



THE HONG KONG INSTITUTE OF
SURVEYORS

9 October 2006

URA Head Office

10/F Low Block, Grand Millennium Plaza
181 Queen's Road Central,
Hong Kong

Attn: Mr. Billy C. L. Lam

Dear Sirs,

Public Consultation – Kwun Tong Town Centre Redevelopment

In response to the public consultation announced in August 2006 regarding the Kwun Tong Town Centre Redevelopment ("the Project"), the HKIS has formed a working group to study the information available aiming to comment and provide suggestions to the Project from various aspects.

Accepting the recommendations of the working group, the HKIS is in support of the proposed redevelopment of Kwun Tong Town Centre. Attached is the position paper of the HKIS on the subject.

We are most prepared to discuss further on the details of the proposal and participate in any forums on the subject.

Yours faithfully,

For and on behalf of Hong Kong Institute of Surveyors

Kam-hung Yu
Vice President
Chairman of URA K7 Working Group

c.c. President, HKIS – Mr Chung-hang Wong
Senior Vice President, HKIS – Mr Raymond Chan



The Hong Kong Institute of Surveyors Opinion Paper on URA Kwun Tong Town Centre Redevelopment Proposals

1. Background

In August 2006, the Urban Renewal Authority ("the URA") announced the launch of a two-month public consultation exercise on the development design concepts of the Kwun Tong Town Centre ("the Project"). It is the largest single redevelopment project undertaken by the URA, covering a site area of about 5.3 hectares and affecting about 5,000 people within over 1,600 property interests.

This Opinion Paper serves as a direct response from The Hong Kong Institute of Surveyors (The HKIS) to the above consultation exercise and incorporates our comments, concerns and suggestions on the Project along the five guiding principles as stated in the Public Consultation Document.

2. Position of The HKIS towards the Project

The existing Kwun Tong Town Centre was built in the 1960s. Generally speaking, the design of the over forty-year-old centre is becoming obsolete and not capable to cope with the requirement for a town centre in the 21st century.

Within the area, there are mainly low to medium-rise tenement buildings for retail and residential uses. As the buildings are old with obsolete design and inadequate services, maintenance on these buildings is getting more costly and inefficient. The living environment is unsatisfactory as evidenced by the deteriorating sanitation and hygiene conditions, the worrying security and safety concerns, a lack of green areas and the very limited communal facilities. The traffic conditions are in chaos and not up to standard for a town centre of an area having probably the highest population density in the world. A new and rejuvenated town centre is needed. These feelings are shared and agreed by The HKIS.

A redevelopment of the Kwun Tong Town Centre seems to be a possible solution to resolve the above problems. A well-balanced, fully public-consulted and carefully considered redevelopment scheme shall not only be able to meet with the above requirements, but may also render Kwun Tong Town Centre a hub of the Southeast Kowloon Development at the eastern end and a new landmark of Hong Kong.

Provided the Project aims to serve the above functions, The HKIS in principle welcomes and supports the URA's proposal in undertaking a comprehensive redevelopment for the Kwun Tong Town Centre.



3. Major Considerations and Concerns on the Project under the Five Guiding Principles

In the Public Consultation Document, the URA has listed five guiding principles, which The HKIS agrees to be the foundation to a successful redevelopment of the Kwun Tong Town Centre:

- Wide public consultation and participation in planning and design;
- Understanding and acceptance of URA's prevailing compensation and re-housing policies by those affected;
- Phased development to minimize impact and sustain economic vibrancy of the area;
- Adoption of a creative and visionary design for a 21st century town centre; and
- Prudent financing strategies to ensure financial sustainability.

Whilst accepting the five principles, The HKIS suggests the URA and the Government to take thorough considerations on the following points.

3.1 Public consultation and participation

Involving 5.3 hectares of valuable urban land, the scale of the Project will be very substantial. The relevant authorities are strongly suggested to carry out comprehensive public consultation on the various issues, especially on those controversial topics including design detail, scheme selection as well as resumption and compensation package, so that the needs of all sectors of the society can be balanced and cared.

The HKIS would also like to raise to the URA the importance of information transparency in order that the public may keep on monitoring and expressing their opinions throughout the whole redevelopment process. Particularly we would recommend more consultation be made to solicit the views and support from the local residents such as those at the District Council, stakeholders such as those owners of properties and related professional bodies who could offer impartial and professional comments.

3.2 Acquisition and disposal strategy

The Project is estimated to affect about 1,860 households and about 300 shops. As no detailed compensation regime is proposed by the URA in the Public Consultation Document, we are not able to comment on the issue. The HKIS urges the URA and the government to pay special attention to ensure the interests of the affected property owners and tenants are compensated in an equitable and reasonable manner.

Regarding the disposal strategy, both joint venture and public tender approaches are feasible and workable options. Again, transparency and fairness are the two main concerns.



HKIS inclines to adopt a joint venture approach which would provide the current property owners an opportunity to participate in the project and thus reduce the resistance to compulsory acquisition which would likely prolong the development programme and increase the project cost. Obviously the detail arrangement should be worked out carefully and practically.

3.3 Development Density and Feasibility

There are voices from green groups and some political parties requesting for more stringent restrictions on the development density of the Project so that the future Kwun Tong Town Centre would be more environmental friendly and the adverse environmental impact of the Project to the surrounding could be put to the minimum. Other opinions worry the lowered development density would affect the attractiveness and even the financial feasibility of the Project.

According to the existing condition, the Project area is subdivided into two sites by Hip Wo Street. The HKIS takes the view that each site should be self-sustainable in terms of development parameters, such as plot ratio, site coverage and open space provision, under the Buildings Ordinance.

It is acknowledged that GIC accommodation and public transport interchange would be GFA accountable. This will address partly the criticism on a high plot ratio.

On the understanding that the Project will have to be self-financing, the development density will be one of the determining factors on the project viability.

The HKIS considers that for a prime site as the subject, too low a density would be an underutilization of the scarce land resources. The level of density as now proposed is considered a reasonable and acceptable balance of all the concerns.

3.4 Phasing and Development Strategy

The HKIS shares the view that a phasing development may minimize the adverse effects to the economic activities in the surrounding and the daily lives of Kwun Tong residents.

For instance, a traffic impact assessment should cover proposals on schemes of temporary road closure or diversion as well as a suitable location of a transitional traffic interchange. The public should also be kept informed and consulted on the relocation of various existing communal facilities so as to retain the reasonable level of services to the residents during the redevelopment stages.

A further consultation on phasing strategy is suggested when the design and programme of the Project are being firmed up.



3.5 Design Details

The three design proposals visualized some possible design options for the Project and are very useful for the members of the public to express their opinions on different aspects.

The traffic impact of the Project to the surrounding is one of the major concerns of The HKIS. Under the three design proposals, three existing busy streets of Kwun Tong Town Centre, namely Tung Yan Street, Yue Man Square and Fu Yan Street, are to be relocated or redesigned. It is expected to cause significant impacts to the traffic on Kwun Tong Road and Hong Ning Road.

Whilst the traffic generated by the Project may also trigger severe congestion of the existing Kwun Tong Road transport network, as evidenced by the existence of the tail back problem during the grand opening of the APM development. The HKIS therefore proposes an in-depth traffic impact assessment to be carried out to review the current traffic reserve capacity and the capacity of the MTR roundabout and Hong Ning Road junction, taking into account the subsequent redevelopment in the surroundings. Re-configuration of the road junctions and widening of the current main trunk roads and surrounding streets are suggested to be seriously considered. The all-weather public transport interchange has to be strategically located and carefully designed to optimize the mechanical ventilation effects with minimum costs.

Regarding the building design, The HKIS suggests a set back of not only the podium but also the buildings thereon to exploit the benefit of this considerable site. Such setback can minimize the visual impact to the surrounding pedestrians and residents and improve the natural ventilation at the facades, especially when the adjoining buildings are subsequently redeveloped.

Kwun Tong Town Centre is a traditional marketplace that street level shopping is a typical feature of the local residents. To avoid causing a "fortress" effect resulting a darkened and dull neighbourhood streets, a design to preserve the current street level shopping behaviour is recommended.

The HKIS has no objection to the inclusion of a sizeable central plaza in the future redevelopment, provided the plaza is carefully designed to avoid the 'heat tank' situation.



4. Conclusion

The Project is supported by The HKIS in principle. As it is still in the schematic stage at the moment, it would be difficult for one to comment on the relevant issues at a micro perspective. It is advisable for the URA to invite members of professional bodies and tertiary educational institutions to set up independent task force to specifically scrutinize and advise on various technical aspects of the Project.

For and on behalf of Hong Kong Institute of Surveyors

Kam-hung Yu

Vice President

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