

Annex IVe

Written Submissions (received for Consolidation Forum)

Harbour-Front Enhancement Review – Wan Chai, Causeway Bay & Adjoining Areas
Stage I – Envisioning Stage

Written Submissions Received for Consolidation Forum

| Ref. | Name of Organization | Subject | Date |
|-------------|--------------------------------------|--|-------------|
| 1 | Harbour Business Forum | Re: Harbour-front Enhancement Review Consolidation Fourm | 25.11.2005 |
| 2 | Royal Hong Kong Yacht Club | Letter | 25.11.2005 |
| 3 | - | Letter | N/A |
| 4 | Clear the Air | Letter | 21.11.2005 |
| 5 | Designing Hong Kong Harbour District | Letter | N/A |
| 6 | Civic Exchange | Letter | 24.11.2005 |
| 7 | - | Re: HER Consolidation Forum | 25.11.2005 |

25th November 2005

Chairman and Members of the
HEC Sub-committee on Wan Chai Development Phase II Review
c/o Bosco Chan,
13/F North Point Government Offices,
333 Java Road,
North Point, Hong Kong.

Email: bpchan@cedd.gov.hk

Re: Harbour-front Enhancement Review Consolidation Forum

Dear Mr Leung and Members,

Harbour Business Forum (HBF) has the following comments on the Consolidation Forum of the HER Envisioning Stage for Wan Chai, Causeway Bay and adjoining areas for your consideration:

- i. HBF welcomes the Harbour-front Enhancement Review (HER) for Wan Chai, Causeway Bay and adjoining areas. We are encouraged to see the expression of the community's visions and views for our harbour-front.
- ii. We would like to remind the committee that the need for this HER is largely due to a need to reverse past traffic and engineering lead planning that has left our harbour-front in its current state. There is also a lack of long-term vision for the design of Hong Kong's harbour and harbour-front districts. We need a responsive planning process and innovative solutions to rectify and to prevent a repeat of these past mistakes.
- iii. Transport and engineering has been given a disproportionate weighting in Government's planning and decision making processes; transport and engineering planning should be lead by land use planning. We need to stop approaching this as a road building project and remember it is a harbour enhancement project.
- iv. The harbour and the harbour-front belong to the public and the public's aspirations need to take priority. Government departments need to embrace these visions and goals for the harbour and only involve consultants with the same attitudes. Government also needs to ensure economic value as well as the long term social and environmental values are given equal weightings in any decision making process and that cost is not the major criteria.
- v. HBF would like to see this HER as a first step in the adoption of a holistic planning process. All professionals involved should be using their expertise to identify and deliver these goals. Government should be aiming for the best urban design, encouraging proactive and cross discipline collaborations and rediscovering engineering as a problem solving tool rather than a prevention tool of good visions.

For example one task is to reduce and relocate incompatible waterfront uses, in the spirit of Harbour Planning Principles (HPP) 5 (Maximizing Harbour-front for Public Enjoyment), such as the electricity substation and the sewage treatment plant so that the tunnel alignment is better and minimising necessary reclamation. By dismissing the possibility of relocation off hand without apparent thorough investigation is neither responsible nor in tune with the aims of the project.

- vi. We believe the five key 'consolidated opinions' 《合理意見》 are good suggestions and they follow the HPP. We believe however the 'progression' from outline concept plan 'consolidation opinions 1' 《整合意見一》 to 'consolidation opinions 3' 《整合意見三》 show a regression of ideas and progressively fail to satisfy the five key consolidated opinions (most

notably the heavily popular 'extend Victoria Park to the waterfront') and, by inference, the HPP. The 'progression' in fact would take us back almost to the status quo and failing the exercise, the public and our Harbour.

vii. We also believe the following 'dismissed suggestions' 《不再考慮的意見》 are detail design items that pose no threat to the viability of the larger Wanchai – Causeway Bay improvement concept, especially at this juncture in the public process when considerations of value-enhancement are more appropriate than considerations of cost-efficiency. These ideas should be kept and reconsidered for their suitability against the finalized vision and concept for the area when it is completed.

- a. Wanchai north shore docking
沿灣仔海岸線的浮躉繫泊設施

In accordance with HPP 2 and 3 (Victoria Harbour as Hong Kong's Identity; and A Vibrant Harbour), a diversity of maritime uses that could host marine craft from around the world can add vibrancy, visual interest, and opportunities for international exposure of the Harbour, complementing the Harbour's role in identity of Hong Kong.

- b. Pedestrians connection to breakwater
連接海堤的開合行人橋

We need to take every opportunity to provide different environments and opportunities for activities for the enjoyment of the harbour. Access to the breakwater and other such otherwise featureless structures can allow for it to double as an interesting promenade, a linear garden or a fishing pier (c.f Sai Kung Public Pier). Encouraging these is an embodiment of Harbour Planning Principles 4 and 5 (An Accessible Harbour; and Maximizing Opportunities for Public Enjoyment).

- c. Typhoon shelter artificial beach
銅鑼灣避風塘人工海灘

A natural edge condition at the culmination of the Tai Hang watershed, where there is currently a unique collection of egrets and aquatic life, would be a laudable step toward sustaining the enjoyment of the Harbour for generations HPP 1 and 7 (Preserving Victoria Harbour as a Natural, Public and Economic Asset; and Sustainable Development for the Harbour). By dismissing the idea before investigating solutions for improving water quality, but offer reclamation as a solution is another example of indolent engineering.

viii. There is urgent need for a specialist harbour body to assume responsibility for the development of the harbour district, to develop a holistic and integrated planning framework and to consolidate the many and diverse views on the enhancement of Hong Kong's harbour-front. This is the only way to drive this entire process forward, to ensure Government departments and consultants are working towards the same goal and to ensure this process will be delivered as envisioned, in the spirit of Harbour Planning Principles 6 and 8 (Integrated Planning for a World-class Harbour; and Early and Ongoing Stakeholder Engagement).

Yours sincerely,



Andrew Thomson
On behalf of the Harbour Business Forum

c.c. Chairman of HEC <enquiry@harbourfront.org.hk>



25 November 2005

HEC Subcommittee on WDII Review
C/o Civil Engineering and Development Department
13/F, North Point Government Offices
333 Java Road, North Point
Hong Kong



Dear Members:

Since the launch of the Harbour-front Enhancement Review (HER) earlier this year, the Royal Hong Kong Yacht Club ("the RHKYC") has actively supported the efforts of the Harbour-front Enhancement Committee Subcommittee on Wan Chai Development Phase II Review ("the Subcommittee"). We commend the Subcommittee on its work during the Envisioning Stage, particularly in engaging with all stakeholders to discuss development of the waterfront in Wan Chai, Causeway Bay and adjoining areas.

Over the past few months the RHKYC has participated in public forums and community charrettes as a member of the Wan Chai and Causeway Bay community. We have also offered written submissions, leveraging our history and understanding of Victoria Harbour, which would hopefully contribute to the discussion on nurturing a vibrant harbour with diverse activities for the public.

As the Subcommittee prepares to move forward to the Realisation Stage, the Consolidation Forum on 12 November 2005 provided an excellent platform to recap findings of the Envisioning Stage, review recommendations from the consultants, clarify uncertainties and, eventually build a consensus for developing the concept plans in the next phase of public engagement. While some of the ideas the RHKYC during the Envisioning Stage were not listed in the Subcommittee document presented at the Forum, we think it essential for HEC and consultants to make these ideas known to all stakeholders before deciding whether to discard them from further consideration.

In January 2005, we sent our first submission to the Subcommittee stating our initial ideas for enhancing the waterfront. This was followed by a presentation by RHKYC representatives to the Subcommittee on 7 February 2005. We encourage the Subcommittee to refer to the text submission for a comprehensive overview of our ideas, including the following:

- Victoria Harbour provides visual interest and unique character as a world class harbour (similar to those in Sydney, Boston, Vancouver, etc.);
- The waterfront can be equipped with recreational facilities for residents as well as visitors; and
- The tunnel option for the Central Wanchai Bypass (CWB) opens up opportunities for various sporting activities for the Wan Chai Marine Basin, such as sailing, dragon boating, rowing, etc.

In July 2005, the RHKYC offered another submission responding to the HEC's call for participation

ROYAL HONG KONG YACHT CLUB

會艇遊港香

KELLET ISLAND, HONG KONG

TEL: (852) 2832 2817

FAX: (852) 2239 0329

in the HER Envisioning Stage. The focus of our submission was to promote interactivity between Victoria Harbour and the harbour-front with diverse activities and "pockets of interests", i.e., clusters of attractions to serve the community, including our recommendation to promote a thriving water sports culture. To summarise, our suggestions in that submission included the following:

- For greater connectivity, a cycling path could be constructed along the waterfront stretching from the Hong Kong Convention and Exhibition Centre to Victoria Park;
- The cultural and historical character of Hong Kong could be distinguished with the establishment of a permanent dragon boat race course at the typhoon shelter area. The 550 metre-long, 100 metre-wide race course could accommodate up to ten dragon boat lanes, sufficient for annual competitions to be held in Victoria Harbour;
- Fishing docks could be constructed along the existing typhoon shelter breakwater and floating platforms could be positioned under the Island Eastern Corridor to provide space for fishing; and
- Food pavilions, bars and shops could be built to provide space for visitors and residents to enjoy the waterfront.

Indeed, a Causeway Bay tunnel would provide substantial opportunities for achieving the above aims. We support exploring the feasibility of this tunnel option, which was endorsed by the Maunsell Consultants at the Consolidation Forum.

Having attended the Consolidation Forum and reviewed the presentation, "Consolidating Public Views" (「整合意見」), we are pleased that some of the ideas shown in RHKYC's HER submission are being considered. We applaud HEC's public engagement efforts and appreciate the opportunity to reiterate the core concepts behind our submission. Nevertheless, we urge the Subcommittee to factor in other ideas suggested in our submission, which we think would give a fairer representation to our position. Please find our feedback for the presentation in the enclosed Appendix for your reference.

As stated in our submission, we are confident that the HEC's consultation efforts will result in the best approach for enhancing the vibrancy of the harbour-front and balancing the economic, environmental and social needs of the Hong Kong community. We look forward to contributing ideas as the Realisation Stage unfolds and continuing to participate in future discussions with stakeholder groups.

We would be pleased to discuss further with you and address any enquiries you may have. Please do not hesitate to contact Ms. Ellen Chan of APCO Asia at (852) 2826-9355 with any questions or concerns.

Yours faithfully



Inge Strompf-Jepsen
Commodore, RHKYC

APPENDIX

As the Subcommittee called for feedback on the presentation, “Consolidating Public Views”, the RHKYC would like to share comments on the slides in which our submissions are mentioned and addressed.

While the aforementioned slides display some illustrations from our first submission to the Subcommittee in January 2005 and second submission for the HER project in July 2005, the Subcommittee may wish to consider the ideas listed in the text of the submission. These constitute our core concepts for developing a world-class Victoria Harbour.

Since many of our suggestions on the water and on the shore extend beyond those displayed in the four slides, we feel it would be helpful for both the Subcommittee and public to be informed of them before deciding whether they should be included in the concept plans.

| From “Consolidating Public Views” | RHKYC’s Feedback and Proposed Amendment |
|--|---|
| <p>#27: “RHKYC’s First Written Submission” (「香港遊艇會的書面意見一」)</p> <p>The slide displays:</p> <ul style="list-style-type: none"> ■ An aerial view diagram of the Wan Chai Marine Basin; and ■ Two maps with a suggested tunnel alignment for the Central-Wanchai Bypass (CWB). <p>The diagrams and maps were illustrated in the appendix of RHKYC’s first submission to the Subcommittee in January 2005.</p> | <ul style="list-style-type: none"> ■ As noted on page 3 of the RHKYC submission, the appendix is a copy of a study prepared by an engineering consultant, and that “[t]he study was <i>not commissioned or conducted by RHKYC and is merely included in this submission to show that the Tunnel Option could be a viable alternative.</i>” ■ This point was also addressed by RHKYC representatives when presenting ideas to the Subcommittee on 7 February 2005. ■ We would like to stress that the ideas, diagrams and tunnel alignments represented in the appendix <u>do not reflect the RHKYC’s position.</u> <p>As such, we propose that the diagrams and maps be removed from the slide.</p> |
| <p>“Support tunnel option and request to keep the trunk road under seabed.” (「支持隧道方案及要求保持管道在海床以下」)</p> | <p>While we support the tunnel option, we have <u>not</u> “requested to keep the trunk road under seabed” in our submission.</p> <p>We propose that this sentence be deleted.</p> |
| <p>“Propose to rebuild part of Island Eastern Corridor at the inlet of the typhoon shelter as a tunnel in order to build an artificial beach in the area.” (「建議重建在避風塘內灣中的一段現有東區走廊為隧道，以作建造人工海灘之用。」)</p> | <p>The idea of converting the Island Eastern Corridor and building an artificial beach was <u>not</u> included in our text submission.</p> <p>We propose that this point be deleted.</p> |
| | <p>We suggest the following text for the slide:</p> <ul style="list-style-type: none"> ■ Develop the Victoria Harbour’s visual interest and unique character and position it as a <u>world class harbour</u> (「發揮維港的景色及獨特氣質，彰顯其世界級海港的地位」) |

| | |
|--|---|
| | <ul style="list-style-type: none"> ■ The waterfront can be equipped with <u>recreational facilities</u> for Hong Kong residents and visitors (「增添文娛康樂設施，供市民及遊客共享海濱」) ■ <u>The tunnel option opens up opportunities</u> for various recreational and sports activities for Hong Kong residents and visitors at the former Cargo Handling Working Area (「隧道方案能讓前貨物裝卸區發展成多姿多彩的海灣」) |
| #28: “RHKYC’s Second Written Submission” (「香港遊艇會的書面意見二」) | |
| <ul style="list-style-type: none"> ■ “Extend the Victoria Park to the waterfront” (「延伸維多利亞公園至海旁」) ■ “Rebuild part of the Island Eastern Corridor at the inlet of the typhoon shelter as a tunnel build an artificial lake in the area” (「重建在避風塘內灣中的一段現有東區走廊為隧道，及在其上建造一個人工湖」) | <p>While the extension of the Victoria Park and construction of an inland lake were included, they were not the core suggestions in the submission.</p> <p><u>We suggest the following text for the slide, concepts having been widely embraced by District Councils and other sports body alike:</u></p> <ul style="list-style-type: none"> ■ Build a <u>cycling path</u> along the waterfront (「沿海岸興建單車徑」) ■ Establish a <u>permanent dragon boat race</u> course of 550 metre-long, 100 metre-wide at the typhoon shelter area (「於避風塘設立長 550 米、闊 100 米之永久龍舟賽道」) ■ Build <u>public fishing docks</u> along the typhoon shelter breakwater and floating platforms under the Island Eastern Corridor (「於防波堤及東區走廊下浮臺設立公眾釣魚區」) ■ Develop local tourism with waterfront <u>F&B facilities and shops</u> (「增設海濱餐飲設施及商鋪，發展區內旅遊業」) ■ Extend the Victoria Park to the waterfront (「延伸維多利亞公園至海旁」) |
| <ul style="list-style-type: none"> ■ “Landfill the inlet of the typhoon shelter for building a park” (「填平在警察俱樂部旁的避風塘內灣以建造公園」) ■ “Landfill along the Wan Chai coastline for waterfront activities” (「填平灣仔海岸地方以供海旁活動」) | <p>We think that “<u>landfill</u>” (「填平」) is not the appropriate phrase in depicting our ideas.</p> <p>Should the Subcommittee wish to include the public park near the typhoon shelter and recreational facilities along the Wan Chai waterfront, it would be more appropriate to indicate our suggestions as:</p> |

| | |
|--|---|
| | <ul style="list-style-type: none"> ■ “<u>Smoothen out</u> the coastal line of the typhoon shelter near the Police Officers’ Club for a public park” (「改善警察俱樂部旁避風塘海岸線的流暢度，並興建公園」) ■ “Provide facilities for recreational and sports activities <u>along the Wan Chai waterfront</u>” (「沿灣仔海岸提供文娛康樂活動設施」) |
| #43: “Floating Pontoons along the Wan Chai Coastline” (「沿灣仔海岸線的浮臺繫泊設施」) | |
| The slide addresses the concern for the safety of the vessels in case of typhoons and that reclamation may be involved for building this facilities. | <p>The RHKYC agrees that safety from a typhoon should be ensured for all facilities built along the waterfront, and that reclamation in Hong Kong should respond to the Overriding Public Need. Nevertheless, the floating pontoons that we have suggested are not necessarily permanent facilities that require reclamation.</p> <p>Instead, we suggest that they be <u>rented and installed</u> during occasions such as exhibitions and trade shows at the Hong Kong Convention and Exhibition Centre or international sailing races. These temporary pontoons would not only offer tremendous support for international events and tourism, but also alleviate congestion whilst providing convenience and flexibility to the neighbourhood.</p> |
| Slide 44: “Suspension Bridge Connecting the Breakwater” (「連接海堤的開合行人橋」) | |
| The slide questions the benefits of the draw bridge if the breakwater lacks recreational facilities. | <p>We fully agree that recreational and sports activities along the breakwater are necessary to justify the construction of the suspension bridge. As such, we suggested (<u>please refer to the map on page 10 of our submission document</u>) building <u>public fishing docks</u> at the breakwater to encourage public use of the waterfront. Visitors can reach the breakwater and enjoy fishing and the magnificent view within a comfortable walking distance.</p> <p>Moreover, the public marina behind the breakwater would enhance water sports facilities and develop the neighbourhood into the water sports centre for the public. The <u>Tin Hau Temple</u> in the typhoon shelter could also be reached through the draw bridge, promoting the cultural heritage of the Wan Chai and Causeway Bay community.</p> <p>Most importantly, the breakwater could become an excellent location for spectators of the <u>dragon boat races</u> at the typhoon shelter, a main feature that we have proposed in our submission.</p> |

陳先生,

我的意見如下:

1. 盡快興建中環, 灣仔繞道至北角
2. 使用隧道形式興建
3. 在有需要時可填海, (如流水的問題)
4. 隧道盡量申延至北角
5. 在銅鑼灣避風塘設公眾水上活動中心 (如遊艇會的建議)
6. 在適當位置設橋通往避風塘的防波堤, 供市民垂釣或散步
7. 連接由維園至銅鑼灣避風塘的岸邊供市民可步行
8. 在維園的地底設大型交通交匯處, 供隧道巴士進行轉乘服務甚至接駁地鐵的沙中線, 減少巴士重覆的問題及對紅隧負荷的影響, 鼓勵市民使用轉乘服務

Thanks



21 November 2005

Harbourfront Enhancement committee

We are replying to the following remark on your website: Envisioning Stage - Consolidation Forum * Way Forward : Next Step (Grateful if comments, especially on the ideas and proposals that are suggested not to be pursued in the "Consolidating Public Views" powerpoint, could reach the Secretariat on or before 26 November 2005)

We note following points:

1. **The Exit point of CWB should be the Eastern Island Corridor - NOT the already very congested eastern end of Victoria Park.** It would be very unwise to dump six lanes of traffic onto what is now an over capacity surface road leading to the EIC. The Transport Department Claims that the purpose of the Central Wanchai Bypass is a strategic road to link to and from the Eastern Island Corridor. This, they claim, is the missing link in a master plan strategy. To solve the stated transport problem - the missing link to the EIC - do not create a dreadful bottle-neck in Causeway Bay right at Victoria Park where people are trying to breathe clean air. **SAVE** - do not throw away the tunnel option that bypasses the typhoon shelter. Fully integrate it with the existing EIC.

2. **SAVE the Harbourfront Beach.** By the time the bypass is finished, the water quality in the Harbour will at least be good enough to fish in. Many people are working to get it good enough to swim in. Standing or sitting on a beach - or fishing - has great recreational value to the people. All the groups wanted a beach. Leave it in.

3. **Bring Victoria Park to the Harbour.** We have been given 3 different options by town planners and engineers. All the groups wanted Victoria Park extended to the Harbour. Leave it in.

4. An **S shaped curve provides the maximum safety** in a tunnel because it slows the traffic down. Your engineers should already know this because there is already a curve at the entrance and exit of tunnels to prevent drivers from speeding up when they see the exit. **This is fundamental tunnel safety engineering.** "Straightening out" the proposed underground curve - which is intended to eliminate reclamation - will make the tunnel MORE DANGEROUS. Save the harbour and make the tunnel safer. Leave the S shaped curve in.

Regards,



Clear the Air

Chair and Members, WD2 SubCom

Care of

Mr. Bosco Chan

Secretary, WD2 SubCom, Harbourfront Enhancement Committee

Further to the invitation to comment on the Envisioning Stage - Consolidation Forum -Way Forward: Next Step, and the ideas and proposals that are suggested not to be pursued in the "Consolidating Public Views" powerpoint. Given the little time, you asked for comments to be made by 26 November 2005, we hereby respond briefly with a summary of our thoughts.

The public participation activities organized for WD2 and the Harbour-front Enhancement Review resulted in many questions and proposals by the public. The gist is a call for sustainable development, an integrated approach, full consideration of the Protection of the Harbour Ordinance, and the Harbour Planning Principles developed by the HEC.

We are extremely concerned to see that comments and ideas which are proposed not to be pursued, are exactly those which have taken these approaches and principles as their starting points. It is entirely unclear why these are 'too hard' to implement. It appears that financial and expediency have been given greater weight than the benefits the many public proposals will bring Hong Kong.

One can only conclude, that the HER is in fact a road project rather than a harbour protection and harbour-front enhancement project. We call on the Chair and Members of the HEC to redirect the objectives for the review of the public comments and proposals, and to place greatest urgency on incorporating the proposals put forward by the Public with such great effort.

Further, the plans lack any vision and direction for the relocation of incompatible uses in the water-front including power sub stations and sewage facilities), re-engineering of existing roads, and so forth.

We recommend:

1. To listen seriously to public input and to try harder to implement the ideas;
2. To think outside the usual engineering solutions to avoid even stronger public opposition;
3. To treat the harbour and the typhoon shelter as a 'natural' resource and heritage and clean it up rather than fill it in to remove pollution;
4. To recreate the beach (which has obvious great public support) so people have access to the waterfront, not necessarily for swimming in;
5. To link Victoria Park to the typhoon shelter (very strong public support);
6. To seriously look at options for relocating incompatible waterfront uses such as the electricity substation and the sewage treatment plant so that the tunnel alignment is better and the amount of reclamation is reduced;
7. To create long term public value rather than go for short-term, least cost options – there is strong public support for this;
8. To adopt the tunnel option with the minimum reclamation option;
9. To reconsider which roads will, and will not link to the CWB, to ensure a quality environment and reduce the need for spaghetti junctions near Victoria Park and the HKCEC.



Convenor

Designing Hong Kong Harbour District

24 November 2005

To: Mr. Bosco Chan, Harbourfront Enhancement Committee
From: [REDACTED] Civic Exchange

We are an independent public policy think tank with experience in land use, planning and political economy research.

We wish to respond to the HEC's invitation to comment on the *Envisioning Stage - Consolidation Forum -Way Forward : Next Step*, especially on the ideas and proposals that are suggested not to be pursued in the "Consolidating Public Views" powerpoint. You asked for comments to be made by 26 November 2005.

We are aware of the public meetings already organized by the HEC and the many comments made by the public. There were many comments reinforcing the need for the Government and HEC to take a sustainable development approach, to observe the Protection of the Harbour Ordinance, as well as the Harbour Principles of the Town Planning Board. It is obvious that some of the comments and ideas not to be pursued have taken these approaches and principles as their starting points. Why these suggestions are considered not possible to implement or hard to implement do not seem to have been adequately explained, if they were addressed at all (e.g. to clean-up water pollution rather than to reclaim a polluted area). The harbour is a resource and a natural heritage asset, and should be seen as such. There was also much support to link Victoria Park to the harbourfront, which does not appear to be given adequate weight.

In terms of how to look at the CWB - if you see this as essentially a road project and not a harbour-front protection and enhancement project, then you have the kind of ideas the government appears to favour. However, if you see it differently, as do many members of the public, then the road design and the higher costs involved to ensure protection and enhancement are the key emphasis, you will have a very different approach to the whole project.

The government must also relocate incompatible waterfront uses (e.g. power substantion/sewage treatment) so that tunnel alignment can be more appropriately done and to reduce reclamation to the very minimum. To say these structures cannot be moved is unacceptable.

In conclusion, some of the proposals you discarded in fact produce long-term benefits. The CWB if it can be justified must adopt the tunnel option with minimum reclamation as its key objective. Furthermore, not all the road links to the CWB need to be implemented. The road network must be designed in a way to create a quality environment. Under current designs, we are extremely concerned about the potential "spaghetti" effect near Victoria Park. This will create a large sanitized area and leave that part of the harbour in extremely bad condition.

Thank you for your attention,

[REDACTED]

Civic Exchange
www.civic-exchange.org



25 November 2005

Chairman and Members WD2 SubCom
Harbour-front Enhancement Committee
c/o The Secretariat of the Harbour-front Enhancement Committee
Housing, Planning & Lands Bureau
18/F Murray Building, Garden Road, Hong Kong

By e-mail: enquiry@harbourfront.org.hk

Dear Sirs

Re: HER Consolidation Forum

Further to the invitation to comment on the *Envisioning Stage - Consolidation Forum - Way Forward: Next Step*, and the ideas and proposals that it is suggested should not to be pursued in the "Consolidating Public Views" presentation, we hereby respond briefly as we have not had a great deal of time to consider the wider issues at stake.

The public participation activities organized for WD2 and the Harbour-front Enhancement Review clearly resulted in many creative, interesting but not unreasonable suggestions and proposals being put forward by the public. These generally focused on the need for an integrated and sustainable approach to be adopted and the importance of giving full consideration to Harbour Planning Principles developed by the HEC and the Protection of the Harbour Ordinance.

We are extremely concerned to see that the comments and ideas which it is proposed should not be pursued are exactly those which have taken these approaches and principles as their starting point. We do not understand why these have to be excluded now, given the will and a little thought, without a clear mandate from the community. It appears that there has been no lateral engineering thought – merely a “can’t do attitude” – and that financial expediency has been given greater weight than the benefits that the many public proposals would bring to Hong Kong.

This approach continues to reconfirm the impression that the HER is in fact an engineering and road dominated project rather than a harbour protection and harbour-front enhancement project. There is an urgent need place much greater emphasis on incorporating the proposals put forward by the public, rather than simply consigning them to the “too difficult tray”.

We would like to see the HEC placing even greater pressure on Government to take on board such ideas as:

1. Thinking outside the usual engineering solutions and rejecting the straightjacket seemingly imposed by the engineers – this may avoid even stronger public opposition;
2. Treating the harbour and the typhoon shelter as a 'natural' resource and heritage and proposing that it should be cleaned up rather than filled in to remove pollution;
3. Recreating the beach (which obviously has great public support) so people have access to the waterfront, (it is not essential that they should be able to swim there – this is a red herring);
4. Linking Victoria Park to the typhoon shelter (very strong public support);
5. Seriously looking at options for relocating incompatible waterfront uses such as the electricity substation and the sewage treatment plant so that the tunnel alignment can be improved and the amount of any essential reclamation minimised;
6. Creating long term public value rather than going for short-term, least cost options – there is strong public support for this;
7. Adopting the tunnel option together with the minimum reclamation option;
8. Reconsidering which roads will, and will not link to the CWB, so ensuring a quality environment and reducing the need for myriad junctions near Victoria Park and the HKCEC. CWB is planned as a **bypass** and should therefore have a minimum of local links.

Yours faithfully

(signed)

