



# THE HONG KONG INSTITUTE OF SURVEYORS

11 May 2005

**BY FAX & POST**  
**#2881 6402**

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Urban Design and Landscape Section  
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15/F, North Point Government Offices  
333 Java Road, North Point, Hong Kong

Dear Sir/Madam

## **Feasibility Study for Establishment of Air Ventilation Assessment System**

We refer to your letter dated 29 April 2005 and regret to inform you that we cannot line up representatives of our institute in time to attend the forum as scheduled. We are, however, extremely concern about the rationale behind and implication of the establishment of the proposed AVA system. We doubt very much the practicality of having such a system applicable for the built up urban area of Hong Kong.

We are also surprised to learn that it has already been proposed with different stages of implementation while the fundamental issue and foundation for the system have yet to undergo vigorous scientific study and proofs such as climatic mapping and breezeways analysis.

Given the diversities of the existing built up townscape in Hong Kong urban areas, we are skeptical how a widely accepted assessment method and a set of definitive assessment standards and criteria could be established in detail.

In the short time available to us for soliciting views from our members, we would like to express our initial views as summarized in the annex. We respectfully request your kind consideration for a review of the applicability of such a system for Hong Kong. We would also suggest that in order to let more members of our Institute to understand more of your proposal, it might be appropriate to arrange an open forum for you to introduce the system.

Yours faithfully

TT Cheung  
President (2004-05)

c.c. Vice-President, Mr Raymond Chan  
BSD Chairman, Mr Edwin Tang

AW/aw



### **Initial Comments on the Feasibility Study for Establishment of Air Ventilation Assessment System from the HKIS**

1. It appears that although at the initial stage the requirement to undertake Air Ventilation Assessment (AVA) may be an advisory approach, it is evident that this would turn out to be a regulatory approach when an urban climatic map is established.
2. As there is yet to establish a widely accepted assessment method and definitive assessment standard and criteria to ascertain the types of projects/ circumstances that warrant an AVA, it is unrealistic to expect initiatives from professionals and the property industry to follow through.
3. As the whole concept of requiring an AVA in the context of Hong Kong (including its peculiar townscape and urban built form) is still in an experimental study stage, it is premature to set out the 8 circumstances to as listed in Page 20-21. It is doubtful how the private sector could be encouraged to conduct AVA on a voluntary basis. Besides, the suggestion to implement the AVA through administrative means would infringe the rights of existing property/land owners.
4. The quoted examples of having AVA incorporated into statutory frameworks in Tokyo and Sydney give little details to substantiate the same can be applicable in the context of Hong Kong which is still one of the most densely populated city in the world and designed with unprecedented number of high rise buildings. Having said that, the concept might be applicable in some virgin planned new towns (especially when talking about "creating breezeways by way of orientation of street grids" but impracticable in the built up areas.
5. There should be ongoing involvement of the stakeholders in the making and must be a major review (including a cost and benefit analysis of applying the AVA throughout Hong Kong) at the end of the initial stage to ascertain whether it is worth pursuing further to the next stage.
6. If the Planning Department considers it an advisory approach in establishing and applying the AVA system throughout Hong Kong, it should provides assurance that this would not become an administrative tool to hinder planning approval of property development, furthermore, not to impose too much constraints to deprive of architectural design freedom.



7. There is no strong foundation to develop such AVA system for the Hong Kong situation based on the concept of breezeways and climatic maps that are apparently ever-changing, fluid, loosely defined and constantly subject to changes seasonally and at all times. Before a convincing scientific analysis of the current proposal has been established and its implications clearly defined, it is irrational to propose a regulatory approach for its implementation and totally pre-mature to suggest and frame out the various stages of implementation and request the industry to follow and the society at large to bear the cost.

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