



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

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By Post and By Email  
[benyblo@devb.gov.hk](mailto:benyblo@devb.gov.hk)

Mr. LO Yu Bun, Ben  
Chief Assistant Secretary (Works)  
Commissioner for Heritage's Office  
Development Bureau  
Unit 701B, 7/F, Empire Centre  
68 Mody Road, Tsim Sha Tsui East, Kowloon

Dear Mr. Lo,

**HKIA's Views on Revitalising Historic Buildings Through Partnership Scheme and Financial Assistance for Maintenance Scheme on Built Heritage**

Referring to our online meeting on 24 January 2022, thank you for the frank exchange of comments on the implementation of Revitalising Historic Buildings Through Partnership Scheme (R-Scheme) and Financial Assistance for Maintenance Scheme on Built Heritage (FAS). HKIA shares your belief that the protection, conservation, and revitalisation of historical and heritage sites and buildings would enhance our city's cultural heritage, identity, and vitality. Below are a few points we discussed at the meeting and some further suggestions for your consideration:

**Revitalising Historic Buildings Through Partnership Scheme (R-Scheme)**

1. The responsibility of pre-construction building works, like site investigation (S.I.) and ground investigation (G.I.), placed on the architect's consultancy services is inappropriate. The lump sum fee for the uncertain risks requires the architect to gamble on incomplete information which is unhealthy for our profession. We suggest that the capital funding for the fee of consultancy services and the cost of building works shall be separately processed.
2. The delayed payment schedule causes a cash-flow problem for the appointed architect, especially for those younger practices with less financial resources. More reasonable contract work scope and terms shall be adopted.



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3. The administrative procedures for Architect's Instructions (A.I.) issuance during construction works should be streamlined. The principles on the different criteria of issuing A.I.s can be pre-agreed between CHO and the appointed architect at an early stage of the project. We suggest that ArchSD's technical advice shall be limited to work procedures and principles only.
4. Consultant is only formally appointed by the NGO after the R scheme has been awarded via tender; and the architect needs to provide pro-bono work for the NGO bid but may not eventually be appointed as the consultant. DEVB may consider conducting pre-qualification of NGOs, instead of open invitation of NGOs for scheme submission. The R scheme application can then be split into 2 stages, with Stage 1 funding being provided to those qualified NGOs for engaging architects on preparation of bidding drawings. This might make the selection of NGOs more complicated but such pre-qualification of NGOs shall facilitate DEVB to identify reliable NGO bidders with quality submissions. Also, the funding provided to the NGO bidders ensures that the efforts spent by architects will be compensated.

### **Financial Assistance for Maintenance Scheme on Built Heritage (FAS)**

1. The current FAS aims to provide financial assistance for minor maintenance works with a ceiling of HK\$2 million inclusive for consultancy fee (capped at 18%) and maintenance work costs. It is often that the appointed architect will sublet the consultancy works to Registered Structural Engineers (RSE), Registered Geotechnical Engineers (RGE), Building Services Engineers (BSE) and topographical surveyors. The current amount of capital fund is insufficient and needs further review. With additional funding announced recently in the 2022-2023 Budget for conservation of heritage and historic buildings, CHO should consider expanding the financial support to cover larger-scale maintenance works, or even adaptive reuse and revitalisation of heritage buildings.

While the current FAS with a ceiling of HK\$2 million can be kept for minor maintenance work, we suggest another funding mode with higher consultancy fees to cater for maintenance works that involve more than one disciplines. Below please find some examples:

- Repairs of structural elements that need Authorized Person (AP) / RSE's input;
- Repairs of building services and drainage work involving AP / BSE;



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- Repairs related to site landscape features involving AP / RGE / topographical surveyors; and
  - Repairs beyond minor works submission and involving alternation and addition (A&A) submissions, e.g. repair for an existing roof that is in a dilapidated condition requiring demolition and re-construction of the roof structure (This is regarded as A&A works under BD's Practice Guidebook for Adaptive Re-use of and Alteration and Addition Works to Heritage Buildings 2012).
2. The current policy only allows funding for repair of original/ historic fabric but NOT restoration of a lost historic fabric, which makes it impossible to correct the previous wrong alteration (e.g. restoration of timber windows to replace later introduced defective aluminium windows is not supported by FAS currently). A review on this policy is necessary to make the funding to be used more effectively for the benefit of heritage conservation instead of turning a blind eye to obvious harm on heritages.
  3. The change of maintenance scope during the consultancy services (in case when new scope is identified during condition survey and preparation of consultancy proposal) without allowance to adjust consultancy fee has also created unfair situations.
  4. The long application approval period and the endorsement time at each project stage also need streamlining to improve the work process so that resources are not wasted on unnecessary administrative works.
  5. FAS may not be a feasible business proposition in its current state since much of it is at the expense of the architect / conservator and NGO. This has also resulted in many owners refusing to have their properties graded and others choosing not to opt for FAS. The crux of the issue is with AMO where technical staff in general is without a comprehensive understanding or empathy of heritage conservation best practices and historic/modern building construction. This may result in delays in decision making causing project overruns.

We are happy to assist CHO in the review of expanding the financial support to FAS to benefit more historic buildings.



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**Regular communication and sharing between CHO and HKIA**

We shall continue to share our member views with CHO on various topics in future sharing sessions, like reviews of building regulations imposed onto historic buildings, review of grading mechanisms to cover post-war modern buildings, etc. We suggest having regular structural discussion meeting with HKIA twice a year, and a major internal review on all CHO schemes and mechanisms once every 2 years with industry stakeholders and leaders to share thoughts and feedback. HKIA has confidence that there are many opportunities for our Institute to collaborate with the Government to meet the public expectation on heritage conservation in our community.

Should you require any further information, please do not hesitate to contact us via HKIA Secretariat Ms. Harmelie Kinsman at 25116323 and email [harmeliekinsman@hkia.org.hk](mailto:harmeliekinsman@hkia.org.hk).

Yours sincerely,

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