

## 1.0 EXECUTIVE SUMMARY

### 1.1 Application Overview

- 1.1.1 The Application site occupies the main part of Peel Street and Graham Street Market area in the heart of one of the oldest urban district of Hong Kong, located between Central and Sheung Wan, in close proximity to the CBD and the dining and entertainment hubs of Lan Kwai Fong and Soho. The site is bounded by Gage Street, Cochran Street, Wellington Street and Kin Sau Lane, and is currently zoned as a "Comprehensive Development Area" (CDA) zone under the Approved Land Development Corporation (LDC) Peel Street / Graham Street Development Scheme Plan (DSP) No. S/H3/LDC4/2 incorporated as part of the current Draft Sai Ying Pun & Sheung Wan Outline Zoning Plan No. S/H3/21.
- 1.1.2 The Application site includes 37 parcels, four of which are pre-war buildings and the rest built in the mid 1950s and 1960s. The site area measures 5,320 m<sup>2</sup>, consisting of three separate contiguous blocks that are bounded by Gage Street, Cochran Street Wellington Street and Kin Sau Lane in Sheung Wan, defined by URA as Site A, Site B and Site C. Site A, measuring 880m<sup>2</sup>, is bounded by Kin Sau Lane, Gage Street and the buildings on Staveley Street; Site B, measuring 1680m<sup>2</sup>, is bounded by Peel Street, Gage Street, Graham Street and the buildings on Wellington Street; Site C, measuring 2,760m<sup>2</sup>, is bounded by Graham Street, Gage Street, Cochran Street and Wellington Street.
- 1.1.3 The Town Planning Board approved a Master Layout Plan for URA project H18 at Peel Street and Graham Street in May 2007. The approved development consists of four towers: two residential towers, one 30 storeys on Site A and one 32 storeys on Site B; a 33-storey office tower; and a 26-storey hotel tower on Site C, over a four-storey podium development covering the three Sites. The three Sites will further be linked via an interconnected, multi-storey basement.
- 1.1.4 The URA's scheme represents an outdated redevelopment approach; it essentially consists of site amalgamation, complete demolition, and construction of new buildings which are out of character with an existing historic neighborhood. In particular, the URA scheme would essentially demolish Hong Kong's oldest operating open-air street market, a vibrant community facility with an invaluable heritage value.
- 1.1.5 World City Committee (WCC), a concern group, is submitting this Application to propose an alternative approach to the upgrading and regeneration of the Peel Street and Graham Street Market area within the Application site. We are not opposed to redevelopment, and we accept that the property resumption process begun by URA is irreversible at this point. However, our Application puts forward an alternative solution to the site redevelopment once the URA gains possession of the properties, including giving an option to shop owners, hawkers, and residents to return. Our approach seeks to maintain the heart of this historic market and neighborhood and upgrade it in a sensitive way which will benefit both the local community and the Hong Kong public at large.

### 1.2 The URA Scheme: Outdated Approach to Urban Renewal

- 1.2.1 URA's current "blanket redevelopment" approach may be the most economically profitable and the easiest one to implement, but it is deeply flawed from an urban and social perspective. This approach was widely practiced in Western cities in the 1950s and 1960s, leading to wholesale destruction of historic neighborhoods and massive disruption to local

communities. Such schemes were abandoned in the 1970s following enormous public outcry, and replaced with more sensitive and sustainable models.

- 1.2.2 As an indication of these trends, the International Council on Monuments and Sites (ICOMOS) of UNESCO has drawn up the Washington Charter, for historic towns and urban areas faced with significant development pressure, which often leads to irreversible cultural, social and economic losses. The Charter recommends saving old neighborhoods within the redevelopment of old city and old villages as the first priority, as these areas are full of history, culture, and tangible and intangible community heritage of the city.
- 1.2.3 Great cities all over the world today recognize the value of preserving old, inner-city neighborhoods. Such areas have become urban icons, hubs of commercial success and provide a unique sense of identity to each of these world cities. Earlier success stories, like SoHo in New York or the Marais in Paris, have inspired current emerging neighborhoods like the Lower East Side in New York or the East End in London. In all these cases the transition was organic, incremental, and driven by market forces. By deploying renovation and adaptive reuse rather than demolition, neighborhoods were able to maintain their urban character while upgrading their infrastructure, refreshing their image, and introducing new uses. GFA intensification was made possible in some cases through limited additions of floors to existing buildings and the careful integration of high-rises in the existing urban fabric.
- 1.2.4 The URA's approved development plan is not just out of touch with urban regeneration as it is practiced today around the world, but also with the growing sentiment in Hong Kong opposing further destruction of traditional neighborhoods and landmark heritage sites. The URA plan pays lip service to some of these trends and the Washington Charter, mostly in the form of nostalgic words and carefully-edited renderings evoking "old shop streets" atmosphere. However, the actual design proposed for the site is very much mid-20th Century wholesale redevelopment, made worse by a dramatic intensification of floor area, out of scale with the neighborhood and existing street infrastructure. There can be no illusion that, despite claims to the contrary made by the URA, implementing this scheme will radically and irreversibly change the character of this historic part of Hong Kong.

#### *End of the Historic Market*

- 1.2.5 The key heritage element in the Application site is, of course, the old open air community market, which has been in operation for over 100 years and is still a functioning and vibrant community market, offering one-stop shopping for affordable fresh produce. The URA approved scheme clearly did not consider keeping the market in operation; even a cursory review of the documents submitted by URA reveals that after redevelopment the entire site would turn into an upscale podium/tower commercial complex, entirely incompatible with a fresh food street market. The URA scheme makes reference to "nostalgia" and "old shop street", suggesting the sort of superficial, tourist-oriented surface treatment which is the antithesis of the current market's "raw" authenticity and devoid of any real cultural value.
- 1.2.6 In the last several months, aware of the growing sentiment against destroying the market, the URA has repeatedly claimed that the market will be preserved since it is "outside the site area". This false and indeed absurd claim needs to be dismissed categorically and definitely, by a simple examination of the facts:
  - Within the redevelopment site, there are currently 32 hawker fruit and vegetable stalls, 30 market food shops, and 7 known hawker storage spaces on the ground floor of market buildings. Under the URA scheme, only 10 new hawker stalls (less than 30%) are shown, and practically all the market facilities located inside the buildings, including all the shops and storage spaces, will be lost. Replacing 62 stalls and shops with 10 hawker stands is not preserving the market, it is destroying it.

- Further, those 10 URA-proposed new stalls on Graham Street and Peel Street have no storage space, and the ones on Graham Street cannot be accessed with a wheeled dolly, which the hawkers rely on for servicing, due to the introduction of stairs.
- It is clear that the podium development will be designed to accommodate upmarket facilities to generate the maximum return on the developer's investments. Even if the developers allow hawkers to operate in front of their shopping facilities, the upscale environment will deter potential market shoppers.
- The critical mass of the market operation will be lost with such a drastic reduction in the number of facilities – it will no longer be a 'one-stop-shop' for food, and thus will have a diminished economic viability.
- Critically, the 5-year-plus redevelopment program, which requires demolition, construction of a deep basement across the entire site, and then construction of the podiums and towers, will physically preclude any market operations during that period; the URA proposal to keep hawkers operating between two construction hoarding walls, given the size of the streets, the basement construction, the noise and dust created, and the lack of servicing and storage provisions is completely unfeasible. Further, the construction program will most likely also cause the termination of any market operations outside the redevelopment site as well, as those rely on the critical mass and on continuous pedestrian movement paths from Queen's Road Central to Hollywood Road.

#### **Out of Scale Development**

- 1.2.7 The URA scheme would introduce outsized super-blocks of a massive scale into a fine-grain, old urban neighborhood. This is more akin to MTR developments in New Towns or to large-scale developments in new reclamation areas, such as IFC. Whatever the merits of such developments elsewhere, they are entirely incompatible with the infrastructure, fabric and ambience of this old neighborhood:
- The narrow, already-congested streets cannot support such an enormous amount of new traffic, and cannot physically accommodate the maneuvering of trucks and coaches serving the proposed commercial and hotel development.
  - No matter how you dress up podiums, they would still be massively out of scale, with large stretches of mechanical louvers, utility inlets, loading and parking access replacing the current human-scaled buildings.
  - The four large towers are exceptionally large and close together, even by Hong Kong standards, and would create a near-wall effect, casting shadows over the entire neighborhood and blocking air flow and view corridors.

### **1.3 WCC's Alternative Proposal: Sensitive Urban Regeneration**

- 1.3.1 Learning from experience and successful examples elsewhere and following the principles of the Washington Charter highlighted earlier, World City Committee (WCC) proposes an alternative to URA's approved development plan. This alternate scheme aims to regenerate the urban area while maintaining the existing urban morphology and ensuring the cultural continuity and collective memory of the street market culture. Relying largely on small-scale renovation and redevelopment, with larger redevelopment limited to the outer edges of the site. This proposal seeks to safeguard the cultural heritage, social networks and economic viability and vibrancy of the markets while improving the quality of life for the residents, shop owners, hawkers and shoppers.
- 1.3.2 WCC agrees that the area is currently run down and needs to be significantly upgraded, as the living conditions and the environmental quality and hygiene of the street markets is poor.

WCC also recognizes that it is important for URA to continue with the resumption of properties in the area, as residents have been waiting for a long time and are expecting compensation for their properties in light of URA's intended redevelopment.

- 1.3.3 Indeed, WCC is not "anti-development" and appreciate that the face of our city needs to reflect economic and social trends, and cannot be frozen in time. However, as experience in many other cities around the world shows, we believe that true urban regeneration does not involve bulldozing down whole neighborhoods. Instead, we support a more incremental, organic and harmonious development mechanism which we believe will yield superior results, preserving more of our heritage and providing improved amenities and better economic benefits for society at large.
- 1.3.4 WCC's alternative proposal calls for carefully upgrading and regenerating the market neighborhood through a combined mechanism of market-driven, incremental redevelopment and design guidelines meant to maintain the urban character of a medium-scale, mixed-use, walkable environment in the heart of the historic old district of Hong Kong. This is not a status-quo proposition. Rather, it is a proposal for the URA to adopt a more sustainable community regeneration model which will facilitate and indeed mandate the upgrading of the neighborhood's buildings and infrastructure, including selective demolition and GFA enhancements, without the abrupt and dramatic disruption in time and space required for implementing the URA's approved development plan.
- 1.3.5 WCC's alternate proposal retains large parts of the Graham Street Market, where existing buildings will be upgraded or redeveloped within the existing building envelop. It promotes the revitalisation of the street market by ensuring the space and services required for a vibrant open-air bazaar, including hawker stalls and shops, storage facilities for hawkers, proper drainage, upgrading of street surfaces, and loading and off-loading areas.
- 1.3.6 The WCC proposal also features two "anchor sites" where more substantial redevelopment will take place: on part of Site A, an 18-storey residential tower will accommodate the market servicing area within its seven storey podium structure; on part of Site C, a 23-storey combined office and serviced apartment tower will accommodate parking and loading/unloading within the seven storey podium. Service vehicle access is carefully coordinated to minimize traffic impact on surrounding streets and interruption of pedestrian movement.
- 1.3.7 Compared with the URA scheme, the WCC alternative proposal does not add significant high density and intense development within the heart of this old urban district, and with its carefully orchestrated phased implementation program, it will allow the neighborhood to transition gradually to its upgraded phase. If the Board accepted that there is no insurmountable problem on aspects of visual, traffic, environment, drainage, sewerage, air ventilation and sunlight penetration upon implementation of URA's proposal, it should have no problem in approving the alternative plan proposed by WCC.

### **1.4 Conclusion and Way Forward**

- 1.4.1 In assessing this Application, one must consider the positive contribution of sensitive regeneration to the overall economic well-being of Hong Kong. As in other major cities, restored and regenerated old quarters have proven to be major economic drivers for inner cities, increasing economic activity; drawing new visitors, both locals and tourists; and creating long-term value for the city. It is difficult to see how the replacement of this historic old neighborhood with another massive, non-descript podium/tower commercial project, with all its negative environmental impact, will contribute to the long-term prosperity of Hong Kong.

- 1.4.2 This WCC Application attempts to provide a comprehensive and rigorous description of the alternative scheme. However, as it is submitted by a voluntary concern group with limited resources, it is not as detailed as the original scheme submitted by the URA.
- 1.4.3 It is hoped that the Town Planning Board, whose mission is “to promote the health, safety, convenience and general welfare of the community”, will see merit in WCC’s alternate scheme, which is a sincere effort from concerned community groups to stop the destruction of this historic neighborhood, in particular the Graham Street and Peel Street Market. It is hoped that TPB will request URA to commission a more comprehensive study assessing some of the technical aspects of this proposal.
- 1.4.4 WCC urges the TPB to stop the implementation of URA’s approved development plan, which will lead to the irreversible loss of the vibrant heart of this old historic urban district, to the detriment of the people of Hong Kong for generations to come.

#### Summary of Market Provisions within the Redevelopment Site

	<i>Existing</i>	<i>URA Scheme</i>	<i>WCC Alternative</i>
<b>Hawker Stands</b>	32	10	25
<b>Market Shops</b>	30	0	30-35
<b>Storage</b>	7	0	5-10

\_Subject to allocation of shop space after building renovation. Additional storage space provided at new market loading/unloading area at the corner of Peel and Gage Streets.

