

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

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Dear John

# **HKIA's Responses to Policy Address 2022**

The Hong Kong Institute of Architects (HKIA) would like to share our views on your freshly delivered policy address. We were particularly excited when you employed "starting a new chapter for Hong Kong" as your election campaign slogan because it implied that you intended to do away with those outdated long-standing regulations, and to adopt creative thinking in resolving lingering chronic issues and reenergizing the city's growth momentum towards the long-term prosperity of Hong Kong. And your policy address speech with the elaborated list of action plans and KPIs indeed tells us that the Government is really putting words into actions.

As such, we at HKIA would like to submit our comments based on our professional knowledge and expertise, which hopefully would help make Hong Kong a better place to live and work.

Yours sincerely

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President

The Hong Kong Institute of Architects

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Encl. Comments on Policy Address from HKIA

# **Comments on Policy Address from HKIA**

#### **Streamlining Regulations and Expediting Procedures**

We welcome the initiative of simplifying regulations and procedures, especially regarding building plan approval and planning-related statutory and administrative procedures. We also support the establishment of KPIs to reward good performers while poor performance will not be tolerated. Nonetheless, much more can be done.

# 1 Adoption of a wholistic approach

- Instead of adopting "Drive development by transport infrastructure" as a major theme in the policy address, we strongly advocate planning and designing urban developments through a "People-oriented (以人為本)" planning approach, which puts people and communities' needs, such as walkability, diversified social and economic activities through well-connected public spaces and facilities, well-composed greenery and open spaces in various forms and scales, as the top priority, followed by the allocation of highways, railways, vehicles and other infrastructures. People-Oriented means Cities-4-People (C4P). Transport efficiency focusing on cost-saving which has been the adopted practice for the past few decades is proven to be not a sustainable way to make happy cities/communities with sense of belonging. There are many local and overseas cases demonstrating how to make a happy and sustainable city by well-thought 'People-Oriented" urban planning and architectural design, and HKIA is ready to elaborate this in greater details. The successful development of Qianhai is a good example of "people-oriented" planning approach based on a productivity-driven mindset instead of a cost-saving one.
- Only under a wholistic approach to reduce and/or remove bottlenecks along a particular government process will significant improvements be realized. Otherwise, the piece-meal enhancements may not create a strong enough impression to stimulate stakeholders' continued support for further changes.
- While we are glad to see that the Government would liaise with Shenzhen as well as others in the Greater Bay Area (GBA) on the development of Northern Metropolis, it should also ensure the alignment and consistency of major development plans such as Hong Kong 2030+, Climate Action Plan 2030+, Railways and Major Roads beyond 2030, Northern Metropolis Development Strategy, and Central Waters Development Strategy so that resources are allocated properly, and consistent and achievable goals are established. In the process, the Planning Standards and Guidelines, Lease Conditions, Buildings Ordinance as well as many other outdated ordinances may need to be reviewed or amended according to changing needs.

#### 2 Breaking down departmental silos.

 The increased participation of professionals in statutory and advisory bodies would enhance communication between government departments and market partitioners, achieving positive results. A good example is the establishment of the Harbourfront Commission which has been the major propeller behind the making of a long-deserved scenic promenade along Victoria Harbour.

# 3 Fundamental changes within the Government

- As suggested in the policy address, the work culture of civil servants needs to be revamped. Convoluted internal guidelines should be abolished or simplified where appropriate. Civil servants should be encouraged to exercise their professional judgements boldly and rid of unnecessary concerns.
- The goal of turning all government services online in two years is an aggressive KPI. In any event, we do agree that the Government should take the lead in digitalization and IT transformation, not only to encourage the private sector to follow suit, but also to enable the Government's full transition to a more efficient e-government and reducing red tape.

# 4 Proactive participation of Government in policy driven initiatives

- Instead of primarily relying on consultation and making exemptions for the
  approval process, the Government should consider proactively proposing
  changes and involving market partitioners to implement changes.
  Professionals from both the public and private sectors should be empowered
  to work together to release their full potentials. The Government should also
  encourage devolution of power, and foster self-certification by professionals.
- Another example would be instead of providing a potential site to an NGO and allowing it to develop by itself, say into a transitional housing project, the Government may want to consider involved in tendering for consultants and other parts of the development process to ensure a smooth implementation.
- The Government should adopt value-for-money tender assessment methods to avoid the vicious cycle of fee-diving.

#### Manpower Issues

### 5 Acute labour shortage

- There are quite a few initiatives to attract non-local talent to come to Hong Kong in the policy address. On the other hand, it doesn't appear that local talent receives similar treatment. As such, the Government may consider allocating resources on local talent retention schemes. For example, it could introduce a talent housing policy providing temporary subsidized housing to retain local young talent. The Government could also offer incentives (such as those proposed subsidy and internship programmes for cultural and arts students) for young people choosing professional majors at university.
- Labour shortage has led to public and private sectors competing fiercely for the same pool of fresh graduates, which usually ends up with the talent joining the Government and statutory organizations. More stringent experience requirements could be established for entrance posts in the public sector so that the private sector may at least have some fresh blood to fill the manpower voids.

- Streamlining procedures and regulations will actually reduce the related demand for human resources in both the public and private sectors. As such, we place simplifying rules and regulations as the top priority for the Government to consider.
- To enhance the General Employment Policy and the Admission Scheme for Mainland Talents and Professionals and Project Manpower Requirement for Supporting the Economy, the current Talent List of 13 professions should be expanded to include architectural professionals, especially supporting staff, to meet with the expected demand from the major construction projects in the coming years. Also, the Development Bureau shall review the project team requirements to allow flexibility in view of the changing labour supply in the market.
- To ensure the continued influx of locally trained architects, training fund for local architectural graduates should be established. Similar schemes have been in existence for years in other professions such as Engineers.

# 6 Educational relevancy

- Rapid technological advancement and the global-wide advocacy for low carbon urban living has called for an across-the-board review of the curriculum of our university education, for professional practices to keep our services competitive and relevant to both local and global markets. To this end, additional resources should be allocated to support upscaling and updating of our tertiary education. Equally important, we recommend the setting up of a Continuous Professional Development Funding Scheme to support upskilling of the practising professionals.
- The Government should also consider broadening the coverage of the VTC Earn and Learn Scheme to address the manpower needs of those trades which are currently seriously suffering from labour shortage. In our industry, Clerks of Works, site staff and technicians are all in short supply.

### **Land and Housing Supply**

### 7 Land supply

- We welcome the proposed amendment of the Town Planning Ordinance and other planning-related ordinances within this year to expedite the land conversion and approval procedures, which is long overdue.
- The Government should conduct surveys to redefine the boundaries of country parks, so as to release more precious land resources for residential use.
- As suggested in the policy address, agricultural land, green belt, brownfield sites and land parcels currently occupied by the Civil Servants' Cooperative Building Societies should be reviewed against the overall development plan of Hong Kong. After study, the land resources released could be used for residential use.

# 8 Housing supply

- We support the introduction of Light Public Housing and utilization of Modular Integrated Construction (MiC) to expedite their production. And we architects can also contribute to the development of "Well-Being" design guidelines.
- When the Design and Build model is deployed on housing projects, systematic control should be set up to ensure the well-being architectural design in the tender will not be replaced by the contractor's cost-driven design alternative after the tender has been awarded.
- The Government should revamp the existing "public housing subsidised housing private housing" housing ladder. Instead of relying on newly-built public housing, the Government should encourage turnover of public housing to vacate more public housing resources for the needy.

#### **Healthy City**

### 9 Sustainability

- While both Shenzhen and Singapore have zero carbon districts, the Zero Carbon Building has been the only example that we can quote in Hong Kong. The Government should work with the private sector to develop a bigger demonstration area, showcasing our latest carbon reduction solutions to the rest of the world.
- The Government has introduced a series of measures since 2011, including the promulgation of Sustainable Building Design Guidelines granting GFA concessions (at a 10% cap) for certain green and amenity features in new building developments. The Government may want to consider either enlarging the incentives to encourage private developers to invest on climate actions towards carbon neutrality, or simply make it a mandatory requirement for new developments.
- The Government should encourage the participation of existing buildings in Building Environmental Assessment Method Plus (BEAM Plus) to achieve the long-term goal of carbon neutrality, probably through offering incentives for sustainable retrofitting.
- The Government should take the lead in adopting carbon neutral solutions and encourage the private sector to follow suit so as to create an ecosystem in the society to work towards the goal of carbon neutrality.

### 10 Liveability

• Hong Kong is a highly dense and compact city with high concentration of population. According to 2021 census results, the median floor area of household is 430 sq ft and the per capita living area is 172 sq ft, making the living space in Hong Kong one of the lowest by global standard. While the ultimate solution is to increase land supply for housing, there is room for enhancing the liveability and improving the living space in Hong Kong. To address the "nano flats" (size less than 20 sq m) introduced to the market in recent years, the Government has promulgated the new minimum unit size

- of 26 sq m requirement. The Government should consider including the provision of "minimum flat area" and/or "maximum number of flats" in residential land leases, so as to strike a reasonable balance between per capita floor area and housing production.
- The Government should set up a timetable to ban substandard Sub-divided Units (SDUs), eventually making the conversion of SDUs mandatory. Subject to the minimum unit size requirement, the Government should ensure the supply of small housing units be able to meet residential needs in the society.
- The Government should make efforts to connect scattered public spaces using a user-friendly approach that is in line with quality living. Again, the promenade along Victoria Harbour is a good showcase.
- For the Kau Yi Chau Artificial Island development, healthy living is very important. The setting up of a Healthy Living Authority could help establish good guidance on the planning and design of the development prior to construction. The appraising result from the efforts of the Harbourfront Commission is noticeable by the public.

# 11 Double aging

- Double-ageing (ageing of population and ageing of building stock) is a serious issue Hong Kong and other major cities currently facing. It has created huge concerns on health and safety, especially amidst the COVID pandemic.
- The Government should establish a commission under the Buildings Department to provide technical support to homeowners regarding maintenance work of "three nil" buildings. The Government may consider directly involving in the 'agency-managed' maintenance work for an entire building, and charging individual owners separately with subsidies coming from a funding scheme overseen by the commission.
- There is an urgent need to review and enhance the design and support for residential care homes for the elderly (RCHEs) as well as rules and regulations governing the operation of RCHEs.

### **Innovation and Creativity**

### 12 Promoting innovation and creativity

The planning, urban design, architecture and construction sectors, in aggregate, generated a total value of HK\$4.94 billion in 2008, which soared some 2.3 times over ten years to HK\$11.7 billion in 2018. The potential to grow even faster and contribute more to the Hong Kong economy is enormous in the next few years through promotion of innovation and creativity. We at HKIA as the leader of these sectors urge the Government to provide specific support similar to the \$1 billion "Film Development Fund" launched in May 2019 to propell the next stage development of our industry, such as increasing the use of design competitions in public building facilities and urban renewal projects, subsidizing new graduates and young people to enter the industry, strengthening the participation of young architects and urban designers in entrepreneurial programmes, setting up special funds to support the adoption of digitalization in architecture and urban design, and

- introducing new technologies and encouraging innovative ideas to integrate design and modern technologies.
- Innovation does not necessarily mean technology or IT only. The Government should promote creative thinking on various fronts, particularly it should encourage more non-IT innovations. In fact, establishing the organization of professionally conducted architectural competitions for major public building projects as a standard policy would be a great tool to uncover the best innovative and creative designs over fee competitions.
- To provide work opportunities for young professionals and smart practices to involve in government projects, to allow them to express their creativity, and to improve the living environment across the districts, the Government should organize more design competitions and sharing workshops on small public projects. Also, they are currently excluded from the recommended list of consultants to work in the GBA. The Development Bureau could help liaise with Mainland authorities so that they can access the Mainland market.
- In the construction industry, while we support the Government's promotion of the adoption of MiC, incentives and supporting facilities should also be provided to encourage the development and application of other similar technologies in the industry, especially in view of the shortage of labour.
- The software cost for maintaining the continuation of the architectural profession to use new technologies such as BIM is of huge concern. Pay for Technology Scheme, like the Pay for Safety Scheme currently running in the construction industry, can be an option for consideration.

# 13 Promoting culture and arts

- Hong Kong is crafted with the distinctive advantage as a cultural melting pot of East and West. On top of this, we should capture and brand the global trend of creative industry and cultural tourism development to shape our soft power so as to strengthen our creative core. We are highly encouraged by the newly proposed GBA Culture and Arts Festival in 2024 and the annual Hong Kong Week and Chinese Opera Festival. City planning and architectural design are the artistic physical representation of our culture. Architects are at a good position to support the promotion of quality city planning and architectural design both locally and internationally, through organizing an Architecture Festival comprising a wide variety of cultural activities, such as an international Architectural Expo, architectural tours to unique heritage sites of our off-shore islands and old villages in the New Territories. diverse art/design/movie/musical exhibitions performances curated from city planning/architectural design perspectives. The mega event has the added benefit of attracting local young people to join the profession and promoting our talented architects and smart practices to other places. It can also attract tourists to come to Hong Kong and support our tourism industry.
- At the District level, each district has its own social and cultural landscape that is unique and distinct. We support the pilot development model of "Energizing Kowloon East", and propose to establish a similar interdepartmental platform in each district to rejuvenate the community with local cultural and public space, and drive the development of a smart-scale

creative economy in each district, such as holiday art and craft festival, remodeling of special old shops (地區老舗), and incubation market for local designer brands. Such initiative not only responds to the concept of "implementing district development" put forward in the policy address, but also creates more and different types of creative projects for young people.

### COVID

#### 14 Open Border

- The COVID-induced border closure and quarantine control measures have caused severe disruptions in the local economy in many ways. Other than human resources, international connection is another valuable asset of Hong Kong, which is the basis of our international financial and business centre status. While we agree that the first and foremost goal of public policies is to protect public health and safety, the Government should make it easier for overseas and Mainland tourists and business people to come to Hong Kong and our residents to go elsewhere.
- Reconnection with the rest of the world as soon as possible is what Hong Kong citizens are all looking forward to. It should help bring business back to Hong Kong, stop the brain drain and heal the wounds of many disrupted sectors.

# Conclusion

#### 15 In summary

- Despite the many challenges lying ahead, we are sure the Administration under your leadership will overcome them and bring Hong Kong's business back to normal. Our members hope that the above suggestions will expedite the territory's recovery, and we are always ready to join hands with the Government in mapping a brighter future for Hong Kong.
- In your closing remarks, you encourage everybody to tell good stories of Hong Kong. We are pleased to let you know that HKIA and our members have been doing exactly this for years. We have been curating exhibitions both locally and overseas to promote the profession, our architecture as well as Hong Kong under different themes. Our young architect groups and practices have also done a lot of community engagement work in the past, and they are enthusiastic to keep the momentum going. Therefore, let's join hands and be good storytellers!