



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

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By Post and By Email  
[sen@enb.gov.hk](mailto:sen@enb.gov.hk)

Mr. WONG Kam Sing, GBS, JP  
Secretary for the Environment  
Environment Bureau  
16/F East Wing, Central Government Offices  
2 Tim Mei Avenue  
Tamar, Hong Kong

Dear Mr. Wong,

**HKIA's Views on Legislative Proposals to Optimise the Environmental Impact Assessment Ordinance Process put forth by Environment Bureau**

Regarding the legislative proposals on optimising the Environmental Impact Assessment (EIA) Ordinance process put forth by the Environment Bureau in its discussion paper tabled at the LegCo Environmental Affairs Panel meeting on 28 March 2022, the Board of Local Affairs of The Hong Kong Institute of Architects (HKIA) has gathered views of its members and summarized into the following responses.

**Centralised Environmental Database**

We support in principle the development of an open Centralised Environmental Database (CED) for practitioners' easy reference and standardizing the requirements of ecological baselines. Nevertheless, both quality and data of ecological items change from time to time, and such information should have clear effective dates for use and best be regularly updated by the Government. The frequency of updating should be consulted and agreed by specified consultants/ partitioners as they will use such data for the Ecological Environmental Report.

**Ecological and Fisheries Impact Assessment**

The proposal of allowing the ecological baseline survey before the issuance of EIA study brief may put the risk to the project proponent. Instead, we believe that a standardized EIA brief issued at an earlier stage would be more welcomed in facilitating project delivery.

**Air Quality Assessment**

The territory-wide baseline model, such as air quality, should be for reference only. To apply the territory-wide data to the specific location of a proposed project, it should be verified by specified consultants.



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### Noise Impact Assessment

With the promulgation of quieter electric vehicles, the limit of noise impact to development sites should be considered with this in view, allowing for better development potential for any given site without sacrificing the acoustic comfort of the affected community.

### Landscape and Visual Impact Assessment (LVIA)

We hope to receive more details on the proposal for further review. In general, the LVIA requirement should only be applicable to special sensitive areas, such as the Peak, and certain cultural significant and waterfront areas.

### Cultural Heritage Impact Assessment

We welcome the development of specific guidelines on sites of archaeological interests requiring cultural heritage impact assessment. This is especially important for Grade A buildings.

### Conclusion

We are glad to see that the Government is taking initiative to expedite the EIA process. We particularly hope that the Government would establish clear guidelines requiring the response to the submission of all assessments to be made within a certain period, say two months for initial submission and one month for re-submissions.

Our members would appreciate an opportunity to discuss with your bureau further on how we can work hand in hand to make Hong Kong a more liveable city while ensuring the continued growth and development of the territory's prosperity.

Yours sincerely,

Donald CHOI Wun Hing, *FHKIA, R.A.*  
President  
The Hong Kong Institute of Architects

Cc: Hon TSE Wai-chuen, Tony, BBS, JP  
HK LegCo, Functional Constituency (Architectural, Surveying, Planning and Landscape)