

31 August 2021

By Fax (2537 9083),
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Ms HO Pui Ling, Doris, JP
Head, Policy Innovation and Co-ordination Office
Policy Innovation and Co-ordination Office
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Dear Ms HO,

Re: HKIS Views to 2021 Policy Address

On behalf of the Hong Kong Institute of Surveyors (HKIS), I have much pleasure in submitting our views and expectations as below for your consideration.

1 Land Supply

1.1 Infrastructure-led for Land Supply

1.1.1 We propose that the Government expedites the design and provisions of infrastructures in New Development Areas (NDAs) and also developed areas. We note that many infrastructure construction works in NDAs are yet to be commenced. Developments will be delayed as a result of slow progress of provisions of infrastructures. The early completion of infrastructures could expedite the planned residential units / floor space supply.

1.2 Streamlining of Application and Approval Processes

1.2.1 We understand that the Government is promoting streamlining of application and approval processes amongst Buildings Department, Planning Department and Lands Department. We support such policy. Further streamlining and elimination of duplications should be promoted, especially for building plan approval and consent/approval under lease. The Government needs to conduct historical study to show the intention of government selling sites for development at different times so that the leases can be properly interpreted to reduce frustrations in the private land market. The Government should also review the practice and of why

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and when land premium should be charged so that the premium charging mechanism would not hold back private development.

1.3 Premium for Lease Modification and Land Exchange

- 1.3.1 We propose that the Government makes use of land premium standard rates for lease modification/land exchange of agricultural land. The standard rates pilot scheme for industrial building redevelopment is a good precedent. Agricultural land is a major source of residential units / floor space supply from private sector. Standard rates pilot scheme would assist in expediting the releasing of development potential in the New Territories.

1.4 Review on Technical Considerations of Developments

1.4.1 Carparking Requirements

We propose that the Government reviews the carparking requirements for development / redevelopment cases. Substantial carparking requirement is a huge obstacle for private redevelopments, especially for small sites (say less than 10,000ft²). Deep basement for accommodating the required number of carparking spaces has resulted in high construction and maintenance costs and lengthened development period.

1.4.2 Town Planning Approval Process

We propose that the Government reviews the approval process of the outline zoning plans and planning applications. We note that there are long approval processes for planning applications. The comments and requirements from the Town Planning Board and government departments for similar cases might be inconsistent or unnecessary. Applicants may find it difficult to comply with such requirements.

1.4.3 Smart City – Submissions for Development

We understand that the Buildings Department is preparing to launch an Electronic Submission Hub for processing electronic plans and documents. We support such system which can improve the operational efficiency of various departments in processing building plans. Similar systems could be promoted to planning and land applications in due course.

1.4.4 Requirements on New Tender Sites

We note that various technical impact assessment requirements (including traffic, drainage, sewerage, noise) have been incorporated into most of the new tender sites in recent years. Excessive impact



assessment requirements would lead to delay of construction including lengthy approval process by various departments. “Infrastructure-led” development approach could minimise the requirements on such impact assessments.

Provision of government accommodation in many new land sales have been seen to be too aggressive. We suggest the Government to review and explore if there should be a cap for each tender site for such provision in order to shorten construction period and relevant approval and acceptance timing by the receiving authority of such accommodation.

1.5 Relocation of Government Buildings

- 1.5.1 Development potential of many sites of existing Government buildings have not been fully utilized. We propose the Government to review such land development and release the development potential.

2 Building

2.1 Minimising Underground Construction for Health and Sustainable Design

- 2.1.1 Basement car park construction has jetted up construction cost and substantially lengthened construction period due to extensive underground construction. While the required extensive excavation and mechanical ventilation installation would result in substantial energy consumption, it is also difficult and costly to maintain and keep clean the system in proper functioning and a hygienic condition.
- 2.1.2 Naturally ventilated car park supplemented by minimal mechanical ventilation should be the preferred design for more effective handling of emitted exhaust gas and from fire safety and fire evacuation point of view.
- 2.1.3 The Government has explained that prohibiting above-ground car parks would help control the building bulk. However, given the full imposition of height restrictions in the Outline Zoning Plans and sustainable building design guidelines under the jurisdiction of the Buildings Department, there is already a coordinated means of control on building bulk. Unnecessary restriction on car park design for building bulk control is already redundant and out of context.



- 2.1.4 The Government should remove the hurdle on car park design which are supplementary to the building use to allow flexibility of building design and promote a healthier, more economical, and sustainable built environment.

2.2 Overall Revamp of the Outdated Buildings Ordinance and Allied Regulations

- 2.2.1 The extant Buildings Ordinances and the allied regulations have been criticised as outdated and not in pace with the modern life city development needs. Moreover, the inflexibility of introducing technological changes and enhancement is also due to the prescriptive legislation approach for most existing control requirements. The Covid-19 pandemic has also alerted us to the urgency of undertaking a holistic review of the adequacy and effectiveness of the current statutory standards on the hygiene and healthiness of buildings, as evident by the public concerns on drainage installations and the commonly seen non-naturally ventilated bathroom/toilet design.
- 2.2.2 Strategy on enforcement of building control on unauthorised building works, dangerous buildings, building maintenance and repair, and resolving disputes due to water seepage problems also require urgent attention due to the ageing building situation in Hong Kong. We would urge the Government to take a proactive stance in setting out a road map and take immediate action in reviewing and enhancing the entire building control mechanism through the Buildings Ordinance and the administration of the Buildings Department.

2.3 Minimum Living Space

- 2.3.1 The nano flat development trend resulting in grossly tiny and unhealthy living space has induced public criticism and led to a wide range of construction, building use, and long-term maintenance problems.
- 2.3.2 A tiny flat design would lead to low-efficiency building layout design and densely set building blocks which are undesirable. Unreasonably small bathrooms and kitchens may induce hazards in use, and the constrained manoeuvring space provision would cause significant inconvenience or sometimes unsafe situations for kids and aged occupants. Constrained construction space also results in access difficulties to maintain essential building parts and elements and necessary daily upkeep and cleansing.



- 2.3.3 It is high time for the Government to set a minimum habitable space size for any future housing development to avoid the emerging undesirable social and building problems brought by the grossly undersized flat design.

2.4 Subdivided Units (SDUs)

- 2.4.1 Implementing tenancy control on subdivided units alone could not resolve the associated health and safety problems. The Government should also take effective enforcement on those unauthorised sub-divided units possessing serious and imminent safety and health hazard to phase out the extreme cases.
- 2.4.2 We reiterate that a pragmatic approach is required to allow a fair number of SDUs to be preserved after necessary and appropriate interim improvements. We suggest the Government formulate an interim design and conversion requirements for SDUs and implement a validation scheme to encourage the upgrade of sub-standard SDUs during this transition period before catching up with the public housing supply.
- 2.4.3 We also call for strengthened and continued financial support by the Government to provide transitional housing via public and private collaboration, which could help alleviate the problem in the interim.

2.5 Modular Integrated Construction (MiC) Policy

- 2.5.1 We appreciate the Government's initiatives in promoting and encouraging construction by the MiC method in the past few years. However, to channel the limited resources and expertise on this new construction method in the most effective and beneficial way, the Government should draw up comprehensive design and construction guidelines with necessary legislation backup to help remove the hardships and obstacles frequently encountered by the professionals and contractors.
- 2.5.2 Almost all current MiC unit manufacturing and assembly plants are located outside Hong Kong. The Government should support the setting up of MiC unit manufacturing and assembly plants locally, which could minimise cost and delay due to long-haul transportation and simplify the burden of building professionals in supervising the MiC unit production. The local assembly plants which run in modern technology could provide employment and training opportunities for local professional and technical personnel, which is essential in further upgrading the skills and competitiveness of the Hong Kong construction industry.



2.6 Implementation of Electronic Submissions by All Departments

2.6.1 Buildings Department's effort in setting up an electronic submission system to facilitate effective and efficient handling of statutory submission for building projects is highly appreciated. However, the Government should be aware that the long processing time on the relevant submissions by numerous other government departments is also causing delays to the entire approval process.

2.6.2 We would urge the Government to simultaneously direct all departments involved in processing building submissions to advance from paper-based to electronic submission mode at the same pace. A comprehensive and complete system is urgently needed to facilitate the processing of submissions by all departments through the centralised electronic submission hub developed by the Buildings Department in a timely and consistent manner.

2.7 Building Management for Aged Buildings

2.7.1 Whilst we welcome and support the Mandatory Building Inspection Subsidy Scheme and the recent Building Drainage System Repair Subsidy Scheme for the improvement of the drainage problems in aged buildings, it is commented by the public that the Government is just pursuing a piecemeal remedial action without considering the other related building management problems arisen in these old buildings. We strongly recommend the Government should take the holistic long-term policies by setting up a specialised team comprised of professional members from building and building management to co-ordinate the matters related to various government departments for the better management of these aged buildings.

3 Housing

3.1 Public Rental Housing

3.1.1 There continues to be a lot of concerns for public rental housing supply as the average waiting time for first allocations is 5.8 years now. The projected new supply of 101,300 public housing units (including both public rental and subsidised sale units) in the five Financial Years from 2020/21 to 2024/25 is still far below the target supply figure as stated in the 2018 Long Term Housing Strategy Report.



- 3.1.2 To expedite the supply of the public rental housing, we propose to build higher public housing block towers, say up to 50 floors, which will lead to a 25% substantial increase in flat supply as compared to the current 40-storey high block towers.
- 3.1.3 We urge for redevelopment of those old public housing estates completed in the 1950s and 1960s with a view to achieving sustainable and healthy built environment for residents. The redevelopment model adopted by the Hong Kong Housing Society in Shaukeiwan Ming Wah Estate have already served as a successful example.

3.2 Transitional Housing

- 3.2.1 We appreciate various NGOs' great efforts in carrying out many transitional housing projects with the Government funding of HK\$2 billion last year. To satisfy the overwhelming housing demand from people living in sub-divided flat units, we strongly opine that the Government should continue to give full support (both in terms of financial funding and land allocations) to the transitional housing projects in the years to come. Sub-divided flat units should be replaced as soon as possible.

3.3 Home Ownership Scheme (HOS)/Subsidised Housing for Sale

- 3.3.1 Hong Kong construction industry had contributed to the successful Private Sector Participation Scheme (PSPS) for providing subsidised housing for sale in the past. Normally a PSPS project could be completed in 3 to 4 years' time. Therefore, we would like to request the Government to revamp the PSPS Scheme with a view to speeding up the supply of subsidised housing for sale.

3.4 Starter Homes Pilot Project for Hong Kong Residents

- 3.4.1 We support the Urban Renewal Authority (URA) to continue with the development of Starter Homes Pilot Project. It is an effective way to help those first-time homebuyers who cannot afford private housing. To be fair, we consider the Home Starters Scheme Housing flats should only be resold to those local first-time homebuyers in the secondary market.

3.5 Elderly Housing

- 3.5.1 Elderly-friendly building designs are considered very helpful in sustaining the elderly's well-being. Therefore, we propose it should be adopted as a basic statutory domestic building design standard, similar to the



disabled design codes, which will effectively enable the elderly to live safely in their own home and hence results in a delay of their demand for Aged Home facilities. The HKIS has produced a relevant design codes proposal and will be happy to discuss further with the Building Authority if such opportunity arises.

4 Land Management and Planning

4.1 Accelerating Land Development

4.1.1 The Government should formulate a strategic plan to improve the reliability of the land boundary records in the New Territories by strengthening the existing legal framework and administrative measures for the validation of land boundary determination. The measures would be able to accelerate land development projects, including land resumption for public works and land exchange for residential developments. By resolving the land boundary problems stemmed from inferior land boundary records, vast amount of affected land would be released, and the land development process would be much accelerated.

4.2 Building Information Modelling (BIM)

4.2.1 The HKIS would like to see the Government continue advocating the digitisation of the construction industry via a wider adoption of the BIM technology, from design, construction, cost control project management and facility management, to support different types of development in Hong Kong. We also welcome the Government to continue facilitating the setting up of relevant standards, providing training and promoting the applications of BIM in Hong Kong. In particular with the increasing demand for BIM practitioners in the industry, the HKIS suggests the Government deploy more resources/fundings in facilitating the training of BIM practitioners.

4.2.2 The Government should continue to promote the use of BIM technology in the construction industry and allocate resources for the capacity development and data sharing of BIM. A centralised BIM data repository should be established to facilitate the management and exchange of open BIM data.

4.2.3 To speed up the use of BIM and its drive for the Hong Kong Smart City Blueprint, the Government should take immediate action to set up a task force for the construction of as-built BIM models of basic Level of



Information Need (LOIN) standard of all the existing high-rise buildings/infrastructures in Hong Kong using advanced surveying technologies available.

4.3 Spatial Data Infrastructure (SDI) in Hong Kong

- 4.3.1 Accurate and up-to-date geospatial information including three-dimensional (3D) digital map is indispensable for policy formulation and informed decisions making. The Government should continue building Common Spatial Data Infrastructure (CSDI) and 3D digital map as they are the critical infrastructure for the development of Hong Kong as a Smart City.
- 4.3.2 The Institute looks forward to the launch of the CSDI portal for public use by the end of 2022 and 3D digital map by 2023; and having a long-term strategy in CSDI sustainable development. The Government should continue mining, creating, and soliciting more geospatial data from all Government Departments as well as private sectors for the CSDI to facilitate policy planning and formulation across bureaux/departments, and for the public to share, utilise and apply the geospatial data supporting innovative applications and the smart city development.
- 4.3.3 The HKIS is also delighted to see the opening of the Geospatial Lab in July this year and looks forward to collaborating with the Lab on various activities. The Government should encourage more young people and start-ups to harness the use of geospatial data to improve daily lives of Hong Kong people and promote business opportunities through Geospatial Lab.

5 Public Project Developments and Professional Supports

5.1 Budget Over-run on Major Infrastructure / Civil Engineering Projects

- 5.1.1 There have been rising concerns from the general public on budget overruns on infrastructure / civil engineering projects and how the public expenditure is allocated. With the increase in Government's investment in infrastructure/civil engineering projects in the post-pandemic economic revival period, the HKIS suggests that the Government fully employ independent cost consultants for infrastructure / civil engineering projects in addition to cultivating a cost-consciousness mindset among stakeholders of the projects. This enables various projects to benefit from the "check and balance" role of independent cost consultants from



planning, pre-construction, construction throughout to the closing out of the projects.

5.2 Innovative Construction

5.2.1 The HKIS advocates the government's drive for innovative construction in local practice. With the positive momentum towards the use of BIM digital platform and MiC construction, the HKIS will also suggest the use of other IT technologies in the local construction practice, e.g., the trackability and traceability technologies on the building materials and procedures, the use of blockchain technology for e-paperwork submission, approval, record purpose. It is in this direction that the HKIS hopes the government could deploy and invest funding as seed money for incubating the local practices to pursue these technologies for forming a digitised platform for maintenance and the long-term benefit of going paperless.

5.3 Magnifying and Investing in Local Surveying Education

5.3.1 Coupled with the rapid aging population and the international migration flows of young population from Hong Kong to other places, there is a growing concern on the brain drain of the construction talent and professionals that are necessary for maintaining the vibrant building force in Hong Kong. Despite this manpower outflow, the HKIS is particularly anxious and worried to learn that there is a downward adjustment in the student cohort sizes of the various local surveying bachelor's degree programmes in the coming years. In view of the imminent need of constructing vast number of residential units in the next 10 years together with other construction projects in the pipeline, there is an upward and constant demand for surveyors in the local construction and property facility management industry. The HKIS would wish the Government to make available the necessary resources and funding to the local universities for increasing the student cohort sizes of the various local surveying bachelor's degree programmes.

6 Town Planning and Transportation

6.1 In order to open up more non-domestic land development opportunities, we propose that the Town Planning Board consolidates "office", "industrial/office", "commercial", "industrial" uses into a boarder "business" use under the Outline Zoning Plans which would result in less Section 16 applications.



- 6.2** We would suggest the Government takes the initiative to review each Outline Zoning Plan comprehensively say every two years to change the suitable sites' land use into residential with appropriate development density, instead of waiting for individual landowners' applications for rezoning land to residential use. It will very much help unlocking the development potential of existing land lots which are either under non-residential zoning or relatively low residential plot ratio due to various historical background (such as former Kowloon Tong Garden City concept region).
- 6.3** For meaningful and effective road transportation/railway planning, we do believe that the Government should carry out a comprehensive transport study (CTS) as soon as possible. In fact, Hong Kong does not have such CTS since the mid-1990s.
- 6.4** For proactive coastal land management and wetland ecological region conservation purposes, we strongly request that the Government conducts a professional study on the Deep Bay Wetland SSSI Zones and Wetland Conservation Areas as soon as possible. Since the last study was completed in 1997, an updated study is urgently needed for policymakers' reference and guidance.
- 6.5** The detailed planning and approval of an outline zoning plan could take a long time. If and when the Government decides to go ahead with the Lantau Tomorrow Vision after due consideration of the Report of the Artificial Islands in the Central Waters Consultancy Study, such reclamation should proceed while the preparation and approval of the OZP are still in progress.



We sincerely hope that our ideas and proposals will be further explored by the Government. Please contact the HKIS Secretariat at 2526 3679 if you require further information or would like to set up a meeting to discuss the above proposals.

Thank you for your attention.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'ET', written in a cursive style.

Sr Edwin Tang
President
The Hong Kong Institute of Surveyors

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