

23th October 2024

Chairman and Members
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point

Email: tpbpd@pland.gov.hk

**Representation on Draft Urban Renewal Authority Sai Yee Street / Flower Market Road
Development Scheme Plan
(Plan No. S/K3/URA5/1)**

Dear Chairman and Members,

Following are the comments from Designing Hong Kong on Site A and Site B in the captioned plan.

Incompatible building heights

The proposed building height of up to 150mPD is incompatible with the surrounding environment. The site is bordered to the north and east by several recreational facilities, which feature low building profiles and modest heights to support their functions.

To the west and south, the area predominantly consists of residential buildings, most of which do not exceed 50mPD. The only notable exception is High Park Grand, standing at 117mPD, making it one of the few structures in the neighbourhood that surpasses 100mPD. Given the generally low building heights in the vicinity, the construction of a 150mPD building would significantly disrupt the area's character.

Moreover, the road network capacity in the area is limited, and further densification will impact movement of traffic.

Lack of an evidence - based plan to promote and grow the flower market.

Various (re-)developments have previously promised to preserve or enhance local character and streetscapes only to fall short. A notable example is Lee Tung Street in Wan Chai, once an iconic hub for the wedding card industry. Unfortunately, the urban renewal project led to the closure of most original businesses, and the promised preservation of the wedding theme was never realized. Today, many of the shops that replaced the original establishments bear no relation to the street's historic identity.

URA projects are designed to restructure old districts and steer growth. This intervention - as other interventions by the URA – is designed to lead and promote redevelopment of an area overall. The outcome will be gentrification, increase in rents, and loss of traditional businesses. The plans fail to identify counter measures.

The Flower Market has developed over time due to market forces and local circumstances. The activity (Fa Hui) started in a nearby area which suffered a fire forcing the retailers to set up stalls in the street. In the '80s, shops started operations in adjacent properties including Flower Market Road and Sai Yee Street. The shop sizes, operation models, rents paid and income earned have found a balance. The proposed plans risk disrupting this balance, leading to unintended consequences and undermining the sustainability of the existing flower market activity.

No analyses have been provided determining such risks, and what measures will be taken to ensure the long-term success of the retail and logistics activities which make up the 'Mong Kok flower market'. Neither has there been an analysis of the shortcomings of the current 'flower market' including occupation of public space, waste handling, (un)loading, short term parking, safe foot traffic, and the dedication of public space for shopfront extensions.

It is stated that the provisions for additional open space and road widening are designed to enhance the living and shopping environment surrounding the Flower Market area. It is unclear how the plans to strengthen the character of the flower market will be realised.

We are deeply concerned about the government's unsubstantiated confidence in replicating the success of organic market-driven development.

To grow the flower market activity, can more 'flower market' space be created? For example, by aligning the north side of Flower Market Road with additional retail space (whether stalls or shops) designed with ample drainage (noting the watering of plants and flowers) and dedicated explicitly for flower retail? How much and which retail space in the new development is earmarked for 'flower market' activities? How is such retail mix ensured, promoted and supported?

Here we submit our representations for your consideration.

Yours sincerely,

Designing Hong Kong Limited