

**COMMENTS ON THE  
SOUTH EAST KOWLOON  
DEVELOPMENT PLAN**

(A submission to the LegCo Panel on  
Planning, Lands and Works)

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## **THE HONG KONG CIVIC DESIGN ASSOCIATION**

### **Comments on the South East Kowloon Development Plan by Dr. E.G. Pryor MBE Chairman, Hong Kong Civic Design Association**

#### **INTRODUCTION**

1. The Town Planning Board has gazetted two related Outline Zoning Plans for the future development of the former airport site at Kai Tak and adjoining areas of Kowloon Bay for a "city within the city" to accommodate about 320,000 persons. The project is also expected to create about 120,000 jobs, principally in the service sector. Further provision is made for a range of major community uses, including a large metropolitan park, a sports stadium, a museum of transport and a number of substantial sites for various government uses. Crossing the area would be trunk roads that broadly divide the whole area into a north-western sector and a south-eastern sector (see Figure 1).
2. The scheme involves the development of the former airport apron areas and the runway promontory in association with the reclamation of the Kai Tak nullah and Kowloon Bay, both of which are highly polluted. The total area that could be made available for various urban uses would be in the order of 629 ha. The extent of the proposed reclamation of Kowloon Bay is such that the width of the harbour would be narrowed to a distance of about 1150 metres. Along the new shoreline would be a two-kilometre landscaped promenade.
3. The Town Planning Board has gazetted the two Outline Zoning Plans to invite objections from any body that directly or indirectly has a point of concern to raise, either in respect of specific property interests or more widely from a general public point of view. The Hong Kong Civic Design Association (HKCDA) has submitted a statement of objection on the latter account. Overall, about 900 objections have been lodged and this indicates that the public at large have a very strong interest in the purpose and contents of the two plans. The Town Planning Board now faces the difficult task of considering all such objections to determine whether the planning proposals should be modified in appropriate ways.
4. The HKCDA also has a broader interest stemming from the two Outline Zoning Plans that relates to the three-dimensional design of our harbour city and, in particular, to the processes that mould its shape, functions and character.
5. The Planning, Lands and Works Panel of the Legislative Council has invited the HKCDA to attend its meeting on 9 March 1999 to offer, along with other bodies, its views about the current planning proposals. This paper, which covers key matters in an abbreviated form, will be supplemented by an illustrated presentation to offer some ideas on how matters might be carried forward. The

contents of this paper are, in no way, intended to prejudice the statutory responsibilities of the Town Planning Board but are offered to help bring about a satisfactory resolution of significant points of concern from all parties affected. A similar submission has been made to the Director of Planning who held a seminar on the South East Kowloon Development Scheme on 19 February 1999. The plans attached to this paper are for illustrative purposes only to help clarify points of principle.

## **MAIN POINTS OF CONCERN**

6. The two Outline Zoning Plans produced for the South East Kowloon Development Scheme and the associated Explanatory Statements follow a standard format that give only a fairly general picture of the development intentions for the area concerned. The plans have been derived from detailed feasibility studies produced by consultants appointed and managed by the Project Manager, Kowloon of the Territory Development Department. Comprehensive technical reports on those detailed studies are available by request from the Project Manager's office but, so far, no executive summary has been produced for reference by the general public to promote an understanding of the proposals. However, from the currently available sources of information, the HKCDA has the following principal points of concern:

### ***Housing Mix***

- (a) There is a heavy predominance of sites reserved for public housing, especially in the initial development phase largely comprising the former airport apron area. It is to be expected that a high percentage will be low rental housing. Whilst recognising that there are substantial territorial needs for such housing for low - middle income groups, the broader area of Kowloon City and Kwun Tong in which the initial phase is located already has a high concentration of rental public housing - in the order of 70%. And yet, Government's policy objective is to raise the proportion of home ownership for the territory as a whole to 70%, requiring a higher level of participation by the private sector. A further related concern is the "unbalanced" socio-economic profile that would result from having large concentrations of "one-class" households.

### ***Urban Design Issues***

- (b) An objective of the current plans appears to be to optimise the yield of new housing stock by building to the highest permitted densities. In pursuing such an objective, however, an implication is that reliance will have to be placed upon the widespread use of standard blocks generally built to uniform maximum heights. The visual impact of such an approach, already apparent in many parts of East Kowloon, would be to create a massive looking urban form with a plateau-like skyline. It is held that the statutory plans for south East Kowloon need to provide a broad urban design framework, with associated parameters, to achieve an aesthetically stimulating three-dimensional urban form befitting of a "city

within the city." It would appear that such controls could (and should) be introduced on the basis of Section 4(1) of the Town Planning Ordinance that allows "*any matter whatsoever (to) be shown or provided for or specified in or in respect of the (outline zoning) plans by means of such diagrams, illustrations, notes or descriptive matter as the Board thinks appropriate.*" Any such diagrams, illustrations notes and descriptive matter shall be deemed to be part of the relevant outline zoning plan and, as such, take precedence over other related legislative provisions e.g. the Building (Planning) Regulations that, hitherto, have shaped city forms in a very regulated way over the past four decades.

- (c) In addition to questioning the use of standard, monolithic housing blocks as the predominant components of city development, we would emphasise the importance of buildings in terms of their role in shaping the urban form itself. Whilst recognising the contribution that standard - form estates can usefully make in responding to ever increasing housing needs, the city of the 21<sup>st</sup> century requires more attention to be given to the creation of a sense of place and identity. This calls for a design approach that also incorporates streets with continuous facades, at least for the lower floors of buildings opening onto boulevard-type pedestrian ways that can add colour and interest in the urban environment. The end result should be a better articulated city form where buildings serve not only their own special purposes but also define space in an aesthetically pleasing way. Such principles are well displayed in many historic cities of Europe and Asia.
- (d) A large area in the geographic heart of the South East Kowloon scheme has been reserved for a number of major sites for such government uses as an international mail centre, USD depot, EMSD workshop facility and vehicle test centre. It would seem preferable for such uses to be relocated to sites in less valuable locations leaving the original sites for more culturally and community-oriented activities;
- (e) The provision in the Outline Zoning Plans for a new, long waterfront promenade stretching from Hung Hom Point across Kowloon Bay to the former airport runway is a bold concept. However, its visual appeal could be greatly enhanced by means of a more curvilinear design and by giving recognition to the opportunities for the design of a waterfront for compatible, multi-purpose activities. The scope for extending the proposed Metropolitan Park so that it directly adjoins the waterfront promenade and the extent to which the currently proposed seawall alignment is considered acceptable in terms of the extent to which it narrows the width of the harbour are other matters for further consideration.
- (f) The size and shape of the South East Kowloon area are such that it seems inevitable that it will need to be developed as a series of "cells" over an extended period of time. There is thus a propensity for each development cell to be conceived and developed independently with the

whole becoming a sum of the parts. That, in turn, could create a rather disjointed overall urban structure. As one compensatory measure, It is submitted that the urban fabric needs to be brought together by means of a comprehensively planned system of interconnected parks, landscaped pedestrian ways and civic spaces providing traffic-free linkages between key activity nodes. The finally approved planning proposals need to give a clear definition of such concepts.

- (g) The phasing of development has to allow for works to be implemented at varying rates, according to changing social and economic circumstances. At present, there is considerable pressure to accelerate the provision of housing on a major scale. However, we also see a need for a more cautious and incremental approach to the design and development of certain key areas of general community value and appeal. Such areas should be allowed to grow in a more evolutionary way and, in the process, create an urban environment that has more character and interest. Such an approach would allow for a wider range of "players" to participate in the development process.

#### ***Transport Systems***

- (h) Trunk roads for the South East Kowloon Development Scheme account for over one-third of the total area designated for urban use. Substantial areas are taken up for multi-level interchanges with ramped connections cutting through valuable sites. Also, within each development cell, it may be expected that local access roads will take up a further 15% to 20% of land. Thus, about 50% of the entire area could be devoted to roads, which seems to be on the high side and suggests that road-based transport systems are to provide the predominant form of transport within the area. That, in turn, would exacerbate air pollution problems, which already have reached serious proportions in various parts of the Metro area. It is suggested that further consideration should be given to creating larger development cells (and hence fewer major boundary roads), the tightening up of the geometry of major interchanges and the provision of effective noise buffers along all major roads.
- (i) A related point is that the current Outline Zoning Plans give no clear indication of the provision to be made for new passenger railways although in the Consultation Document for the Third Comprehensive Transport Study (CTS3) it is sated that "*railways, being the most efficient mass carriers and being environmentally more friendly, should be given priority in the development of our future infrastructure programme*" and further that there needs to be "*a trigger-point mechanism for purpose of ensuring a more timely provision of infrastructure and streamlining the planning process.*" And yet, the Explanatory Statements for the South East Kowloon (Kai Tak North and South) Outline Zoning Plans make no mention of these policy objectives or of any related proposals, even though the Territorial Development Strategy Review makes it clear that the scale of development of the proposed "city within the city" and the

levels of transport demand for the Metro area clearly warrant extensions of the MTR through the South East Kowloon Development Scheme at the earliest possible time. Indeed, it would have been desirable from the outset for any new alignments and station locations through the area to have been considered as an integral part of the plan-making process. Also, the use of supplementary tramway feeder services would seem to deserve closer consideration. It is to be hoped that these important matters will be properly addressed in the context of the current studies for the Second Railway Development Strategy (RDS2), along with parallel adjustments to the development proposals for South East Kowloon.

### ***Economic Activities***

- (j) It is widely recognised that Hong Kong needs to broaden its economic base, in respect of which there are policy targets aimed at upgrading Hong Kong's tertiary educational programmes, the promotion of hightech business and industrial enterprises, the diversification of its cultural and tourist attractions and the development of the territory's role as a centre for international and regional aviation, with which there needs to be a range of support activities. There are clearly stated policy objectives relating to all these key sectors. It is thus submitted that a closer look be made at the opportunities for such activities in the South East Kowloon area, which is well located relative to the large pool of labour in the Metro area. That, in turn, implies that some reduction in the currently planned scale of housing provision may be justified, on which account alternative sites in other locations would need to be identified in the context of the Territorial Development Strategy.

### ***Temporary Uses***

- (k) It will take many years before the whole of the Kai Tak - Kowloon Bay area can be fully developed. There will be large areas of already formed land, such as the former runway promontory and certain apron areas included in later development phases, that will remain uncommitted for some considerable time. It is the policy of Government for such areas to be made available for temporary uses and that can be of material benefit for a city where space is always at a premium. However, it is considered that there needs to be a co-ordinated plan of action to help ensure, as far as possible, that permitted temporary uses are compatible with adjoining permanent development. Also, the former airport site contains many large buildings that also could be made available for temporary uses and a co-ordinated approach is also advocated. In particular, it is seen that the former Government Flying Service building, of relatively recent construction, would lend itself to use for the establishment of a range of aviation-related activities, including training facilities, that would help promote Hong Kong's role as an international and regional centre of aviation. Also, the large passenger terminal building and former cargo storage facilities could be adapted for various community and business activities that may well provide new employment opportunities for the residents of new estates built in adjoining areas.

## **SOME POINTS OF PRINCIPLE**

7. It is clear that the substantial response from the public to the current planning proposals for the South East Kowloon Development Scheme calls for a reconsideration of certain key elements. At the same time, however, it needs to be recognised that there is an obligation upon the government to move forward with the earliest possible development of the initial phases of development, especially to keep pace with growing housing needs.
8. It is submitted that any reconsideration should be done in recognition of the following points of principle:
  - # the future use of the South East Kowloon area should take account of the role it should serve in a territorial context having regard to broad sectoral policy targets relating to such matters as housing and economic diversification;
  - # the area also needs to provide opportunities to meet the needs of the Metro area in respect of such matters as the rationalisation of land uses, the restructuring of obsolete housing and industrial areas, the creation of new job opportunities; the enhancement of environmental conditions and the creation and sustenance of an urban form and way of life that establishes a new hallmark in the field of city development; and
  - # the scale, form and functions of the city, on the one hand, and the shape, width and functions of the harbour need to be considered jointly rather than as separate and unrelated entities. That, in turn, will require high levels of value judgements in order to reach a consensus view.

## **THE PLANNING PROCESS**

9. Clearly, the Town Planning Board faces a daunting task in sifting through the numerous objections to the South East Kowloon outline zoning plans and it will probably be necessary for the fundamental parameters on which the original proposals were based to be reviewed. Making ad hoc changes in response to any specific objection or groups of similar objections is considered to be a questionable way to devise a satisfactory overall plan for a scheme of such major dimensions. Indeed, the application of the detailed procedures set out in the Town Planning Ordinance leading to an open ended invitation for the lodging of objections seems to be a rather confrontational way for plan formulation.

10. It is submitted that for any plan involving the development of a new strategic growth area there should be a two-stage process covering the following matters:

### **Conceptual Proposals**

These should be based on outline planning/engineering feasibility studies to cover such matters as:

- # **the broad vision** e.g. creating a new city form that puts Hong Kong in the forefront for the development of an environmentally sustainable way of urban living. Reliance of standard planning solutions needs to be relaxed, especially for certain "key" projects (e.g. town centres and waterfront communities), to allow urban designers and architects greater freedom to develop more innovative designs.
- # **defining the broad policy context** to reflect community-based values relating to such matters as home ownership and the diversification of housing types; a predominant role for passenger railways from the outset; broadening the scope for economic diversification through the joint efforts of the public and private sectors; widening the provision of educational opportunities for self improvement etc;
- # **the objectives and needs to be met** e.g. early provision of a passenger rail transport system; provision for 70% of households to be home owners; the setting up of a high tech business estate; the development of a special tourist-related activity area; the creation of a comprehensively designed centre of Asian culture; the creation of multi use waterfront recreational amenities; the provision of a comprehensive landscaped system of inter linked, traffic free pedestrian ways and civic spaces etc
- # **the key issues to be resolved** e.g. disposal of contaminated sediments; the creation of a three-dimensional urban design framework; the early provision of new job opportunities etc;
- # **the development constraints and opportunities** within a defined study area that should be taken into account in setting the limits of harbour reclamations (see Figure 2) and in demarcating areas for a range of broad land uses;
- # **a well conceived statement of basic design principles and parameters** to be used for plan preparation, with particular regard to aspects of three dimensional city forms;
- # **the formulation of a "driving concept"** (see Figure 3) and the preparation of a number of broad planning options (see Figure 4) and related engineering works; and



- # **a comprehensive evaluation of the merits of each option** to identify a preferred broad development plan and associated phases (see Figure 5).

The end result should be presented in the form of a well illustrated consultative report that should be released for public comment and consultation. The summarised results of any relevant detailed background studies should be made available for reference through appropriate public consultation centres e.g. libraries and district offices. Subsequently, a finally recommended "**Broad Development Plan**" with an associated report covering all key elements, should be channelled through established channels for high-level policy endorsement.

#### **Detailed Plans for Each Phase**

Detailed plans should be prepared in order of priority for each phase in line with current standard procedures under the Town Planning Ordinance and alongside which other related statutory action may need to be taken under the Foreshore and Seabed (Reclamation) Ordinance and the Roads Ordinance. The planning proposals for each phase should be of a high standard of presentation sufficient to enable the "man in the street", community bodies, professional groups etc to fully understand the development intentions. In particular, outline zoning plans for strategic development projects and areas of special design significance need to be supported by well conceived broad urban design parameters relating to the massing of buildings, height profiles, spatial relationships and the creation of city places and waterfronts of distinction. It is held that, on such a basis, the objection process under the Town Planning Ordinance would be more meaningful and proactive.

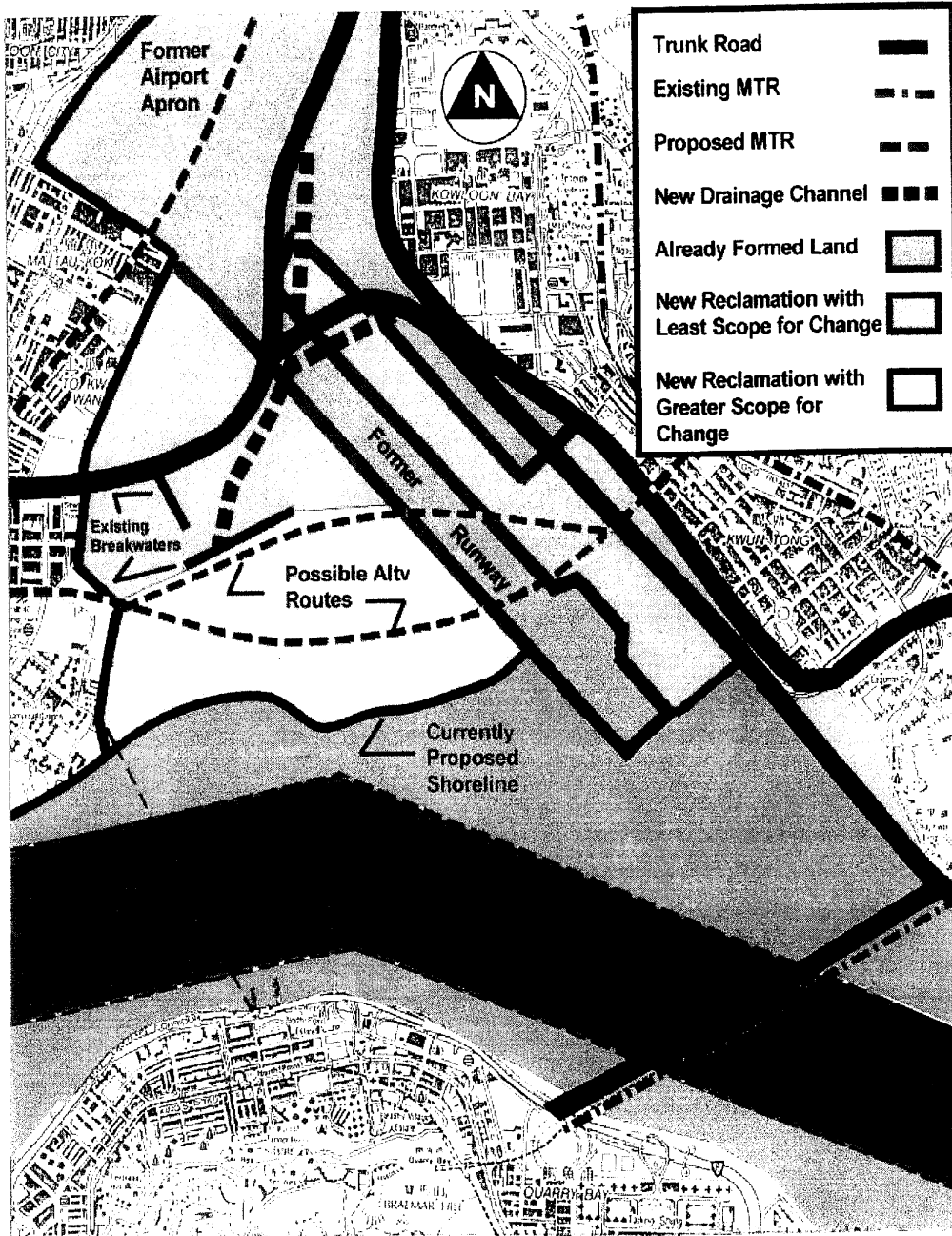
For the South East Kowloon Development Scheme, it will be imperative that efforts be focussed initially on the first phase, most of which would cover the north-western sector where there are large expanses of former airport apron areas. A substantial part of the first phase would be required for housing development, related uses and associated transport systems and other essential infrastructure. For subsequent phases, there should be more time to consider a wider range of innovative ideas, taking account of changing circumstances and technology.

Figure 6 gives a simplified illustration of the proposed modified planning process.

#### **FINAL WORDS**

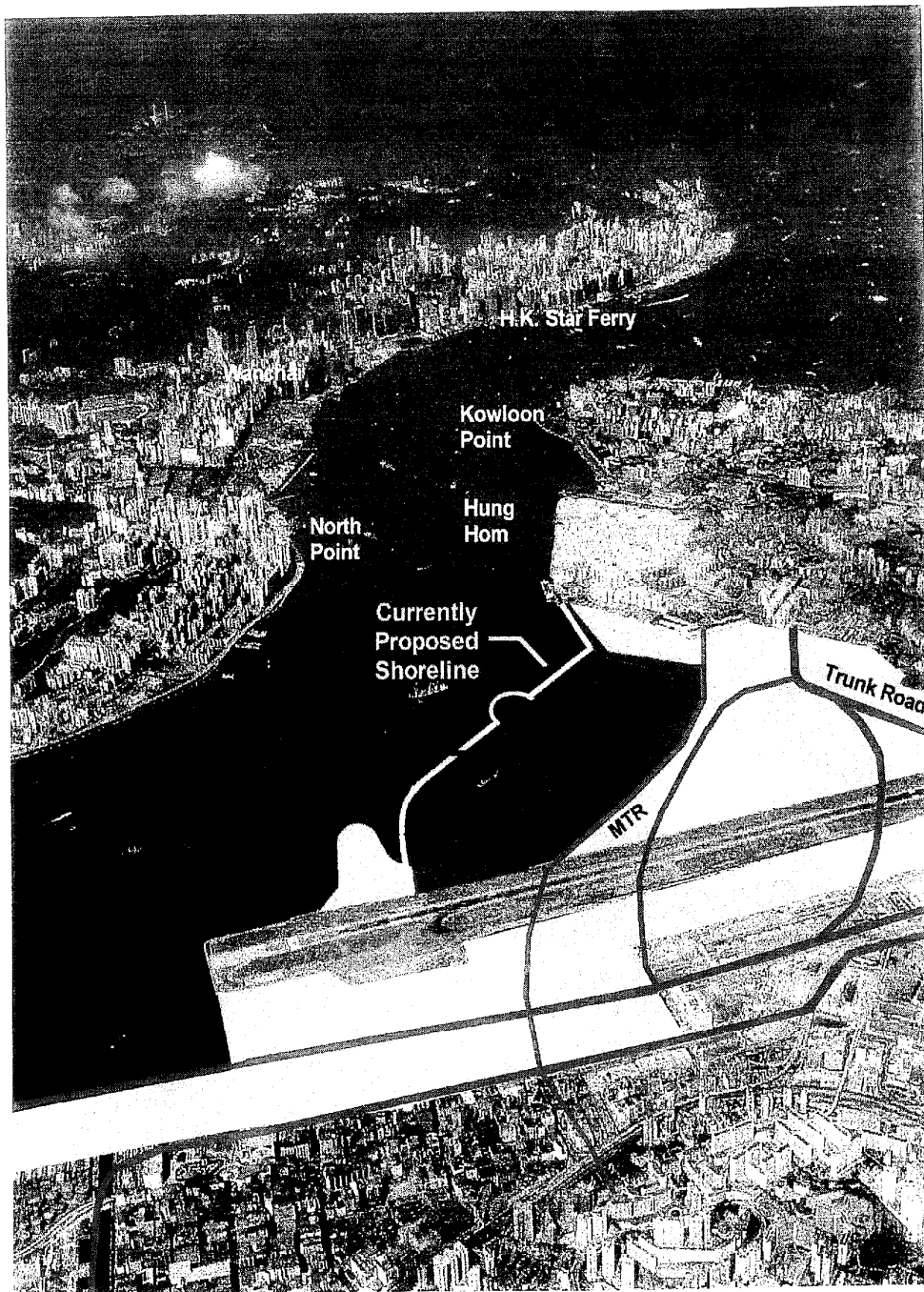
The concept of a "City within the City" to make use of the substantial land bank at Kai Tak and adjoining areas of Kowloon Bay is a matter that has aroused the deep interest of many sections of our community, the general views of which indicate that public consultation has an important role to play in the process of plan making. The views presented in this paper are offered in the hope that they will help to maintain a forward momentum for the creation at South East Kowloon of a new and enriching way of urban living. It is further perceived that the points of contention and concern presented

above cover matters that also relate to other strategic growth areas, such as the Green Island Reclamation, and to our harbour city as a whole. At the heart of many of the issues raised in this report, is the contention that both the planning and implementation process of such an important "addition" to the Metro area requires a very careful and sensitive approach. This must be geared to the achievement of everything that is best for city living and also is related to Hong Kong's traditional urban culture, based on such parameters as architectural interest; a rich mix of land uses; sensory diversity from experiences of sight, touch and smell; a day-round medley of human activities with associated surprises and excitement; and an interconnected web of pedestrian ways that binds all these elements together. An urban form and environment can thus be created not only to satisfy the expectations and needs of the Hong Kong people for a better place in which to live and work but also to demonstrate to the international community at large that Hong Kong is second to none in the field of city design.

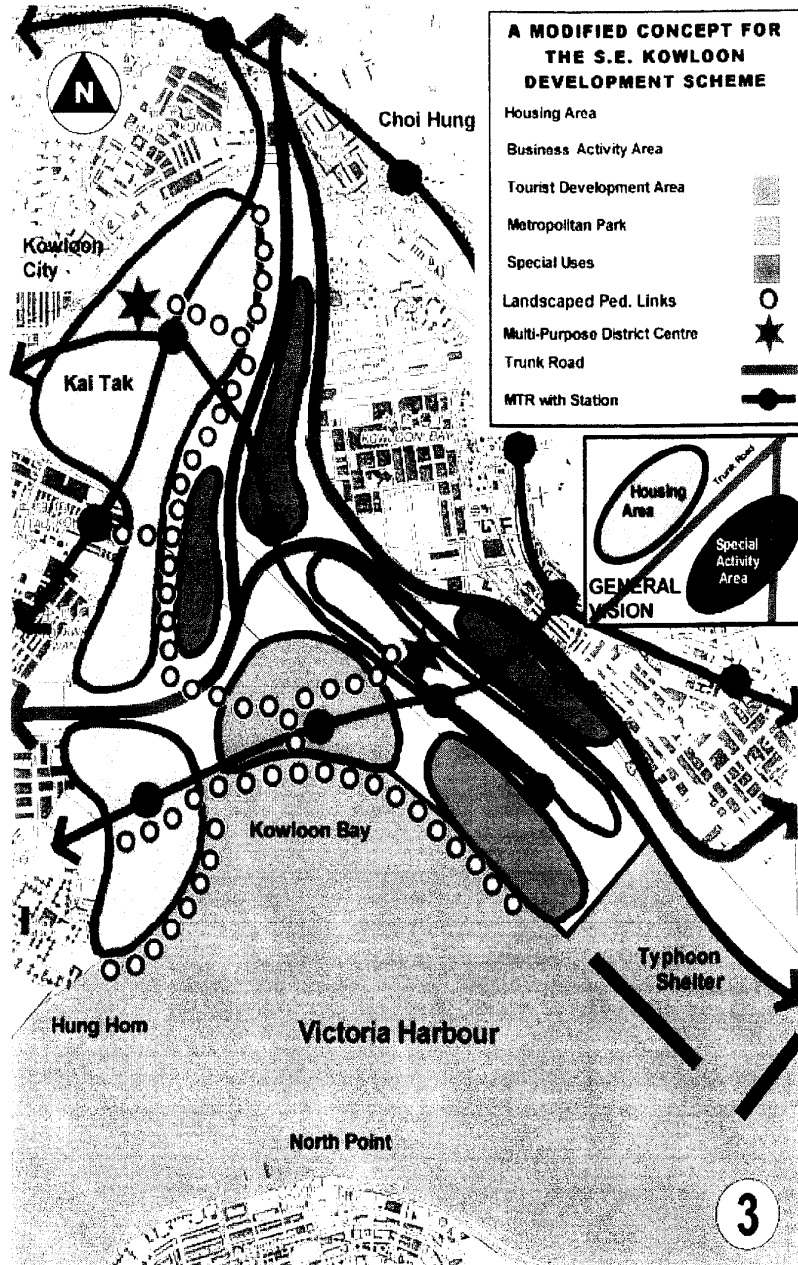


**DEVELOPMENT CONSTRAINTS  
SOUTH EAST KOWLOON  
DEVELOPMENT SCHEME**

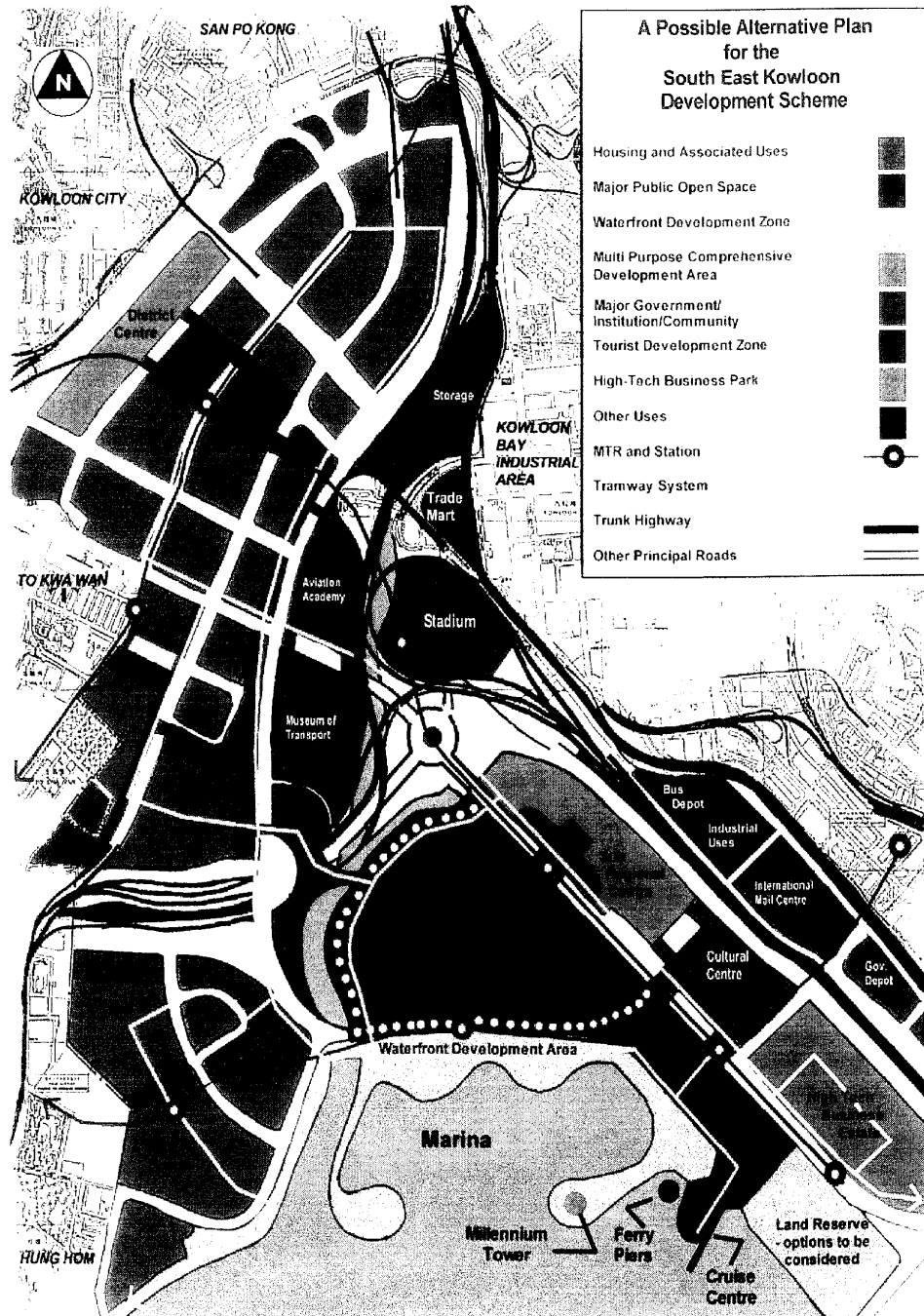




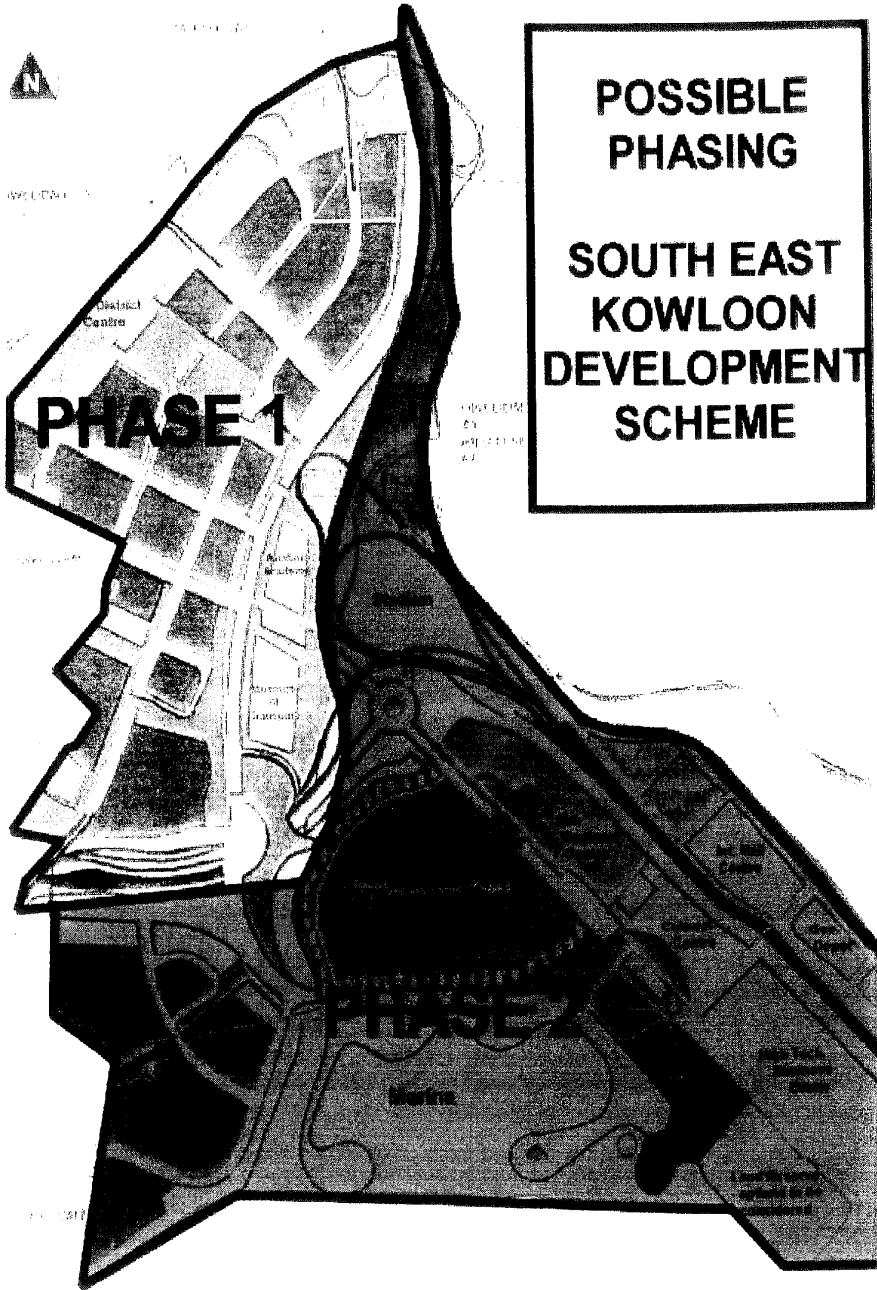
**A Possible Alternative Shoreline Profile  
for S.E. Kowloon Development Scheme**



Joint Submission of the Hong Kong Civic Design Association  
 and the Hong Kong Historical Aircraft Association  
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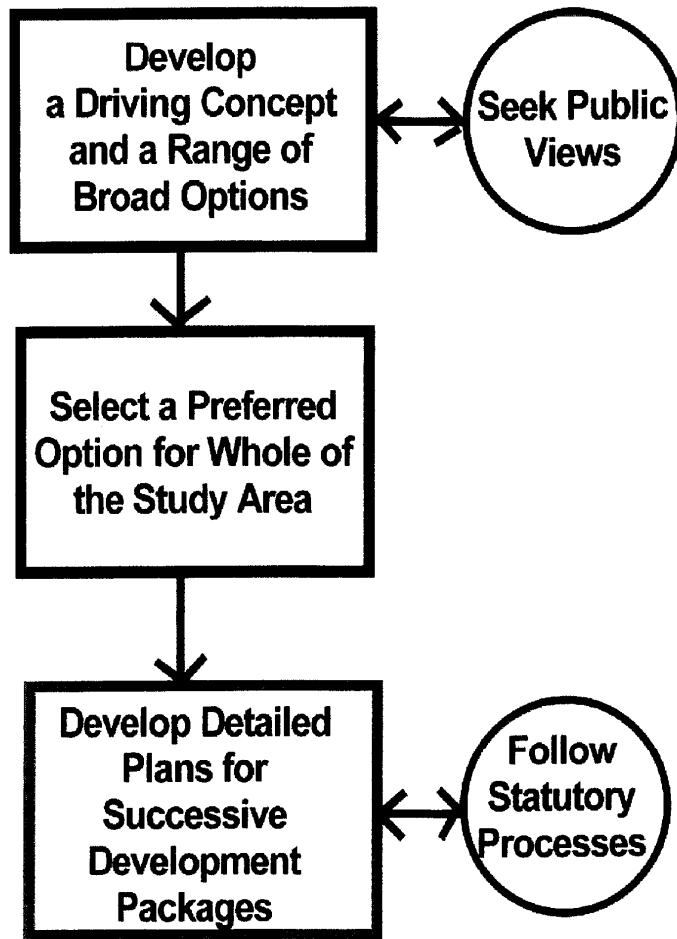


Joint submission of the Hong Kong Civic Design Association  
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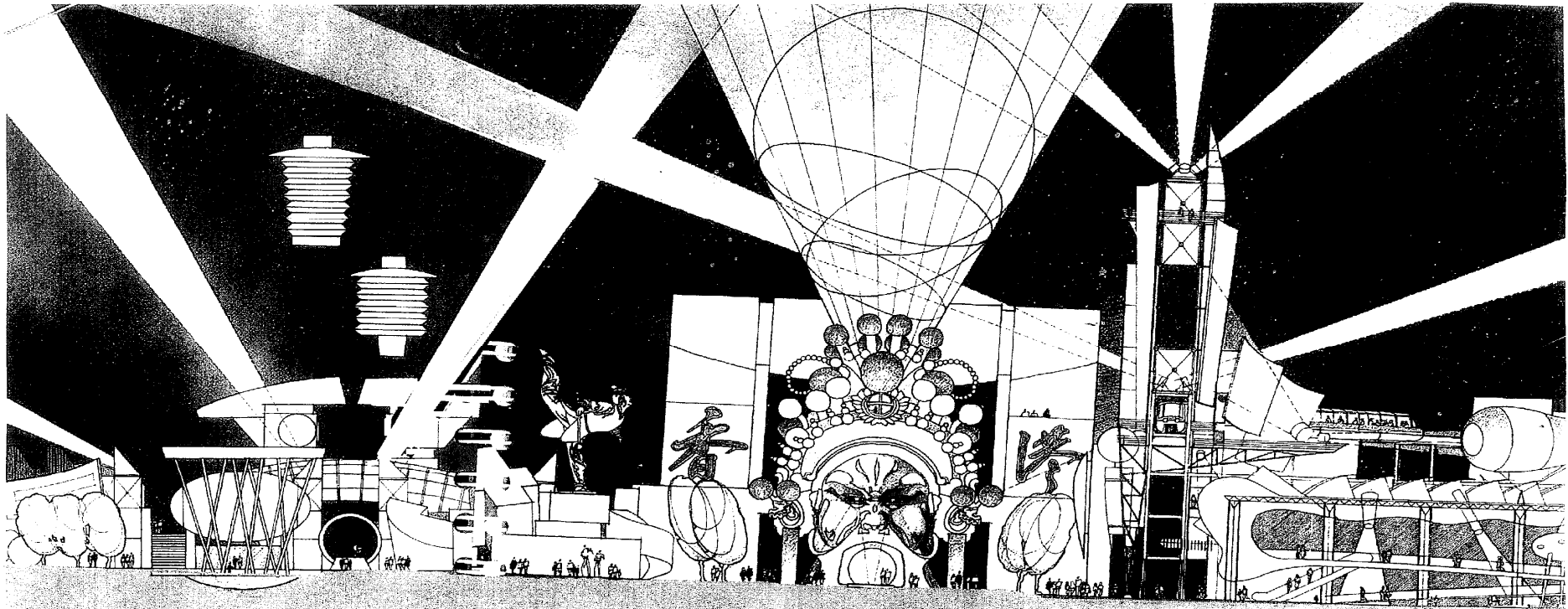
**POSSIBLE  
PHASING**

**SOUTH EAST  
KOWLOON  
DEVELOPMENT  
SCHEME**



**WE NEED A MORE INTERACTIVE  
AND STRUCTURED (BUT FLEXIBLE)  
PLANNING PROCESS**





**South East Kowloon offers good opportunities to create "special" civic areas and waterfronts that can be fun places to be during both the day and the night.**

Courtesy : HKTA - Hong Kong Expo Outline Feasibility Study





**The City within the City at South East Kowloon needs to have special attractions for Hong Kong residents and overseas visitors on well located sites of suitable size and shape.**

