

21 August 2019

BY EMAIL ONLY

Civil Engineering and Development Department and the
Planning Department
11/F, Civil Engineering and Development Building
101 Princess Margaret Road
Homantin
Kowloon

Dear Sirs,

HKIS Comments on Stage 2 Public Engagement for Pilot Study on Underground Space Development in Selected Strategic Urban Areas

In response to the "Stage 2 Public Engagement" for Pilot Study on Underground Space Development in Selected Strategic Urban Areas ("Public Engagement"), The Hong Kong Institute of Surveyors ("HKIS") would like to make the following comments:-

1. Further information needs to be provided

The Public Engagement website uploaded the "Stage 2 Public Engagement Digest" and "Leaflet" to introduce the proposed scheme for "Kowloon Park Underground Space Development". We take the view that insufficient information were available for detailed comments to be made by the general public, like for example:

- Details of pedestrian trip survey (especially along the Haiphong Road) to justify the development of such underground space;
- Financial/economic viability of development of the underground space;
- Details of construction arrangement;
- Indicative construction cost;
- Details of the community facilities to be provided;
- Width and headroom of the pedestrian passages;
- Arrangement of vertical transportation facilities between different levels;
- Indicative number of shops;
- Indicative efficiency ratio of the Retail/Food and Beverage ("F&B") spaces;
- Fire safety measures for the proposed multi-storey underground space;
- Number of car parking spaces and loading/unloading spaces; and
- Car parking arrangement and vehicular access points for the car park.

2. Type of possible uses/facilities

We support the provision of the different uses: "Community Facilities", "Pedestrian Passages", "Covered Public Spaces", "Parking Facilities" and "Retail/F&B Facilities". The proposed uses of the community facilities needs to be set out.

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The provision of car parking facilities are important to the district. Critical mass of retail facilities would also be crucial to attract shoppers and pedestrians, and the rental income of such space would be an important economic driver for the proposed development.

3. Specific concerns on the Underground Space Development

- The new underground space shall provide further connections to current/future private commercial developments nearby to achieve synergy, and to effectively divert pedestrians from overcrowded pavements.
- Apart from the provision of the new underground space, improvement works shall be conducted at the Tsim Sha Tsui MTR Station and its entrances to solve the existing overcrowding problem.
- Underground common utility enclosure shall be provided to minimize at grade laying of utility services. Early engagement of utility companies/departments is recommended for better planning of space requirements.
- The technical feasibility of providing underground F&B facilities should be considered in details (say, smoke extraction system, oil trap facilities, emergency exits, and other fire safety concerns).
- The design of new underground space should be incorporated with the existing Kowloon Park facilities with an aim to upgrade the whole Kowloon Park.

4. Incentive measures for using the Underground Spaces

To encourage the community to make use of the proposed underground spaces, we would further suggest the following incentive measures to be incorporated during detailed design/operational stages:-

- Provision of retail shops alongside the pedestrian passages as far as possible;
- Provision of travelator at the pedestrian passages;
- "Park and Ride Scheme" for MTR interchange;
- Provision of Taxi/Private Car laybys at the entrances of the space; and
- Implementation of the underground spaces through private entities to enhance the effectiveness and efficiency.

We sincerely hope that our comments and views will be further considered by the Departments. Please contact the HKIS Secretariat at 2526 3679 if you require more information.

Thank you for your attention.

Yours faithfully,

Sr Dr Tony Leung
President
The Hong Kong Institute of Surveyors