

08 June 2021

Chairman and Members

Town Planning Board

15/F, North Point Government Offices

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**Proposed Public Utility Installation (Fresh Water Pumping Station) and Government Use
(Application No. A/H5/416)**

Dear Chairman and Members,

Designing Hong Kong Limited **objects** the captioned for the following reasons:

- There is no strong justification to show the need to relocate the Fresh Water Pumping Station. As stated in the Responses-to-Comments Table from the applicant, the new High Court project is still in the initial planning stage. There are numerous overseas examples including a water pumping station into new building construction. We believe the design of the new buildings can accommodate the existing pumping station into its design scheme.
- The applicant failed to have a comprehensive overview of all the alternative sites in the area. The second round of site selection exercise which was conducted in 2015 only reviewed Lockhart Road Playground, Cotton Tree Drive (Site B1) and the Hong Kong Red Cross Headquarter (Site B2). The last two had already been studied and proposed back in 2009 and 2010.
- After completion of the Central and Wan Chai Bypass Reclamation, there are several vacant sites near the existing Harcourt Road Fresh Water Pumping Station now used to support construction. They are zoned as “Open Space” and are more suited for development as public space. Works has yet to start and would not affect existing uses of other public space in the area.
- The applicant should also publish the detailed results of the public questionnaires completed in January 2019. The applicant highlights only supporting comments and suggestions in their planning statements. It is important to let other stakeholders and Board members learn about the questionnaires and the other comments and suggestions regarding the closure of the Playground for 6 years.
- There are no alternative plans or compensation for the loss of public space for the users during the construction period. There is a shortage of Local Open Space (LOS) in Wan Chai. Lockhart Road Playground provides children playground, elderly fitness area and basketball court. It is a recreational open space for residents, workers and students in Wan Chai West. There are three LOS along the Gloucester Road, but all three LOS at there are solely sitting-out areas. They lack children playgrounds and elderly fitness equipment. Users have to travel to the busy Southorn Playground or Manmouth Terrace Playground for those facilities.

- The latest plan adds a Children Play Area on the LG/F. This is separated from the children play area at the street level and deck level. This design segregates the play area and violates the Chapter 4 of Hong Kong Planning Standards and Guidelines (HKPSG) that *children's playground should be confined for easier supervision by parents*.
- The increase of open space in the new plan is misleading. According the Chapter 4 of the HKPSG, only covered areas that provide ancillary facilities to support the main recreation use should be counted as part of the open space provision. However, the 500m² covered area counted in the open space includes Multi-purpose Activities Area, which is obviously not used for supporting the main recreation use. It should be count as government use instead. The increase of open space is less than the 557m² as stated in the further information submitted by the applicant.
- We would also like to raise awareness for the proposed multi-purpose area in the new open space. At Sai Lau Kok Garden in Tsuen Wan redevelopment and 'improvement' of open space also included a multi-purpose room. However, the multi-purpose room is closed for public and has not been open for public use since the reopening of the garden in 2019 (Photo 1). There are no guarantees that the situation will be different in Wan Chai after the 'improvement' of the Lockhart Road Playground. It is more likely that public is highly constrained in their use and enjoyment of the facilities.
- Our concerns and comments that submitted to the Town Planning Board previously on 30 April 2021 are still valid (attachment 1).

Here we submit our concerns for your consideration.

Yours,
Designing Hong Kong Limited

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Photo 1: Multi-purpose room in Sai Lau Kok Garden (May 2021)

