



香港建築師學會
The Hong Kong Institute of Architects

HKIA's Views on URA District Study for Yau Ma Tei and Mong Kok
香港建築師學會就市建局油麻地及旺角地區研究的意見

1. YMTMK Old District Renewal Initiative by URA:

The Old District of Yaumatei and Mongkok (YMTMK) is a densely populated district concentrated with old buildings and unsatisfactory urban environment much desired to be improved. The Urban Renewal Authority (URA) recognizes that the past practice of ad-hoc redevelopment of individual plots will not be able to resolve these known problems in old districts of Hong Kong. URA carried out a 5-year comprehensive social-economic study and planning of the problems of this district from 2017-2021, to explore feasible new planning and development ideas to holistically address these critical issues. The findings and suggestions were presented by URA and Development Bureau to LegCo in Sept 2021¹.

油旺舊區更新之市建局倡議：

油麻地及旺角舊區是一個人口稠密的地區，老舊建築集中，城市環境欠佳，亟待改善。市區重建局(市建局)承認，過去對個別地塊進行斬件式重建的手法無法解決香港舊區的這些已知問題。市建局針對該些舊區的問題，自從2017年起進行了為期五年的綜合社會經濟研究和規劃，並探索可行的新規劃和發展思維，以全面解決這些關鍵問題。市建局和發展局於2021年9月向立法會提交了調查結果和建議¹。

2. Past Proactive Inputs by HKIA:

The Hong Kong Institute of Architects (HKIA) followed closely on URA's renewal study of this district since mid-2017. We formed a Task Group of member architects experienced in urban planning and heritage conservation to maintain our dialogue with URA proactively throughout the process. Our two Former Presidents led the Task Group to meet URA Senior Management and working team in July 2018 and October 2021 respectively to exchange views. Our Institute submitted written professional comments to URA in November 2021, and to the Town Planning Board (TPB) on URA's Planning Application in November 2022 to amend the Mongkok Outline Zoning Plan (OZP)².

¹ Refer to Legislative Council, "Panel on Development Meeting on 28th Sept 2021: Brief Background brief on the district Study for Yau Ma Tei and Mong Kok conducted by the Urban Renewal Authority", LC Paper CB (1)/1347/20-21(03).

參考立法會2021年9月28日《發展事務委員會議程：就市區重建局進行的油麻地及旺角地區研究擬備的背景資料簡介》

² Refer to Amendment to Mong Kok Outline Zoning Plan S/K3/34A approved by Town Planning Board 22 July 2022
參考城市規劃委員會在2022年7月22日批准之旺角分區計劃大綱核准圖編號S/K3/34的修訂



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香港建築師學會過去的主動參與：

香港建築師學會 (HKIA) 自 2017 年年中市建局開始此區更新研究以來，一直密切關注此事。我們成立了一個集合在城規和保育經驗豐富的建築師成員組成的專務小組，以便在整個過程中與市建局保持積極對話。HKIA 兩位前會長帶領小組於 2018 年 7 月和 2021 年 10 月分別會見了市建局高級管理層和工作團隊交換意見。本學會亦在 2021 年 11 月向 URA 提交了我們的書面專業意見，並於 2022 年 11 月向城市規劃委員會 (TPB) 提交了關於市建局對旺角地區分區計劃大綱圖 (OZP) 的修改²。

3. Building and Planning Initiatives Promoted by HKIA on YMTMK Old District:

HKIA in principle supports the preparation of a well-considered long-term comprehensive urban planning strategy. Communications between HKIA and URA have established some synergies between our views and their approach. Three points are worth elaborating:

香港建築師學會推動之油旺舊區建設規劃的措施：

HKIA 原則上支持制定經過深思熟慮的長期綜合城市規劃策略。HKIA 與市建局之間的溝通，讓我們的觀點和他們的方法建立了一些協同效應。三點值得闡述：

(a) Transfer of Development Rights (TDR)³ or Plot Ratio Transfer (see Fig 01):

This planning tool is already well used by overseas authorities, for maintaining low density planning of a precinct, or conservation of historic buildings or precincts, or encouraging the dedication of public passage, while balancing the existing property rights of private owners. Nevertheless, this method is still severely restricted under the current HK framework, and can only be executed on a case-by-case basis (as proven successful in the conservation of King Yin Lei). Our institute has

³ Transfer of Development Rights (TDR) is a planning concept, meaning a statutory and/or legal framework to facilitate the building bulk (either in terms of gross floor area, or height, or intensified use) permitted under prevailing planning rules to be transferred to a different site. If it involves private properties or sites, this method provides opportunity for private owners to forfeit the demolition of existing buildings or redevelopment of sites to maximum density. Under the regulations of Hong Kong, this means Transfer of Plot Ratio. Although current rules allow the transfer of plot ratio to an adjoining site by lots amalgamations, the tackling of a more extensive old district, it needs more comprehensive amendment of outline zoning plans, re-grant of land leases, or relaxation of Buildings Ordinance clauses.

發展權利轉讓 (TDR) 是一項規劃概念，意即一項以促進將現行規劃條例下允許的建築體量（在總建築面積、高度或集約化用途方面）轉移到不同的地點的法法定和/或法律框架。如果涉及私有物業或地盤，這種手法可以向私人業主提供放棄將建築拆卸或將地盤以高密度重建的契機。在香港的條例中意即地積比率轉移。現行法規雖然可以通過個別個案合併地盤將地積比率轉移到接壤地盤，但是應付面積範圍較大的舊區，則要更全面的修改計劃大綱圖、重新土地租約或甚至在《建築物條例》條文上鬆綁。

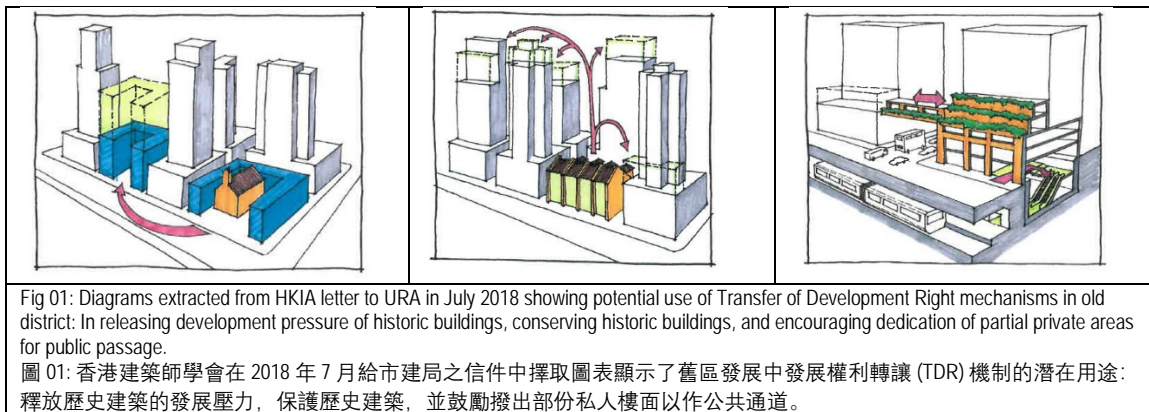


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been promulgating the wider and more flexible adoption of this method in Hong Kong; thus, we concur with URA's suggestion of using TDR to tackle the existing density and ownership problems of YMTMK old district if executed diligently and cautiously.

發展權利轉讓 (TDR)³ 或地積比率的轉移 (見圖 01) :

此項規劃工具早已被海外政府廣泛使用，以維持區域的低密度規劃，或保護歷史建築或區域，或鼓勵撥出公眾通道，同時平衡私人業主的現有產權。但是在現行香港的框架下依然受到嚴格局限，並且只能在個別個案的基礎上執行(在保育景賢里中證明是成功的)。本學會一直倡議在香港推行更廣泛和更靈活地採用這種手法，因此 HKIA 認同市建局的建議，以地積比率轉移來應對油旺舊區現有的密度和業權問題。



(b) Connection of Public Open Spaces – Our Suggestion on Pedestrianization of Mongkok Nullah (see Fig 02):

We believe that offering open spaces or pedestrian routes for public in existing districts does not always need wholesale demolition of buildings. In our paper to URA in July 2018, we suggested the exploration of the re-opening up of the historic Mongkok waterway from Nullah Road to coast of Tai Kok Tsui⁴ into a continuous pedestrian walkway, with water-feature and under-road paths,

⁴ The Kowloon District, from the early development of 1860s, had a number of waterways leading to the west coast, which were later covered over to become the east-west running streets of the Kowloon Peninsula. One of them, still retaining its peculiar disposition and its historic name, is the nullah from Tai Hang Tung, cutting diagonally across Mongkok, that discharged into the old coastline at Ferry Street. Despite most portion of it is now covered over, the above of this concealed route is not yet built over by private properties or major roadways, hence theoretically feasible to be re-opened and made into a continuous pedestrian walkway.

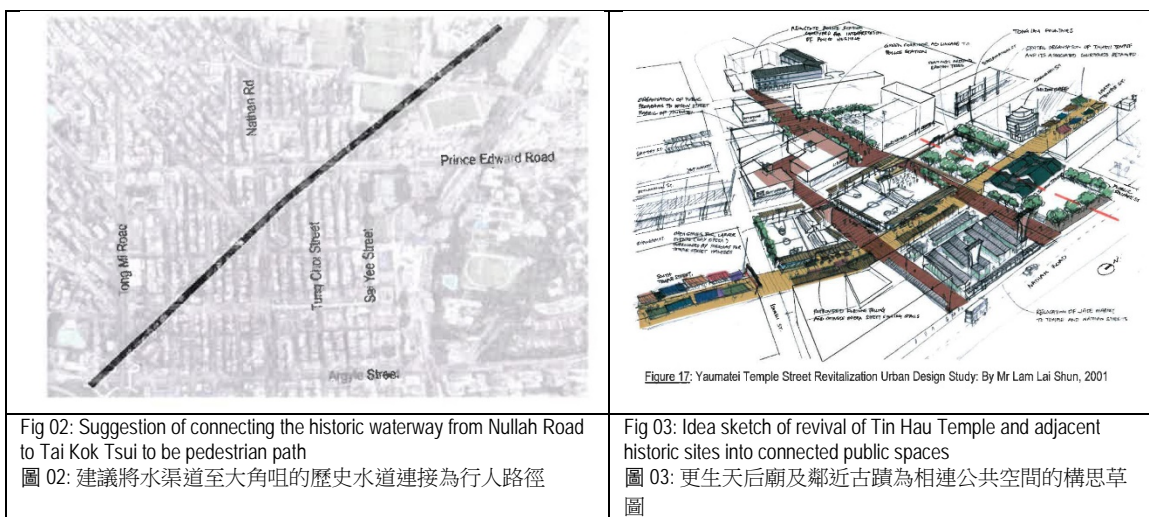


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referring to successful examples of Cheonggyecheon-ro of Seoul and Kai Tak River of HK. We are pleased that URA's Final District Study presented to LegCo indeed adopted this as one of their core greening and pedestrianization initiatives. In an old district like Mongkok, severely short of easily accessible open space and continuous pedestrian routes, this rare remaining underground linkage maybe a last opportunity for an extensive leisure path with a historic touch.

連接公共休憩用地——我們對旺角明渠行人化的建議 (見圖 02) :

我們認為，在現有地區為公眾提供開放空間或步行路線並不必然需要大規模拆除建築。在我們於 2018 年 7 月向市建局提交的文件中，我們建議探索將由水渠道至大角咀海岸的歷史悠久的旺角水道⁴重新開放為一條連續的行人通道，並設有水景和地下路徑，參考首爾的清溪川路或香港的啟德河的成功例子。我們很高興市建局向立法會提交的最終地區研究接納此意念作為其核心綠化和行人專用區措施之一。在像旺角這樣的舊區，交通便利的空地和連續的行人通道嚴重匱乏，這個難得的僅存地下連接線可能是最後一次機會，可以開闢一條具有歷史意義的廣泛休閒路徑。



九龍區自 1860 年代初期發展起，已有多條水道通往西海岸，後來被覆蓋成為九龍半島東西走向的街道。其中一條仍保留其獨特風貌和歷史名稱的，是來自大坑東的明渠，它斜穿過旺角，排入渡輪街的舊海岸線。儘管現在它的大部分都被覆蓋了，但是這條隱藏路線之上仍未有被建造為私人物業或主要幹道，因此理論上仍然可以重新開放並變成一條連續的人行道。



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(c) Revival of Historic Spaces and Precinct – Our Suggestions on Tin Hau Temple Ensemble (see Fig 03):

HKIA has been following up on the extensive infrastructural project of Central Kowloon Route since the beginning, particularly on its effect on the historic precincts of Yaumatei around Tin Hau Temple ensemble⁵, which CKR has to run through and remodel. Our letter to the Highways Department in 2012 already presented our concerns, that the projects appeared to have focused on engineering issues, but probably short of comprehensive long-term urban planning of the historic spaces and buildings that the CKR project disrupted and re-provided.

Our proposal at that time urged the reinstatement of the historic Temple Street, and making use of this once in a century opportunity to re-connect the historic Temple Street and associated precinct by pedestrian spaces and revitalized historic buildings. Our paper to URA in July 2018 again re-presented this sketch idea, and we are pleased that URA's Final District Study presented to LegCo indeed adopted this as one of their core urban renewal initiatives, using preservation and revitalization instead of re-development as the main approach.

復興歷史空間及街區——我們對天后廟整體的建議(見圖 03)：

HKIA 從一開始就跟進中九龍幹線龐大的基建項目，特別是它對中九龍幹線必須穿越和改造圍繞天后廟建築群油麻地歷史街區的影響⁵。HKIA 在 2012 年給予路政署的信件中已經表達了關注，特別是當時這項目似乎集中在工程議題，但缺乏對中九龍幹線項目干擾或重置的歷史空間和建築的全面長遠都市規劃。我們當時的建議是希望恢復歷史悠久的廟街，並利用這個百年一遇的機會，以行人空間和活化歷史建築重新連接歷史悠久的廟街和相關區域。HKIA 在 2018 年 7 月提交給市建局

⁵ The Central Kowloon Route (CKR) project, started by Highways Department (HyD) since 2007, who launched public engagement in 2009. The project involved extensive engineering works from Ferry Street, passing through Kansu Street, to Nathan Road, inevitably affecting Yaumatei Police Station, re-providing the Jade Market, re-aligning the historic Temple Streets, re-organizing the local communities facilities, and re-igniting the development risks of old Tong Lau. In particular, the Temple Street used to be a continuous market street historically associated with the Tin Hau Temple since 1884, and still busy with hawkers as seen in the famous movie of 1960 "World of Suzie Wong", until abruptly cut by the Yaumatei Carpark building in 1970s. The demolition of this un-matching utilitarian transport structure provides a once-in-a-century opportunity to re-instate the historic street to tell the story of the local street-life and the temple.

中九龍幹線工程由路政署於2007年展開，並於2009年展開公眾參與。工程涉及大量工程，由渡輪街經甘肅街至彌敦道，無可避免地影響油麻地警署，重新提供玉器市場，重新規劃歷史悠久的廟街，重新組織社區設施，重新點燃老唐樓的發展風險。尤其是廟街，自1884年起已成為與天后廟有聯系的連續街市街，正如1960年著名電影《蘇絲黃的世界》中所見小販林立之貌，却直至70年代突然因興建油麻地停車場而被截斷。拆除這座不匹配的功能性交通結構提供了百年難得的機會來恢復歷史悠久的街道，講述當地街坊生態和廟宇的故事。



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的文件重提這個草圖想法，很高興見到市建局向立法會提交的最終區域研究以此作為其核心城市更新舉措之一，以保育和活化而非重建作為主要手法。

4. Summary:

While HKIA is supportive of the initiative of URA to take up this challenge to approach the urban planning of YMTMK old district in a holistic manner, we have offered advice to URA on many areas, which were summarized in our letter to URA in November 2021:

- (i) Support in principle TDR to address Area Density, but also need to address Population Density;
- (ii) Retain/ reinforce Street Characters, NOT displace Small Stalls/ Shops to new Iconic Buildings;
- (iii) Need to know more on design of Open Spaces, and effect of Consolidating City Blocks;
- (iv) Maintain Diversity for SME, Young People, Ethnic Minority, and Aging Population;
- (v) Want to see Longer Term Resolution on Traffic Congestions and Implementation of Walkability;
- (vi) Ventilation Corridors and Micro-Climate Improvements;
- (vii) Take Lead in Upgrading and Energizing / Rejuvenating Old Buildings and Neighbourhoods;
- (viii) Identify Buildings / Streets of Rich Tangible / Intangible Heritage Values; Pursue Adaptive Re-uses;
- (ix) Conserve Temple Street, Tin Hau Temple Ensemble and Yau Ma Tei Fruit Market.

In the coming year, HKIA will continue our dialogue with URA in a constructive manner.

總結：

香港建築師學會原則上支持市建局的倡議，以整體方式處理油旺舊區的城市規劃，於2021年11月致市建局的信件中總結了本會就不同範疇提供的建議：

- (i) 原則上支持發展權利轉讓 (TDR) 以處理區域密度問題，但亦需要解決人口密度問題；
- (ii) 保留/加強街道特色，而不是將小攤位/商店轉移到新的標誌性建築；
- (iii) 需要更了解開放空間的設計，以及整合城市街區的效果；
- (iv) 維護中小企業、年輕人、少數族裔和長者人口的多樣性；
- (v) 希望看到交通擁堵的長期解決方案和步行便利性的實施；
- (vi) 通風走廊和微氣候改善；
- (vii) 帶頭改造和活化/更生舊建築和社區；
- (viii) 鑑定具有豐富物質/非物質遺產價值的建築物/街道；務求活化再利用；



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(ix) 保育廟街、天后廟群及油麻地果欄。

來年本學會將繼續與市建局保持對話。

HKIA 香港建築師學會
April 2023