

Promenade vs. Cadogan Street Park – Why not keep both?



Presentation to the Harbourfront Commission Committee

19th October, 2016

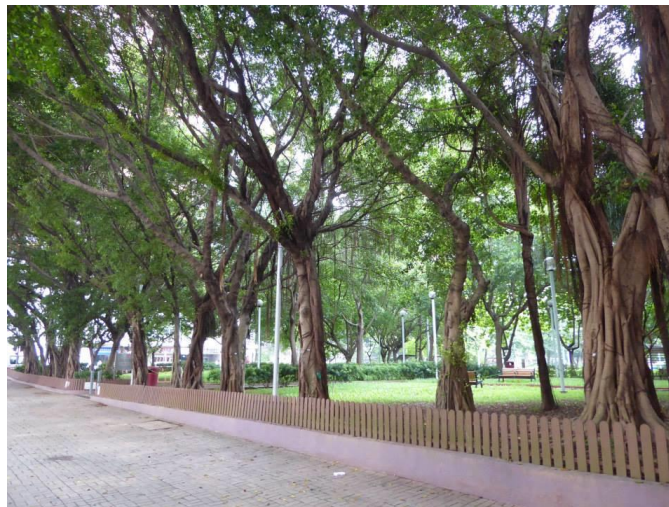
Objectives of today's presentation

- Share with the Harbourfront Commission Committee the rationale why Cadogan Street Temporary Garden (the “Park”) should be retained as a permanent park/ open space:
 1. Cadogan Street Temporary Garden is highly compatible with the proposed promenade
 2. Replacing the Park with residential buildings negatively impacts the accessibility of the promenade, failing the mission and planning guidelines for developing the promenade
 3. Demolition of the Park is against the international treaties that HK has set targets to achieve
 4. Decontamination is an excuse and based on an inappropriate EIA report
- We seek support from the Harbourfront Commission Committee to ask the Development Bureau and Town Planning Board to retain the Park as a permanent one

Cadogan Street Park has been in use for 18+ yrs with 196 healthy trees

Key Facts of the Park

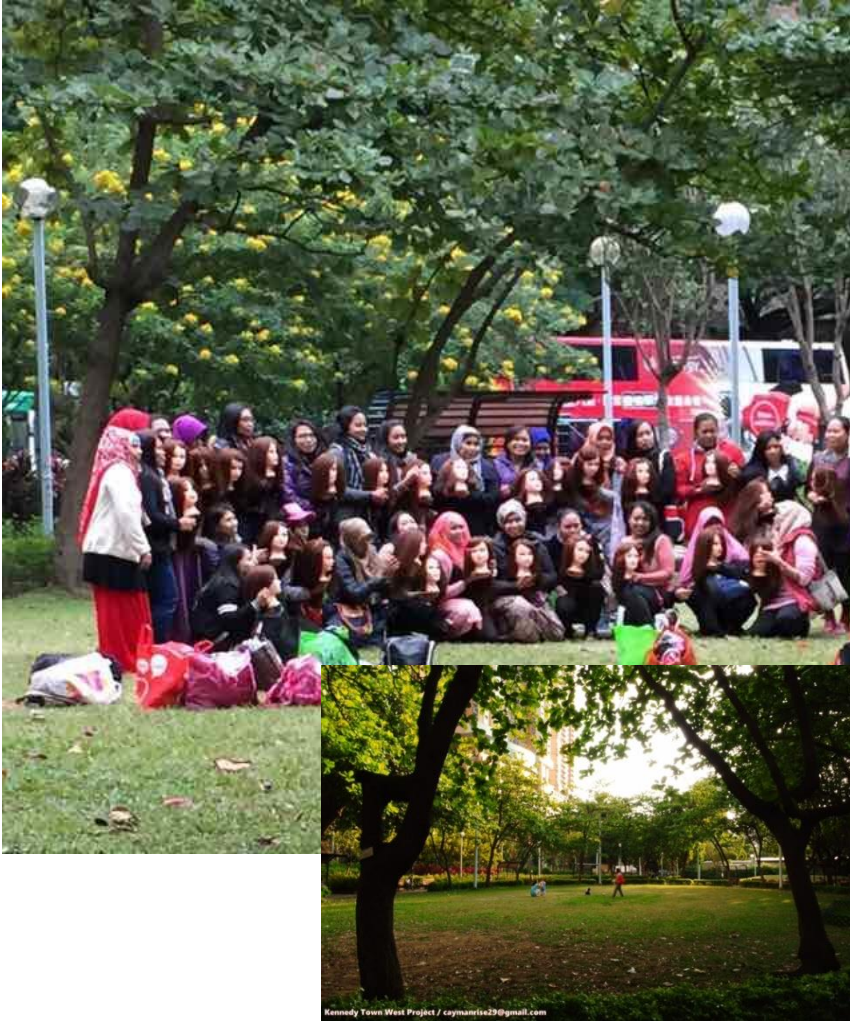
- Established as of Oct 1998, previously was a vegetable wholesale market
- 5,800 sqm with 196 trees with 4 *Aquilaria sinensis*
- Only flat green grass park in S/H1/20 OZP, popularly used by residents
- Only urban park with high (80%+) green coverage in HK
- Quality urban greening with high accessibility, connectivity & biodiversity
- Serves as city lung to improve environment quality & quality leisure space for citizens



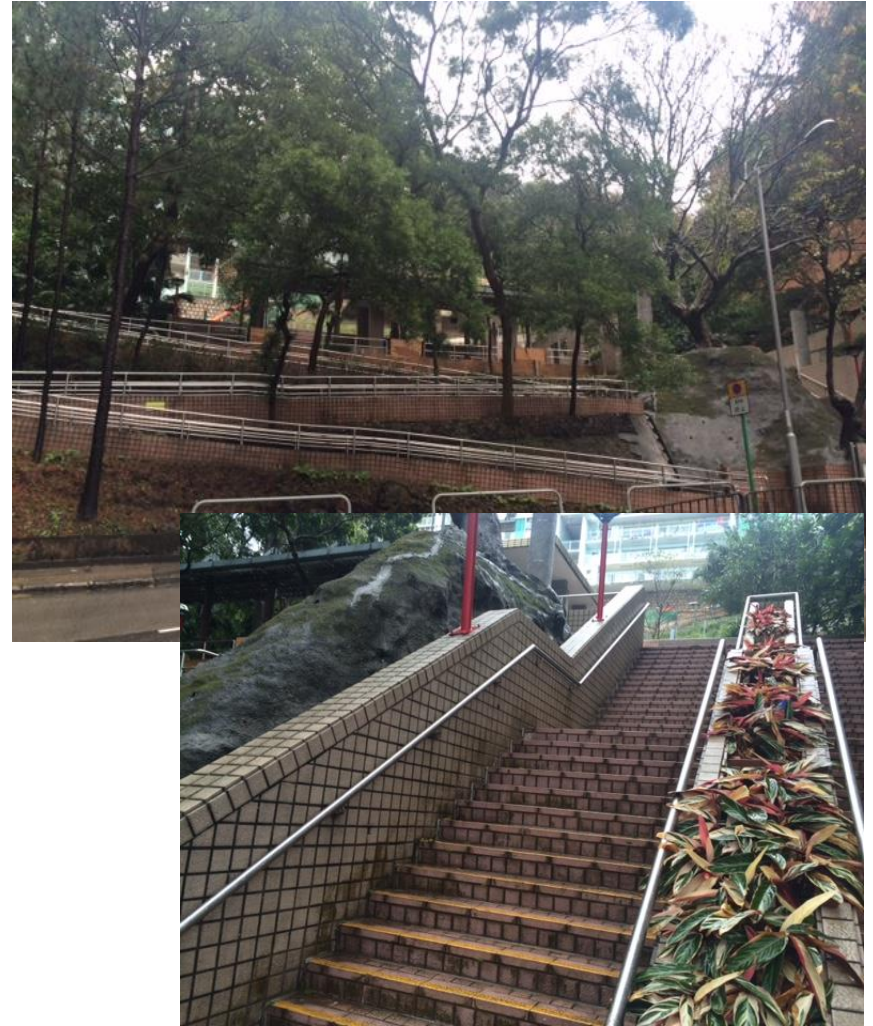
Video:
People
talking
about the
Park and its
uses.

Cadogan Street Park is unique & irreplaceable

Cadogan Street park is used by various people with its unique shading effect & 196 living trees



Ka Wai Man Road Garden 加惠民道花園 – long stairs/ G-shape – no one really uses it!!

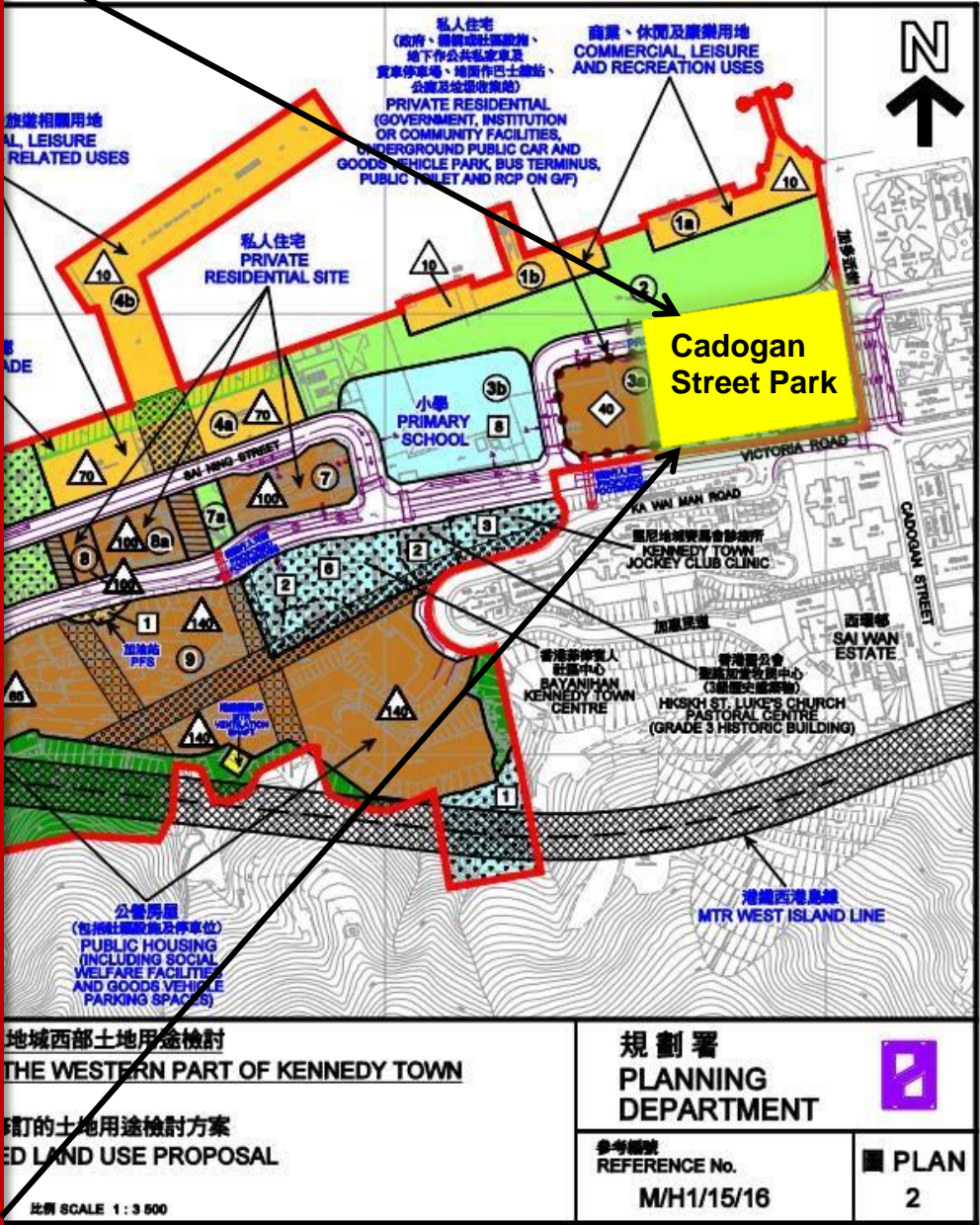


Government is absurd (style over substance) – wasting money to kill a much used, beloved park but built a less usable park and counts it as the equivalent

Cadogan Street Park is highly compatible with the proposed Promenade

Key messages:

- As the Government's directive is to let citizens easily access and enjoy the harbourfront, Cadogan Street Park is conveniently located and accessed by residential buildings and can serve as a conduit to allow and attract people to seamlessly access the promenade and harbourfront
- Commercial elements at the promenade can coexist with the citizens' Park to serve diversified segments of people living in Kennedy Town
- Planning Guidelines require 2 sqm per resident of open space; according to OZP,
 - Current open space is only 0.83 sqm
 - Together with the Promenade and the Park, the open space is supposed to be 0.95 sqm
 - But demolition of the Park will reduce the open space to 0.87 sqm only
 - Government is not taking this re-zoning opportunity to optimize the open space but rather is depriving residents of it
- The Park helps fulfill Harbourfront Planning Principles by maximizing public enjoyment, unrestricted and convenient visual and physical access for pedestrians to the Promenade, and addressing social needs for sustainable development

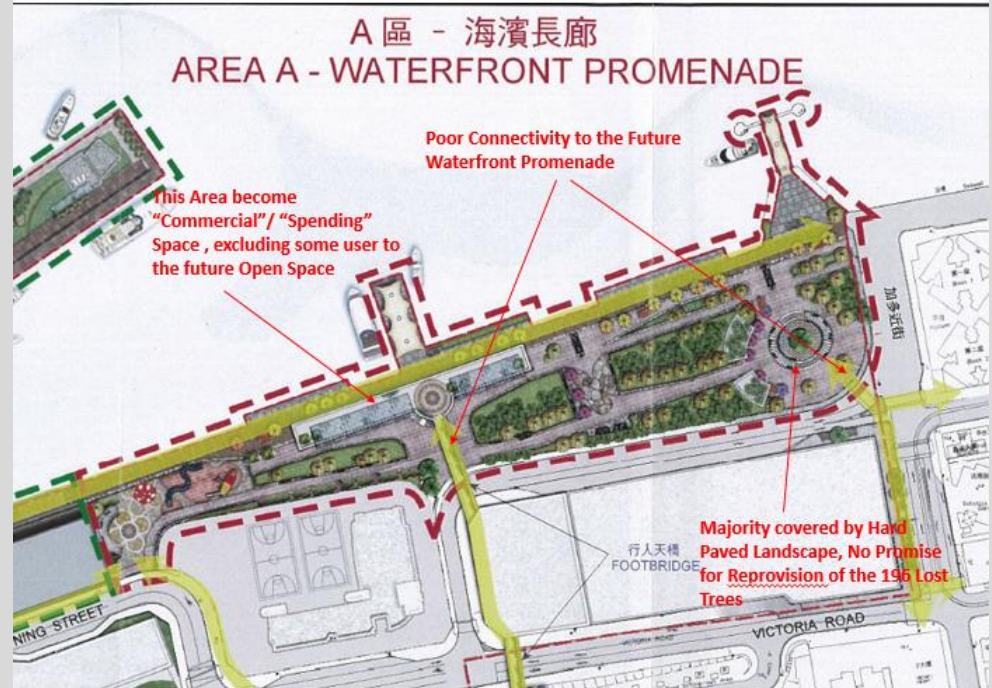


Demolishing the Park negatively impacts the proposed Promenade

1. This **Waterfront Promenade** was a promise made by the Government for a connected promenade for the entire HK Island for many years and it is **NOT** supposed to be a replacement for the Park
2. The greater part of this future Promenade is covered by hard-paving, boardwalks and commercial areas, with limited areas for greening and trees – **no way comparable** to the current Park, which has 196 trees and everywhere is green

3. **Very bad connectivity and accessibility** of the waterfront Promenade:

- Blocked by a newly-built road so future residents need to use the narrow end of Cadogan Street to reach the promenade, or else need to cross the footbridge through the podium of the newly-built private residential buildings (in Area 3A, where the Park is located)
- Usage of the proposed Promenade will be very low, causing security problems at night, and might become a virtual “**private garden**” of the new residential buildings in Area 3A
- Footbridge is difficult for the elderly to use as they need to walk up & down the steps or slopes as in the case of Ka Wai Man Road Garden



4. Seafront side of the proposed Promenade is intended for “Leisure and Recreational Use with Ancillary Commercial Facilities” which is a concept of a low-rise structure for food and beverage with a viewing deck on top, e.g. Central and Tsim Sha Tsui Waterfronts – those F&B facilities will become “high-spending commercial” activities, **turning the open space into a “Spending Space” excluding grassroot users**
5. Proposed Waterfront Promenade is of **very limited usage for Hong Kong as a whole** because:
 - This is in discontinuity from the central waterfront promenade
 - The Government has not proposed any unique or special features for this Kennedy Town promenade to attract people from other areas to come
 - Proposed residential areas will lengthen travel routes and decrease its accessibility for local residents

Demolishing the Park is against international treaties that HK Government has set targets to meet

Keeping the Park reduces GHG emissions

保留公園可減溫室氣體排放

Climate change deteriorates rapidly. Urgent action should be taken for environmental protection and green house gas (GHG) reduction. Conserving the Park is actively contributing towards reducing the atmospheric carbon dioxide level -- a responsibility we cannot neglect!

HK Government has set target to reduce the volume of GHG emissions by 2020 down from 7 tonnes per capita per annum to 4

Cadogan Street Park is contributing towards the government's 2020 goal to reduce GHG. Killing the Park while building 125 public car parks increase traffic flow volume, traffic congestion, and GHG emissions. Why does HK government need to be so contradictory that it promises the international community to reduce GHG, while demolishing urban green space (incl. Cadogan Street park with its green grass and trees)?

http://www.greenpower.org.hk/html/chi/2013_10.shtml)

Keeping the Park reduces Heat Island effect

保留公園可減熱島效應

Conserving the Park reduces the Heat Island effect so that both existing and new residents benefit from a better and cooler living environment

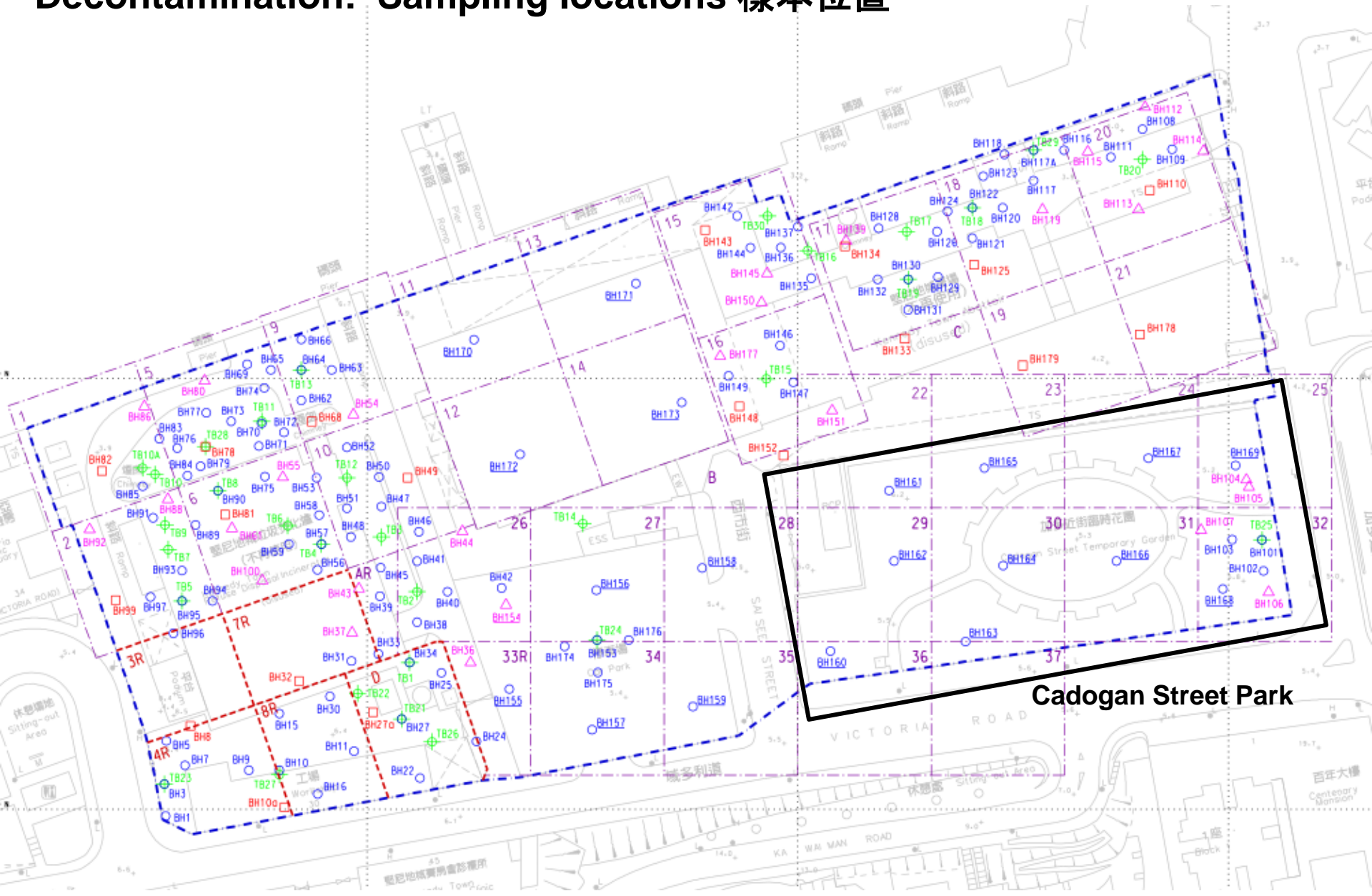
Urban Heat Island Effect refers to the increase in temperature in urban areas compared to suburbs and rural areas.

The Urban Heat Island Effect results in a series of environmental and social problems, such as aggregating air pollution problems, facilitating the spread of infectious diseases, and increasing energy demands. Therefore, we must take this problem seriously and seek solutions.

According to Green Power, temperatures at large green spaces in the city (e.g. parks) are 2 to 3.2 °C lower than that at the hottest spot in urban centre, indicating a clear cooling effect of green spaces in the city

http://www.greenpower.org.hk/html/chi/job_weather_03.shtml)

Decontamination: Sampling locations 樣本位置



Background of the contamination

- Lead contamination was most severe around the ex-incinerator and the road connecting to the ex-incinerator region. 鉛污染最嚴重的地方為前焚化爐和接連的道路. Most regions with severe surface contamination are less than 4.5m in depth. 屬嚴重污染的大部份為淺層，少於4.5 米深
- The Park is relatively “clean” compared to the ex-incinerator region, and most contamination is deep. 公園相對較為清潔和深層
- Benzo(a)Pyrene 苯比啉 is the most dangerous carcinogen and is largely related to incomplete combustion in the industrial era. Among the samples taken from the ex-Kennedy Town Incinerator area, the Benzo(a)Pyrene level should be expected to be the polyaromatic hydrocarbon that is most frequently found exceeding the contamination standard
- More samples were taken around the ex-incinerator area, whereas only a few were taken from the Park. However, it seems more samples at the Park exceeded the Benzo(a)Pyrene contamination threshold. The contamination at the Park is usually at a discrete depth, which is far from the surface
- After land reclamation in the 1950s, a vegetable market was built at the current Park’s site, and subsequently changed to a public park. Therefore, a higher contamination level for Benzo(a)Pyrene at the Park area cannot be explained by the pollution of the ex-incinerator
- The location and depth of the contamination can better be explained by the fact that the Park area was a government wharf before land reclamation in the 1950’s. The sea bed was likely contaminated by the engine oil and the coal tar from the ships

Decontamination is an excuse and based on inappropriate EIA (1/2)

Outdated data of contamination

1. Problems re decontamination work proposal
 - Total lack of current assessment of contaminants situation – EIA report used for Public Works subcommittee's approval in 2015 is based on 2002 EIA report data, which was dated
 - Borehole sampling is not random – it is just a convenient sampling; one sample per grid in the Park is not up to international standards; there were only around 5 new samples taken in 2014 (which our understanding is that they are outside the Park area); basically most of the samples taken in 2002 are outdated
2. Biopile method proposed to be used for decontamination is only one of the bioremediation methods. Bioremediation is a waste management technique that involves the use of organisms to remove or neutralise pollutants from a contaminated site. Those organisms can be externally added or local. Phytoremediation is another bioremediation method such that the organism is the plant
 - The Park is full of plants with green coverage nearly 100%. The roots of the plants are deep into the soil such that mycorrhizae coexisting with the roots can effectively extend soil contacts, accelerate its growth to go deeper, transport water & soluble materials (incl. contaminants, e.g. heavy metals) to the plants, active bacteria in the soil and other micro-organisms forming rhizosphere effectively degrading or transforming organic contaminants such as benzo(a)pyrene and hydrocarbons.
 - Phytoremediation method is more effective and cheaper than Biopile for decontamination. It leverages the metabolism of the plants, such as blossoming and withering of the flowers, leaves and fruits, that the contaminants have been moved to plant organs. As the organs wither, the contaminants are removed from the contaminated site by sweeping away the withered leaves and branches. The Park has been here more than 18 years, i.e. phytoremediation process has been taking place so long that the contamination situation at the Park must have improved.
 - As the government lacks knowledge about phytoremediation, they did not mention it in the report. Biopile usually uses local micro-organisms, but the soil at the Park already has the micro-organisms required to degrade the contaminants. Even though the Biopile decontamination has not started, micro-organisms in the soil have been decontaminating for 18+ years. So many annual rainy seasons in HK have already washed away contaminants that have various degrees of solubility

Therefore, the validity of the government using data which is 14+ years old to represent the current situation of soil contamination and design decontamination approach is highly questionable. Using unscientific representation of the contamination situation is not only misleading the design and budget of decontamination, it also violates the essence of EIA ordinance. How can an EIA permit be granted continuously since 2000 without the contaminant situation being adequately updated?

Decontamination is an excuse and based on inappropriate EIA (2/2)

Outdated air pollution assessment models

- The two models they used are based on free US models: Fugitive dust and ICSP3
- ICSP3 model is a short-term model – US government has replaced that model since 2007; Kennedy Town decontamination is a 7 year project, a short term model is not appropriate to assess the risks
- EIA ordinance is supposed to request HK government to use international standards; however, CEDD did an EIA report based on outdated models, clearly not up to international standards
- EPD should have published a report on wind flow direction in Kennedy Town West, indicating that wind blows from the sea to the hillside; it is doubtful if the Fugitive dust model sufficiently takes into account the wind flow direction that could underestimate the risks

Inadequate monitoring measures

- EIA report indicated that air pollution monitoring measures in the EIA report are inadequate as it treats this decontamination as a general engineering work “沒有特事特辦”. HK EPD air quality objectives should require monitoring of Lead and NO², etc., but they are not included in this decontamination work monitoring protocol
- Without appropriate air pollution monitoring, given these contaminants are colorless, tasteless and odorless, residents are being poisoned and do not know it; even low dosages/ concentrations, with long-term exposure, are still hazardous and harmful to life
- Given soil decontamination is proposed before development of this area, it is common sense that urban greenery with trees can filter out the contaminated dust raised by the decontamination project and acts as a barrier protecting the public health of the local residents
- Hence, it warrants the Park to be retained as a permanent one

No imminent risk – just an excuse

- Based on a previous meeting with government officials in late November 2015 and what we learned from the Harbourfront Commission HK Taskforce Unit, government officials indirectly admitted that if the land use of the Park does not change (i.e. is retained as an open space) and kept as it is, there is no need for decontamination
- Government’s reply on “Ground Decontamination Works at the Site of the Ex-Kennedy Town Incineration Plant/Abattoir and Adjoining Area” (as at 24.2.2016): *“the contaminated soil at the Cadogan Street Temporary Garden (CSTG) has been found at various depths up to 9m below the ground level, and is currently covered by either a top soil layer or concrete paving. It is generally under a stable condition if not disturbed or exposed by any earth moving works. As no unacceptable impact on the nearby environment and users of the garden is envisaged, no warning notice is posted”*
- Decontamination just needs to be done at the harbourfront area (i.e. ex-abattoir area) to prepare for the proposed waterfront Promenade area

Government's real intention is to kill the Park for private residential buildings to be built after 7 to 10 years

- . Pick the best piece of land to sell (unobstructed sea view and have a nice promenade in front of it)
- . Build ~600 luxury private housing units after 7 to 10 years - who can really benefit? It does not really solve any imminent housing issues/ needs at all!!
- . Alternatives? Always available if the government is willing ...
 - Though Cadogan Street Temporary Garden (the “Park”) seems to be temporary, it has been in use for more than 18 years; the government cannot ignore its current function as a permanent park with its long-term use by the community
 - Case example: In the district nearby, Belcher’s Bay Park was also temporary in the past, but now has been converted into a permanent park
 - Case example: Previously, Kwai Chung Incineration Plant was removed and it was agreed to exclude residential use, and will be used either as a Public Park or for Industrial use
 - Based on a general search by local concern groups and planning experts, we already identified 6 different alternative sites that could be possibly used to house the facilities proposed on the Park’s site, indicating that the government should find an alternative site, and retain the Park

Our request to the Harbourfront Commission Committee

We seek support from the Harbourfront Commission Committee to ask the Development Bureau and Town Planning Board to retain the Park as a permanent one as the new Promenade is to be built

- ***The Government should not work on the old plan without considering the current situation that Cadogan Street Park is a long-serving existing park and will lead to a significant negative social impact if it is removed***

- ***Our proposal to retain the Park:***
 - ***Not only can it increase the accessibility and popularity of the proposed Promenade/ open space (no new road is needed and thus a footbridge is not required; the existing entrances in the Park could still be used to enter it)***

 - ***Can also help further enhance the Promenade/ open space functionality (space to provide more facilities) and mitigate the inadequate open space problem in Kennedy Town***

Thank you!

Prepared by Alliance for Protecting Cadogan Park
Email: protectcadoganpark@gmail.com