

## 就草圖作出申述

**Representation Relating to Draft Plan**

參考編號

Reference Number:

230305-090152-47163

提交限期

Deadline for submission:

13/03/2023

提交日期及時間

Date and time of submission:

05/03/2023 09:01:52

「申述人」全名

Full Name of "Representer":

先生 Mr. Lau Chun Kit

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的草圖

Draft plan to which the representation relates:

S/H25/5

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
灣仔北分區計劃大綱核准圖編號 S/H25/4 的所有修訂	支持 Support	該修訂能令修訂項目附表內的土地用途更據效益、更有彈性和更加清晰。

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

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003

## 就草圖作出申述

## Representation Relating to Draft Plan

參考編號

Reference Number:

230127-173759-61628

提交限期

Deadline for submission:

13/03/2023

提交日期及時間

Date and time of submission:

27/01/2023 17:37:59

「申述人」全名

Full Name of "Representer":

先生 Mr. CHENG, Yui Hang

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的草圖

Draft plan to which the representation relates:

S/H25/5

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Item A	反對 Oppose	Maximum gross floor area could be relaxed further (without compromising current building height restrictions, if the ridgel line is the chief concern).

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

1. Increase maximum gross floor area by allowing more extensive underground excavation for exhibition and convention facilities. Underground development would be in line with existing government policy, and optimize massing / reduce pedestrian visual impact by transferring floor space from the proposed podium underground.
2. Provisions could be made for connecting the proposed development with Wan Chai Station via an underground passageway, to reduce congestion on the existing footbridge.

001

## 就草圖作出申述

## Representation Relating to Draft Plan

## 參考編號

Reference Number:

230312-192520-21933

## 提交限期

Deadline for submission:

13/03/2023

## 提交日期及時間

Date and time of submission:

12/03/2023 19:25:20

## 「申述人」全名

Full Name of "Representer":

先生 Mr. John Douglas Moore

## 「獲授權代理人」全名

Full Name of "Authorized Agent":

## 與申述相關的草圖

Draft plan to which the representation relates:

S/H25/5

## 申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Amendment to Item A	反對 Oppose	The proposed redevelopment will further destroy the view of the ridgeline, exacerbate existing traffic issues and create a large deficit of open space and lack of trees. There is a surplus of office space currently being built in the Central & Wanchai districts. Further space in this area is not needed as many businesses are relocating to cheaper areas. Residents and businesses currently operating on Hong Kong Island will be deprived of essential GIC services offered by the existing government offices located in the buildings. The planned footbridge network will create a tunnel for pedestrians at-grade and will lead to high levels of pollution, lack of sunlight, and lack of proper ventilation.

## 對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

004

## 就草圖作出申述

**Representation Relating to Draft Plan**

## 參考編號

Reference Number:

230312-192958-91803

## 提交限期

Deadline for submission:

13/03/2023

## 提交日期及時間

Date and time of submission:

12/03/2023 19:29:58

## 「申述人」全名

Full Name of "Representer":

女士 Ms. Wilhelmina Evelyn Moore

## 「獲授權代理人」全名

Full Name of "Authorized Agent" :

## 與申述相關的草圖

Draft plan to which the representation relates:

S/H25/5

## 申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Amendment to Item A	反對 Oppose	The existing buildings provide useful services, GIC space and accessible public open space and trees that should be preserved. What we get in exchange is an ever taller building that blocks the ridgeline and subjects pedestrians to a never-ending maze of footbridges, diminishing the existing at-grade space. There is no need for this redevelopment. Repurpose these buildings for another use of continue offering government services from the existing buildings. The endless construction projects near the Central waterfront and HKCEC has been going on and will go on for years. We don't need another massive construction project when the population is expected to decrease.

## 對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

005

## 就草圖作出申述

## Representation Relating to Draft Plan

## 參考編號

Reference Number:

230312-193658-17415

## 提交限期

Deadline for submission:

13/03/2023

## 提交日期及時間

Date and time of submission:

12/03/2023 19:36:58

## 「申述人」全名

Full Name of "Representer":

女士 Ms. Genevieve James Moore

## 「獲授權代理人」全名

Full Name of "Authorized Agent":

## 與申述相關的草圖

Draft plan to which the representation relates:

S/H25/5

## 申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Amendment to Item A	反對 Oppose	The height of the proposed building is excessive and will destroy views of the ridge line. There will be an oversupply of office supply in Central and Wanchai with the construction projects already underway. The existing buildings are GIC offering essential government services and public open space. This land and outdoor space should not be privatized. It should be reserved for essential services to residents and businesses operating on Hong Kong Island. The trees should be preserved as well. The answer to a proposed redevelopment should not be to fell the existing trees and replace them with bushes and shrubs. At-grade pedestrian and outdoor space should also be preserved and not covered over with inconvenient networks of endless footbridges. No additional parking is necessary at this location given the nearby parking garage is being used as an Automall for my whole life. Parking is needed in Central--particularly at the existing Star Ferry carpark which should be preserved. There are already enough projects underway destroying the existing useable facilities and open space in Hong Kong

006

	g. We don't need yet another, and we do n't need years of endless noise, traffic disruptions and construction waste. Leave these sites alone.
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對草圖的建議修訂(如有的話)

**Proposed Amendments to Draft Plan(if any):**

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**RE: Wanchai OZP / Wanchai OZP S/H25/4**  
13/03/2023 11:44

From: [Redacted]  
To: "tpbpd" <tpbpd@pland.gov.hk>  
File Ref:

Dear Town Planning Board,

Please find my updated contact details with the first 4 digits of my Hong Kong ID card as required.

Melanie Moore [Redacted]  
[Redacted]

**From:** [Redacted]  
**Sent:** Sunday, March 12, 2023 7:21 PM  
**To:** 'tpbpd' <tpbpd@pland.gov.hk>  
**Subject:** Wanchai OZP / Wanchai OZP S/H25/4

Dear Town Planning Board,

I object to the proposed amendment for the following reason.

**Ridgeline Breach**

The height of the proposed tower is excessive, will obscure a sizable chunk of the **supposedly protected ridge line**, and will further diminish the panoramic view allowing maximum enjoyment of the mountain backdrop.

The applicant clearly knows this to be a paramount issue as evidenced its lengthy hyperbole seeking to justify such negative impact quoted below:

*"According to strategic VP 1 when viewing from the West Kowloon Cultural District, **the existing Immigration Tower and Revenue Tower have already breached the ridge line (Plan 13a). The proposed tower is close to the Central Plaza (+305mPD (main roof)) with similar BH and massing (Plan 12). Two buildings will form a building group together and add visual interest in the existing building group for viewers from strategic VP 1. With the redevelopment at the Site, although the BH of the proposed tower will protrude the ridge line when viewing from Cultural Complex at Tsim Sha Tsui at strategic VP 2 (Plan 13b) and will exceed the '20% building free zone' when viewed from the waterfront promenade at Kai Tak Development at strategic VP 3 (Plan 13c), the proposed BH is***

*compatible with Central Plaza and the urban setting in Wan Chai district and other existing high-rise commercial buildings around the Site. The proposed tower together with the Central Plaza will become part of the Victoria Harbour view and part of the building group of backdrop of HKCEC in the foreground, creating interesting and **appropriate skyline profile**.*

*Whilst the HKPSG recommends that a building free zone below the ridgelines would need to be maintained from key and popular vantage points in order to preserve views to ridge lines and mountain backdrop, flexibility could be allowed for relaxation on individual merits and for special landmark buildings to give punctuation effects at suitable locations. In this connection, **the proposed iconic tower will be juxtaposed with the Central Plaza and create a twinning effect via its building scale, BH and the commercial building appearance**. Capitalising on the strategic location and good accessibility, the Site could be considered for development with high quality architectural/landmark building design and planning and design merits to add vibrancy to the Wan Chai North area.*

*Furthermore, a series of visual mitigation measures would be incorporated in design concepts of the proposed development **to alleviate any potential adverse visual impacts**, including integrating colour and finishes of the proposed development, architecture features matching with the surrounding elements, and landscape measures such as provision of landscape terraces at different levels. Providing such visual order and harmony among surrounding tall buildings would be a key factor for ensuring aesthetically pleasing skylines. While the proposed development with innovative technologies and building materials would re-form the city skyline, the iconic building would also reflect its economic and global standing, and notable for its shape, lightness, **transparency, colours, elegance, and iconicity**.*

The redevelopment of these buildings could provide an opportunity to rectify breach of the 20% building free zone and restore the views of the impacted ridgeline. When Central Plaza is eventually redeveloped as well, the restitution will be completed. This opportunity should be taken to reverse the damage rather than allowing the applicant to create an even higher impediment. Yet, I believe these buildings should not be redeveloped, but rather repurposed when the government departments exit.

### **Shortfall in Office Space**

The applicant seeks to justify the redevelopment by citing a purported Grade A office space market shortfall. This is false. A significant surplus of office space existing or is being built in the Central and Wanchai districts. We have Henderson redeveloping the former Murray Road carpark, redevelopment of Cheung Kong Centre 2 and the upcoming Queensway Plaza project. This ensures a surplus for years to come. Factoring in the many businesses moving to alternative, cheaper business districts (BNP Paribas, for example, removing its remaining operations from IFC 2 to Lincoln House in Quarry Bay), these relocations will further reduce demand for office space in the Central/Wanchai districts.

### **Shortfall in Hotel Space**

Demand for hotels is also overstated given the many existing hotels being rezoned to other uses.



## **Demand for Additional Convention Space on Hong Kong Island**

Convention space on Hong Kong Island is not in demand. The art auction houses are moving from the existing convention center. The location is very inconvenient, even with the additional MTR lines.

Please do not ignore the advice of the Central Government with regard to the integration within the GBA. There are currently no plans for convention centre space in the northern metropolis, which has much better links to both the GBA and the airport.

## **Open Space**

The applicant acknowledges that the redevelopment will result in a loss of existing public open space.

*“While the proposed development will result in loss of an existing public open space of about 3,400m<sup>2</sup> (i.e. Gloucester Road Garden), various open space would be provided to offer diverse, attractive, vibrant and accessible open spaces and landscape areas for public enjoyment.”*

Please note that this argument is framed as a ploy to allege this development is in Wanchai North. The Wanchai district has a serious deficit of both local and district open space.

Please refer to the recent Wanchai OZP approved on 20 January 2023.

*“[A] landscape deck of around 3,000m<sup>2</sup> will be constructed by the future developer atop the proposed vehicular tunnel entrance at Fenwick Pier Street to the northwest of the Site”*

Such landscape deck is effectively in another district and is not convenient or accessible to Wanchai residents. Wanchai has a planned population of 60,000+. The plan creatively only includes residents in the immediate area where few residential units are located. So, in exchange for 3,400 sq m of accessible open space, the community essentially gets a slightly wider bus stop on one of the most busy and congested highways in the city. No one wants to use such a space.

*“[A] wider pedestrian path with a tree-lined boulevard, providing greenings and edge plantings, creating a wider and open pedestrian environment along existing bus stops at Gloucester Road”*

*“an outdoor seating area (about 638m<sup>2</sup>) near the eastern boundary of the Site”*

This area would be sandwiched between an extensive drop off and the very tall podium of Central Plaza. I note that no visuals are provided as they would reveal the reality of a row of trees against a long and high wall with little natural light and poor ventilation.

## **Loss of GIC**

The GIC site currently provides a number of essential community services to resident and businesses on Hong Kong Island that are to be hived off to distant and inconvenient locations. Again, this important issue is being downplayed by basing the HKPSG on the very limited area covered by the plan instead of the district in general. This big chunk of GIC will be privatized and removed from the public realm. Wanchai is seriously deficient in many community services, members should refer to the overall Wanchai district HKPSG. This is an overall loss for both Wanchai and all of Hong Kong Island.

### **Parking**

There is no need for an additional 400 parking spaces for HKCEC at this location when New World has been allowed to operate a used car sales room—Automall—for many years rather than using its existing carparking spaces for actual carparking. Additionally, the police have failed for years to address the persistent issue of illegal parking on Harbour Road.

### **Pedestrian Network**

*"The proposed development also provides the opportunity to improve the traffic and pedestrian arrangements in the Wan Chai North Area, **including strengthening of the pedestrian network** and improved connectivity with the core area in Wan Chai and the Wan Chai New Harbourfront. The integration of the proposed development with the existing HKCEC will boost synergy in C&E activities and also allow **convenient and more direct access** for workers, visitors, and the public alike traversing from the Wan Chai hinterland to the New Central and Wan Chai North harbourfronts.*

Covering a long stretch of road with a multi-storey bridge brings no benefits to the general public as pedestrians not participating in events at HKCEC would still use the Central Plaza footbridge to get to the MTR, bus station, Star Ferry and Eastern Waterfront.

At the same time the current traffic free at-grade passage between Gloucester Road and Harbour Road would be replaced by roads open to vehicular traffic. These road would be more dangerous and generate higher levels of pollution. The extensive and very high bridging over Harbour Road would turn Harbour Road into a tunnel, block ventilation and encourage a build-up of pollutants at street level. This development is similar to what will occur on Lung Wo Road with the redevelopment of Central Harbourfront Site 3 with its many connecting footbridges and extensive buildings blocking the ventilation around the harbourfront.

The many other footbridges mentioned in the application have been touted for many years but never delivered.

There is no plan to improve the at-grade pedestrian connectivity. This would be far more beneficial than causing an increasingly elderly Hong Kong population to trek up and down footbridges and using time and energy to cross road via footbridge rather than at-grade.

### **Trees**

*"78 trees (mostly common species in Hong Kong) are surveyed within the Site. No*

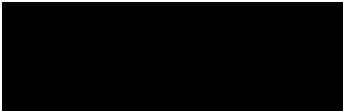
*Registered Old and Valuable Trees are found within the Site. The 78 trees are all affected by the demolition works of the existing buildings, excavation works, provision of underground car parks and utilities as well as the construction of the deck over structure in the Site. Among which, 60 are assessed not suitable to be transplanted and **proposed to be felled**, and the remaining 18 trees are to be transplanted. A total of 65 new trees will be planted at the ground floor within the Site. However, given that the proposed development are subject to detailed design by the future developer, the number of trees to be felled/transplanted at this stage is only an initial estimate for reference"*

Existing trees should be preserved and accorded respect. They are an essential part of our urban landscape. They provide shade and clean the air. They are far preferable to flowering plants that will replace them.

### **Misallocation of Site to Vehicles**

The drop off point should be underground rather than at-grade. There is no reason for two vehicle entrances. This plan gives excessive attention to vehicular traffic at the expense of pedestrian and other use.

Sincerely,  
Melanie Moore



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**AMENDMENTS TO THE APPROVED WAN CHAI NORTH OZP NO. S/H25/4**  
13/03/2023 10:13

From: [Redacted]  
To: Tpbpd <tpbpd@pland.gov.hk>  
File Ref:

History: This message has been replied to.

**Dear TPB Members**

**AMENDMENTS TO THE APPROVED WAN CHAI NORTH OZP NO. S/H25/4**

**Item A - 19,025m2** Rezoning of a site covering the existing Wanchai Tower, Revenue Tower, Immigration Tower, Kong Wan Fire Station and Gloucester Road Garden together with part of the Harbour Road from "G/IC" and an area shown as 'Road' to "Other Specified Uses ("OU")(6)" annotated "Exhibition Centre with Commercial Development" with the stipulation of Sub-areas on the Plan.

**OBJECT** to these Amendments for the following reasons:

**1. BREACHING RIDGE LINE**

The proposed tower will block the **protected ridge line** and diminish the panorama that should allow the maximum mountain backdrop.

The justification as offered below in italics is "over-the-top" convoluting codswallop. This circumventing verbosity is a clear admission of the known **NEGATIVE VISUAL IMPACT** of these plans.

It is a clear attempt to bamboozle the Board Members and deflect from the reality. It should be noted that other Wan Chai hotel and C&E developments have had their planned height curtailed in other to meet the HKPSG guidelines - i.e. Hopewell's HCII/Mega Tower Hotel

reduced from 92 storeys to 55 storeys because of TPB (and Development Bureau and Planning Department) objections.

*"According to strategic VP 1 when viewing from the West Kowloon Cultural District, the existing Immigration Tower and Revenue Tower have already breached the ridge line (Plan 13a). The proposed tower is close to the Central Plaza (+305mPD (main roof)) with similar BH and massing (Plan 12). Two buildings will form a building group together and add visual interest in the existing building group for viewers from strategic VP 1. With the redevelopment at the Site, although the BH of the proposed tower will protrude the ridge line when viewing from Cultural Complex at Tsim Sha Tsui at strategic VP 2 (Plan 13b) and will exceed the '20% building free zone' when viewed from the waterfront promenade at Kai Tak Development at strategic VP 3 (Plan 13c), the proposed BH is compatible with Central Plaza and the urban setting in Wan Chai district and other existing high-rise commercial buildings around the Site. The proposed tower together with the Central Plaza will become part of the Victoria Harbour view and part of the building group of backdrop of HKCEC in the foreground, creating interesting and appropriate skyline profile.*

*Whilst the HKPSG recommends that a building free zone below the ridgelines would need to be maintained from key and popular vantage points in order to preserve views to ridge lines and*

*mountain backdrop, flexibility could be allowed for relaxation on individual merits and for special landmark buildings to give punctuation effects at suitable locations. In this connection, the proposed iconic tower will be juxtaposed with the Central Plaza and create a twinning effect via its building scale, BH and the commercial building appearance. Capitalising on the strategic location and good accessibility, the Site could be considered for development with high quality architectural/landmark building design and planning and design merits to add vibrancy to the Wan Chai North area.*

*Furthermore, a series of visual mitigation measures would be incorporated in design concepts of the proposed development to alleviate any potential adverse visual impacts, including integrating colour and finishes of the proposed development, architecture features matching with the surrounding elements, and landscape measures such as provision of landscape terraces at different levels. Providing such visual order and harmony among surrounding tall buildings would be a key factor for ensuring aesthetically pleasing skylines. While the proposed development with innovative technologies and building materials would re-form the city skyline, the iconic building would also reflect its economic and global standing, and notable for its shape, lightness, transparency, colours, elegance, and iconicity.*

## **2. OVER-CROWDING**

Central Plaza has become an iconic building for Hong Kong. The positioning of this new development will obviously diminish Central Plaza's impact - the justifying "twinning effect" is complete architectural nonsense.

## **3. HOTEL, C&E, and Grade A OFFICE FACILITIES**

The justification:- *Hotel facilities would complement the C&E activities, and Grade A office space could also help alleviate the market shortfall, built on top of the new C&E venue."*

On Hong Kong Island and Wan Chai there is no shortfall of these facilities - and new developments are coming on stream. Hopewell's phase II will add massively to hotel and C&E facilities.

Population and incoming international business "optimistic" projections are over-hyped, and growth of facilities needs to be targeted towards the GBA and thus to the Northern Metropolis NOT Hong Kong Island and Wan Chai.

## **4. OPEN SPACE and TREES**

The justification:- *"While the proposed development will result in loss of an existing public open space of about 3,400m<sup>2</sup> (i.e. Gloucester Road Garden), various open space would be provided to offer diverse, attractive, vibrant and accessible open spaces and landscape areas for public enjoyment." and "a landscape deck of around 3,000m<sup>2</sup> will be constructed by the future developer atop the proposed vehicular tunnel entrance at Fenwick Pier Street to the northwest of the Site" The 78 trees are all affected by the demolition works of the existing buildings, excavation works, provision of underground car parks and utilities as well as the construction of the deck over structure in the Site".*

Wan Chai is SHORT of GENUINE PUBLIC OPEN SPACE...and ALL recent developments in this planning area place "PUBLIC OPEN SPACE on podiums with "blind" access for the general public. They become private facilities for the benefit of the developer NOT the PUBLIC. For example: The Zenith, Lee Tung Avenue, Garden East, Ship Street Park, Nam Koo Terrace. Our city needs TREES and they do not

grow to maturity in podium planters. For developers and our Planning Department and TPB it seems "OPEN SPACE" and TREES are just a numbers game - there is never any requirement for QUALITY .

I trust that the Board will take these views into consideration

Yours sincerely

Roger Emmerton



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**AMENDMENTS TO THE APPROVED WAN CHAI NORTH OZP NO. S/H25/4**  
13/03/2023 03:15

From: [REDACTED]  
To: tpbpd <tpbpd@pland.gov.hk>  
File Ref:

**AMENDMENTS TO THE APPROVED WAN CHAI NORTH OZP NO. S/H25/4**

**Item A** – 19,025m<sup>2</sup> Rezoning of a site covering the existing Wanchai Tower, Revenue Tower, Immigration Tower, Kong Wan Fire Station and Gloucester Road Garden together with part of the Harbour Road from “G/IC” and an area shown as ‘Road’ to “Other Specified Uses (“OU”)(6)” annotated “Exhibition Centre with Commercial Development” with the stipulation of Sub-areas on the Plan.

1 Tower / 24mt Podium / Exhibition floors / Offices / 500 room hotel / PR 15 / 280mPD / 930 Vehicle Parking

Dear TPB Members,

Strong Objections:

**BREACHING RIDGE LINE**

The proposed tower is far too tall and would remove a sizable chunk of the **supposedly protected ridge line** and diminish further the panorama that should allow the maximum enjoyment of the mountain backdrop.

That this is an issue is clear from the lengthy hyperbole that seeks to justify the clearly negative impact:

*“According to strategic VP 1 when viewing from the West Kowloon Cultural District, **the existing Immigration Tower and Revenue Tower have already breached the ridge line** (Plan 13a). The proposed tower is close to the Central Plaza (+305mPD (main roof)) with similar BH and massing (Plan 12). Two buildings will form a building group together and **add visual interest in the existing building group for viewers from strategic VP 1**. With the redevelopment at the Site, although the **BH of the proposed tower will protrude the ridge line when viewing from Cultural Complex at Tsim Sha Tsui at strategic VP 2 (Plan 13b) and will exceed the ‘20% building free zone’ when viewed from the waterfront promenade at Kai Tak Development at strategic VP 3 (Plan 13c)**, the proposed BH is compatible with Central Plaza and the urban setting in Wan Chai district and other existing high-rise commercial buildings around the Site. The proposed tower together with the Central Plaza will become part of the Victoria Harbour view and part of the building group of backdrop of HKCEC in the foreground, creating interesting and **appropriate skyline profile**.”*

*Whilst the HKPSG recommends that a building free zone below the ridgelines would need to be maintained from key and popular vantage points in order to preserve views to ridge lines and mountain backdrop, flexibility could be allowed for relaxation on individual merits and for special landmark buildings to give punctuation effects at suitable locations. In this connection, **the proposed iconic tower will be juxtaposed with the Central Plaza and create a twinning effect via its building scale, BH and the commercial building appearance.** Capitalising on the strategic location and good accessibility, the Site could be considered for development with high quality architectural/landmark building design and planning and design merits to add vibrancy to the Wan Chai North area.*

*Furthermore, a series of visual mitigation measures would be incorporated in design concepts of the proposed development **to alleviate any potential adverse visual impacts**, including integrating colour and finishes of the proposed development, architecture features matching with the surrounding elements, and landscape measures such as provision of landscape terraces at different levels. Providing such visual order and harmony among surrounding tall buildings would be a key factor for ensuring aesthetically pleasing skylines. While the proposed development with innovative technologies and building materials would re-form the city skyline, the iconic building would also reflect its economic and global standing, and notable for its shape, lightness, **transparency**, colours, elegance, and **iconicity**.*

WHAT A LOAD OF OBFUSCATING CRAP. THE AUTHOR MUST HAVE KEPT A STOCK OF THE NOW BANNED CBD PRODUCTS ON HAND WHEN CHURNING IT OUT.

SO THE BUILDINGS TO BE TORN DOWN ARE AN EYE SORE AND IN BREACH OF THE 20% BUILDING FREE ZONE. WITH REDEVELOPMENT THERE IS THE OPPORTUNITY TO RECTIFY THIS AND RESTORE THE IMPACTED RIDGELINE. WHEN CENTRAL PLAZA IS EVENTUALLY REDEVELOPED THEN RESTITUTION WOULD BE COMPLETED.

BUT INSTEAD OF TAKING THIS OPPORTUNITY, THE PLAN IS NOW TO COMPOUND THE INAPPROPRIATE MASSING WITH AN EVEN HIGHER IMPEDIMENT.

TWO WRONGS DO NOT MAKE A RIGHT.

AS FOR ICONICITY BLA BLA BLA, IT'S A GLASS WALL TOWER WITH NO RESEMBLANCE TO CENTRAL PLAZA, PERIOD.

## **JUSTIFICATIONS**

*Hotel facilities would complement the C&E activities, **and Grade A office space could also help alleviate the market shortfall, built on top of the new C&E venue.***



THERE IS NO SHORTFALL OF ANY GRADE OF OFFICE SPACE. THERE IS ALREADY A SIGNIFICANT SURPLUS IN THE CENTRAL/WANCHAI DISTRICTS AND WITH THE MURRAY CAR PARK, REDEVELOPMENT OF CHEUNG KONG CENTRE AND QUEENSWAY PLAZA PROJECTS THERE WILL BE A SURPLUS FOR YEARS TO COME. DEVELOPMENTS OF ALTERNATIVE, AND CHEAPER, BUSINESS DISTRICTS WILL FURTHER REDUCE THE DEMAND FOR OFFICE SPACE IN THE AREA.

AS FOR HOTELS, THE OPERATORS DO NOT APPEAR TO SHARE THE VIEW THAT THERE IS A SHORTFALL AS CAN BE SEEN IN THE NUMBER OF APPLICATIONS TO REZONE EXISTING HOTELS TO OTHER USES:

AND IS ADDITIONAL CONVENTION SPACE NEEDED ON HONG KONG ISLAND?

THE ART AUCTION HOUSES ARE PULLING OUT OF HKCEC. THE LOCATION IS VERY INCONVENIENT, EVEN WITH THE ADDITIONAL MTR LINES.

THE ADMINISTRATION CONTINUES TO IGNORE THE ADVICE FROM THE CENTRAL GOVERNMENT WITH REGARD TO INTEGRATION WITH GBA. THERE ARE NO PLANS FOR A CONVENTION CENTRE IN THE NORTHERN METROPOLIS WITH MUCH BETTER LINKS TO BOTH THE GBA AND THE AIRPORT.

## **OPEN SPACE**

*"While the proposed development will result in loss of an existing public open space of about 3,400m<sup>2</sup> (i.e. Gloucester Road Garden), various open space would be provided to offer diverse, attractive, vibrant and accessible open spaces and landscape areas for public enjoyment."*

NOTE THAT PLAND HAS EXPEDITIOUSLY FRAMED THIS DEVELOPMENT AS WANCHAI NORTH. THIS IS A PLOY TO DISTRACT ATTENTION FROM THE REAL PICTURE, THAT WANCHAI DISTRICT IS IN SERIOUS DEFICIT OF BOTH LOCAL AND DISTRICT OPEN SPACE. MEMBERS SHOULD REFER TO THE RECENT WANCHAI OZP APPROVED ON 20 JAN 2023.

*"a landscape deck of around 3,000m<sup>2</sup> will be constructed by the future developer atop the proposed vehicular tunnel entrance at Fenwick Pier Street to the northwest of the Site"*

BUT THIS IS EFFECTIVELY IN ANOTHER DISTRICT AND CERTAINLY NOT CONVENIENT OR ACCESSIBLE TO WANCHAI RESIDENTS – PLANNED POPULATION 60,000+. THIS PLAN CREATIVELY ONLY INCLUDES RESIDENTS IN THE IMMEDIATE AREA WHERE THERE ARE FEW RESIDENTIAL UNITS.

SO IN EXCHANGE FOR 3,400SQ.MTS OF THE COMMUNITY WILL GET WHAT IS ESSENTIALLY A SLIGHTLY WIDER BUS STOP ON ONE OF MOST BUSY AND

CONGESTED HIGHWAYS IN THE CITY. WHO WOULD WANT TO SIT AROUND THERE?

IN ADDITION THE DEVELOPMENT DOES NOT COMPLY WITH CURRENT GUIDELINES WITH REGARD TO THE PROVISION OF OS AND GREENING.

*"a wider pedestrian path with a tree-lined boulevard, providing greenings and edge plantings, creating a wider and open pedestrian environment along existing bus stops at Gloucester Road"*

*"an outdoor seating area (about 638m<sup>2</sup>) near the eastern boundary of the Site"*

THIS SANDWICHED BETWEEN AN EXTENSIVE DROP OFF AND THE VERY TALL PODIUM OF CENTRAL PLAZA. NOTE NO VISUALS PROVIDED AS THEY WOULD REVEAL THE REALITY OF A ROW OF TREES AGAINST A LONG AND HIGH WALL WITH LITTLE NATURAL LIGHT AND POOR VENTILATION.

## LOSS OF GIC

The site currently provides a number of essential community services that are to be hived off to distant and inconvenient locations. Again this is being sidestepped by basing the HKPSG on the very limited area covered by the plan instead of the district in general. This big chunk of GIC will be privatized and removed from the public realm. Wanchai is seriously deficient in many community services, members should refer to the overall Wanchai district HKPSG.

The relocation of some existing services, Immigration being but one example, this is to be moved to remote TKO, a district that is very difficult to access as the MTR service requires making a number of changes and the trains are often packed. The most frequent visitors to Immigration are domestic helpers with limited time and means. It is unacceptable that there will be no sub offices provided on HK Island to serve the many thousands of helpers employed locally. Immigration is not a service that can be provided online as it requires a physical presence, fingerprinting, etc. Part of the site should be retained to accommodate such facilities.

## PARKING

Question the need for an additional 400 parking spaces for HKCEC when New World has been allowed to operate a used car sales room, Automall, for many years on now reduced to around 200 parking spaces at the current HKCEC. In addition the police have failed for years to address the persistent issue of illegal parking on Harbour Road. The extended footbridge over Harbour Road would be very popular with drivers looking to park on the roadside for hours in the shade.

## PEDESTRIAN NETWORK

*"The proposed development also provides the opportunity to improve the traffic and pedestrian arrangements in the Wan Chai North Area, **including strengthening of the pedestrian network** and improved connectivity with the core area in Wan Chai and the Wan Chai New Harbourfront. The integration of the proposed development with the existing HKCEC will boost synergy in C&E activities and also allow **convenient and more direct access** for workers, visitors, and the public alike traversing from the Wan Chai hinterland to the New Central and Wan Chai North harbourfronts.*

COVERING A LONG STRETCH OF PUBLIC ROAD WITH A MULTI-STOREY BRIDGE WOULD PROVIDE BENEFITS FOR THE OPERATOR OF HKCEC, BUT IN NO WAY BRINGS ANY BENEFIT TO THE GENERAL PUBLIC AS PEDESTRIANS NOT PARTICIPATING IN EVENTS AT HKCEC WOULD STILL USE THE CENTRAL PLAZA FOOTBRIDGE TO GET TO THE MTR, BUS STATION, STAR FERRY AND EASTERN WATERFRONT.

AT THE SAME TIME THE CURRENT TRAFFIC FREE AT GRADE PASSAGE BETWEEN GLOUCESTER ROAD AND HARBOUR ROAD WOULD BE REPLACED BY ROADS OPEN TO VEHICULAR TRAFFIC, MORE DANGEROUS AND SUBJECT TO HIGHER LEVELS OF POLLUTION.

THE EXTENSIVE AND VERY HIGH BRIDGING OVER OF HARBOUR ROAD WOULD TURN HARBOUR ROAD INTO A TUNNEL, BLOCK VENTILATION AND ENCOURAGE A BUILD UP OF POLLUTANTS AT STREET LEVEL.

APART FROM AN ADDITIONAL FOOTBRIDGE CONNECTION TO THE BUS STATION, THE OTHER FOOTBRIDGES MENTIONED IN THE PLAN ARE PROJECTS THAT HAVE BEEN TOUTED FOR MANY YEARS BUT YET TO BE DELIVERED.

NOTE THAT THERE IS NO PLAN TO IMPROVE AT GRADE PEDESTRIAN CONNECTIVITY BUT MORE OF THE TREK UP, TREK DOWN, WASTE A LOT OF TIME AND ENERGY TRYING TO CROSS ROADS VIA FOOTBRIDGE SCENARIO.

## TREES

*"78 trees (mostly common species in Hong Kong) are surveyed within the Site. No Registered Old and Valuable Trees are found within the Site. The **78 trees are all affected** by the demolition works of the existing buildings, excavation works, provision of underground car parks and utilities as well as the construction of the deck over structure in the Site. Among which, **60** are assessed not suitable to be transplanted and **proposed to be felled**, and the remaining 18 trees are to be transplanted. A total of 65 new trees will be planted at the ground floor within the Site. However, given that the proposed development are subject to detailed design by the future developer, the number of trees to be felled/transplanted at this stage*

*is only an initial estimate for reference"*

AS USUAL NONE OF THE TREES ARE ACCORDED ANY RESPECT. THE OUTDOOR SEATING AREA INDICATES THAT THEY WILL BE REPLACED WITH THE INEVITABLE FLOWERING AND DECORATIVE SPECIES.

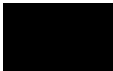
And this brings one to the questions of

WHY IS HALF OF THE AT GRADE AREA OF THE SITE TO BE DEVOTED TO VEHICLES? WHY IS THE CEC DROP OFF AT GRADE AND NOT UNDERGROUND? AND WHY TWO VEHICLE ENTRANCES? THIS IS YET ANOTHER EXAMPLE OF EXCESSIVE AMOUNTS OF LAND BEING GIVEN OVER TO VEHICLES WHILE PEDESTRIANS AND OTHER USES ARE MARGINALIZED.

IN ADDITION THERE IS NO INDICATION AS TO WHETHER THE EXISTING DROP OFF IN FRONT OF HKCEC WILL BE RETAINED OR CONVERTED TO OTHER USE.

Of course the Administration ALWAYS KNOWS BEST. But time and again it has ignored the views of the community. The White Elephant HKMZ with no rail component is just one glaring example. Members should carefully consider all the issues.

Mary Mulvihill



Secretary, Town Planning Board  
15/F,  
North Point Government Offices,  
333 Java Road,  
North Point,  
Hong Kong

Your ref. : -  
Our ref. : O/RAP/EXH/1000-0005  
Date : 3 March 2023

By Post & Fax: 2877 0245/ 2522 8426

Dear Sir/Madam,

**Draft Wan Chai North Outline Zoning Plan No. S/H25/5 – Representation**

**Railway Protection Concerns**

From MTR railway protection point of view, we have the following requirements to Amendment Item A for rezoning of a site covering the existing Wanchai Tower, Revenue Tower, Immigration Tower, Kong Wan Fire Station and Gloucester Road Garden together with part of the Harbour Road from “Government, Institution or Community” and an area shown as ‘Road’ to “Other Specified Uses (6)” annotated “Exhibition Centre with Commercial Development” on the the Draft Wan Chai North Outline Zoning Plan No. S/H25/5 as gazetted by the Town Planning Board on 13 January 2023:

1. The works shall be carried out in compliance with the requirements as stipulated in PNAP APP-24 or DevB TC(W) No. 1/ 2019, whichever is applicable;
2. The Project Proponent is required to check and ascertain that the proposed works will not have any conflict with the existing MTR structures or operation equipment;
3. The proposed works is in close proximity to the East Rail Line & Island Line. Provision of issue of the relevant railway protection plans are ongoing. Hence, for the details of existing railway structure, the Project Proponent are welcomed to visit our office at Fo Tan Railway House to search for the MTR as-built information useful for the works with minimum administrative cost;
4. Impact assessment report(s) to existing MTR structures shall be submitted for MTR review and agreement at preliminary design stage.

Should you have any queries or require further information, please contact the undersigned at [REDACTED] or email [REDACTED].

Yours faithfully,

  
Matthew NG  
for Chief Railway Protection & Land Survey Manager (Operations)  
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