevant to this case being the preservation of:

- Urban patterns as defined by lots and streets
- The formal appearance, interior and exterior, of buildings as defined by scale, size, style, construction, materials, colour and decoration
- The various functions that the town or urban area has acquired over time

According to the Charter, any threat to these qualities would compromise the authenticity of the historic town or urban area.

The current URA design for Graham Street market has violated all of the above principles:

- Major damage to historic street patterns
- Mass demolition of existing buildings and replaced by high-rise towers which are incompatible to the surrounding low-rise area
- Replace a functional marketplace with a pseudo “Old Shop Street” with stalls fit for souvenirs only.

URA must give up its mass demolition/construction (全拆建新) approach. It

should review its design and aim at **organic regeneration** of the Old City Area:

- Respect historic street patterns, scale and size. Retain all historic streets – there is no need for a new “Old Shop Street”, the old streets are already there!
- Renovate those better-quality buildings (the building where the URA office is located on Gage Street is a good example) and replace dilapidated ones with new buildings of similar scale and size. Such regeneration model can be seen in SOHO and Pak Sha Road, Causeway Bay and has been a success. The general low-rise nature on both sides of Peel and Graham should be maintained
- Retain and enhance the street market (see below)
- Devote more resources to keep not only the façade of Wing Woo but also the interior and the “ingredients” to make it a living heritage – a “living museum”
- Maintain the settings and the diversity of the Old City Area in terms of architecture, uses, fabric and community network

A Functional Market

The Graham Street market is a highly functional market and the ONLY in Central serving hundreds of thousands of residents, people working in the area and a vast number of restaurants nearby – SOHO, NOHO and Lan Kwai Fong. It is a complete ecology of street hawkers, their storage facilities, as well as a large variety of shops

selling all kind of meat and food products located mostly on the ground floor of old buildings. Pulling down all these buildings will mean a major disruption of market activities and to the detriment of the wide community. The regeneration should aim at

- Retain the current scale of the market by making provision for all shops and hawkers to stay
- Work with FEHD to review the hawker licensing system so retired hawkers are allowed to transfer their licenses to newcomers or their helpers
- Enhance the hygiene condition of the market, improve street surfaces
- Allow a bigger space for each hawker (3x4 feet too small)
- Provide adequate storage facilities, electricity and water for hawkers
- Proper arrangement for the interim period so as not to disrupt market activities and the livelihood of hawkers and shop operators. Regeneration could adopt a **phase-by-phase approach** so as to minimize disruption
- Pedestrianize Gage Street by restricting delivery hours

Without proper planning, the whole economy of the food and beverage industry in Central and many households in Hong Kong (even outlying islands) will be seriously affected.

A Place for All

The Graham Street market is a living cultural heritage which belongs to all Hong Kong people and also to our visitors. URA's current design will destroy one of the most important tourist areas in Hong Kong. The pseudo old shop street will be despised by tourists and make this city an international joke. Replacing an organically thrived community with a sterile development only shows the government's lack of competence to deal with the city's heritage, our history and our culture. In short, such bad planning will lead to social, economic, cultural damages to Hong Kong.

Currently, this low-rise area of Central offers a breathing space for an otherwise over-developed city. It has been said to have "a village atmosphere", "a park within a concrete jungle", "a place like home". Hong Kong will not be Hong Kong anymore if we lose this market and the old city area. Some foreign residents in SOHO said they will consider leaving HK if the government continues this senseless destruction.

The current plan will also cause environmental disaster. The 4 high-rise towers together with the extra traffic will definitely worsen air quality in the area and bring more congestion. Continued pollution in this city will further drive away international

businesses and executives. This is already happening.

The way to go is for government to adopt international standards in conserving our old city, to restrict high-rise development in this area, and to truly understand that street markets are our city's asset and should be protected at all costs. URA has to change its plan to conform to these objectives – more sensitivity in the design and the regeneration process will make Graham Street market a successful place enjoyed by all.

All being said, the resumption and compensation procedure for affected residents and property owners should commence as scheduled.

Questions & Requests

What is the objective of the H18 Conservation Advisory Panel and what has it achieved since its first meeting on May 2 this year?

Has any heritage assessment report been prepared for this area? Such assessment is a pre-requisite for any renewal plan which involves the old city area

URA said the scale model (with the four buildings) of this project has been discarded, even when the project has not actually commenced. For public interest, it is the responsibility of URA to rebuild this model and display it to the public ASAP.

What is the follow-up action after the Panel receives comments from the public?

Will there be more consultations and forums to further discuss the follow-up actions?

The Antiquities Advisory Board, the Legco Panel on Home Affairs Subcommittee on Heritage Conservation should be involved in this important project which concerns a significant cultural heritage of Hong Kong

* **Graham Street market** generally refers to the area of hawkers and shops on both sides of Graham , Peel and Gage streets

Submitted by
Katty Law

Member of the Central & Western Concern Group
September 6, 2007



"Au, David"
<DCWAu@ura.org.hk>
2007/09/07 AM 11:17

To "Katty Law"
cc <inquiry@mail1.ura.org.hk>, <devbenq@devb.gov.hk>, <fhb@ghb.gov.hk>, <lpbd@pland.gov.hk>, <cshiu@legco.gov.hk>, <ftai@legco.gov.hk>, <hspkwok@lcsd.gov.hk>
Subject RE: Comment on H18 Project

Dear Ms Law,

I acknowledge the receipt of your e-mail with thanks. Your letter will be considered together with others at the coming Project Conservation Advisory Panel meeting and the consolidated result will be recommended to the District Advisory Committee for consideration, and subsequently the Board of the URA, and then assimilate those which are found to be practical and of benefit into the overall plan.

Regards,
David Au
Secretary to the Project Conservation Advisory Panel