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The Hong Kong Institute of Architects

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By Fax and By Post
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Highways Department
6/F Ho Man Tin Government Offices
88 Chung Hau Street
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Dear Mr. Lau

Phase 2 Public Engagement - Central Kowloon Route Project

Thank you for delivering a briefing on the captioned public engagement to our members on 22 January 2013.

Further to the briefing session on 22 January 2013, the Institute is pleased to deliver our written views on the subject. Please find enclosed our written submission for your consideration.

Yours sincerely

Ada Y S Fung JP FHKIA RA
President

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Professional Views on the Central Kowloon Route (CKR) Project Stage 2 Public Engagement

We, at Hong Kong Institute of Architects (HKIA), would like to offer our professional comments on the Central Kowloon Route (CKR) Project. This is in response to the Phase 2 Public Engagement Exercise led by the Highways Department and also as a following up of the discussion between Highways Department and HKIA on 22nd January 2013.

A. Urban Design should be one of the Key Objectives of the CKR Project:

1. This is a Public Urban Planning Project and NOT a mere Infrastructural Project:

We at HKIA reiterate our long held position that infrastructure projects in Hong Kong with an extensive impact on urban environment should NOT limit the design attention to engineering aspects. This project essentially involves extensive disturbance to a number of existing densely populated urban districts like Yau Ma Tei, Ho Man Tin and Ma Tau Kok, implying interventions to existing heritage fabric, street patterns, public open spaces and public facilities, and interlinked with a number of major upcoming urban planning works like West Kowloon, MTR Ho-Man Tin Station, and Kai Tak. Seemingly infrastructural decisions (like routing and configuration / disposition of flyovers, tunnels, shafts, and bridge columns) that appear in the document, in fact become determining criteria or irreversible hindrances for future major urban public life, including **urban planning, site allocation, open-space, pedestrian traffic, architectural designs, cultural heritage, environmental protection and public facilities provisions**. Therefore, while we in general understand the traffic need for this project, we reserve our support until these urban design issues are fully addressed.

2. This Project should set Vision and Objective for the Non-engineering Public Agenda:

We believe that livable harmonious society depend on good governance based on clear, transparent and long term visions in-line with public policies and aspirations. While the documents in the Public Engagement Exercise indicate the



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traffic and engineering rationale, it offers barely any explanation on the basic design criteria of the numerous urban public design aspects, for example, how CKR works fall within the overall urban regeneration of Yau Ma Tei district, how landscaped decks created by CKR follow the pedestrian policy of HK government, or how roadworks proposed by CKR integrate with Kai Tak Master Plan. We urge that the Public Urban Vision and Objective of this Project, not limited to traffic and engineering terms, should be laid down at Policy level, made transparent to public, and reached consensus at society, before presenting the various designs we see in the documents.

3. All Key Social / Planning Background Studies should be made Transparent:

We noted the assurance by Highways Department that all key public aspects were carefully considered in detail when proposing the infrastructures, and necessary background studies concerning the public aspects were already prepared, although not presented in the Public Engagement Exercise. We as architects feel that we cannot offer constructive professional inputs unless we see results of earlier studies: like (a) **Conservation Master Plan and Heritage Impact Assessment** particularly on the wider context of Yau Ma Tei and Ma Tou Kok and not limited to individual buildings, (b) **Land Use Study** investigating options of land disposition in terms of public benefits, and **Public Facilities Study** including public surveys of needs, arriving at target Schedule of Accommodations of various facilities, which then determines the bulk and dispositions of re-provided or altered public buildings / sites, (c) **Open-space Usage Study** and **Pedestrian Traffic Study** in views of the infrastructural impact and comparing opportunities of different optional designs, (d) **Environmental Impact Study** comparing overall strategic decisions on tunnels / flyovers, and (e) **Local Trading Activities Study** and **Tourism Strategy Study** that should form the prime basis for any decisions affecting local markets and street activities.

4. Cross-departmental Liaison: The traditional government procedures where Bureau sets a policy and then hand over to Department for execution, established since 1970s from the well-known McKinsey report, appears no longer applicable in our times. Nowadays good governance relies essentially on consensus of multiple stakeholders and alignment of multi-faceted policies. While understanding that a number of issues implied in the CKR Projects falls outside



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the narrow highways and transport agenda, we urge the Highways Department to convey our recommendations to the government (via the Housing and Transport Bureau), that many of the issues encountered in this project require leadership by Development Bureau, with supports by Planning Department and other government arm with expertise in town planning and urban design and agenda in carrying out land use study, conservation plan and HIA etc. In this case, one possible mechanism may be setting up of a special Steering Committee to take up the inter-departmental liaison, explore various challenges and opportunities incurred by the CKR project, including land usage, urban planning, street stall management, public facilities, cultural heritage, public park design, and environmental protections, collect inputs and studies from other bureaux and departments, and consolidate and present such comprehensive findings and optional designs to public. (For example: mechanisms like the newly formed Environmental Steering Committee, currently effectively coordinating cross-departmental efforts and cross disciplinary inputs from society on issues like bus re-routing, may be employed to steer social / environmental / planning issues of major civic projects like CKR).

B. West Entry Interchange Point at West of Ferry Street:

- 1. Integrate with West Kowloon Future Planning:** We would like to see the current presented proposed landscape deck covering the West Entry point of CKR at West of Ferry Street, to be designed not as an individual infrastructural element, but in the context of the long term planning of West Kowloon.
- 2. Landscape Deck not considered Public Usage:** Providing a mere landscape area with open gates is far from assurance of good public use. Neither of the two options of landscape deck presented in the Public Engagement Digest indicates consideration with pedestrian traffic, public usage pattern or public enjoyment experience, in terms of how members of public from normal residential areas or public transport can arrive this place or progress after proceeding to the far end.
- 3. West Kowloon Government Office (WKGO):** The adjacent future West Kowloon Government Office (WKGO) Building had always been intended to re-house most government facilities that do not require public interface, thus



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releasing current government sites in and around the Yau Ma Tei district (including existing Temple Street car park block and Government Office building). Also, there were once proposals that the re-provided Police Station and re-provided clinic in this area supposed to accommodate some of such facilities in Yau Ma Tei. We urge the government to make the intended Schedule of Accommodations (SoA) of WKGGO, and also the re-provided Police Station and public clinic, if still pertinent, be made known, before we can offer views on suitability of design / provisions of public facilities in Temple Street and Kansu Street shown on current Public Engagement Digest.

C. Works for West Part of CKR affecting Yau Ma Tei District:

- 1. Temple Street should be Re-aligned:** Yau Me Tai Car park building ignorantly and ruthlessly truncated the historic Temple Street, which led to disassociation with heritage, inconvenience of pedestrian, and deprivation of historic street stalls. The site vacated by car park building demolished as a necessity of CKR works should be re-allocated to facilitate the re-instate the historic rational alignment of Temple Street. The current Public Engagement Digest shows a straight re-provision of some facilities on exactly the same plot arbitrarily created decades ago, which appears to be an easy un-assessed approach, instead of a rational conscious well-considered cross-departmental decision. We opine that thorough heritage study, pedestrian traffic study, or tourism potential study would have led to design options other than currently presented.
- 2. Planning of Open Spaces can be Enhanced:** Tin Hau Temple historically faced the waterfront (now Reclamation Street), and the current open area in front of the Temple was historically used for festival rituals and events (like Chinese Opera or celebration). CKR works, which necessitate the temporary re-shuffling of spaces, markets and playgrounds in the vicinity, and vacating of sites by demolished buildings or re-positioned infrastructures (like piers of reconstructed flyover), offers a rare opportunity that historic special relationship be re-instated or local space integration be enhanced. We opine that thorough heritage study, urban planning study, and open space utilization study would have led to more design options than currently presented.



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- 3. Temple Street and Street Stalls should be Respected:** Temple Street originated from the historic vernacular stalls that served temple festivals but gradually evolved into permanent trading street. Therefore, street stalls on pavements of Temple Street are not merely hawkers, but in fact valuable intangible cultural heritage, and also historic testimony of how Hong Kong developed from fishing village to modern metropolis. The current re-provided Public Library leave the existing stalls in and around the carpark building (facing Shanghai Street and along mid-Temple Street) on same narrow pavements as per existing arrangements, and forcing pedestrians onto roads. We opine that thorough Cultural Mapping Exercise, local trading pattern study and pedestrian need study would have led to a more considered strategy that respects, conserves, sustains and enhances these stalls and traditional street activities.
- 4. Public Facilities Provisions to Re-considered:** The existing Police Station provides a very important security to the Yau Ma Tei district. The current proposal shows relocating the existing Police Station to very far West under the flyovers, and, despite re-providing a small Reporting Centre in the vicinity, thus implies a reduction of local police patrol frequency at night. That, together with retention of relocating certain clinic functions to very far East to Queen Elizabeth Hospital, while retaining the Methadone facility, indicates decisions of public facilities provisions associated with CKR, are being taken without community consultations and consensus.
- 5. Future of Historic Police Station Unknown:** The Public Engagement presents the south wing of the Historic Yau Ma Tei Police Station, but with no indication of the treatment of the parade ground, or the future or overall design of the ensemble. We as professional architects strongly believe that requesting public or professional opinion on the major intervention of an important historic building without advising the intended long-term usage, is an incorrect approach.

D. Gascoigne Road Flyover:

- 1. More Environmental Options be Explored:** We reserve our comments to the proposed semi-enclosure of the re-built Gascoigne Road flyover until we review the results of the earlier Environmental Impact Assessment (EIA), which should



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have compared and exhausted options of, say complete enclosure, shifting away from residential buildings, relocating, subsiding to underground, or even abandoning it (due to substantial reduced demand). While cities like Guangzhou, Taipei and Toronto are busily demolishing above ground flyovers, and subsiding such to underground, it seems that the current proposal to re-construct and widen such a vehicular flyover in the middle of urban district, so close to residential buildings, is a move opposite to current government strategic policies to improve our city to be a livable metropolis.

2. **Long-term Need for the Flyover is Questioned:** Knowing that Gascoigne Road flyover connects only West Kowloon with Chatham Road, and that given that CKR is supposed to eliminate the cross district vehicular load above ground, then the assessment of future anticipated vehicular demand of the Gascoigne Road flyover after CKR is completed is essential before making any premature decision on the future of this flyover. Even if the traffic is found to serve the If most of the traffic is found to serve Hung Hom Cross Harbour Tunnel, then the long term policy should be by reducing the already very congested Hung Hom Tunnel, by improving West Cross Harbour facilities, instead of encouraging more cars to pass above the heart of Yau Ma Tei like currently shown in CKR proposal.
3. **Pedestrian Impacts also to be Studied:** Do the reconstructed flyover and the reconstructed underground facilities also explore opportunities to improve pedestrian traffic across Nathan Road at this road junction, with possible integration of existing planters / parks at this junction and possible integration with elevated pathways along the various institutional sites on the hill of Gascoigne Road?

E. Mid-way Provisions in Ho Man Tin:

1. **Size of Vent-shafts:** We like to see if the sizes of the above ground portions of these air-shafts in Ho Man Tin be reduced.
2. **Integrate with Adjacent Infrastructures and Open Spaces:** Knowing that the various MTR exits of the Shatin-central Link (Oi Man Exit of Ho Man Tin Station and Ko Shan Theatre exit of Ma Tau Wai Station) are just in vicinity, and knowing



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that District Council and local groups have long proposed some worthy schemes like, pedestrian footbridges across Fat Kwong Street, and improvements to jogging trails and landscaped playgrounds around the hill top reservoir parks, we like to see how this extensive landscaped shaft building integrates with these public facilities and existing pedestrian fabric within the housing estates, to improve the living environment of residents.

F. East End Infrastructural Works Affecting Ma Tau Kok District:

- 1. Long Term Conservation of Heritage Fabric:** The old urban district of Ma Tau Kok area around the proposed CKR works is in the vicinity of some significant sites of heritage and collective memory like heritage sites Old Kowloon City Pier and Fish-tail Rock. We urge the preparation and presentation of Conservation Master Plan and Heritage Impact Assessment to consider effects to heritage values and opportunities to (a) Adaptive Re-use the pier, (b) Improve open-space and pedestrian integration to the promenade linking Fish-tail Rock to Kai Tak, and (c) interweave with other URA schemes on the old streets / blocks in adjacent streets.
- 2. Landscaped Deck Lacking Architectural Inputs:** The two options of the deck above the PTI presented to the public consist of exact same size / configuration, following the footprint of the existing PTI, but without any indication of elevational treatment, street view, or pedestrian study. We are disappointed that the current design pays little attention to the architectural design, streetscape effect, open-space integration and effects to the historic pier, particular on a site so near to residents and so frequently visited by public for enjoyment as part of the promenade.

G. East End Extension to Kai Tak:

- 1. Temporary Reclamation:** We reserve our comments on the proposed temporary reclamation issue, provided that (a) the harbour will be properly reinstated to no adverse effect to existing configuration, by a date to be committed by Highways Department, with no adverse effect to environment, (b) the works are carried out with strict accordance with environmental controls; and (c) more architectural



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inputs are put into eventual design of affected local urban design, heritage fabric, pedestrian movements, and exact configuration of re-instated coastal facilities after the re-instatement of temporary reclamation at the harbour inlet.

- 2. Integral and Multi-functional Use of Highway Structures:** We are disappointed at the design of the networks of roadworks currently presented at CKR documents. We reiterate the position long held by our institute that the design of highways structures (e.g.: flyovers and bridges) in urban areas should NOT be limited to traffic or engineering parameters, but also on no less significant considerations like urban planning, pedestrian utilization, cityscape modulation, micro-climate enhancement, open-space integration and urban land usage. In particular, we highlight potentials of Integral and Multi-functional Use of Highway Structures raised by our institute on various occasions: (a) to release potential land uses above and on sides of the structure, (b) to enclose traffic by other functional zones to reduce the emission of noise and other pollutants, (c) to reprovide active streetscape with functions other than empty lots under mega concrete structures and tunnel-like noise barriers, and (d) to release potential land uses on sites accommodating ventilators.

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