

HKIA's Response to the 2023-24 Policy Address

The Hong Kong Institute of Architects (HKIA) welcomes the Chief Executive's 2023 Policy Address. It is a thoughtful and comprehensive policy blueprint that covers livelihood, economic and urban development, liveability, community care and inclusivity, sustainable development, education and other aspects, addressing the needs of various sectors of the society. The Policy Address responded to some of the recommendations put forward in our Institute's Policy Address Submission in August (referred to as "Submission").

Regarding the content of the Policy Address, HKIA has the following opinions:

(II) Challenges and Opportunities

11 & 65. HKIA supports the Government's introduction of policies that leverage the unique advantages of "One Country, Two Systems" to assist the industries in integrating into the overall national development and explore opportunities in the Greater Bay Area, the Belt and Road Initiative, and the ASEAN region. Many Hong Kong architectural firms have already expanded their operations in these regions. The Institute suggest that the Government's overseas "Economic and Trade Offices" to take a more proactive approach in providing support to Hong Kong enterprises, including offering more in-depth information (such as the latest construction projects), regularly arranging networking sessions with local businesses, and providing assistance in the event of legal issues and contractual disputes.

13-14, 16, 50, 157. The Policy Address mentions the Government's commitment to nurturing local talent, strengthening professional services, and taking President Xi Jinping's proposal of "Hong Kong will Prosper Only When its Young People Thrive" as a policy blueprint to cultivate highly skilled professionals who are well recognised. However, the architectural and related sectors are facing a severe shortage of manpower, resulting in excessively long working hours. Worse still, while many new policies introduced by the authorities may be well-intentioned, they further burden young professionals and create an extremely negative working ecosystem. Striking a balance between work and life becomes an unattainable luxury.

HKIA hopes that the Government will consider the industry's capacity and provide a sufficient adaptation period before implementing new policies. In the long run, the authorities should streamline procedures and reduce the private sector's workload to deal with complex Government processes.

(IV) Strive to Improve Governance

34. In addition to enhancing communication and collaboration between the Executive Council and the Legislative Council, the Government should also strengthen interaction and communication with professional institutes and relevant stakeholders.

37. HKIA has previously reflected our members' concerns to the Government regarding the cost-effectiveness of the Kau Yi Chau Artificial Islands and the related burden on public finances. As such, we welcome the establishment of the "Committee on the Financing of Major Development Projects" by the Government to provide advice on financing arrangements for large-scale developments and ensure the sustainability of public finances. We suggest that the Government should timely provide the public with financial arrangements for the artificial islands to alleviate public concerns.

39-42. HKIA supports the Government's promotion of digitalization and smart city initiatives, utilizing big data and artificial intelligence to enhance governance efficiency and operational effectiveness. We

also support the Government's coordination with the Mainland authorities to jointly promote the "Digital Bay Area" to enhance the overall competitiveness of the Greater Bay Area. We suggest the Government to establish more open databases, providing non-sensitive data for industry use, such as regional traffic flow statistics and micro-climate records.

45-48. HKIA supports the Government's proactive approach in formulating contingency measures to cope with critical incidents caused by extreme weather and collaborating with the Shenzhen Government in formulating the "Greater Bay Area Emergency Response and Rescue Operational Plan" to address major emergencies through interconnection and mutual assistance. However, ultimately, the most effective approach is to focus on energy conservation and emissions reduction to achieve the goal of carbon neutrality at an early stage. Please refer to our August "Submission".

(V) Continue to Create Strong Impetus for Growth

54-57. HKIA supports the Government's development of the "Headquarters Economy", attracting overseas companies to establish headquarters in Hong Kong, as well as implementing measures to attract and retain talent. In addition to investment and administrative facilitation, our Institute has long recommended the Government to enhance the liveability and cultural atmosphere of the city to attract overseas professionals to work in Hong Kong and retain local talent. High-quality architecture and urban design are essential elements of an international metropolis. As such, the Government should select key public and cultural facilities projects and conduct open design competitions to solicit innovative and high-quality designs while providing opportunities for young architects to showcase their talents. Please refer to our August "Submission".

63. HKIA supports the Government's promotion of the cultural and creative industries. Architectural design is also part of the creative industry, and HKIA has received strong support from Create Hong Kong to organize and participate in various high-quality architectural design exhibitions both locally and internationally, such as the Venice Biennale. Our Institute suggests the Government to increase funding resources to allow us to better align with Government policies and promote Hong Kong's creative industries.

Move Ahead with the Northern Metropolis as the New Engine for Growth

78-80. HKIA has previously submitted quite a number of suggestions to the Government regarding the Northern Metropolis, and we are pleased to see that the Policy Address has responded to many of our proposals, such as the need to conserve and integrate the Sam Po Shue Wetland Conservation Park in the new development area, integrate the existing historical buildings and traditional cultural resources of the Metropolis, make good use of tourist resources like Robin's Nest, and provide high-quality cultural, artistic, and recreational facilities. Infrastructure-led and a railway-based transportation backbone are conducive to creating a pedestrian-friendly, low-carbon, and liveable environment, which has been our Institute's recommendation for many years. We have also suggested the Government to select key public and cultural facilities projects for open design competitions. Please refer to our August "Submission". We welcome the recent release of the "Northern Metropolis Action Agenda" by the Government, and HKIA will provide further feedback after studying it.

Revitalise Tourism

85. HKIA supports the Government's innovative approaches, such as "Night Vibes Hong Kong" events to promote the tourism industry. The Hong Kong Architecture Centre and some members of our Institute have been involved in the planning of various activities related to the events. We also support

the Government in optimizing the "Cultural and Heritage Sites Local Tour Incentive Scheme" into the "Characteristic Local Tourism Incentive Scheme", making good use of cultural heritage and traditional cultural resources as part of civic education.

Promote the New Energy Transport Industry

86. HKIA supports the Government's proposal of formulating a roadmap and timetable for the green transformation of public buses and taxis within the first half of next year, aiming to achieve the goal of zero vehicle emissions by 2050, and the proposed research on the use of green energy in the shipping and aviation industries. Our Institute also welcomes the Government's formulation of the Strategy of Hydrogen Development in Hong Kong. In our "Submission", we proposed the modernization of ferry services in various outlying islands of Hong Kong to reduce carbon emissions and improve accessibility to the islands. As such, we suggest that the Government's new measures should cover ferry services to the outlying islands.

87. HKIA supports the Government in utilizing the rooftops of public markets to establish modern farms and stalls, and extending relevant policies to vacant land.

Streamline the Licensing Regime of Food Businesses

88. Our Institute welcomes the Government's efforts to streamline the licensing system, making it easier for farms engaging in commercial agriculture to sell simple cooked food. In recent years, many architects have encountered difficulties in obtaining licences when revitalizing traditional buildings located in remote rural areas for use as restaurants and guesthouses. HKIA suggests that the Government should consider the unique circumstances of rural areas and formulate appropriate regulations to facilitate such revitalization projects.

(VI) Earnestly Address People's Concerns and Difficulties in Daily Life

Land and Housing as the Top Priority

89-96. Our Institute is pleased to see the Government securing sufficient land to go beyond the target of building 100,000 public housing units in the next 10 years and preparing land for some 80,000 private housing units in the next five years. We also welcome the Government launching measures such as Light Public Housing and the "Private Subsidised Sale Flat" scheme to significantly reduce the waiting time for public housing. As for the establishment of the "Task Force on Tackling the Issue of Subdivided Units", it should help gradually improve the living environment for subdivided unit residents and crack down on those substandard units. As to the various measures to enhance the public housing system, including extending the mortgage default guarantee period for subsidized sale flats in the second-hand market, sustaining Housing Authority's redevelopment projects, promoting smart estate management, and optimizing the Modular Integrated Construction approach to enhance speed, efficiency and quality, they will contribute to ensuring citizens' housing needs are met.

HKIA appreciates the Government's long-term planning for land supply in Hong Kong, with a projected supply of up to 7,000 hectares of land in the next 30 years and over 3,000 hectares of developable land in the next 10 years. These land supply figures are crucial for Hong Kong's long-term planning.

98. HKIA welcomes the Government's continued efforts to assist citizens in homeownership through programmes such as the Home Ownership Scheme (HOS), Green Form Subsidised Home Ownership Scheme (GSH), Starter Homes for Hong Kong Residents, and the Private Subsidised Sale Flat - Pilot

Scheme. In addition, the traditional "HOS" flats have their merits, and we suggest the Government to continue building an adequate number of "HOS" flats.

99-100. HKIA welcome the Government's adjustments to the cooling measures in response to the property market situation to alleviate difficulties for genuine homebuyers. However, the Government needs to continue monitoring the market closely to prevent the recurrence of excessive speculation and flipping activities.

Create Developable Land to Build More Housing

101. The Legislative Council has passed the "Development (Town Planning, Lands and Works) (Miscellaneous Amendments) Bill 2022" this year, streamlining procedures under urban planning and related land and works ordinances to accelerate land supply and urban development. Nonetheless, in addition to the Town Planning Ordinance, the authorities must also streamline procedures under other ordinances, such as the Buildings Ordinance, Fire Services Ordinance, and administrative procedures of the Lands Department. After the statutory plans have been approved by the Town Planning Board, architects will prepare building plans for approval by the Buildings Department based on the owners' requirements. These cumbersome approval processes often delay building completion, so streamlining is necessary. We have made many substantive recommendations in our "Submission," but, unfortunately, the Policy Address did not respond to our suggestions. We urge the Development Bureau to follow up and study these suggestions and consider implementing relevant measures promptly, including:

1. Improving the Central Processing System (CPS) function of the Buildings Department's plan approval mechanism, allowing simultaneous cross-departmental (Buildings Department, Lands Department and Planning Department) approval of General Building Plans instead of inter-departmental circulation for approval;
2. The Lands Department should simplify the approval process for Tree Preservation and Removal proposals (TPRP), such as not requiring them to be bundled with building plans for approval;
3. Regarding the Town Planning Board's approval process, efforts should be made to address the time required for circulating opinions from multiple departments during planning applications and unnecessary departmental consultations, and to allow more minor design revisions to be exempted from Town Planning Board/Planning Department approval;
4. The Lands Department should enhance its coordination with the Buildings Department to expedite the approval of building plans, and further simplify and clarify joint operation considerations for projects eligible for GFA calculation exemption;
5. The Buildings Department should simplify approval of building plans related to fire engineering methods and sustainable building design, and the recent complex BEAM Plus 2.0's performance-based approach to granting GFA exemptions contradicts the overall administrative simplification policy;
6. The Fire Services Department should expedite the approval of various fire-related plans and enhance communication and coordination with the Buildings Department, requiring consistent fire regulation requirements during inspections;
7. The Environmental Protection Department should allocate more resources for the approval of environmental or noise impact assessment reports and collaborate with the Planning

Department to explore ways to facilitate obtaining preliminary agreement on such reports so as to expedite the overall building plan approval process;

8. The Government should establish performance pledges for all departments involved in the approval process, such as striving for an 80% approval rate for building plans within two reviews by the Buildings Department;
9. Overall, government departments should adopt a "facilitator" mindset rather than a "gatekeeper" role in project development approvals;
10. Given that each building project has unique circumstances, government departments should not apply the same approach to all cases but consider a graded and individualized processing approach based on project scale and complexity, while reasonably simplifying details to reduce delays.

102 - 103. HKIA has been recommending the Government to expedite the pace and enhance the efficiency of urban renewal in old districts through measures such as exchange of plot ratio and multiple land use. We are pleased that the Government has responded positively to our suggestions. We also support the proposal to increase the borrowing limit of the Urban Renewal Authority.

104 - 105. HKIA welcomes the Government improve building management and enhance building safety, via strengthening law enforcement, providing technical and financial support to needy property owners, and amending the Building Management Ordinance. Meanwhile, it is necessary for the authorities to eliminate the long-existing problem of unauthorized building works to ensure public safety. In this regard, the Institute has several suggestions:

(a) First, it is important to educate citizens about the importance of maintaining and repairing residential properties. While older buildings certainly require proper maintenance and repair, it is also important not to neglect newer buildings, as they can quickly deteriorate if not properly maintained. Therefore, when calculating affordability before purchasing a property, citizens should take into account not only daily expenses such as management fees and utilities but also the maintenance and repair cost of buildings.

(b) Secondly, there is a need to strengthen citizens' awareness of compliance with the law and demonstrate the Government's determination in enforcing it. Unauthorized building works or alterations not only violate the law but also pose risks to building safety, endangering both oneself and neighbours. Once such violations are discovered, the relevant government departments must take immediate and stern actions. For example, when unauthorized building works are found, or when property owners fail to comply with the mandatory inspection orders issued by the Buildings Department, enforcement actions should be taken promptly without any tolerance.

(c) Additionally, the Government can require buildings to undergo inspections by professional architects or surveyors and sign certificates confirming the absence of unauthorized building works or alterations before they are sold in the second-hand market. This would discourage property owners from engaging in illegal construction and ensure that potential buyers are not unknowingly purchasing units with unauthorized building works. Currently, there are tens of thousands of secondary property transactions in Hong Kong each year, and implementing this measure would progressively reduce the number of units with unauthorized building works.

(d) To encourage property owners to proactively address the issue, the Government can formulate more lenient policies to handle cases where property owners voluntarily rectify unauthorized building works.

(e) The frequency and cost of building maintenance increase with the age of buildings. Therefore, the Government should consider accelerating urban renewal in the city, such as allocating more resources to the Urban Renewal Authority and the Housing Society, or introducing administrative measures to encourage private developers' participation in renewal projects.

107. HKIA welcomes the Government's plan to commence environmental assessment work on the Kau Yi Chau Artificial Islands within this year, so as to relieve public concerns. We suggest that the Government refers to the model of liveable city centres in Singapore and establish a City Design Committee, which could gather input from industry elites to provide professional advice on overall and district-level planning in Hong Kong, including the design proposals for major projects like the Kau Yi Chau Artificial Islands. Additionally, the Institute hopes that the Government fulfills its promise of conducting an open design competition for the Kau Yi Chau Artificial Islands development to enhance the project's design quality and provide opportunities for young architects to showcase their talents.

(VII) Work Together to Safeguard Harmony and Stability

114. HKIA appreciates the Government's adoption of innovative measures to encourage childbirth. In addition to the "Newborn Baby Bonus" and increasing the deduction ceiling for mortgage interest or domestic rents, the Government has also shortened the waiting time for public housing for families with newborns and reserved a portion of subsidized sale units for such families. These measures provide significant incentives for low-income families to have children, but the middle class is not benefiting from them. The Institute suggests increasing the tax exemption for children to assist middle-class families.

118, 119 & 121. In addition to strengthening services for the elderly and supporting persons with disabilities, HKIA recommends the Government to learn from the lessons of the past three years' pandemics and review the design and spatial standards of elderly care homes and disability accommodation, to ensure that these facilities have sufficient space to implement temporary isolation measures and arrange other necessary responses in the event of future outbreaks. Please refer to our August "Submission". HKIA also suggests the Government to enhance age-friendly building and urban design to enable the elderly to age in the community and persons with disabilities to live as independently as possible with dignity and fulfilment.

The Policy Address mentions incorporating universal design and age-friendly design into Hong Kong's housing planning to address population aging. Nevertheless, these designs often require more total floor area and larger spatial standards, which are not incentivized under existing legislation for private residential projects (unlike green building designs). Without incentives for total floor area exemption, relying solely on elderly care homes is difficult to develop the elderly housing market and address the rapidly growing aging population. For example, the Australian Government introduced an additional 20% total floor area exemption and special land use zoning to provide an adequate supply of private elderly housing. Similar elderly housing policies are being implemented in places like Singapore and Mainland China.

141. HKIA supports the Government's efforts to raise public awareness of infectious diseases. In addition to enhancing surveillance, early warning, and prevention and control capabilities, as well as promoting vaccine research and development, it is necessary to build a healthy city. In our August "Submission", we proposed the establishment of a dedicated inter-departmental task force for healthy cities to formulate guidelines and standards for planning, urban, and architectural design.

A Liveable and Vibrant City

154. HKIA supports the Government's efforts to strengthen policies that encourage energy-saving and carbon reduction in buildings. We hope that the authorities can implement mandatory disclosure of energy audit report data as soon as possible to strengthen energy-saving and emissions control. Our Institute also welcomes the gradual inclusion of different products into a legal framework to expand producer responsibility schemes.

HKIA supports the establishment of wetland conservation parks which hopefully could obtain relevant wetland certification to ensure that Hong Kong's wetland conservation projects meet international standards. At the same time, we also welcome the updating of the biodiversity strategy and action plan to safeguard the local ecosystem.

Stay United to Tell Good Stories of Hong Kong

156. HKIA has been telling the good stories of Hong Kong through architectural exhibitions for many years, including exhibitions held both locally and abroad, such as the Venice Biennale and the Urbanism\Architecture Bi-City Biennale (UABB) of Shenzhen and Hong Kong. These exhibitions showcase the design excellence of Hong Kong and the creativity of local architects in the international arena. Many themed architectural exhibitions have been held in cities such as New York, London, Tokyo, Kuala Lumpur, Shenzhen, Hangzhou, Nanjing, and Macau. The Institute will continue to align with government policies and carry out these endeavours.

The Hong Kong Institute of Architects

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