



香港建築師學會
The Hong Kong Institute of Architects

Our Ref. : HKIA/DEVB/BC/WC/nk/20230331

31 March 2023

By Email and By Post
michaelfong@cedd.gov.hk

Mr. FONG Hok Shing, Michael, *JP*
Director of Civil Engineering and Development
Civil Engineering and Development Department
15/F, Civil Engineering and Development Building,
101 Princess Margaret Road,
Homantin, Kowloon

Dear Mr FONG,

Re: HKIA's Further Comments on Kau Yi Chau Artificial Islands

In response to the Public Engagement on Kau Yi Chau Artificial Islands (KYCAI), The Hong Kong Institute of Architects (HKIA) submitted a response to the Development Bureau (DEVB) on 11 January 2023, which remains valid (copy attached for your easy reference). After further studying the information provided in the briefing to HKIA by the Civil Engineering Development Department (CEDD) and Planning Department (PlanD) on 16 February 2023 and the project public engagement website, we have formulated additional comments (please also see attached).

HKIA supports in principle the Government's plan in developing the Central Waters. We do hope to contribute our knowledge and expertise in this early stage of the study so as to facilitate the successful planning of the project. As such, we look forward to continuing our dialogue with the DEVB, CEDD and Sustainable Lantau Office (SLO) on the subject matter. In particular, we would be grateful if our Institute could be kept informed on the progress of the study, any upcoming related events and the development of KYCAI.

Yours sincerely,

CHAN Chak Bun, Benny, *CHKIA, R.A.*
President
The Hong Kong Institute of Architects

Encl.

1_HKIA Letter to DEVB on "Study on the Artificial Islands in the Central Waters" (Our Ref.: HKIA/DEVB/BC/WC/nk/20230110)

Cc: Ms. LINN Hon Ho, Bernadette, *JP* – Secretary for Development sdev@devb.gov.hk
Mr. LAM Chi Man, David, *JP* – Under Secretary for Development sdevoffice@devb.gov.hk



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HKIA's Further Comments on Kau Yi Chau Artificial Islands

The Hong Kong Institute of Architects (HKIA) appreciates the efforts of the Government in engaging the public in the planning process for the major infrastructural project of Kau Yi Chau Artificial Islands (KYCAI). While our opinions submitted to the Development Bureau on 11 January 2023 remain valid, after further studying the information provided in the briefing to HKIA by the Civil Engineering Development Department and Planning Department on 16 February 2023 and the project public engagement website, we offer the following additional comments.

Strategic Positioning, Land uses and Planning

2. Strategic Focus and Land Use - The unique location and physical isolation of those artificial islands, being highly secured with limited accessibility but direct linkage to Qianhai should be well considered in the formulation of the appropriate land uses, the necessary supporting infrastructure and facilities, a suitable development density, and the urban design approaches, so that the new CBD would be attractive to tenants and enhance Hong Kong's economic competitiveness. The current focus of KYCAI is for WORK, LIVE, PLAY. More elements could potentially be included to provide more enriched and all-rounded developments, such as education (to include tertiary education in addition to primary, secondary education facilities), art communities, technology hubs, water sports facility for athletes and public, etc.

3. Decanting for Redevelopment - The practicality of using KYCAI for decanting spaces to support the chain flows arising from the redevelopment of old urban districts of Kowloon (where most of the buildings over 50 years old are located) should be reviewed. Residents need to be close to work to reduce their cost of transportation and traveling time, but work opportunity for the grass root level living in public housing flats on a remote island might be insufficient.

4. Optimization of Land for Development - The consultation material notes that 25% of land is dedicated not just to roads but mobility infrastructure. It is also noted that 20% is dedicated to GIC and utilities. But only 35% of the 1000ha is actually used for development. Better optimization by combining infrastructure, utilities, GIC and open space through 3-dimensional planning and urban design approaches should enable planning of the completely new islands to minimize both reclamation and construction costs. A holistic 3-dimensional planning, urban and streetscape design would increase land use efficiency, and at the same time allow for more intimate relationship between these spaces and the commercial/ work/ living/ educational/ cultural/ healthcare activities. If the use of cars can indeed be prohibited or minimized on KYCAI, the waterfront and green features can be located at any desirable level.

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5. HKIA would like to reiterate the importance of quality architectural and urban design in creation of a city with good liveability and economical competitiveness, and a critical review of the Government's procurement system is imminent so that consultancy bids would be assessed with focuses on quality of design service, rather than just low fee level.

6. **Alternative Development Areas at Lantau** – The Lantau Island is generally perceived as underdeveloped and underutilized. Parallel feasibility studies shall be carried out on other development sites (e.g., near shore of Northern and Eastern Lantau) to understand the full contextual effect, as well as comparing their cost and benefits to justify the proposed development and infrastructural costs of KYCAI.

7. **Financial Viability** – KYCAI aims to offer residential flats at a more affordable cost, and at the same time increase the area of flat size for both public and private housing by a range of 10% to 20%. Considering the recent low sale price of commercial land lots and lower projected population growth, a review of the financial analysis of KYCAI would be advisable, and we hope that more information could be released to ease public concerns and address recent changes.

Transport and Mobility

8. **Regional Rail Network** – A clearer picture of the regional rail network including the Greater Bay Area (GBA) future development would be helpful in understanding the Government's current position in developing this new rail link instead of enhancing existing railways such as the Express Rail link and its connectivity with the intercity rapid rail network or the West Rail for the development of Northern Metropolis and KYCAI.

9. **Road Links** – In the current study, the major means of transportation is utilizing railways. However, we note that the Core or CBD of KYCAI on island A has no direct road link from the city or to Lantau. The rationale of this design should be clarified. Also, the selection of road link landings from the other part of cities should be further studied to avoid generating excessive internal vehicular traffic due to the limited options of landings.

10. **Alignment of Rail and Road Links** – In the current study, the rail and road links appear to be with separate alignments of sea tunnel and viaduct. The alignments should be rationalized to minimize construction costs and impacts to environmental and sea ecology.

11. **Ferry Transportation** - No specific planning of ferry services had been mentioned in the study up to date. KYCAI sits along the routes of major outer island ferries i.e., Peng Chau, Discovery Bay, Disneyland, Cheung Chau and Lamma Island. A potential re-organization of ferry services and overall enhancement of our marine traffic may best utilize our advantage as a harbour city in bringing Hong Kong to a new era of both green and blue transportation,



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as well as relieving the congestion in the existing developed areas. More efficient ferry services can also help develop our outer islands into the next era.

12. Pedestrian Links and Cycling Tracks – Since walkability is an important consideration for sustainable development, provision of walkable links and cycling tracks between the 3 artificial islands would enhance connectivity and promote a healthier lifestyle. Similarly, walkable links could also potentially connect KYCAI and with nearby parts of Hong Kong.

Climate Action, Sustainability and Resilience

13. Carbon Neutrality Target – The application and extent of the carbon neutrality assessment is to be determined in the KYCAI development. A full life cycle including embedded carbon and operational carbon emission shall be assessed holistically. Carbon emission shall be monitored and managed to ensure carbon neutrality is achieved and maintained. Given the carbon footprint and environmental impact of this project, further information should be released on how to achieve carbon neutrality and offsetting the emission in reclamation and infrastructure works.

14. Provision for Climate Change – KYCAI comprises a group of islands that are apparently more vulnerable to extreme weather, tidal waves and rise in sea level by meters. We appreciate if further information could be released to ease the concerns, such as the current assumptions and strategies coping with the climate change, as well as buffer and contingencies allowed for further resilience.

15. Sustainable Lifestyle - With the more extended green area, urban farming/farm to table should be encouraged to further reduce need for transportation and unnecessary packaging. The Government should promote healthy living, education towards sustainable living and fruitful engagement of the aging population.

16. Long-Term Sustainability – To ease public concern on the long-term sustainability of this development, the Government is suggested to release more information on the studies on environmental, ecological, and micro-climate impacts, as well as resilience to global warming, etc.

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