



香港城市設計學會
Hong Kong Institute of Urban Design

Reference Number: PAC/25/013

30 June 2025

By email: sdevoffice@devb.gov.hk, plbeng@devb.gov.hk

Mr. David Lam, JP,

Under Secretary for Development

Development Bureau

Land and Development Advisory Committee Secretariat,

17/F., West Wing, 2 Tim Mei, Avenue, Tamar, Hong Kong

Dear Mr. Lam,

**Government Workplan on Streamlining Development Control 2025
JSC Meeting on 17 June 2025**

On behalf of the Hong Kong Institute of Urban Design, we would like to submit the following file for your consideration, our comments on Government Workplan on Streamlining Development Control 2025 - JSC Meeting on 17 June 2025. We are also pleased to meet relevant officers to further explain the contents therein if necessary.

Should further information be required, please kindly contact me or Ms. Cherry Lau, our Senior Administrative Officer at 2235 9057.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Cheung', is written over a horizontal line.

(Anthony CHEUNG)
Chairman, Public Affairs Committee
Hong Kong Institute of Urban Design

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A. General Comments:-

Item No.	Issue	Comments / Questions
	General – Self Certification	<p>We noted that the topic wasn't discussion but we have the following questions:-</p> <ul style="list-style-type: none">a) Will there be any sampling of self-certifications that was completed? If so, will there be penalties imposed for problems coming out from self-certification?b) Will cross-certification shall also be allowed beside self-certification, i.e. beside self-certification by the project architect, landscape architect or engineer?
	General – Overall review of Reduction of Red-tapes	<ul style="list-style-type: none">a) All bureaux and departments shall comprehensively review if certain procedures can be entirely removed or significantly reduced.b) Certain procedures can be the responsibility on one single department or be supervised by one independent supervisor. For example, site safety, it is about labour operation and shall be overseen by the Labour Department instead of the Buildings Department. It should be overseen by a building safety professionals rather than all professional involved and who may not have site safety knowledge or training. Essentially, site safety supervision plan under BD shall be abandoned totally. This is one example only, we encourage the government to review all operations one by one and see if there are any unnecessary procedures or overlapping responsibilities by departments and professionals.
	ESH / Performance Pledge / Phased submission arrangement	<ul style="list-style-type: none">a) There shall be performance pledges for all stages of government operations for development matters. For example, currently, there is a general lacking of Lands Department's commitment on replying on submission under lease. We suggest a 2-month (smaller projects) to 3-month (for larger projects) period for checking/ approval of each stage of submission under lease. There shall be scheduled meetings between LandsD officer and project proponents for effective

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	<p>communication.</p> <p>b) BD's ESH is welcomed but its functions can be mad more transparent and further expanded to record: i) date of submission; ii) dates of document distribution; ii) deadlines for government departments to reply; iii) names and telephone of responsible officers; iv) approval status for each department and, if disapproval, the corresponding disapproval reasons.</p> <p>c) With there is any phased submission arrangements and to speed up construction process in general, the corresponding processing time for government officials shall be proportionally reduced (e.g. BD's processing time for staged drainage plan submission shall be reduced from 2 months to say 1 month).</p> <p>d) HKIUD suggests that BD, PlanD and LandsD shall share the common ESH platform.</p>
Carparking Ratio	<p>According to HKPSG, there is a high end and a low end carparking ratio. The government shall allow project proponents to choose rather than dictating the ratio. This should apply to both planning procedure and lease drafting.</p>
Information required under First Hand Sales	<p>There are too much information required in First Hand Sales and shall be streamlined. Dimensional information shall be general and not in details. Information on GFA exemption is dubious and shall not be required.</p>
Escalation system	<p>PlanD reports that they have an internal monitoring system to stipulate processing time and internal meeting to discuss cases.</p> <p>LandsD also has a similar system to monitor deadlines.</p>

B. Itemized Comments:-

37	GFA exemption for above ground car park	<p>The policy of having underground carpark is for enhancing ventilation within urban areas, if any new buildings with above ground carparks fulfil the SBD guidelines, above ground carparks can be allowed.</p> <p>However, in order to reduce the environmental impact, visual impact and avoid carparking floors sterilising the street frontage, we suggest that when allowing above</p>
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		<p>ground park, one or more of the following measures will have to be proposed alongside with an application for allowing above carpark:-</p> <ul style="list-style-type: none">a) 50% open on opposite side of the carparking floor for better ventilation.b) Increase of low-zone green coverage (on either horizontal or vertical surfaces) say by a further 10% of the required area.c) Minimum of 50% of the ground floor frontage facing street be lined with retails or lobbies and not by carparking or loading/unloading usages.
47	<p>To introduce a pilot scheme to facilitate waiver applications for holding activities in public open spaces in private developments</p>	<p>We fully support LandsD's exploration of allowing commercial usages within public open space in private developments. Singapore already have such a policy for a long while. They, in fact, are encouraging covered public open spaces and allowing commercial uses with a fee.</p> <p>BD shall also consider comprehensive measures to allow such activities in covered open spaces.</p>
48	<p>To set out the time targets for the key steps for processing of applications for lease modifications, land exchange, private treaty grants and other land transactions ("land transactions")</p>	<p>We generally support the initiative but consider that 22 weeks for issue provisional PBTO and 12 weeks: issue binding PBTO are way too long. We believe LandsD can do it within 16 weeks and 8 weeks respectively. When there is a subsequent appeal, LandsD shall also commit to a performance pledge, say, replying within 6 weeks.</p>
50	<p>To review the requirements for technical assessments at the planning application stage</p>	<p>We generally support PlanD's plan to have guideline on streamlining of planning submission and eliminating certain unnecessary assessment submissions.</p> <p>PlanD shall consider allowing simplified procedures for allowing policy-supported height relaxation for cases such as MiC, sky garden, etc.,</p> <p>HKIUD also support HKIA's suggestion that the comprehensive review terminologies for new building types such as those for modern day I&T uses. BD and FSD shall also review policy on new I&T usages such modern day research and advance manufacturing facilities (where there are lower human occupancy). They should not be regarded as industrial uses for which EVAs of 13.5m on both sides of the concerned buildings are required. In fact, FSD shall study if 13.5m wide EVA on both sides of industrial developments can be reduced in</p>



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order not to unduly reduced lands available for I&T usages
in the Northern Metropolis.

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