

29 August 2005

Expert Panel Forum on
Sustainable Transport Planning and Central - Wanchai Bypass
Harbour-front Enhancement Committee's Sub-Committee on
Wanchai Development II Review
c/o Civil Engineering and Development Department
13/F North Point Government Offices
333 Java Road, North Point, Hong Kong
Hong Kong

Dear Members of the Panel.

Herewith we submit our views for your consideration.

The following considerations outline the framework for our subsequent discussion:

1. The Expert Panel Forum is part of the Envisioning Stage of the Harbour-front Enhancement Review – Wanchai, Causeway Bay and Adjoining Areas. The primary task of the Expert Panel Forum is to define sustainable transport planning in respect of this specific location. Therefore, the Expert Panel must fulfil this task within the major and broader aim of enhancing the Harbour-front. These objectives and the relevant study areas are set out in the 'Digest'.
2. The Harbour Planning Principles identify the principles for harbour-front enhancement, specifically the vision for a vibrant harbour-front. To achieve this, the Harbour Planning Principles set out the need to provide visual and physical access to the waterfront and to minimize the use of land for purposes incompatible with the enhancement. Therefore, in regard to land use, roads and marine use planning along the harbour-front, it must be the enhancement of the harbour-front that is the key objective.
3. The Protection of the Harbour Ordinance and Court of Final Appeal Judgment established a presumption against reclamation, and the need to consider all reasonable alternatives. Therefore, the key planning constraint is to avoid the need for reclamation.

More specifically:

The works for the Central-Wanchai Bypass (CWB) impact the area from Rumsey Street to Oil Street. It must be recognized that the CWB runs from Central to Causeway Bay and will therefore impact the entire stretch of this harbour-front area.

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The works related to the CWB must be seen in light of the above THREE considerations, specifically in regard to the need to minimize reclamation and maximize harbour-front enhancement. We wish to re-emphasize that in considering whether the CWB is needed (i.e. must consider all reasonable alternatives means to ease traffic) and how it should be designed, the major consideration is harbour-front enhancement to facilitate public enjoyment of the waterfront.

We are concerned that the construction of the CWB means continuing with the reclamation of land in the Wanchai area. In addition, the CWB proposal, as it is currently designed, will affect the visual and physical access to the waterfront, and, therefore, be in conflict with the aim of enhancing the harbour-front and the Harbour Planning Principles.

Furthermore, the highway project known as “P2” and its related road works also conflict with the THREE considerations noted above (see PWP item No. 343CL, Plan No. HKI – 366, Central Reclamation Phase III – Proposed Roadworks). At the Central end, the Central District (Extension) OZP potentially allows for nearly 13 million sq ft of GFA to be added in the future. This alone will add substantial traffic to the harbour-front (see minutes of the Town Planning Board meeting of 5 August 2005 and the subsequent government issued press release). Plans to add an extension to the Hong Kong Convention and Exhibition Centre will likewise increase traffic.

In these areas in Central and Wanchai, the existing development density is already very high. As such, “P2” will mean the reduction of open space and increase of traffic noise and pollution, making whatever open spaces there unhealthy and unpleasant. Thus, the quality of the waterfront will be severely affected by this project which constitutes an example of ‘unsustainable’ transport planning.

The high density along the harbour-front and its impact on the harbour-front means Hong Kong should think very carefully about how much more development density can fit there. This question needs to be addressed by the Expert Panel in how it assesses the CWB, and indeed not to ignore the “P2” highway and roads network.. The government justifies the need for reclamation to build new roads so as to ease traffic congestion. However, the proposed development will add density and consequently generate a need for additional roads. Thus, it is the government itself that is promoting the ever rising traffic demand in Central-Wanchai through its decisions on increasing density on the harbour-front.

Finally, it is worth asking where in the CWB and “P2” projects can the stated aim of enhancing the harbour-front be found. Our view is that plans for the CWB and “P2” are in conflict with that aim. If these projects proceed, the conclusion that can be drawn is that creating a beautiful harbour-front has become secondary to easing traffic. This would be an undesirable scenario for Hong Kong people and contrary to

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the law. In the context of the Protection of the Harbour Ordinance and the Harbour Planning Principles, roads should be subservient to good town-planning and not the other way around.

Because of the aforementioned, we consider that the CWB and “P2” projects are in conflict with the Protection of the Harbour Ordinance, the Harbour Planning Principles and the enhancement of the harbour-front and, therefore, should be reconsidered and re-planned with enhancing the harbour-front as the ultimate objective.

Yours sincerely,



Chief Executive Officer

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