



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

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By Post

4 January 2014

Mr Nicholas Brooke  
Chairman  
Harbourfront Commission  
17/F, West Wing, Central Government Offices  
2 Tim Mei Avenue  
Tamar  
Hong Kong

Dear Mr Brooke

**Phase 1 Public Engagement Exercise for the  
Proposed Establishment of a Harbourfront Authority**

Thank you for your letter dated 15 October 2013 inviting the Institute's views on the proposal and issues set out in the Consultation Digest for the captioned public engagement exercise, and also the briefing to HKIA members delivered by Mr Vincent Ng, Chair of the Core Group for Public Engagement of Harbourfront Commission and representatives from Development Bureau on 10 December 2013.

The Institute is pleased to deliver our views for the captioned public engagement exercise. Please find enclosed our written submission for your consideration.

Yours sincerely

Ada Y S FUNG JP FHKIA RA APEC Architect  
President

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## Position Paper of the Hong Kong Institute of Architects on Phase 1 Public Engagement Exercise for the Proposed Establishment of a Harbourfront Authority

The Hong Kong Institute of Architects (HKIA) welcomes the initiative by the Government to attempt to establish a new administrative framework for managing Harbourfront planning matters in a holistic manner. The HKIA acknowledges the conceptual foundation of the proposed Harbourfront Authority (HA) is in the right direction, but would require further clarifications on various issues. In this regard, we offer our initial observations and opinions as follows:-

### 1) Clarification on the Role and Empowerment of the HA

Based on our understanding from the consultation, despite the establishment of the HA, the current planning approval mechanism under the Town Planning Ordinance would still remain in force and largely unchanged. In effect, the HA would just be an additional "stakeholder" of equal status with the District Council(s) and other similar public bodies under the current planning application procedures. It is of great concern to the HKIA that whether such kind of administrative role would empower the HA any authority over other stakeholders to "proactively" promote any high quality waterfront designs, as the Commission has pledged. What is the role of the HA in inter-departmental coordination/negotiation? How would the HA champion to resolve any departmental/ district conflicts when it comes to upholding high quality waterfront design(s)? The HKIA is concerned that if such "super-role" of the HA should not be forthcoming, any opinion given by the HA would be rendered just another one of the many departmental comments to be addressed and discharged by the project proponent and HA's mission would be greatly compromised. The HKIA is also disappointed that such fundamental question was not being fully addressed or clarified in the Consultation Document.

### 2) Golden Opportunity to Clarify on Reclamation

Ever since the enactment of the Protection of Harbour Ordinance, reclamation has been a delicate issue clouded with much confusion and skepticism amongst the legal professionals and public officers, especially after the ruling of the Supreme Court in 2003. For a full decade, waterfront development has been severely stifled. If the HA were to be established with a corresponding new Ordinance, it would be a golden opportunity to put things right. Reclamation should be defined in a much clearer manner and any *bona-fide* marine needs and utilisation should be taken into consideration.

### 3) Harbourfront Bureaucracy

The HKIA strongly supports the concept of a centralised and holistic harbourfront planning body. We believe this would be a positive step towards a better sea-land relationship building along our world-famous Victoria Harbour. However, the HKIA would like to caution that district characters are very important aspects of a dynamic cityscape. Over-planning and micro-management from a mega-Authority might actually homogenize the different waterfront conditions thus making the city more banal as a whole. In the long run, there is also a risk of complacency and bureaucratic red-tape within a mega-management structure. How the Authority's management structure is designed to avoid such bureaucracies is a great concern to the HKIA.



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(continued)**

**4) Design be Judged on Merits**

HKIA opines that the objectives of HA should be mass community-oriented. By mass community, it means different sectors of the society should be included and served. The HA should not be biased for or against commercial development proponents for fear of unfounded allegations on collusions. Harbourfront development proposal submitted for endorsement should be evaluated and judged on its own design merits and public benefits. In particular, waterfront retail of appropriate scale, nature and diversities should be actively promoted as they are catalysts that could help energize public waterfront open spaces.

**5) Professionalism vs. Populism**

With the new initiative to revitalise the waterfronts, it would be natural to assume that all harbour-abutting Districts would seek to gain as much waterfront presence as possible. Inevitably, monuments, grand projects and "great ideas" would be proposed and put forward for lobbying HA support. In entertaining District demands, HKIA strongly urges the HA to exercise its professional judgment and not be led by petite populism. How this professionalism could be effectively upheld and not be compromised for other non-professional considerations might have a bearing on the composition of the HA Members/Directors. This board composition structure is yet to be discussed and/or deliberated.

**6) Vested Land and Operating Fund via Endowment**

In principle, the HKIA has no objection to vesting land to HA and thus allowing an operational endowment fund. The HKIA would reserve our comments until a plan is prepared showing which areas are to be vested to HA and what administrative approval procedures would be required for building projects on or abutting the vested land zones.

**The Hong Kong Institute of Architects  
January 2014**