## HKIUD comments and proposed amendments to the Urban Design Guidelines review 18 September 2020

General comments	Comments
◆ Preface and Structure	Both the Preface, which has now emphasized the importance of putting people first and the Structure of the Guidelines under the four overarching principles are well acknowledged and complimented.  This review comes at a time of the rampage of Covid-19. Urban Design would have a vital role in urban betterment and the shaping of a liveable and sustainable future by embodying various interrelated components and disciplines in urban development. Thus, despite other principles and visions already expressed by current planning strategies, the "People-centric" principle must now accord due emphasis to people's health and wellness.  Whilst not attempting to write some text-book, it may be useful to users in general if the definition of Urban Design could be more developed and greater emphasis should be given to its importance and breadth in the city making process.  The UDG UK definition may be reference if necessary:  'Urban design is the design of towns and cities, streets and spaces. It is the collaborative and multi-disciplinary process of shaping the physical setting for life in cities, towns and villages; the art of making places; design in an urban context. Urban design involves the design of buildings, groups of buildings, spaces and landscapes, and the establishment of frameworks and processes that facilitate successful development.'
◆ Introduction " It addresses the three-dimensional relationship of buildings, spaces between and around them, and the surrounding landscape. These components and their related elements woven together, make up the image of the city, affecting the way the city is seen and experienced, thus informing the liveabilty of the environment."	The Introduction is good. It has now highlighted the "three-dimensional relationship" of things upfront. It would be even better if the "macro", meso and "micro" sense of things could also be covered, by slightly rewording this sentence to read: "These components and their related elements at a micro level woven together, make up the image of the city at a meso and macro level, affecting the way the city is seen and experienced, "  Should the word "Respecting" be changed to 'acknowledging'? "Hong Kong as a unique urban high-density environment can be continuously improved through

increase of outdoor space in dense urban areas, improvement of the quality of street scapes and amenity that provides a richer more human centric environment for people".

GUIDELINE			Comments
1 Responding to Context			
1.1	Respect Natural Assets	<ul> <li>a. Design in Harmony with Nature</li> <li>2. "Integrate greenery particularly into the urban areas, "</li> <li>4. "Incorporate BGI in the development when opportunities arise" (s)</li> </ul>	<ol> <li>Is "Integrate" sufficient? How about preserving, compensating, and creating greenery? Any reference to PlanD's Landscape Value mapping?</li> <li>"When opportunities arise" seems not strong enough. Shouldn't this be a design objective upfront?</li> <li>images: The illustrations should be able to reflect people's views instead of aerial views like views from a drone, specifically:</li> <li>Respond sensitively to existing topography and landscape character: It is unclear how the image shown is an exemplary example of sensitivity to existing topography;</li> <li>Urban waterfronts, country parks and beach/coastal areas provide a wide range of leisure and recreation functions. The illustrations should preferably be able to reflect these people's views.</li> </ol>
1.2	Respect Neighbourhood Character	a. and b.	The three points in (a) and four points in (b) have broadly referred to "developments" which might easily be taken to mean "buildings", and are unable to cover efforts that should be encouraged to respond to, protect and enhance the stepped-street type of characters of an area in general.  The UDG should also recommend Government to prepare Neighbourhood Character Maps or designate Special Design Areas – the urban design guidelines of which should be incorporated into new or amended OZPs, and the lease conditions where appropriate.  Overall, we are concerned that there is lack of implementation mechanism. The UDG should highlight this so that the "overarching principles" can actually be carried through from design to implementation.
1.3	Create Permeable Development b. Maintain a Comfortable Urban Microclimate	<ol> <li>"Create layouts for new development that respond to local topography"</li> <li>"Link open spaces, road and low-rise buildings to form ventilation corridors etc."</li> </ol>	1.& 2. "Roads" are not necessarily effective ventilation corridors especially if huge flyovers are imposed on top or where there are many bridges across the roads. The layout for new development areas should avoid using flyovers — which incidentally may also invoke another problem due to the installation of unsightly and obstructive noise barriers. It may be relevant to add some advice that elevated transport structures - roads, railways, other bridges should be avoided, unless there is no better at-grade option.

2	Pedestrian-Friendly Movement No	4. "Increase trees and vegetation in the urban environment as far as practicable to improve thermal comfort and reduce urban heat island" effects.	<ol> <li>About the "low-rise (or even high rise) buildings along major roads, where footbridges are needed, they should be integrated with the adjacent buildings as far as possible, taking into account possible biodiversity corridor opportunities and sponge city visions.</li> <li>Advice should also be made that adequate spaces should be allowed for tree planting – appoint to be further elaborated under "Engaging Public Realm", and take into account HKGBC microclimate guidelines.</li> </ol> The outdoor environment of Hong Kong can be quite hostile in summer. Emphases should be given
2.1	Support Sustainable Transport modes	a. Encourage public transport. b. Promote Sustainable Low-Carbon Transport c. Ensure a Safe Walking and Cycling Environment	the provision of shades in the guidelines for planning and design of pedestrian networks.  a. Whilst over 90% of the daily journeys in HK are on public transport, the highest rate in the world, urban design is not only about quantity but also on the experience of the trips. The TOD MTRC's type of high rise and compact developments often result in the sudden change between interior and the harsher exterior environment, and often cliff-like edges for the pedestrians. Urban design should if possible, encourage more friendly transitions and external environments. The image of the ICC is inappropriate as this is one of the most unfriendly outdoor environments for pedestrians.  b. How about "modern trams" and "autonomous vehicles"? Autonomous vehicles could space out the vehicles intelligently to avoid collision and thus can avoid the "stop and go" movements and reduce air pollution (of petrol engine vehicles).  c. There seems to be no separate mention of/distinction between recreational cycling and others (the photo example is clearly one for recreation use)
2.2	Promote Walkability	a. Create Walkable Communities     b. Maximise Pedestrian Convenience     and Comfort	<ul> <li>More emphases should be given on the need for provision of seating, as well as clear signage, shading, rain shelters and greening, particularly in view of the ageing population. Although the idea of providing seating appears in a subsequent section "2.3 Create Efficient Multi-layered Connections: b. Provide Safe and Comfortable Pedestrian Connections.", seating is an important element in pedestrianized plazas and streets and not only for the links / bridges.</li> <li>More emphasis on sidewalk capacity</li> <li>Street furniture should be encouraged to be "integrated" and "smart" to reduce obstruction.</li> <li>Paving materials should be porous, non-slip and non-reflective.</li> </ul>
2.3	Create Efficient Multi-layered Connections	a. Promote seamless multi-layered     Pedestrian Connections      b. Provide Safe and Comfortable     Pedestrian Connections	<ul> <li>1. Agree. Street-level - Pedestrian movement should be prioritised as far as possible to maintain street life.</li> <li>Elevated walkway system should preferably be integrated with the buildings a.f.a.p. since the escalators, stairs, lifts etc. also occupy space – and both the bridges and these would affect ventilation and sunlight. The Guideline mainly guides the parts crossing the roads.</li> <li>Bridges are created by structures and often leave blank unused space below. Add "where a bridge is proposed give consideration to utilize and maximize the value of space under and around the</li> </ul>

			bridge. Develop opportunities to activate edges and landscape elements'
			It may be worthwhile to say something about possible design opportunities that could be brought about through split level designs – such as resulting in more interesting semi-sunken atriums, etc.
			Any mention about the provision and treatment of road-side parking and loading-unloading facilities?
3	Engaging Public Realm		
	"The private sector's contribution is not limited only to Public Open Space in Private Developments (POSPD) but includes building appearance and use of spaces and landscape treatment between and around buildings which form a significant part of the streetscape."		It is good to have now included this statement that This would lend a hand to say TPB in future in considering the merits or otherwise of private development proposals, especially those very large ones that may cause great impacts on the general area.
3.1	Welcoming Parks and Plazas	a. Create Vibrant and Unique Open Spaces: "3. Enhance active frontages where appropriate onto and overlooking the park, plaza or square"	Agree. The corollary is that the designer should avoid placing the development's utility rooms, such as RCPs, toilets, transformer rooms, etc. all fronting onto the park, plaza or square. May be this point should in fact be clearly spelt out? This idea has been placed under a subsequent Section 3.3 b.1: "Promoting a Human Scale Streetscape" which reads: "Reduce the dominating impact of new building development on pedestrian experience by disposition of the upper portion above the building base as well as services areas such as utilities, refuse collection points, and loading and unloading areas away from the street frontages." This idea should be more relevant to making the plazas, squares active, rather than about "human scale".
3.2	Accessible Waterfronts and Water Edges	a. Introduce Distinctive Places with Diverse Uses along Waterfronts and Water Edges: "3. Create points of interest or nodes"  b. Improve Connections between Waterfronts and Hinterlands	a. There is a need for more seats, resting places for people to enjoy the views in peace.  ~ Regarding the sentence: "Fence-free and lighting design should be carefully considered to enhance water connection with the people and add nighttime effect and appeal.", "Fence-free" design and the other ideas like "nighttime effect" are very different ideas. It is not advisable to mix these up. Fence-free design may have various pros and various cons. May be a separate section is needed to deal with fence-free designs for public spaces. Water-front is clearly a special situation per se and may need to be addressed carefully.  Connections to the Harbour should be given more emphases and reference should be made to the
		vvaternonts and fillterialius	Harbour Planning Principles and Guidelines.  ~ It is not clear what "water-connection with the people" imply. DSD have some projects on-going

			which seek to be like "Cheonggyecheon" in Seoul. Shouldn't this be more clearly spelt out?  b. Utility structures such as pumphouses, transformers, etc. should be carefully located and if possible, integrated with other buildings such as pavilions, to avoid causing undue blockage to pedestrian access, views and ventilation.
3.3	Attractive Streetscapes	b. Promote a human scale streetscape	As per comment on Section 3.1 above but it is repeated herewith for easy reference: b.1: "Promoting a Human Scale Streetscape" which reads: "Reduce the dominating impact of new building development on pedestrian experience by disposition of the upper portion above the building base as well as services areas such as utilities, refuse collection points, and loading and unloading areas away from the street frontages." This idea should be more relevant to making the plazas, squares active, rather than about "human scale".
			Illustrations: There should be some illustrations showing how various spaces are enjoyed by the people, in day time as well as in night time as appropriate.
3.4	Robust and Sustainable Landscapes	a. Promote Sustainable Landscape Design :	~ Under "extreme climate and weather", shouldn't "typhoon" and "possible landslides be specifically spelt out ?
			Regarding canals and waterways. Suggest adding 'Canals and waterways are opportunities to extend
			pedestrian and blue green assets in the city. Designs should seek to upgrade edges, encourage cleaning
			and safe public use'
			(example: ABC guidelines in Singapore, source:
			https://www.pub.gov.sg/Documents/ABC Waters Design Guidelines.pdf)
			~ How about reserving pocket spaces for community framing?
3.5	Inviting Street Furniture	a. Create a Coherent Identity :	~ 2. "Coherent identity" could perhaps be manifested in various other ways, e.g. design of bus stops, pavilions, etc. Noise barriers or fence walls can be "beautified", but we should not encourage "cosmetic" actions as good "urban design". Can we tone down the noise-barrier as an example and add other examples instead?
4	People-Centric Building Design		
4.1	Human Scale Emphasis	a. Mega tower design	There are many issues about mega towers, some even controversial. The present content is somewhat thin. As far as "human scale" is concerned, one could associate with the volumes of flow going up or down at peak hours and the impacts on the surrounding networks, including how well the towers are connected to an underground mass transport system below. The reflective surfaces of some towers could also be a concern to people at the street level. The distances or gaps between mega towers may have adverse micro-climatic effects which need to be addressed through CFD or wind tunnel studies,

			etc.  One issue that these Guidelines could perhaps help urban designers is to point out how the present building regulations restrict more creative designs and otherwise more interesting building forms. A more common examples is twin-towers with connections at the upper floors. The building forms cited in the subsequent Section 4.3 on "Sustainable Built Environment - b. Create Comfortable Microclimate" try to improve ventilation but how far they could go is still subject to the present restrictive Building Regulations. The present Regulations probably cannot deal with more innovative building forms such as those with dynamic forms.  I suggest that this Section needs to be further elaborated.
		b. Human scale design	The above comments also apply to this Section. Whilst we have to work within present Building Regulations and try to be as "creative" as possible in setting back podiums and frontages, etc. we should take this opportunity to seek new directions for better urban design subject to a review of the regulations.
		c.	Commercial billboards are hard to miss in HK and add sparkle to the city at night but may also degrade local streetscape and pedestrian comfort. It is suggested to add 'Streetscape and building facades; signage- integrate static and activated digital signage sympathetically to the building to balance quality of streetscape with communication objectives'
4.2	Urban Heritage Regeneration	a. Breathing New Life into Old Building	
		b. Harmonious Interaction between the Old and New	Mention should be made on seizing opportunities of new development or redevelopment nearby to free up more street level spaces to integrate with the old building under conservation.
4.3	Sustainable Built Environment	a. Use Environmentally Friendly Materials	
		b. Create Comfortable Microclimate	Building Regulations may be very restrictive to how far one could go with special building forms. See comments above.
		c. Promote Health and Well-being	
Checklist & Glossary			
	Checklist for Design Consideration		Although the Checklist cannot be used for simple comparisons between alternative designs due to certain subjective elements latent in the parameters, it would be undesirable to be left to interpretation by anybody who do not have relevant professional training. Therefore, Government should be urged to set up an Urban Design Expert Panel or Commission to advise authorities such as the TPB, as well as to provide authoritative interpretation in case of disputes.
	Glossary of Urban Design Terms		
	Appendix		Any mention about PlanD's Study on Landscape Value mapping(2002), the Landscape Character Map (2005) ? It has actually said: "Our landscape is an asset which: contributes to our well-being; helps to

	define the identity of a city; provides habitats for wildlife; and is part of our culture and heritage."