

Development Bureau  
18/F, West Wing, Central Government Offices,  
2 Tim Mei Avenue, Tamar, Hong Kong  
(Email: [sdev@devb.gov.hk](mailto:sdev@devb.gov.hk))

Civil Engineering and Development Department  
11/F, Civil Engineering and Development Building,  
101 Princess Margaret Road, Homantin, Kowloon  
(Email: [info\\_urbanunderground@acocom.com](mailto:info_urbanunderground@acocom.com))

Planning Department  
17/F, North Point Government Offices,  
333 Java Road, Hong Kong  
(Email: [rklee@pland.gov.hk](mailto:rklee@pland.gov.hk))

20th August, 2019.

**By email only**

Dear Sir/ Madam,

**Pilot Study on Underground Space Development in Selected Strategic Urban Areas**  
**Stage 2 Public Engagement**

1. We refer to the captioned.
2. After reading the Digest<sup>1</sup> for the captioned and also the submission by the Hong Kong Bird Watching Society (HKBWS), we would like to raise our grave concern regarding the development proposal at Kowloon Park.
3. As mentioned in the Digest, about 300 trees would be impacted due to this proposal, but the associated ecological impacts have not been further elaborated. We would like to remind the project proponent that many of the trees within Kowloon Park are not young trees and these trees also constitute valuable habitats for many birds and other wildlife such as squirrels and bats – these habitats are unique in such an urban setting and are not replaceable as there are not many alternatives (in terms of area and tree density) like Kowloon Park within the centre of West Kowloon. Thus the loss of the trees and the biodiversity they accommodate

---

<sup>1</sup> [https://www.urbanunderground.gov.hk/files/docs/Stage2\\_Digest.pdf](https://www.urbanunderground.gov.hk/files/docs/Stage2_Digest.pdf)

would represent a highly significant impact on our urban ecology. We cannot accept that the trees would be felled because of this proposal. Even if a compensatory tree planting proposal is planned, no one can guarantee the affected wildlife would be back after the disturbance (e.g., effects on the breeding community of ardeids in the Kowloon Park egret), and replanted trees may not harbor the same numbers and diversity of wildlife. Thus we consider it may not be appropriate to assume that the effects would only be temporary, under the present circumstance with no effective measures proposed.

4. We also agree with the concerns raised by the HKBWS that, although the Old and Valuable Trees (OVTs) seem to have been largely circumvented by the development footprint, it is still not clear as to whether their extensive root systems would be appropriately protected. We urge that the extensive root systems of these OVTs should be fully protected by appropriate means (e.g., the development footprint should at least not overlap with the area covered by the tree canopy (i.e., from the drip line)).

5. As shown in the Digest, only a relatively small portion of the proposal would be designated for community uses (less than 40%); the majority of the remaining areas would be for car parking and retail/ food and beverage facilities (60%). If the key objective of this proposal, as shown in the Digest, is to improve pedestrian connectivity, we cannot understand why there would still be a need to designate such a large area for parking and also retail/ food and beverage facilities. Indeed, these facilities would even attract additional pedestrians/ visitors to stay in the area and may not help to reduce the undesirable crowded conditions now appearing in Tsim Sha Tsui. This proposal seems to be putting the cart before the horse.

6. Two underground development examples from Japan and France, respectively, are mentioned in the Digest. We would like the project proponent to elaborate on what proportion of the underground spaces in these references has been used for car parking and retail/ food and beverage facilities. There are already numerous shopping arcades in different parts of Tsim Sha Tsui; is there still a desperate need to reserve such a large area (30%) for retail/ food and beverage facilities in the present proposal? If these unnecessary facilities can be removed from the proposal, can the development footprint be reduced? If the development footprint can be reduced, can the number of trees to be affected be reduced as well?

7. Finally, we would like to remind the project proponent that most of Kowloon Park is a public place which can be enjoyed by all Hong Kong citizens. We object to any attempts to try to hand over the ownership of any of the public area to private sectors/ private developers. If

the underground space is developed in the future it should be primarily for the benefit of the general public; it should not be targeted for making profit which would only help a small portion of the community. We hope all relevant departments can learn something from the repeated lessons related to facility development appearing in different parts of our city (i.e., the controversy of community facilities becoming privately owned as repeatedly reported (e.g., see 2, 3)). Otherwise we cannot see how Government proposals will gain support by the wider community.

8. Thank you for your attention.

Ecological Advisory Programme  
Kadoorie Farm and Botanic Garden

cc. Hong Kong Bird Watching Society  
The Conservancy Association  
Designing Hong Kong

---

<sup>2</sup><https://www.scmp.com/comment/letters/article/3005250/why-firms-bought-properties-link-reit-have-only-the-mselfs-blame>

<sup>3</sup> <https://www.hongkongfp.com/2019/04/07/shoppers-concerned-future-link-mall-sold-private-equity-fund/>