



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

6 January 2023

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Mr. CHUNG Man Kit, Ivan, JP

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Dear Mr Fong and Mr. Chung,

Re: HKIUD's Comments on the Study on Artificial Islands in Central Waters

On behalf of the Hong Kong Institute of Urban Design, we would like to submit, on the attached file for your consideration our Comments on the Study on Artificial Islands in Central Waters.

We are also pleased to meet relevant officers to further explain the contents therein if necessary.

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.

Ms. LINN Hon Ho, Bernadette, JP, Secretary for Development (email: sdev@devb.gov.hk)

Legislative Council Secretariat, The LegCo Panel on Development (email: panel_dev@legco.gov.hk)

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We generally welcome the initiatives put forth in the interim report for Legco, in particular, the people-first concept. However, to truly attain the people-first concept, strategies should adopt a scientific approach based on sustainable and zero carbon lifestyles, prioritising emerging knowledge in environmental health and human wellness, harnessing quality-of-life metrics and not those of economic growth. Since this new metropolis is to be constructed anew, along with transformative transportation technologies available, the project team shall target a low carbon, private vehicle-free metropolis, complementary to the existing surrounding developments at Discovery Bay and Outlying Islands. As one of the invited professional assisting in the further design development of the proposal, we list out our response comments in correspondence to the relevant points put forth in the interim report.

	Legco Paper	Comments
	STRATEGIC POSITIONING AND PLANNING OBJECTIVES	
4.	<p>The KYCAI will provide land to develop a core area of a new generation with a view to increasing public and private housing supply, while at the same time further enhancing Hong Kong’s economic competitiveness through the development of a third Central Business District (CBD3). Besides, the proposed strategic transport infrastructure for supporting the artificial islands will significantly enhance the connection between the Harbour Metropolis and the Northern Metropolis, reinforce Lantau’s edge as “Double Gateway” to the world and other Greater Bay Area (GBA) cities, and further refine Hong Kong’s overall transportation network. Situated not far from the existing urban area¹, the KYCAI can offer decanting spaces to support the chain flows arising from the redevelopment of old urban districts of Hong Kong Island and Kowloon.</p>	<p>1. Assertions It remains uncertain whether the strategic planning of the project is conceptually well founded and “will” meet the desired social and environmental aspirations set out. We note the many public comments to date and concur it to be of high risk in both financial terms and in actually meeting development aims and needs. More information on financial analysis should be released to demonstrate that the project will “enhance Hong Kong’s economic competitiveness through the development of a third Central Business District (CBD3)” and with it provide the new jobs outlined. Creating this CBD may also be at loggerheads with meeting other strategic objectives. A completely new development model may be required, and business-as-usual scenarios cannot be adopted as default.</p> <p>2. Double Gateway to GBA/World and the CBD of HK - Should the government or the people of Hong Kong is looking towards having KYCAI as the “Gateway” between the world and GBA, KYCAI shall, along with the tradition CBD on Hong Kong Island, be established as “the CBD” of Hong Kong and KYCAI shall not be the no. 3 CBD.</p> <p>3. Should not be for Decanting – There is a conflict in promoting the project as a new CBD and then also positioning it as an overspill from urban areas. The mission of KYCAI should be more important than just offering decanting spaces to support the chain flows arising from the redevelopment of old urban districts of Hong Kong Island and Kowloon. It</p>



		is suggested to review this statement for such an important and strategic development for Hong Kong.
5.	<p>The development of the KYCAI will be based on the following three major planning objectives:</p> <p>(a) Prosperous and diverse (繁榮多元) – to enhance Hong Kong’s international competitiveness and regional significance including by developing CBD3 on the KYCAI to enhance Hong Kong’s position as an international financial centre, continue to play the role as an international trade centre and strengthen the edge in legal services. Land will also be reserved outside the CBD for development of other economic activities to prepare for long-term diversified economic development and provide quality employment opportunities for young people;</p>	<p>4. Diversity brings Vibrancy and Prosperity – Diversity, i.e. mixed-use neighbourhood, bring vibrancy and prosperity. Unsuccessful CBDs, e.g. Los Angeles, around the globe become deserted after dark due very much to their planned singularity in business use. We encourage the project team to consider bold mixed-use planning for the islands, mixing business, hospitality, GIC and residential uses all together. In certain areas radical mixed-use, especially in the vicinity of the station, must be considered.</p>
	<p>(b) Green and liveable (綠色宜居) – to create sustainable, accessible and people-oriented communities, adopt the planning concept of 15-minute neighbourhood and encourage residents to travel by healthy modes such as walking or cycling. Besides, with reference to the recommendations of Hong Kong 2030+, living space will be enhanced with the introduction of more forward-looking parameters in land planning, including assuming an increase in the average flat size of public and private housing by a range of 10% to 20% and raising the ratios of land for open space and land for community and social welfare facilities to population to no less than 3.5 square metres (m2) per person respectively; and</p>	<p>5. Pedestrian First CBD - We welcome the people first concept. To make this concept work, traditional car-first city planning must be abandoned. Tseung Kwan O is typical of a car first community and has proven to be an unsuccessful planning example whereby more land is used for infrastructure than for development. Many dense European and Australian city neighborhoods are restricting access and parking for private cars, freeing the most important urban spaces for people rather than vehicles. Passengers and goods are being increasingly connected to their destinations via walking, bicycles, micro-mobility and smart motorised alternatives and autonomous vehicles. A very low percentage of dedicated road space should be designated from the planning area, whilst heavily restricted parking capacity should be established for both private and public development. Current planning layouts give no indication of people oriented concepts driving the urban form.</p>
	<p>(c) Forward-looking and innovative (前瞻創新) – to comprehensively implement a smart, green and resilient (SGR) city strategy with a view to reducing daily energy demand and</p>	<p>6. Self-sustainability – With Hong Kong committed to carbon neutrality by 2050, this means that the KYCAI must be designed to such a standard. However, the Legco interim report has little</p>



	carbon emissions by formulating measures in three aspects, including planning and urban design, infrastructure system and smart mobility to make the artificial islands an exemplar of urban innovation embracing global and regional changes.	information on how this can be achieved. Discussion might be focused on the necessity for extensive dredged river sand as well as the significant carbon cost of the project, not just the financial cost. It might outline potential public health metrics and benefits. Will there be mass sustainable energy generation facilities within the islands? Will potable water resources be self-sustained within the islands? How will waste be treated? These are all questions that should have been driving the feasibility study and the project team must address them in the 2 nd stage report.
6.	In order to achieve the above planning objectives, our proposals at this stage will cover the following six highlights: (a) adopt a “three-island” design to match the surrounding environment; (b) achieve the target of carbon neutrality through SGR city strategy; (c) connect the world and GBA and develop key routes for opening up Hong Kong’s strategic transportation network; (d) adopt a 15-minute neighbourhood concept for a liveable community; (e) create a work-live-play CBD; and (f) invite professional institutes to set up a platform to develop the detailed design of the artificial islands, realising community participation in planning this core area of the new generation.	7. More data and information shall be released on the Urban Design of the Islands - We welcome the concepts of more islands, carbon neutrality through SGR, connection with GBA, mixed-use neighbourhood for liveable and work-live-play communities/CBD, however, there are little information in the interim report illustrating the data or logic behind such concepts. We hope the government can provide up to the moment research to the professional institutes such that we can give more constructive comments to the study.
	Reclamation Extent	
7.	We preliminarily propose 1 000 ha of KYCAI which comprises three islands (namely Island A – about 380 ha, Island B – about 380 ha and Island C – about 240 ha), which forms a Y-shape channel separating the islands. The layout plan of the proposed artificial islands is provided in Enclosure 1. In formulating the proposed “Three-island configuration”, factors including ecology, water quality, engineering feasibility, marine traffic and port operation have been fully considered.	8. No. of Islands and Incremental Reclamation Approach – There yet remains no substantiated rationale as to why this scale and configuration has been adopted. The indicative layout plan indicates that the feasibility study has focused on technical feasibility and not a people oriented planning approach. HKIUD previously advised the government that more islands and a flexible and incremental approach to reclamation might be adopted. We, generally, welcomed the government’s current proposal to have 3 islands as compared to 2 islands in the previous proposal. However, more data and reasoning for having 3 instead of more islands shall be revealed to public for the public to judge if 3 islands would be the best approach. Environmental consideration, i.e.
8.	The proposed configuration can keep the artificial islands away from coral communities with ecological value along the coastlines of Kau Yi Chau, Siu Kau Yi Chau, Sunshine Island and Peng Chau. The Y-	



	<p>shape channel will effectively cope with the impact of reclamation on water quality and ecology by maintaining sufficient water flow velocity in the waters nearby. The design of the water channels is aligned with the prevailing wind direction to reduce the urban heat island effect. Besides, in order to enhance construction efficiency and cost effectiveness, we propose carrying out reclamation in shallower waters. Also, the proposed extent minimised impacts on the existing fairways and anchorage areas. We also plan to use the water channel as an ecological refinement measure to promote biodiversity through such as deploying artificial reefs at seabed and building eco-shoreline in the intertidal zone. The coastline design will echo the surrounding islands, increase waterfront open space, and promote water sports. It also provides multiple activity venues and optimises living spaces.</p>	<p>impacts on habitats, water life and wind and water flows, shall be taken as priorities but incremental reclamation and pedestrianisation shall be taken as of equal importance. It might be sensible to further fragment island following a strong design driver, i.e. 15 minute pedestrian city, etc. The shape of the islands should be determined by their possible functional urban form. Currently they are just masses of land with accidental shape it seems. Maybe a study on the characteristics of Island urban form with Hong Kong characteristics, such as the causeways on both Cheung Chau and Peng Chau may help.</p>
10.	<p>We are conducting an Environmental Impact Assessment (EIA) study for the KYCAI development. The preliminary findings (Enclosure 2) show that the proposed reclamation works would not cause insurmountable impacts on ecology and fisheries. We will in the planning of the islands consider adding cultural tourism of outlying islands such as fisherman's wharf to provide upgrading and transformation opportunities for the local fisheries industry. The Government will also review the system of granting the ex-gratia allowances for fishermen affected by marine works projects in Hong Kong waters.</p>	<p>9. Configuration A balance needs to be struck between impacts and amenity. In failing to connect new development to the existing islands the opportunity for enhanced amenity and integrated green infrastructure is lost and project costs escalate. Thorough scientific studies is need to substantiate that the suggested man-made coastline will echo the surrounding natural islands, and to ensure that the reclamation formation to be in coherent with the urban design.</p> <p>10. Pedestrianisation and Location of the Station – According to “The Study of Pedestrian Accessibility to Rail Transit Stations Based on KLP Model” by Rongrong Yang et al.: “based on 85% percentile, pedestrians would accept time range within about 12 minutes. 800~1 000 meters can be estimated, depending on the results of acceptable time by the walking speed equal to 4~5 km/h, which fits to the walking distance limits value of 1km. This will mean that, if the mass transit station be located in the centre of Island A, it can be served by one station and all can reach their destination on foot, not to mention by bicycle and other nascent micro-mobility means. This will also mean Island A, the other 2 islands as well, can be free of expensive contemporary infrastructure developed for outmoded car focused urban centres.</p>
	Broad Land Use Concepts	
11.	<p>Based on the aforementioned three major planning objectives of “prosperous and diverse”, “green and liveable” and “forward-looking and innovative”, a Broad Land Use Concept for the KYCAI has been formulated by adopting the major planning concepts</p>	<p>11. “True” Diversity brings Work-live-play – True implementation of mixed-uses will bring a “work-live-play” metropolis. We hope that the government will be true to this concept. CBD2 has been turned into a “live-live-live” with little “work”</p>



<p>below (Enclosures 3 and 4):</p> <p>a) A “work-live-play” CBD3 (Enclosure 5) – taking the geographical edge of situating closer to the Hong Kong Island, a CBD3 of 100 ha (including commercial, residential, culture and recreation, open space and mobility related use) will be located in the eastern part of Island A for providing about 4 million m² of commercial gross floor area (GFA) to create a CBD for the new era and Hong Kong’s future economic engine matching the national policy of promoting Hong Kong as an international finance and trade centre as well as a node for legal services. With reference to the overseas experience in planning new or transforming existing CBDs in advanced cities in recent years and considering the aspiration of the new generation of young people for work-life balance, the planning of the artificial islands will adopt an innovative planning concept different from that for traditional CBDs by using urban design and place-making approach to create a quality work-live-play environment for living and working. Apart from providing commercial spaces and convenient transportation network, land will be reserved for housing, culture, creative arts, fashion and entertainment, popular city sports and facilities related to daily living, as well as a large amount of quality public spaces. The diversified activities and the planning of mixed uses will inject liveliness in the business district and make it another unique and attractive tourist destination for Hong Kong.</p>	<p>and “play” area after the government succumbed to pressure of attaining more lands for residential use. Besides, segregation of business uses and residential uses dominates CBD2 planning as well. We urge the government to abandon the traditional mode of segregation of uses while adopting radical mixed-use concept for the at the least the various nodal points of this new metropolis.</p> <p>12. GBA-wide Cultural and Event Facilities – Since the KYCAL is being designated as the Double Gateway to the GBA and the world, should cultural and event facilities be provided be at a regional scale with a higher standard than normal cultural and event facilities? How with they be considered to complement or enhance other regional facilities?</p>
<p>b) Seven liveable living communities planned with 15-minute neighbourhood concept (Enclosure 6) – these liveable living communities will be connected by a green mass transit system and separated by blue-green corridors with green waterfront promenade along the shorelines. Based on the concept of 15-minute neighbourhood, each community will be around 80-100 ha and has a green mass transit station at the centre, with the public transport stations,</p>	<p>13. More Information on 15-minute Neighbourhood – We generally welcome the concept but with caution. We urge the project team to release more information on the composition and detail planning concept of each of the neighbourhoods. In general, there should be hierarchical difference between CBD core and these communities. Each of the communities should also have its own specific scale, character, and unique service provision.</p>



	<p>daily shopping and dining facilities, basic community facilities, open spaces, etc. reasonably distributed within the community. At the same time, comprehensive pedestrian and cycling networks will be planned to allow residents to travel by healthy modes such as walking or cycling within 15 minutes from their homes to different destinations to obtain various necessities. In addition, land will be reserved in each community for large-scale community, social welfare and recreational facilities and/or economic use(s) with a view to diversifying the employment opportunities and increasing the local employment rate within the community. Overall, there will be about 1 million m2 commercial GFA in the seven communities outside the CBD.</p>	
	<p>c) Blue-green network for promoting healthy living and biodiversity (Enclosures 7 – 9) – a comprehensive blue-green network will be planned on the artificial islands to provide a variety of recreational and sports opportunities for people living and working on the islands and create a diverse range of flora and fauna habitats to enhance biodiversity. The network comprises the blue-green corridors between living communities, over 20 km of accessible waterfront promenades to encourage water-friendly culture, eco-shorelines, and various local, district and regional open spaces. In addition, the waters surrounding the artificial islands (including the water channels between islands) are very suitable for marinas and a variety of water sports venues including those for hosting local/international competitions.</p>	<p>14. Welcome Blue Green Network and SGR Strategy – We generally welcome the concept or strategy however from the very vague plan presented in Enclosure 3, the green and blue network appears to be developed without context to the existing resources and natural systems, lacking in hierarchy, unconnected to the major focus areas and engineered in a way that generally exhibits a superficial understanding of what should form green infrastructure and how green infrastructure needs to be developed.</p>
	<p>d) Adopting smart, green and resilient city strategy – the strategy will cover the following measures to ensure that the developments on the islands could in the long term adapt climate change and facilitate Hong Kong to achieve the carbon neutrality target before 2050:</p> <p>Sustainable planning and urban design: include 15-minute neighbourhoods as discussed in</p>	



	<p>paragraph 11(b) above, “sponge city”, building orientations according to prevailing wind directions, coastal design strategy adapting climate change, green building, urban forestry, etc.;</p> <p>SGR infrastructure system: include sustainable urban drainage system, district cooling system, desalination plant, advanced food waste / sewage sludge anaerobic co-digestion facilities, common utility tunnel, etc.; and</p> <p>Smart mobility: include pedestrian and cycling networks, supporting facilities for electric vehicles and other new energy vehicles (such as hydrogen vehicles), etc., as well as measures to be recommended by the Transport Department under the “Traffic and Transport Strategy Study”.</p>	
	Major Development Parameters	
12.	<p>Taking into account the above planning objectives, various city development strategies, the capacity of connecting transport infrastructure for the artificial islands and a liveable population density, it is preliminarily proposed providing 190 000 – 210 000 residential flats on the KYCAI of 1 000 ha by adopting a public to private housing ratio of 70:30 in the planning study for accommodating a population of 500 000 – 550 000 and providing 270 000 employment opportunities (including about 200 000 in CBD3). The proposed maximum domestic plot ratios are 6.5 and 7.5 for living communities and CBD respectively, while the maximum non-domestic plot ratio for the artificial islands is 15.</p>	<p>15. Review Plot Ratio – PR of 7 for residential and PR of 15 for commercial use seem to be very high. With such a high plot ratio, territory-wide air-movement, quantity and quality of open spaces and daylighting studies are of utmost important. To ensure the liveability of this new metropolis, these studies and the logic behind the recommendation of having such high plot ratios shall be carefully scrutinised and made public.</p>
	Land Use Targets	
13.	<p>Based on the above concept and development parameters, the land use targets for the KYCAI of 1 000 ha are broadly as follows:</p> <ul style="list-style-type: none"> a) Residential use (about 250 ha or 25%); b) Economic uses (about 100 ha or 10%) – include (i) commercial uses in CBD3, and (ii) other economic uses (e.g. creative industries, private medical; private education, tourism, marina club and retail, dining and entertainment); c) Open Space (about 200 ha or 20%); 	<p>16. Reduce Land Use % for Infrastructure - We believe there is room for improvement from dedicating 25% of land for infrastructure. First of all, the islands should be designed without traditional road infrastructure in mind; thus standard calculations for roads, parking and logistic facilities, thus freeing land for more valuable resources such as open space and housing space. Vis a vis comment above any land use concept must be followed by urban design guidance and only thereafter a functional engineering outline in view of circulation, utilities,</p>



	<p>d) (d) Government, Institution and Community (GIC) facilities and utility infrastructure (about 200 ha or 20%) – apart from the usual population-based GIC facilities, they may include special facilities (e.g. cultural venues, sport facilities and venues for international competitions, public water sports centre, etc.). Utility infrastructure may cover sewage treatment works, desalination plant, refuse transfer station, advanced food waste treatment facilities, district cooling system and grey water⁴ treatment plant; and</p> <p>e) Mobility-related infrastructure (about 250 ha or 25%) – include roads, railway-related facilities, pedestrian streets, cycle tracks, etc.</p>	<p>etc. There are already some rather quick determines on the indicate layout, such as using an attractive stretch of coastline for “essential utility infrastructure” disguising it with a museum symbol.</p>
14.	<p>To realise community participation in planning the core area of a new generation, we will invite relevant professional institutes to set up a platform to present their proposals to the Government, including the major planning concepts explained under in paragraph 11 above and certain important planning issues, such as how to create an attractive quality public space, how to develop the artificial islands into a smart city of the new generation, how to optimise the use of multidimensional spaces, how to implement the concept of sustainable development and living diversity, etc.</p>	<p>17. Professional Institutes’ Participation – we welcome the idea of setting a platform for professional institutes to contribute the advising the urban design and master planning of the islands. Urban and Architectural Design led competitions with binding results are suggested to determine design parameters should be employed, not “tendered design&build”. It is noteworthy that there is a novelty regarding the financing mechanism similar to PPP projects such as the Channel Tunnel Rail Link in the UK. In line with optimizing the outcome for all stakeholders, including the end user there can be a pre-defined profit margins for developers to stimulate their creativity how targets can be achieved, rather than stipulating a maximization process towards profit.</p>
	<p>Strategic Transport Infrastructure</p>	
15.	<p>The KYCAI provides a good opportunity for us to plan a network of strategic transport infrastructure (i.e. The Hong Kong Island West – Northeast Lantau Link and Hong Kong Island West – Hung Shui Kiu Rail Link) with a view to improving Hong Kong’s overall transportation network. The preliminary proposal of the strategic transport infrastructure can meet the traffic demands of the KYCAI development and greatly enhance the connectivity of Hong Kong’s transportation network. The alignments of the strategic transport infrastructure are preliminarily proposed to connect the existing and planned major trunk roads and rails for facilitating linking Hong Kong International Airport, Zhuhai and Macau to the west, Qianhai, Shenzhen and Northern Metropolis to the north, West Kowloon to the east and Hong Kong</p>	<p>18. Strategic Infrastructure – Since the KYCAI is identified as the gateway to GBA, it is essential the road and rail network passes through and have the major stops and station within KYCAI. This does include connection to existing urban surround, such as the MuiWo-Discovery Bay-Penny Bay corridor or the Peng Chau-Cheung Chau quasi urban settlements with their inherent growth potential and connectivity needs.</p>



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	Island West and Central to the south. The entire transportation network will extend in all directions.	
	The Hong Kong Island West – Northeast Lantau Link	
16.	The Hong Kong Island West – Northeast Lantau Link (HKIW– NEL Link) (Enclosure 10), comprising southern and northern sections, is about 13 km long in total. The HKIW– NEL Link will be the first major trunk road connecting Hong Kong Island and the Northwest New Territories without passing Kowloon and will improve Hong Kong’s overall transportation network.	19. Major Passing Highways should go Underground – major highways that pass through the islands should be grade separated to reduce disturbance to the adjacent communities.
17.	The preliminary proposal for the southern section of the HKIW – NEL Link, as the fourth road harbour crossing, will be in the form of a sub-sea tunnel connecting the KYCAI with Route 4 on Hong Kong Island West. Drawing reference to overseas experience, it is proposed that the HKIW – NEL Link will land on Island C in view of avoiding the commercial land on Island A being occupied by the HKIW – NEL Link. To enhance the connectivity of the CBD, we also propose a slip road connecting the HKIW – NEL Link with the CBD on Island A.	20. Satellite and Centralised Carparking and Logistic Facilities – With advancement in transportation technologies such as community autonomous vehicles and logistic robots, the government should plan common, centralised and peripheral carparking facilities and loading/unloading hubs and demonstrate in the short term and how such land may be re-provisioned to more valuable. First of all, centralised facilities are more efficient than individually built carparking and L/UL facilities. If they are accessed directly from the highways, traffic and noise disturbance to the communities will be greatly minimised.
18.	The northern section of HKIW– NEL Link will connect KYCAI with the planned Route 11 and Tsing Yi – Lantau Link via viaducts and/or tunnels in the preliminary design. In addition, it is proposed constructing a road near Penny’s Bay for connection with the North Lantau Highway. This design is to cope with the actual site constraints and technical difficulty encountered if connecting the HKIW – NEL Link with the planned Route 11, Tsing Yi – Lantau Link and North Lantau Highway at a single interchange.	
19.	We propose commencing the reclamation works and the construction of the HKIW – NEL Link concurrently, and strive to complete the HKIW– NEL Link in 2033 so as to support the land formation works and to suit the target of having the first population intake in the same year.	
	Hong Kong Island West – Hung Shui Kiu Rail Link	
20.	With the development of Northern Metropolis proposed in the Policy Address in 2021, the Government is actively planning the Hong Kong –	21. Major Passing Railway should be grade separated – Whilst we are encouraged that major railway connecting to Central District, the airport

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	Shenzhen Western Rail Link, connecting Hung Shui Kiu and Qianhai, to facilitate connections between Hong Kong and Shenzhen and foster the integrated development among Hong Kong and the GBA cities with better interconnectivity.	and Qianhai (thus other parts of GBA) will pass through the islands, these railways should be grade separated to minimise disturbance to the planned communities.
21.	Taking this opportunity, we propose extending the strategic railway to Hung Shui Kiu for connection with the planned Hong Kong – Shenzhen Western Rail Link (Hung Shui Kiu to Qianhai) so as to strengthen the connections among the KYCAI, the Northern Metropolis and the Hong Kong-Shenzhen Western Rail Link, thus effectively enhance the strategic position of the KYCAI and the connectivity of Hong Kong rail network.	22. TOD/TID to be Planned Around Stations – To capitalise the planned stations, major TODs or TIDs should be planned on top and round these planned stations.
	Recommended Rail Alignment and Depots	
22.	The total route length of the HKIW – HSK Rail Link is about 30 km long (Enclosure 11) which comprise a station on Island A and Island C respectively. The HKIW – HSK Rail Link will pass through Hong Kong Island West, the KYCAI, Sunny Bay, Tuen Mun East and Hung Shui Kiu in the Northern Metropolis for connection with the planned Hong Kong – Shenzhen Western Rail Link (Hung Shui Kiu to Qianhai). In order to enhance the connectivity of Hong Kong rail network, we preliminarily propose several interchange stations along the rail link for passengers transferring to the Island Line via Hong Kong University Station, the Tung Chung Line via Sunny Bay Station and the Tuen Ma Line via Hung Shui Kiu Station to facilitate the public’s travelling. We will also explore the possibility of interchanging with the Island Line at Kennedy Town with a view to enhancing the railway network. Besides, we propose locating the depot at the proposed reclamation site at Sunny Bay to facilitate daily operations and train deployment, and to allow flexible deployment of trains during emergencies.	
	Transportation System on the KYCAI	
23.	To cope with the planning needs and transport demand at the KYCAI, our preliminary proposal is to link up the three artificial islands by a green mass transit system with land reserved for locating depot at Island C and to interchange with the HKIW – HSK Rail Link at suitable location(s). Each neighbourhood on the KYCAI will be supported by a new generation of transport interchange hub allowing a centralised	23. New Transportation Technologies – Whilst we have no objection to the proposed green mass transit system serving the neighbourhood, we would like the project team to study and report if any new transportation technologies available or becoming available can make the transportation within the islands and between the islands more effective and induce less disturbance to the urban

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<p>connection with public transport with different transport modes to connect the neighbourhoods and provide effective patronage coverage on the KYCAI. We will continue to assess the cost-effectiveness and feasibility of different transport modes, and examine the compatibility with the planning and land uses of the KYCAI holistically.</p>	<p>and park spaces.</p>
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Without having been able to review the technical feasibility study that has produced the Interim Report, it is not possible for the public to identify all the shortcomings and potential problems. Government is suggested to release more information to the public. Government’s proposal should provide a series of development increments against a realistic time and budgeting scenario and include the clear strategies and programs being addressed at each stage, declared against quantifiable target objectives and budgets. Each incremental decision must be re-evaluated against contextual changes and the “plan” must remain robust whatever new form of further development may need to be adopted later in the process.

The project proponent needs to present its vision scientifically and robustly through substantiated and referenced planning and reporting steps that can be evaluated and explored further by the public at large and include as wide a stakeholder base as possible. There is supposedly a design competition by the end of the brief of the original Stage 1 consultancy. However, we didn’t notice any design competition except the one for students. We urge for update on design competition arrangement in the context of this co-design approach with the professional institutes.

HKIUD is primarily commenting on the proposal from the urban design angle, however, on the financial aspects, we would like to better understand the government’s logic of arriving at the housing and commercial building stock amount, especially in light that the government is projecting a decline of population of Hong Kong around 2040.

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