



香港城市設計學會
Hong Kong Institute of Urban Design

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By email: cswai@ura.org.hk

Ir Wai Chi Sing, GBS, JP, FHKEng,

Managing Director

Urban Renewal Authority,

26/F Cosco tower, 183, Queens Road Central, Hong Kong

Dear Ir Wai,

Re: HKIUD's Comments on the District Study for Yau Ma Tei and Mong Kok

We refer to URA recent release of the information booklet in 2/2022 and Legco paper of 28/9/2021 regarding their Yau Mong Urban Renewal study and proposal and would like to offer the below HKIUD's comments.

1.0 General Comments

	URA's Statements	HKIUD's Comments
1.1	Background and Objectives	
	<ul style="list-style-type: none"> A more holistic, district-based approach is needed to deal with the extent, pace and multi-dimensional nature of urban decay 	We agree that a holistic, district-based approach is needed to deal with Yau Mong's urban problems
1.2	Key Planning Issues	
	<ul style="list-style-type: none"> High Population Density and Congested Space - the population and density within the Study Area are the highest amongst the 18 districts in Hong Kong (180 persons / 1,000m², which is six times the territory-wide average) with only 18.7m² living space per person (compared to the territorial median of 21.4m²). Urban Decay with Slow Redevelopment Momentum - existing buildings within the Study Area, about 65% are aged ≥ 50 years. Of which, 47% are in "marginal", "varied" and "poor" conditions, and 37% are "Three-Nil Buildings"². By 2047, about 80% of the building stock will be ≥70 years. 	<p>We reckon that the district is indeed congested and, therefore, lowering the population density should be one of the objectives of the renewal. Therefore, MRCP may perhaps be the way to go. We would like to remind URA to take precaution with and, in fact, not to adopt the approach of wholesale wipe-out of existing urban fabrics and characters. Existing community, heritage and traditional characteristics should be preserved through public engagement and careful redevelopment strategies.</p> <p>We agree that urban decay is a major problem that should be resolved through urban renewal, to safeguard public safety; facilitate economic development and improve livability.</p>
	<ul style="list-style-type: none"> Redevelopment momentum in the Study Area has been slow - Residual gross floor area is only about 7%, over 800 out of 3350 existing buildings are classified as having nil or negative redevelopment 	We agree that there shall be catalyst to revive interests of redevelopment, however, it can come about with urban design improvement: improvement of streetscape, urban environment and streetscape and not

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	potential.	<p>necessary relying primarily on “financial” mechanisms to increase of redevelopment potential.</p> <p>Urban regeneration would generate long term direct or indirect benefits like future Government tax income due to active commercial activities in the district, social benefits due to increase in job opportunity and improvement of livability and safety. The image of HK as an international financial centre would also be enhanced, which would help attract international companies and talents to come to HK.</p> <p>Government should not only focus on the short-term budget balance.</p>
	<ul style="list-style-type: none"> • Traffic and Transportation Strategy 	<p>There is a lack of discussion and information regarding traffic and transportation strategy for the districts supporting the conclusion of the study in either the information booklet or the Legco Paper of 28/9/2021. Careful assessment is needed for formulating a good traffic strategy for this congested district, and we would like to have more information.</p> <p>It is important to study infrastructure capacity, for instance, how much more populations the existing infrastructure can handle and see if additional and innovative transportation modes can be explored. Good and efficient public transportation systems are needed to reduce the use of private cars, and carbon footprint in transportation.</p> <p>We also want to remind that should more mix-use be allowed, there should be reduction factors on roads and infrastructure loading assuming a higher percentage of workers living in the same district and close to their work destinations.</p>

2.0 Specific Comments.

	Issues	Comments
2.1	No new urban design concept for the regeneration of the area	In the information booklet and the Legco paper, we noted that the main theme is that URA is “ financial viability ” and the so-called “ new concepts ” of SCA and TRP are presented merely to capture financial benefits. Whilst we welcome the



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		introduction of the techniques of SCA and TRP, they have to be discussed in the context of urban design. It is also needed to take into account social benefits, as well as long term and indirect financial returns as discussed above so that the proposal would be to the best overall interest of HK.
2.2	Better Urban Design will bring livability, vibrancy and the key objectives and financial viabilities	We believe better urban design will bring better values while can help to attain livability, vibrancy and bring in all the key objectives established in URA's report. Look at Xintiandi of Shanghai, financial viability came alongside improved urban environment, cityscape and availability of mix-use developments.
2.3	Up-zoning and new zoning concepts	<p>We are not against up-zoning but there are just not sufficient details in the information booklet to convince us that this is viable from city planning, urban design and traffic capacity standpoints.</p> <p>We welcome the idea of OU(MU) to allow more mix-use development; during the pandemic, we work from home or, sometimes, lived in the office, we wonder if, conceptually, there shouldn't be a requirement of distinction between domestic and non-domestic use.</p>
2.4	Transfer of Plot Ratio (TRP)	<p>Whilst we welcome the "new" planning mechanism of TRP, we consider that this mechanism should only be allowed if there are obvious public benefits, e.g. keeping certain low-rise clusters, historical buildings, districts with characters, in order that their relevant residual PRs can be transferred.</p> <p>We consider that planning submission is an accept process to enable this new concept. In order to keep city scale in check, there shall also be mechanism to cap maximum density allowed at the receiving sites.</p> <p>We also wonder if TRP concept can be applied for cases that the RS is not within Yau Mong districts. Allowing cross-district transferal mechanism will actually help alleviating congestion of these 2 districts.</p>
2.5	Site Consolidation Area (SCA)	44% of the land of the district being occupied by roads is excessive, and, therefore, we welcome adoption of the concept of SCA in these 2 districts. However, in this connection, the primary criteria of allowing SCA should be for more "quality" open spaces and encouraging pedestrianisation . We also believe that with the reduction of roads, thus road junctions, local traffic condition will also be

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		improved. To institute the mechanism, there shall be criteria of acceptance based on merits in urban space improvement, street-level permeability and walkability, gains in green coverage and traffic improvement.
2.6	Improvement of Nathan Road Corridor – turn it into a public urban space	Nathan Road is the most important streets in the district and, in actual fact, the whole of the Kowloon Peninsula and it appears that the potential of this “asset” of Hong Kong has not been fully utilised. Nathan Road, historically is a tree-lined road with commercial activities on both side of the roads. We should certainly turn Nathan Road into the focal point of the district. With the Park n’ Walk concept, stop cross-district buses from entering Nathan Road, replacing within-district buses with slow-moving street cars or autonomous vehicles, we can make turn Nathan Road from a service road for logistics into a true public space lined with banyan trees, with intermittent lawns, al fresco dining, fountains, food kiosks, etc. We should make Nathan Road the gemstone of not only the district but the whole of Hong Kong , just like Champs-Elysees for Paris.
2.7	Connected Open Space	We welcome the proposal of comprehensive and interconnected open space network. However, it lacks details in the information booklet and the possibility for its implementation is in doubt. We urge URA to provide the public detailed information on this proposal.
(a)	Green Link	We welcome the proposal of the “Green Link”. However, we have to remind that this kind of “Highline Park” equivalent will only be successful if there are planned activities: kids’ play areas, ad hoc performance stages, learning hubs, shops, eating places/restaurants and that any developments adjacent to them can be linked onto the “link” (of course, for free). Restricting this “Green Link” for pure pedestrian circulation will simply be a lost in opportunity. Such Green Links and Urban Waterway would also improve the micro-climate and biodiversity of the district if carefully planned and designed, which should be included in the design brief for the URA consultants.
(b)	Urban Waterway Open Space Corridor	We also welcome the proposal of the “Urban Waterway Open Space Corridor”.
(c)	Central Urban Park	It is a little small to be called an urban park. Amalgamation of PCCW building and, one or two, side streets will help.



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2.8	Development Nodes (DN)	We are not sure about the urban design impact of the seemingly huge developments of those DNs illustrated in the booklets and how are they being integrated with their vicinities. We need more information for any constructive comments. Fundamentally, there are no layout plan, no sectional drawings nor data for us to appreciate and comment on the proposals.
2.9	Traffic and Transportation Study	<p>As said, we are surprised that there is no information on traffic studies; we wonder but hope that the infrastructure is sufficient to cater for the various redevelopment proposals, DNs and the whole scheme in general.</p> <p>We would also like to remind that the MTR Tsuen Wan Line may have reached its capacity; how to capture and utilise the capacity available from the Tung Chung Line will, therefore, be essential. We encourage more studies, especially east-west pedestrian and autonomous vehicle service to accompany this concept.</p>
2.10	Park n' Walk	<p>We welcome the Park n' Walk concept. Kindly note that Park n' Walk will work best if all cars can enter the proposed satellite carpark facilities once they exit the major highways and not required to enter onto the local streets.</p> <p>Having mentioned above, we still believe URA shall stress the reliance on public transport, a walkable Yau Mong and mix-use development mode are to be encouraged rather than providing for more parking spaces within this area for addressing traffic and transportation issues.</p>
2.11	TRPSR – “transferring of carparking requirements”	<p>TD has for the past few years openly requested all new developments or redevelopments that are undergoing planning submissions, no matter big or small, to provide carparking spaces up to the highest range in HKPSG. TD should not implement such a policy for these districts as this will absolutely kill the districts. The potential developments, even if amalgamated as promulgated by URA, are still quite small in scale; it is silly to require each of all these “small” developments to build a ramp to serve their underground carpark.</p> <p>In fact, the districts should mainly rely on public transportation, and the government might allow individual redevelopments with carpark requirement to “subscribe” their required carparks at the proposed centralised satellite carparking facilities; this is a TRPSR – “transferring of carparking requirements”</p>

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		which is a planning tool for inner city cores of many European cities and towns.
2.12	Consolidation of Street Activities into Buildings	We have serious doubts of the proposal consolidating businesses that primarily of street activities into a new high-rise buildings. Jade market street, goldfish street, sneaker streets and cooked food-hawkers are something unique to the districts and Hong Kong, in fact, they are established brands of Hong Kong, and their characters should be leveraged upon in the proposal rather than have them displaced. There is a need to review his approach in order to preserve the existing community characteristics as discussed above.
2.13	Affordable Housing	It is noted that 23% of the territory's SDUs is within Yau Mong in accordance with the baseline study. We believe that many of SDU dwellers belong to the low-income group and prefer to live close to their work destinations. SDUs are "affordable housing" for them. Therefore, they should not be displaced and sufficient in-kind "affordable housing" shall be targeted. Affordable housing by HA may not fit for Yau Mong, therefore, alternative means, e.g. running by NGOs shall be considered.
2.14	Sustainability	There is no information how the urban renewal in the districts could meet the Government's target of carbon neutrality, and upgrading of the energy performance of the existing buildings that would not be replaced in the process.

Whether in the Legco Paper and the information booklet, there is a general lack of details on how numbers came about, benchmark references, key parameters, layout plans or sectional diagrams for our members to appreciate and understand the urban design aspects of the proposal. We would suggest URA to release more and detailed information so that the public could have more constructive discussion and suggestions, for example, on the seemingly excessive scale of the various proposed DNs.

In conclusion, we welcome the new tools of TRP and SCA but there should be a reasonable mechanism for balance and check; the associated acceptance criteria shall be towards good urban design practices, sustainability and public benefits. We also need a true gemstone to spark the revitalisation of the district. We hope that URA and PlanD have the courage to turn Nathan Road into the "public space" of Kowloon Peninsula. Last but not least, good urban design will bring values and it should be the central theme of the study rather than having financial viability as the forefront objective of the study. Should the government need to pump money into the urban regeneration of Yau Mong and, if the society thinks that good urban environment is the priority for the districts, so be it.

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Should further information be required, please kindly contact me or Ms. Cherry Lau, our Senior Administrative Officer at 2235 9057.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Cheung', is written over a horizontal line.

(Anthony CHEUNG)
Chairman, Public Affairs Committee, HKIUD

Cc Mr. WONG Wai Lun, Michael, JP, Secretary for Development, Development Bureau
Mr. Ivan Chung, JP, Director of Planning, Planning Department

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