

***“Conserving
our modern built heritage
amidst collective sale fever”***

Addressing gaps in the collective sales process

Policy Analysis Exercise

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Executive Summary

Collective sale of sites plays an important role in urban redevelopment in land-scarce Singapore. While collective sales are seen as a market-efficient strategy that benefits both residents and developers, little attention is paid to other aspects such as the historical, architectural or even socio-cultural elements of the building and its surroundings. In the last year, several prominent modernist landmarks such as Pearl Bank Apartments, People's Park Complex and Golden Mile Complex (GMC) have been targeted as prime sites for collective sale, with Pearl Bank Apartments sold and slated for demolition soon. These three buildings are modernist icons highlight the achievements of local architects in Singapore's post-independence era. GMC, a mixed-used commercial and residential building and enclave for the Thai community in Singapore, is used as the focal case of study.

Through our research, we studied the various policy instruments used to facilitate collective sales and identified the gaps in the process that allow for the premature destruction of buildings with high heritage and socio-cultural value. We noted that profit is the key factor driving the collective sales process. However, some users mourn the loss of socio-cultural ties and community roots with the sale of the site. Our fieldwork also highlights the disenfranchised role of tenants who have no say in the collective sale of a building despite their deep connection to the community and place. Our secondary research shone light on the various ways that urban redevelopment can occur without the necessary demolition of buildings and other strategies to keep the original communities intact. Furthermore, the research also brings out the various ways that buildings can be given a new lease of life without complete demolition, through adaptive reuse and stronger placemaking.

In view of our findings, we propose several policy recommendations to improve the process of collective sale and to prevent any unnecessary demolition by considering different forms of conservation. We propose a two-pronged strategy, considering the roles of the government and SHS, before a collective sale and after it occurs.

Before a strata-titled building is sold, we propose that the government can:

1. Tighten the criteria for collective sale of buildings
2. Encourage better maintenance of older buildings
3. Encourage representation of tenants and minority owners in the CSC;

while SHS can

1. Organize heritage awareness campaigns and encourage relevant stakeholders to prevent the sale
2. Promote and guide developers' use of Heritage Impact Assessment, possibly through a handbook

Should collective sale of a site occur, the government can pursue the following suggestions:

1. Encourage placemaking and adaptive reuse of a site by incentivising developers under the Strategic Development Incentive scheme, thereby conserving the site
2. Mandate Heritage Impact Assessment for specific sites to mitigate the loss of heritage values

while SHS can

1. Work with stakeholders of a site to highlight the heritage and cultural value and viability of adaptive reuse and placemaking

These recommendations emphasize the importance of the government's collaboration with other stakeholders, such as developers and SHS, in improving the collective sales process. While there may be greater financial costs, this ensures a more holistic and equitable collective sales process that addresses the tangible as well as intangible value of a building and its interaction with its immediate community. Conservation through adaptive reuse is not a new concept in Singapore, but has mainly been limited to sites owned by the state or few owners. This project thus proposes changes to the collective sales process to encourage the conservation of strata-titled buildings.

1. Introduction

1.1 Background and Client Needs

In the last two years, Singapore has seen many of its buildings sold collectively ('en bloc') to the redevelopment market. These deals amounted to more than \$8 billion in 2017, the highest in a decade¹, raising concerns about the quickening pace of urban redevelopment. This is especially so for buildings of high heritage value up for sale, such as Golden Mile Complex (GMC) and People's Park Complex, or already sold, like Pearl Bank Apartments. Such collective sales involve buildings collectively owned by multiple owners that decide to sell the site to a buyer, usually either a property developer or the government, who then demolishes and replaces the existing buildings.

In this context, the Singapore Heritage Society (SHS) is calling for a re-evaluation of current land-use policies and regulatory framework, to facilitate the conservation of modernist structures for adaptive reuse². It is focusing on post-independence strata-titled modernist buildings, especially those part of the government's urban renewal drive in the 1970s and designed entirely by Singaporean architects. These buildings are also large-scale megastructures that have shaped the downtown landscape and were innovative urban solutions during their time. SHS argues that these buildings represent Singapore's post-independence era and reflect the country's ability to build cutting-edge urban design. However, as strata-titled buildings, they are owned by multiple owners and sold en bloc. Multiple stakeholders thus present a unique challenge to conservation.

The client for this PAE project, SHS, is a non-profit non-governmental organisation serving as an independent voice for heritage conservation in Singapore, where heritage is defined as the "living presence of the past"³. Founded in 1987, SHS has established presence in Singapore. In 2018, it organised the 'En Bloc, or Buildings Must Die' series of programmes intended to facilitate dialogue on heritage and en bloc policy. SHS thus engages with both policymakers, such as the Urban Redevelopment Authority, and the public at-large.

For this project, the client is seeking a nuanced understanding of how collective sale⁴ shapes the motivations, options and decisions of stakeholders in a collective sale. This will inform strategies to conserve these modernist buildings, whether or not it is ultimately sold en-bloc. SHS has

¹ Aravindan, A. (2018). "Singapore's 'en-bloc' redevelopment fever may be cooling", Reuters. Retrieved from: <http://www.asiaone.com/singapore/singapores-en-bloc-redevelopment-fever-may-be-cooling> [Accessed 10 January 2019].

² Singapore Heritage Society (2018), "Too Young to Die. Giving New Lease of Life to Singapore's Modernist Icons", Singapore Heritage Society.

³ Singapore Heritage Society. (2010). "About Us - Singapore Heritage Society." Singapore Heritage Society. Retrieved from www.singaporeheritage.org/?page_id=2 [Accessed 5 April 2019].

⁴ From this point onwards, we shall use the word "collective sale" to refer to the sale process of strata-titled building to capture the wider aspects of the process, rather than the term "en bloc" which refers specifically to the legal aspects of the process.

written a position paper on the need to conserve Pearl Bank, Golden Mile and People's Park — exploring factors that have led to collective sales, such as maintenance issues and debt financing rules that discriminate against properties with less than 60 years lease. These buildings share certain commonalities: they are large buildings designed entirely by Singaporean architects in the 1970s as part of the post-independence urban renewal drive. Owned collectively and involving multiple stakeholders, they are vulnerable to collective sale and demolition and present a unique challenge to conservation. Pearl Bank was sold for \$728 million to private developer CapitaLand in February 2018⁵. Separately, more than 80% of owners at GMC agreed, in August 2018, to a collective sale⁶, while owners at People's Park Complex have begun the collective sale process by setting up a collective sales committee in March 2018⁷. In Appendix 1, we present some facts and figures of the three buildings.

GMC was part of the Government's early urban renewal phases, where land was acquired and sold in consolidated sites to facilitate redevelopment of the city area in the 1960s. Similar to People's Park Complex, it was one of the first mixed-use developments with retail, office and residential units completed in 1973 by DP Architects⁸. The development of the Thai enclave in the site began in the early 1980s, supported by the inflow of Thais in the construction industry in the 1980s and 1990s. Beginning with a few Thai shops, to the opening of a Thai supermarket, the site became a key meeting point for Thais. It also acts as a start and end point for coach bus companies providing travel to Thailand and Malaysia. Now, the site features numerous Thai eateries and other businesses, where one can send money or goods home, buy Thai newspapers and music and other goods. Many Thais operating businesses in the complex also live, as tenants or owners, in the residential units above.⁹ In October 2018, owners have agreed to a collective sale with a reserve price of SGD\$800 million, with a tender closing in January 30, 2019.

Recognising that SHS's position paper proposes policy ideas to allow these buildings to be conserved for rehabilitation, regeneration and reprogramming, this PAE project seeks to explore specifically, the current gaps in the collective sales process that allow for the demolition of modernist strata-titled buildings, using GMC as a case study. We zoom in on GMC because it

⁵ Luo, S (2018). "Pearl Bank Apartments in Outram sold en bloc to CapitaLand for S\$728m", *Straits Times*, February 23. Retrieved from <https://www.straitstimes.com/business/companies-markets/capitaland-acquires-pearl-bank-apartments-for-s728m-q4-profit-falls-38>.

⁶ Zaccheus, M and Tai, J (2018). "People's Park Complex, People's Park Centre, Golden Mile Complex and Golden Mile Tower attempting collective sales", *Straits Times*, March 7. Retrieved from: <https://www.straitstimes.com/singapore/peoples-park-complex-peoples-park-centre-golden-mile-complex-and-golden-mile-tower> [Accessed 17 Jan 2019]

⁷ Ibid.

⁸ Zakaria, F. (2011). "Golden Mile Complex". *Singapore Infopedia*. http://www.eresources.nlb.gov.sg/infopedia/articles/SIP_1833_2011-08-29.html [Accessed 17 Jan 2019].

⁹ Lim, J. (2019). "Golden Mile Complex stays for now, but experts say conserving it may not help en-bloc sale", *Today Online*, January 8. Retrieved from <https://www.todayonline.com/singapore/golden-mile-complex-stays-now> [Accessed 13 January 2019].

has not yet been sold, and is the site of a unique cultural community—Thai immigrants to Singapore—and its en-bloc has been currently an ongoing process.

1.2 Research question and methodology

Recognising that the trend of fast-paced urban renewal goes beyond these three buildings, our PAE project seeks to explore gaps in the collective sales process that do not account for the different ways a building site is valued by stakeholders. Our research first hopes to understand the different kinds of value presented in a building site from the perspective of different stakeholders. Next, we explore how the current collective sales process ignore these types of value. Finally, we analyse why these gaps exist and propose recommendations for a collective sales process and the role of stakeholders that more comprehensively takes into account a site's value.

Our research questions are the following:

How do we encourage a more holistic collective sales process that takes into account heritage, social and cultural values present in modernist strata-titled buildings?

1. What are the different ways stakeholders value a modernist strata-titled building?
2. What are the current gaps in the collective sales process that do not take into account these different values?
3. Why do these gaps exist, and how can the collective sales process be altered to address these gaps?
4. How can the government improve the collective sales process to address these gaps?
5. How can an NGO like SHS improve the collective sales process to address these gaps?

Our project begins with a literature review on the impact of en bloc policy on stakeholders, particularly owners who oppose a sale, and the social impacts on local communities. We reviewed academic literature and analysed newspaper reports on Singapore's en bloc policy and the history of urban redevelopment in Singapore. Bearing in mind the different types of value present in a site, we also researched case studies on the assessment and mediation of social and heritage value with urban revitalization. Reviewing case studies of successful heritage conservation and adaptive reuse, we highlighted key success factors for each case.

To gain a sense of ground sentiment and perspectives, we then conducted fieldwork at two public events on the collective sales of modernist buildings, including the Too Young To Die Panel organized by Singapore Heritage Society on September 8, 2018 and Deliberative Forum held on September 22, 2018.

We also visited GMC and conducted ten in-depth interviews to understand the diverse views of stakeholders involved in an collective sale, as well as experts and researchers (See Appendix 2 for the list of interviewees). We spoke with primary users or unit owners of GMC, including

tenants and owners, both commercial and residential. In addition, we interviewed one of the original architects of GMC, Mr. Tay Kheng Soon. Finally, we interviewed real estate market researchers and government officials from the Ministry of Law, which administers the Strata Titles Act governing collective sales, and officials from the Urban Redevelopment Authority.

These interviews enable us to understand the research question from different perspectives and serve as an appropriate tool to fill in the existing gaps in the literature and media on the impact of the collective sales process in Singapore. As the impact of collective sales is mainly analysed currently through economic, legal and governmental perspectives, a broader context is applied in the study, to examine the long-term impacts of collective sale on society.

We then present our policy analysis on the collective sale process¹⁰, the procedures to sell a site en bloc, and associated policy tools like development charges. We find that that current collective sales process focuses on the financial and development aspects of a sale, ignoring the value of architectural heritage, established social networks and cultural enclaves. We explore different experiences of owners and tenants in a site up for collective sale, with the lack of agency of tenants who have no say and at times even no information on the en bloc process.

Building off our fieldwork and research, we propose recommendations for a collective sales process that considers the interests of multiple stakeholders better, and an evaluation of the roles of the government and an NGO like SHS in changing the process.

2. Literature Review

2.1 Background and discussion of collective sales policy

Collective sales policy in Singapore has its roots in the 1990s where the government decided to involve the private sector in urban renewal projects. The rise of collective sales in the urban landscape was a gamechanger in the sense that it marked the growing prominence of private developers in Singapore's urban development.¹¹ This arose from a policy shift in urban development where the Urban Planning Authority introduced a "two-tiered planning system" to maximise usage of land and to rezone certain areas to provide space for further growth.¹² This paved the way for private sector involvement in urban renewal. Justification for their involvement was twofold — (1) private sector involvement was aligned with free market principles and this could spur economic growth and (2) maintenance costs of old buildings were

¹⁰ We use the 'collective sale process' to not just to the legislation allowing an en-bloc sale but the process of discussions on en bloc within an estate, forming a collective sales committee, engaging property consultants and lawyers, the tender process and post-sale development.

¹¹ Lum, S.K., Sim, L.L & L.C, M.L. (2002). "Market-led policy measures for urban redevelopment in Singapore", *Land Use Policy*, Vol.21, pp.1-19.

¹² Christudason (2010a). "Controversial Strata Legislation: Catalyst for Housing Regeneration in Singapore", *Journal of Legal Affairs and Dispute Resolution in Engineering and Construction*, Vol.2, No.1, pp.63-72 (p.63).

increasing and the private sector could play a role in urban renewal.¹³ Before the late 1990s, these collective sales were marked by 100 percent consensus amongst residents in the participating building. However, the state subsequently made amendments to the Land Titles (Strata) (Management) Act in 1999 which modified the levels of consensus to 80/20.¹⁴ This helped to facilitate the rise of collective sales as the implementation of this Act meant that a majority consensus would suffice.¹⁵

Given the issue of majority consensus, there are several papers that have focused on the protection of ‘minority’ rights in the process of deliberation and negotiation.¹⁶ While there were attempts made by the government to regulate the transparency and ensure a “fairer” outcome in collective sales, there were difficulties of placating the minority stakeholders.¹⁷ In a separate article, it was argued for the need to consider the protection of ‘minority rights’ vis-à-vis the ambitions and expectations of property investors.¹⁸ Generally, the papers by Christudason focused on the losses incurred during the process of en bloc¹⁹ and suggested that the law should balance the interests of the various actors yet avoid hindering the process of “urban renewal and land optimisation”.²⁰

The economic losses from collective sale for owners have also been examined through the use of several case studies such as Kim Tian plaza and One Tree Lodge.²¹ Some of the owners refused to go en bloc due to the fact that they would sustain “financial losses”, which could be interpreted in multiple ways by various stakeholders.²² What complicated the issue in the case of Kim Tian Plaza was the mix-used development nature of the property, where shop units would be valued at five times of a residential unit.²³ This meant that voting rights would tip in favour of shop owners. Even though the law has since been amended to improve transparency of the process, it was still arguable that ‘minority’ owners in these cases would be at the losing end.

The unintended effect of the collective sales process was also studied by surveying the impact on the rental markets, property markets and construction sectors.²⁴ While the construction and property markets did benefit from collective sales by creating more job opportunities, there was

¹³ Ibid.

¹⁴ Sim et al 2002.

¹⁵ Sim et al 2002.

¹⁶ Christudason, A. (2009). “Property rights: achieving a fine balance in collective sales of strata developments in Singapore”, *International Journal of Law in the Built Environment*, Vol.1, No.1, pp.26-41; 2010a; (2010b). “Legal framework for collective sale of real estate in Singapore: Pot of Gold for investors?”, *Journal of Property Investment and Finance*, Vol.28, No.2, pp.109-122.

¹⁷ Ibid., Christudason 2010a, p. 16.

¹⁸ Christudason 2010b.

¹⁹ Christudason 2010a, Ibid.

²⁰ Ibid., p. 120.

²¹ Christudason 2009.

²² Ibid.

²³ Ibid., p. 9.

²⁴ Christudason 2010a.

the problem of displaced sellers who were unable to find replacement private units and had to ‘downgrade’ to public housing or decided to rent private properties. In fact, data from 2008 revealed that the demand for replacement properties in the market exceeded the supply of existing properties, suggesting that owners may have difficulties finding newer units and had to rent places as a temporary measure. It was argued that this would exacerbate the rental situation for tenants who were displaced out of the mix-used developments that went en bloc.²⁵

On the contrary, some papers acknowledged the tension between the ‘majority’ and the ‘minority’ during the process of collective sale and demonstrated how it could be a process fraught with sensitivity and unhappiness amongst property owners still supported the policy.²⁶ They argue that en bloc policy was instrumental in freeing more land in Singapore and the growth of private developments would still house more people in the ‘land-scarce’ island-state.²⁷

In light of such findings from academic literature and newspapers, we note that these writings still mainly focused on the economic and financial aspects of collective sale. While there have been brief mentions on the social aspects of collective sale, they tend to be scattered across various sources. The subsequent literature review will fill this gap by introducing less tangible aspects to collective sale for a more nuanced understanding of collective sales process and its impact on the stakeholders.

2.2 Social impact of collective sales

Collective sales is not without its critics. In Singapore, urban redevelopment has often been accompanied by a dissolution of community ties and social relations.²⁸ Social identity is also often tied to places and urban redevelopment efforts often challenge the tenacity of one’s identity and belonging to the place²⁹. This is especially the case for the tenants and community of GMC where redevelopment leads to more expensive residences or commercial units that original users cannot afford³⁰. Media reports estimate that if the site is sold at its reserve price of \$800 million for its October 2018 tender exercise, residential owners will obtain between \$1.27 million and \$6 million each; commercial unit owners will receive between \$200,000 and \$7 million each; and office unit owners, \$360,000 to \$3 million each³¹. Although the payouts are likely to be high and gainful for owners, long-time tenants will not benefit from the sale and are unlikely to find

²⁵ Ibid., p. 69.

²⁶ Lum et al 2002; Sim et al 2002

²⁷ Sim et al 2002.

²⁸ Sharifah, M.A (2010) “Urban Renewal of Traditional Settlements in Singapore and Malaysia”, *Asian Survey*, Vol.50, no.6, pp. 1135-1161.

²⁹ Ibid.

³⁰ Goo, D. A. 2018. "Gentrification in South Africa: The ‘Forgotten Voices’ of the Displaced in the Inner City of Johannesburg", in *Urban Renewal, Community and Participation*, Julie Clark and Nicolas Wise (ed.). Retrieved from https://link-springer-com.libproxy1.nus.edu.sg/chapter/10.1007/978-3-319-72311-2_5

³¹ Leong, G. (2019). "Developers get more clarity on Golden Mile en bloc site", *Straits Times*, January 9. Retrieved from: <https://www.straitstimes.com/business/developers-get-more-clarity-on-golden-mile-en-bloc-site>.

similar units at similar rentals. As a result, displacement and loss of community, particularly the cultural diaspora in GMC, are discussed as one of the the main consequences of collective sales.

While the social impact of collective sale remains scant in academic literature, many newspaper sources have highlighted the loss of neighbourly ties amongst residents during the decision-making process³². These sources highlight how ties between neighbours turned sour as they differed in views towards collective sales—the need to balance the views of more than 600 families within a single building was an arduous process fraught with disagreements and even verbal conflict at times. This is particularly salient in the case of Cashew Heights where there was a bid in 2017 to offer the property on the collective sales market. The general atmosphere in Cashew Heights have been described as “tense and stressed” due to the divide in opinions towards collective sales.³³ In Mandarin Gardens, verbal conflict between residents and the MCST had resulted in the vandalism of a car belonging to one of the MCST members. This highlights the aggravation of relations wrought by the collective sales process and the deterioration of neighbourly ties.³⁴ Elsewhere, there were also concerns about displacements from the community and difficulties in adjusting to a new environment, especially for families with elderly or children.³⁵

The social impact of urban redevelopment also includes the loss of a sense of community and social capital inherent in the social networks of the neighbourhood. Places allow for shared experiences and trust built over time, and a sense of belonging³⁶. These intangibles are lost when urban redevelopment entails displacement or demolition. Social Impact Assessments have been used to measure the social impact of development, similar to heritage and environmental impact assessments. For example, Hong Kong Urban Renewal Authority is required to conduct an assessment to “alleviate potential undesirable social impacts on affected communities” before a renewal project is launched. The assessment explores the socio-economic backgrounds of those affected, and potential impacts like loss of jobs and social networks³⁷. In Singapore, there is no similar assessment required for collective sales.

³² Wong, P. T. (2018a). “The Big Read: En bloc wars erupt once more, turning neighbours into foes”, *Today Online*, February 10. Available at: <https://www.todayonline.com/singapore/big-read-en-bloc-wars-erupt-once-more-turning-neighbours-foes>. [Accessed 7 September 2018]

³³ Aravindan 2018

³⁴ Wong P. T. (2018b). “En Bloc bid stirring emotions at Mandarin Gardens”, *Today Online*, January 24. Retrieved from: <https://www.todayonline.com/singapore/en-bloc-bid-stirring-emotions-mandarin-gardens> [Accessed 15 Jan 2018].

³⁵ Wong 2018a; Straits Times 2017.

³⁶ Ng, M. K. (2018). "Urban Renewal, Sense of Community and Social Capital: A Case Study of Two Neighbourhoods in Hong Kong". in *Urban Renewal, Community and Participation*, edited by Julie Clark and Nicolas Wise. Retrieved from https://link-springer-com.libproxy1.nus.edu.sg/chapter/10.1007/978-3-319-72311-2_1

³⁷ Chan, K.W. (2017). “Rethinking the mechanism of the social impact assessment with the ‘right to the city’ concept: a case study of the Blue House Revitalization Project in Hong Kong (2006–2012)”. *International Planning Studies*, Vol.22, No.4, pp.305-319

2.3 Assessment of heritage value

Heritage value is another intangible aspect to an aged building which is a combination of historical, cultural, social, and architectural values. This type of value is identified in order to measure worthiness, prioritize resources, and inform decisions on conservation. Governments have traditionally taken the lead in the conservation of old buildings. Most countries thus have their own definitions of measuring the “heritage value” of buildings and it is these definitions that determine the viability of building conservation in the city or country. Most of the scholarship on building conservation focuses heavily on the tangible and “hardware” elements of buildings. Countries, such as Singapore and Australia, stress the historical and architectural values of buildings as part of the conservation criteria. These criteria pay more homage to the national significance of these buildings, emphasizing their role played in a specific period and their “creative” or “technical” contribution to a particular epoch e.g: Industrial Revolution.³⁸

In recent years, there has been a re-orientation in the focus of heritage value. Heritage buildings are not only perceived to be of national, historic significance but are assessed on their value to communities and societies. In other words, social value becomes a more critical component of heritage conservation. This was aligned with the growing trend of community involvement in the heritage conservation process, and has been accompanied by a shift in the emphasis towards the societal perceptions of heritage, as well as an emphasis on the intangible elements of heritage. In Europe, the Framework Convention on the Value of Cultural Heritage for Society was set up in 2011 and it focused heavily on the role of community involvement in defining the “social dimensions” of heritage—in other words, heritage status was not state-ascribed. Rather, it stressed heavily on community recognition of heritage status.³⁹ In the United Kingdom, the Heritage Fund has commissioned a study to develop a cultural framework in linking heritage conservation to wider outcomes such as community development and well-being.⁴⁰

Viewed in this light, heritage conservation is perceived as a key means to deliver broader social and economic contributions to people and the designation of places worthy of heritage value is established by consensus after a series of discussions with relevant stakeholders. In the case of Norway, conservation efforts for schoolhouses were largely driven by locals as the schoolhouses were touted to have immense heritage value to particular communities.⁴¹ Yet in this case, heritage value was not defined as the contribution of schoolhouses to the aesthetic or historical development of Norway. Instead, it was a channel for local communities to promote the continuation of a “local identity” and to forge new “social experiences, relations, exchanges and so forth”.⁴² Thus, what accords heritage value is perceived as an ongoing process and the value

³⁸ Department of Environment and Heritage Protection (2013). Assessing Cultural heritage significance: Using the cultural heritage criteria, *Department of Environment and Heritage Protection*, Queensland; Preservation of Monuments Act, 2011 (Cap. 239), Rev. Ed.

³⁹ Mydland and Grahn, 2011; 581

⁴⁰ Clark, K. & Maer, G. (2008). “The cultural value of heritage: evidence from the Heritage Lottery Fund”, *Cultural Trends*, Vol.17, No.1, pp.23-56.

⁴¹ Mydland and Grahn, 2011.

⁴² *Ibid.*, 583.

of buildings are tied to their roles in facilitating community development and in bridging social relations.

2.4 Adaptive reuse

Adaptive reuse has emerged as a key cornerstone of the movement to preserve the socio-cultural ties of a building. Shanghai's Tianzifang is a case of community-driven effort to adaptively reuse. Local communities and artists campaigned for the conservation status of Tianzifang over a five-year long period before the government eventually decided to proffer heritage status to the area.⁴³ Four types of "sustainability" were used to evaluate the adaptive reuse of buildings within Tianzifang, namely economic, social, environmental and political. These criteria were adopted to study the effects of adaptive reuse on the intangible aspects of heritage conservation, such as social networks, community relations and their "original way of life".⁴⁴ It also reinforced the possibilities of public-private partnership in empowering communities. In this case, the government took a backseat in the process and played the role of a facilitator. This engendered an outcome where communities took stock of the development of the area, making urban renewal a process that captured not just the tangible elements of buildings (aesthetics, building quality and design) but also the intangible aspects (social networks, way of life).

Having surveyed the various strands of literature that focus on the role of heritage in the contemporary world, we gather that there is a gradual emphasis on the social and cultural elements of building protection and heritage conservation. While the designation of heritage value was traditionally within the government's domain, governments have also recognised the imperatives of involving communities in the process of conservation and urban regeneration. The more successful examples of urban regeneration also illustrate the critical position of community participation, suggesting the imperatives of analysing the relational aspects of a building or a given environment to its inhabitants.

The literature review has highlighted the fact that heritage value has shifted from the emphasis on historical and architectural values of old buildings to one that recognizes value in the modernist architectural designs as well as the socio-cultural value of the building. However, we note that in Singapore, what defines heritage is still pretty much assessed based on the early definition of heritage value and less attention has been showered on the intangible, lived experiences within sites. Nevertheless, Singapore is not new with regards to adaptive reuse, as can be seen from the case of the Fullerton Hotel⁴⁵, where the building was revitalized through market-led conservation by URA in 1998 and subsequently designated a landmark status.⁴⁶

⁴³ Yung, EHH, Chan, EHW, & Xu, Y. (2014). "Community-initiated Adaptive Reuse of Historic Buildings and Sustainable Development in the Inner City of Shanghai", *Journal of Urban Planning and Development*, Vol.140, No.3, pp.1-13.

⁴⁴ *Ibid.*, 11.

⁴⁵ Urban Redevelopment Authority (URA) (2013). "Historic Waterfront." Viewed on March 23, 2019. Retrieved from: <https://www.ura.gov.sg/>

⁴⁶ The Fullerton building is a seven-storeyed neo-classical structure located between Singapore River and Marina Bay. It was designed by Keys & Dowdeswell and completed in 1928. Before the turn of the 20th century, it had

2.5 Cases of heritage conservation and urban revitalization

We look into three representative cases to analyse key success factors of the conservation of heritage buildings. The first two cases are both located in the United Kingdom, one is Brunswick Center, highlighting the possibility of adaptive reuse of brutalist building, while the Covent Garden case highlights the role of civil society in the process of conservation. In addition, Hong Kong's building conservation policy and revitalisation scheme are incorporated here as examples of a comprehensive policy and an inclusive effort respectively to promote conservation of old buildings into heritage sites.

2.5.1 Brunswick Center and adaptive land use⁴⁷

Brunswick Center is a collection of vivid brutalist low-rise buildings built in the 1960s to replace the run-down terrace houses. It served as the city council, which made it very unpopular and underappreciated. Later in the 1990s, the Center remained unpopular and was subsequently slated for immediate demolition. However, there were attempts to rejuvenate the area and the center was refurbished by Allied London Properties (ALP), which bought its freehold in 1998. With some changes it made to repair the buildings and upgrade the shops, conviviality was encouraged on the streets. Brunswick Center today is now a keynote attraction, with multiple facilities for visitors and residents alike, despite its earlier history. The case of Brunswick Center suggests that adaptive reuse is a useful way of rejuvenating old buildings and bringing conviviality back to the area.



The Brunswick Center before renovation⁴⁸

served several government departments, such as the General Post Office, the Exchange, Singapore Club, Chamber of Commerce. The building was restored and reused as a luxurious, five-star hotel through multiple internal reconstructions, which included adjustment of floor height according to the windows' locations, and transformation of the lighthouse into a French restaurant.

⁴⁷ Rykwert 2015

⁴⁸ Photos from <https://www.levittbernstein.co.uk/project-stories/brunswick-centre/>



*The Brunswick Center after renovation*⁴⁹

*2.5.2 Covent Garden Market and the role of civil society*⁵⁰

London's Covent Garden Market was first built in 1830 into the form of a historical market hall featured by neoclassical facades lined with the arches, columns and iron-ribbed glass roofs. But due to the worsening traffic situation, the market became very unpopular and was relocated to the southwest corner of London. Later, the area was planned to be redeveloped into a common and ordinary residential community, but the local community strongly disagreed and galvanized themselves to conserve the original buildings. Their efforts were eventually successful and this place has since morphed into a vibrant center filled with business and lively streets, connecting to many facilities like the courts, royal operas, theaters. The case of Covent Garden Market highlights the prominent role that the local civil society played in ensuring that the original steel structure was preserved while allowing for the area to be transformed and re-opened as a commercial center in 1980. This case illustrates the important role that civil society can play in the systematic process of heritage conservation.

*2.5.3 Hong Kong's building conservation policy*⁵¹

Hong Kong has issued the administrative order to prevent historical buildings from total demolition or mandating guidelines which call for partial conservation. More importantly, there is a comprehensive set of measures put in place to encourage conservation by providing guidance through planning policy, financial support, loans and professional support. For the private-owned heritage building, it incentivizes the owners for conservation through providing subsidies

⁴⁹ Ibid

⁵⁰ Ibid.

⁵¹ Wei, Q & Huang, W. (2008) "On the urban renewal policy of Hong Kong". *Urban Problem*, vol.9, pp 73-76

or loans for maintenance, mandating the planning regulation and penalties; offering the free service and technical aid on conserving historical buildings; counting it as tax credits.

2.5.4 1881 Heritage and Hong Kong's revitalisation scheme

1881 Heritage is Hong Kong's keynote example of how adaptive reuse transformed the 120-year-old historical building into a cultural and commercial site located in Tsim Sha Tsui.⁵² Constructed in 1884, the complex of former Marine Policy Headquarter, Central Magistracy and Victoria Prison was declared monument in 1995 and a project under the Revitalising Historic Buildings Through Partnership Scheme in 2003. The initiative aimed to revamp the government-owned historic building through adaptive reuse and fell under the wider ambit of conservation policy.⁵³ The revitalization scheme represents a "quadripartite relationship" between the government, non-profit making organization (NPO), expert advisory committee and the public. The funding model promotes broad-based stakeholder engagement while encouraging the role of private sector in heritage conservation.⁵⁴ This project is also regarded as the "city's most ambitious heritage project" that overcame the odds of conservation by maintaining the historic value of the building in the midst of Hong Kong's redevelopment fever.⁵⁵ The success of the project can be attributed to the scheme's following features; (1) conducting a six-month public engagement exercise to engage stakeholders through various channels-- this demonstrated the inclusion of diverse views into the development of the revised design by Hong Kong Jockey Club and (2) Partnership between the project's NPO and the government's Commissioner for Heritage's Office as well as the Advisory Committee on Built Heritage Conservation which provided financial support and one-stop advisory service to both the office and NPO.⁵⁶ The Hong Kong case highlights the critical role of a "quadripartite relationship" in revitalising built heritage.

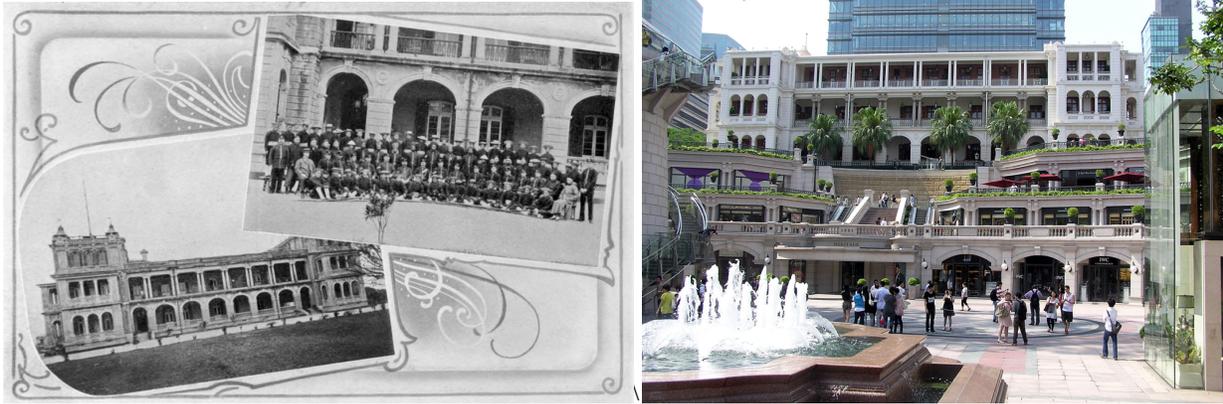
⁵² CK Asset (n.d.). About 1881 Heritage. Retrieved from: <https://www.1881heritage.com/about.php?lang=en>. (Accessed 22 March 2019).

⁵³ Development Bureau (2017), About the Scheme, Revitalising Historic Buildings Through Partnership Scheme, July 13. Retrieved from: <https://www.heritage.gov.hk/en/rhbt/about.htm>. (Accessed 22 March 2019).

⁵⁴ Brooke, M., Cheung, A., DiStefano, LD., Ho, DCW., Lee, HY., Moir, M. and Ying, R. (2016). "Adaptive reuse of built heritage in Hong Kong: integrated conservation approach for development", RICS Insight Paper, p. 1-14. Retrieved from: <http://hdl.handle.net/10722/235533>.

⁵⁵ Tsui, E. (2018). "Hong Kong Central Police Station restoration: how city's most ambitious heritage project overcame the odds", *South China Morning Post*, June 15. Retrieved from <https://www.scmp.com/lifestyle/article/2150710/hong-kong-central-police-station-restoration-how-citys-most-ambitious>. (Accessed 22 March 2019).

⁵⁶ Development Bureau (2016), Central Police Station Compound, Heritage Conservation and Revitalisation Projects, December 23. Retrieved from: <https://www.heritage.gov.hk/en/conserves/central.htm>. (Accessed 22 March 2019).



*1881 Heritage before and after renovation*⁵⁷

To conclude, we have learnt at least three key success factors from the cases. For the top-down approach, governments as the key decision-making actor in conservation can design policy to promote conservation and encourage both profit and non-profit making organization in the process. At the same time, civil society can best promote the significance of historic building conservation in developing a sense of identity and belonging in a community. In fact, this bottom-up effort has a significant role to play in conservation particularly when intangible values of a building and consequences as a result of displacement and loss of community are not as much emphasized as we found in the discussion on the social impacts of en bloc policy.

More importantly, our review of heritage value assessment and adaptive reuse highlight the possibility of heritage conservation through a smart use of old buildings. Similarly, the cases also demonstrate the importance of economic of heritage value that may help promote conservation. Conservation does not always imply freezing the buildings and economic loss but is open to adaptive reuse that bring new new breath into a heritage site and take into account different values of a building. Heritage value as an ongoing and interactive process has communicative power and values which should be valorized and sustained in accordance with the development of community and city.

3. Main Findings

Building on our literature review, fieldworks and interviews, our analysis focuses on 1) analysing the collective sales process which is a top-down, private-led urban development approach and focuses on the economic value of land due to existing policy design, 2) identifying the different ways stakeholders value a modernist strata-titled building, specifically GMC, and 3) analysing how current gaps in the collective sales process ignores non-economic values of socio-culture and heritage.

⁵⁷ Photos from <https://www.1881heritage.com/>

3.1 Collective sales and policy design

Urban development in Singapore has been characterised by top-down intervention, with the state administering majority of the land developments. With such strong ownership over land, the Singapore government has the authority to decide the zoning for the various uses of land.⁵⁸ Singapore has been described as a “property state”⁵⁹ where allocations of land are contingent on market forces and capital is accumulated through land investments. The corporatist nature of land policies is emphasised by how the Singapore government made decisions that were aligned with macroeconomic trends and privileged market forces.⁶⁰ Coupled with the challenges of scarcity in terms of space and natural resources, land development in the city-state has often been controversial.⁶¹ Issues such as heritage conservation have been contested by the various stakeholders, as the state often prioritised factors such as economic growth over intangible elements like community and social relations which were tied to a place.⁶² Thus, urban development was often bones of contention in state-societal relations.

In Singapore today, urban redevelopment has particularly come under the spotlight, characterised by growing private sector participation.⁶³ The roots of private sector participation were seeded in the 1990s where the government gave the authority to private developers to redevelop the central business area.⁶⁴ The government subsequently released Development Guide Plans in the 1990s which relaxed “extant development of development controls of building density”.⁶⁵ This eventually gave rise to the phenomenon of collective sales, in the property market.

3.1.1 Collective sales policy rationale and instruments

Singapore government has utilized various policy instruments to facilitate and regulate collective sale. We explore the government’s approach to the policy problem and the framing of the solution to understand why certain policy instruments are preferred as the urban redevelopment strategy, and how these focus mainly on the economic value of land.⁶⁶ ⁶⁷ The following table summarizes an overview of collective sales policy instruments categorized by Howlett’s

⁵⁸ Haila, A (2000). “Real Estate in Global Cities: Singapore and Hong Kong as Property States”, *Urban Studies*, Vol.37, No.2, pp.2241-2256.

⁵⁹ Ibid.

⁶⁰ Neville, W (1993). “The Impact of Economic Development On Land Functions in Singapore”, *Geoforum*, Vol.24, No.2, pp.143-163.

⁶¹ Kong, L & Yeoh, B.S.A (1994). “Urban Conservation in Singapore: A Survey of State Policies and Popular Attitudes”, *Urban Studies*, Vol.31, No.2, pp.247-265.

⁶² Ibid.

⁶³ Lum et al 2004.

⁶⁴ Ibid.

⁶⁵ Ibid., 2.

⁶⁶ Ibid.

⁶⁷ Vedung, E (1998). “Policy Instruments: Typologies and Theories” in *Carrots, Sticks & Sermons: Policy Instruments and Their Evaluation*. New Jersey, p.21-57.

taxonomy of policy instruments.⁶⁸ In brief, the NATO model represents the four tools that governments use to address policy programs namely their legal power (authority), financial resource (treasure), information (or nodality), and organization.⁶⁹

Policy Instruments for collective sales

Authority	Treasure	Organization	Information
1. Land Titles (Strata) Act 2. Government Land Sale 3. Development Control	4. Development Charges	5. Collective Sale Committee 6. Strata Titles Board	7. Development Guidelines

Source: adapted from Howlett et al 2009

This following discusses each policy instrument in detail.

1. Land Titles (Strata) Act

Land Titles (Strata) Act (LTSA) is a legislation established to formulate rules and regulations regarding collective sales since 1967. Before the late 1990s, collective sale was marked by 100 percent consensus amongst residents in the participating building. However, agreement on collective sale was not easily obtained and various attempts at collective sale failed due to the disapproval of minority owners. Thus, the government subsequently made amendments to the LTSA in 1999 which modified the levels of consensus to 80-90% depending on a building's age.⁷⁰ Essentially, the amendment is the principal tool as it changed the legal requirement from the unanimous consent to majority consent, thereby, removed the constraint for private developers and make the exchange of land and building easier.

2. Government Land Sale (GLS)

With majority ownership of land, the government is able to control land supply to support land optimization by selling or leasing land to private sector.⁷¹ After Singapore's independence, the Land Acquisition Act was enacted in 1966 to acquire 76.2% of the land in Singapore and make the government the biggest land owner.⁷² The release of State land for development by private developers, through GLS Program, is aligned to the key goals of the long-term national

⁶⁸ Howlett, H., Ramesh, M. & Perl, A. (2009). *Designing Government: From Instruments to Governance*, Oxford University Press, p.169.

⁶⁹ Ibid.,115.

⁷⁰ Sim, L.L., Lum, S.K & L.C, M.L (2002). "Property rights, collective sales and government intervention: averting a tragedy of the anticommons", *Habitat International*, Vol.26, pp.457-470.

⁷¹ Urban Redevelopment Authority (URA) (2019a). Land Sale: General Land Sale Information. Available at: https://www.ifaq.gov.sg/URA/apps/Fcd_faqmain.aspx#FAQ_122411. [Accessed 22 Dec 2018].

⁷² National Library Board (NLB) (n.d.). Land Acquisition Act is Enforced: 17th June 1967, Government of Singapore. Retrieved from: <http://eresources.nlb.gov.sg/history/events/1f669eff-bc82-49d1-a27c-2624e4cab8c6>.

development according to Singapore's Master Plan and Concept Plan.⁷³ With URA as the main governmental agent, GLS is planned and released every six months.⁷⁴ The GLS is a substitute to collective sale sites, and so the amount of land the government sells affects the demand for collective sale sites.⁷⁵ Indeed, one of the main drivers of the current collective sale cycle in 2016-2018 is the 2014 retrenchment of land supply from GLS, resulting in collective sale frenzy in 2017.⁷⁶

3. Development Control (DC)

Similar to other development projects, collective sale sites are subjected to DC, a type of regulation on development projects administered by URA in accordance with the Master Plan concerning land use, building height, and plot ratio.⁷⁷ URA's DC Handbooks serve as the guidelines for both developers and URA in consideration of a development application. DC critically influences collective sale redevelopment projects where land-use will be intensified through increasing the number of units in a building, or Dwelling Units.⁷⁸ Thus, the development control guidelines influence the potential selling price of collective sites, to further capture the economic value of land.

4. Development Charges (DCs)

Redevelopment projects via collective sale are feasible when the land is not fully optimised per development guidelines, if the buildings are old and/or land value increase as a result of government's rezoning or new infrastructure development. A part of this higher land value is captured through Development Charges, a fee paid by developers to the government who want to buy and develop the building, as required in the Planning Act 1998. After the planning permission is granted by URA, DCs will be levied when developers.⁷⁹ The amount of charge depends on whether and how much the Development Ceiling is higher than the Development Baseline.⁸⁰ Other factors, such as development types, site location, or Development Charge rate

⁷³ URA n.d.

⁷⁴ Urban Redevelopment Authority (URA) (2019b). Land Sale Procedure. Available at: <https://www.ura.gov.sg/Corporate/Land-Sales/Land-Sale-Procedure>. [Accessed 22 Dec 2018].

⁷⁵ Song, T. (2017). The Collective Sales Wave Impact on Singapore's residential market, Colliers Radar, Colliers International, Singapore.

⁷⁶ Tan, HB and O, TH (2018). "Mismatch in price expectations breaks sales", *Business Times Singapore*, March 29. Retrieved from: <https://www.businesstimes.com.sg/hub-projects/property-2018-march-issue/mismatch-in-price-expectations-breaks-sales>. [Accessed 7 January 2019]

⁷⁷ Urban Redevelopment Authority (URA) (2018a). "General Information on Development Control", FAQs. Available at: <https://www.ifaq.gov.sg/URA/> [Accessed 28 Dec 2018].

⁷⁸ DC creates a Maximum Allowable Dwelling Units from a detailed formula derived by dividing the proposed building Gross Floor Area by 70 sqm outside the Central Area and by 100 sqm in four designated areas.

⁷⁹ Urban Redevelopment Authority (URA) (n.d.). Land Sale. Available at: <https://www.ura.gov.sg/corporate/land-sales>. [Accessed 28 Dec 2018].

⁸⁰ Development ceiling is the value of the proposed development which received planning permission from URA while development baseline is the approved value. Specifically, DCs are determined by the URA's formula as follows: Development Charge = Development Ceiling – Development Baseline – Development charge exemption.

reviewed every six months, are also considered. The government thus gains revenue from intensified development due to the economic value of the land. DC revenue is also argued to be redistribution from development projects to local neighbourhood as the monetary gain will be utilized to compensate for infrastructure improvement in the area.⁸¹

DCs also play a role in cooling demand for en-bloc sites^{82 83 84}, although it is small relative to the amount paid for the site itself and other costs. In 2007 and 2017 after collective sales peaked, the government introduced an increase in development charge to cool down the collective property markets, specifically DCs for non-landed residential developments, with an increase by 57.8% in 2007 and 22.8% in 2017 on average.⁸⁵ The implication of development charge on collective sales is, thus, more explicit compared to development control, as the charge is able to directly encourage or discourage the actors involved in collective sale, especially those in the sites with high DC rate and fee.⁸⁶ This could result in a longer collective sale process for those in pipeline and future collective sale application⁸⁷, where developers may need more time to evaluate the redevelopment potential, the reserve price, and their bid for public tender.

5. Collective Sale Committee and 6. Strata Titles Board

As required by LTSA, when a multi-owner building is going on collective sale, the owners in the shared building need to set up a Collective Sale Committee (CSC), a body consisting only of elected owners to represent and steer the collective sale process.⁸⁸ The responsibility of the committee includes proposal of reserve price, collecting signatures from owners who agree to the collective sale within one year and find a buyer through a public tender exercise.⁸⁹ STB is a tribunal established to oversee collective sale application and comprises lawyers, architects, surveyors and other property professionals as required by LTSA.⁹⁰ The responsibility of the board includes reviewing collective sale applications with regards to the consent requirement, due process, and minority's objection before issuing an approval. If there are objections against

⁸¹ Christudason 2010a

⁸² Ibid.

⁸³ Shankari, U. (2007). "Property stocks sink on news of higher DC charges." *Business Times Singapore*, September 4. Retrieved from: <http://propertyhighlights.blogspot.com/2007/09/property-stocks-sink-on-news-of-higher.html>.

⁸⁴ Wong 2018a

⁸⁵ Foo, E. (2018). "DC rates increased by 22.8% for non-landed residential use", *New Launch 101*. Retrieved from: <https://newlaunch101.com/dc-rates-increased-by-22-8-for-non-landed-residential-use/>.

⁸⁶ Leong (2018b), "National Day Rally 2018: All HDB flats will be upgraded twice under expanded Home Improvement Programme", *Straits Times*, August 19. Retrieved from: <https://www.straitstimes.com/politics/national-day-rally-2018-all-hdb-flats-will-be-upgraded-twice-under-expanded-home>. [Accessed 13 January 2019]

⁸⁷ Ibid.

⁸⁸ Christudason 2010b

⁸⁹ Strata Titles Board (STB) (2018). "En-bloc sale by majority consent", Steps relating to an application under Part VA of the Land Titles (Strata) Act. Available at: <https://www.stratatb.gov.sg/applicant-steps-relating-to-ltsa.html>. [Accessed 11 January 2019].

⁹⁰ Ibid.

the application, STB would also serve as a mediator to assist parties to resolve the dispute.⁹¹ Under the LTSA, the High Court can only reject the collective sale application if there is an objector who will incur a financial loss from the sale⁹², highlighting the financially driven process of a collective sale.

With different types of policy tools, we observe that the Singapore government has created a combination of tools that primarily relies on substantive instruments to achieve administrative feasibility, while also take advantages of procedural tools to achieve a politically accepted policy mix. With these instruments, the government is able to effectively administer the entire process of collective sale and align it with urban redevelopment plan. More importantly, the economic-focused aspect of collective sale policy instruments has ensured that collective sales are driven by the economic value of sites.

3.1.2 Collective sales fever and the government cooling measures

In addition to the design of collective sales policy, another reason for the recent slew of modernist heritage buildings like GMC being put up for collective sale is the collective sale fever in the market in 2017 and 2018. Our research indicates that government policy seeks to facilitate market-led urban renewal while balancing for inflation with cooling measures. However, the government has also played an active role in curbing collective sale and land sales in late 2018 with property cooling measures, in response to an active market. When interviewed, Christine Li, Senior Director and Head of Research, Cushman and Wakefield, argued that the current collective sales cycle during 2016-2018 resulted from limited GLS sites that could not cope with the increased purchasing demand of developers.⁹³ The low supply of land emerged from the government's decision to reduce GLS sites in response to the shrinking residential market and oversupply of land since 2013.⁹⁴ This recent strong demand has led the government to increase the supply in 2017 which will potentially cool down the collective sales market. Apart from GLS, several policy instruments have been introduced to regulate en bloc market. This includes Additional Buyer's Stamp Duty (ABSD), Development Charge rates, and Development Control's plot ratio. From such perspective, the government is able to control collective sales through these measures by "heating up" and "cooling down" the property market.

This study of policy instruments reveals that economic values of buildings have been explicitly captured by the government through the design and application of policy instruments throughout the collective sales process. This leaves gaps where other types of values of a building perceived by different stakeholders are sidelined. In the next section, we examine the perception of the

⁹¹ *ibid.*

⁹² Attorney-General's Chambers. (2019). "Land Titles (Strata) Act — Singapore Statutes Online." Retrieved from <https://sso.agc.gov.sg/Act/LTSA1967#pr84A->

⁹³ From our interview with Christina Li (2018).

⁹⁴ Song 2017.

different types of value by perceived by different stakeholders in the case of GMC, and how the ‘inherent values’ of buildings are, unlike earlier, manifested but disregarded in the goal of collective sales.

3.2 Different perceptions of value in building

Collective sales policy as it stands focuses on the economic value of a building in the sales process. Crucially, owners vote to sell the building based on a reserve price and the only valid way to contest the sale is if an owner is getting less than what he or she paid for the unit⁹⁵. Developers are mainly cost-driven, considering costs to conservation, changing land-use zoning and more. Architect Tay Kheng Soon argues that “developers see the profit; aging private owners want to sell out for cash; and however, tenants who have connected want to stay”⁹⁶. Therefore, as a key means of urban regeneration and redevelopment, Singapore’s collective sales brings out benefits in terms of sales profits for developers, higher tax revenues for governments and additional wealth or improved conditions for private owners.

3.2.1 Economic values in buildings for developers and owners

Our interviews with real estate experts emphasize the mainstream price-driven issues of collective sales. In fact, the considerations on potential conservation of an existing building when redeveloping a collective sale site are translated to higher cost for collective sales owners, as owners will need to lower the reserve price of the conserved building “to compensate for the conservation” which will leave owners with less payouts.⁹⁷ For developers, land value is the most important determinant to purchase buildings through collective sales, which translates into development potential and profitability of the purchase. Hence, when the consensus level and asking price are reached from the owners’ side, collective sales phenomenon “all boils down to price”.

For developers, the value of building depend mainly on price and location. Changing the zoned function of a redeveloped building may be costly and not always possible.⁹⁸ Only a few collective sale transactions included zoned function changes, such as Waterloo Apartments and Golden Wall Centre which changed from residential to hotel. However, a change from residential to commercial buildings including retail and office entails a large difference in land value which developers will need to pay. Whether this aspect of collective sale would impose as a constraint on adaptive reuse still needs to be further investigated.

⁹⁵ Attorney-General’s Chambers 2019

⁹⁶ From our interview with Tay Kheng Soon 2018

⁹⁷ From our interview with Li 2018

⁹⁸ Ibid.

Collective sales in Singapore were introduced to encourage urban redevelopment.⁹⁹ However, with an overemphasis on the profit, urban renewal is no longer the primary goal of property redevelopment.¹⁰⁰ Redevelopment can be used to regenerate older areas where properties are in deteriorated conditions with little preservation value. However, redevelopment of collective sales sites in Singapore has been mainly driven by economic value rather than factors such as the designed physical lifespans, ages and existing conditions of buildings. Thus, it can lead to a waste of resources when relatively new buildings in comparatively good conditions are demolished.¹⁰¹ This was highlighted by Tay, who argued that even though “the electrics and mechanical equipment of buildings, like GMC, would be in need of repair and replacement every 20 years” and “general wear and tear on fitting and finishes would also require maintenance”, in fact, their structure could last rather long.¹⁰²

For owners, the decision to go on collective sales is driven by the resale value, particularly for leasehold properties, the maintenance cost of the existing buildings and the replacement cost of finding a new place. Ande Lai, a long-term resident of GMC was agreeable to selling his unit as he bought his apartment in the 1980s and also runs a business within the building. Moreover, the fact that GMC was a mixed-used building has added a dash of complication to maintenance efforts.¹⁰³ While Ande had acknowledged the difficulties of maintaining a building with so many owners, he felt that GMC’s facilities were generally well-maintained in the sense that the elevators were working fine and the building was on the overall, “clean”. This was in contrast to a Channel NewsAsia report on GMC¹⁰⁴ which emphasised the poor maintenance, such as the shared swimming pool which has been abandoned as there was not enough financial resources to keep it going. The report also explained that many owners had eventually leased out their units to Thai tenants and the limited amount of money poured into the shared fund for building maintenance was running dry, thus there was little impetus to keep the building running.

This suggests that there may be a contradiction in the views held by different owners. Our interviewee who prioritises the sentimental value of the place focuses less on issues related to maintenance while people who stress the functionality of the building tend to focus more on the state of maintenance. Thus, the prospect of selling a building and turning a profit may incentivise a lack of maintenance in older buildings in favour of premature redevelopment.

⁹⁹ Chang, M. (2018). “Collective sales a key part of urban renewal”, *Strait Times*, January 21. Retrieved from: <https://www.straitstimes.com/forum/letters-in-print/collective-sales-a-key-part-of-urban-renewal> [Accessed 13 January 2019].

¹⁰⁰ Loe, J. and Sim, G. 2018. "The Disappearance of Little Thailand.", *Multiple Cities*. Retrieved from <https://www.multiplecities.org/home/2018/10/14/the-disappearance-of-little-thailand>

¹⁰¹ Cheang, K.L. 2018. "Losing Luster: Singapore's Golden Mile Dilemma". *Yale Daily News*. Sep 16. Retrieved from: <https://yaledailynews.com/blog/2018/09/16/losing-luster/>

¹⁰² From our interview with Tay 2018

¹⁰³ From our interview with Lai 2018

¹⁰⁴ Ng et al 2018

3.2.2 Socio-cultural values for Thai diaspora and tenants

While a collective sale may focus on the economic aspect, the sale and potential demolition of a building also affects the socio-cultural value inherent in a building. For GMC, in particular, there are strong social networks in the unique Thai enclave. In an ironic twist, many of those who value the building for its socio-cultural aspects are not unit owners, only tenants, and have little say in the en bloc process.

From our interviews, we found that quite a few tenants who were living in GMC came to Singapore upon referrals from friends or relatives who were currently working there. This corresponds with our observation that GMC is indeed a hub for the Thai community—two of our interviewees had been working there for two decades and both said that they came to Singapore as they had relatives who were living in the city. This is part of the greater phenomenon of “chain migration”, explicated by Macdonald (1964). Chain migration is a process by which migrants from a particular country or province follow their compatriots to the same location and this process is mediated by social relations or networks. One of our interviews eventually settled down in Singapore as she had married a local. Six years after she arrived, her sister moved to Singapore as well, living with her and working in the same massage parlour at GMC. Another interviewee, a Malaysian lady, mentioned that GMC was not only home to the Thai community, but there were quite a few Malaysians working in the complex as well¹⁰⁵. She was herself one of those who came to Singapore via a friend’s recommendation. Notably, she was from Perlis, a northern Malaysian city that shares borders with Thailand. This hints at the strength of networks that facilitated the flow of the Southeast Asian diasporas into GMC.

Despite the strong Thai presence in GMC, we found that many were not involved in the collective sale deliberative process. One of our interviewees said that many of the Thai tenants were unclear about the prospects of en bloc and many of the information they received were hearsay and not clarified by the MCST¹⁰⁶. In fact, she had heard of the news of en bloc from other friends working in the complex and they only learnt of the en bloc tender through the newspapers. Tenants were largely excluded from en bloc discussions and many of their interests are not taken into consideration. Based on our interviews, many tenants have made some plans if the building is sold, with planning to relocate to indeterminate locations. The lack of tenant consultation in the en bloc process supports the argument about the exclusion of tenants’ views in the process of en bloc deliberation.¹⁰⁷ They highlighted that the MCST has yet to provide the tenants with more information on the prospects of en bloc and this made it difficult for them to consider alternative plans of relocation. The lack of input from tenants highlights how the social value of GMC may not be sufficiently taken into account in the collective sale because some of

¹⁰⁵ From our interview 2018

¹⁰⁶ From our interview with Vivian 2018

¹⁰⁷ Loe and Sim 2018

those who participate in the social networks and social capital in the site are not owners and have no say.

Tenants interviewed express a mix of sadness and ambivalence towards the possible demolition of GMC. Vivian said that it was “impossible” to re-create another Thai diaspora because the development of GMC into an informal haven for the community occurred over decades, and given the maturity of the Singapore landscape, it was difficult for such an organic formation to occur again. Another interviewee who worked in the Thai supermarket for 12 years, mentioned that she would probably return to Thailand. She said, “Even though business is not good during the weekdays, I feel more comfortable when I can speak in my own language and there are people from my hometown here.” However, not all tenants were sentimental. Some responses were marked by a sense of resignation—a tenant felt that given the rather notorious image of Golden Mile area as a place for late-night shenanigans and red-light activities, brawls were not uncommon, and the police intervention was part and parcel of life. Thus, she felt that it would be less of a loss should the building be demolished.

From a local owner’s perspective, Ande Lai, stressed continuously on the intangible, social aspects of the place. He recounted the bond with neighbours and friends, referring to these ties as the “gel” of the community and felt that such ties would not be forged again when they have to relocate. He said, “Here in GMC we have Thai restaurants and Thai imported produces. You can buy almost anything you miss from Thailand. Getting all the operators to come together again is quite impossible. The operation style here is an open concept and somewhat chaotic.”¹⁰⁸

Collective sales may be financially profitable, but also result in social and cultural costs for stakeholders, especially for those rooted to the community, as it breaks off the personal connection and network established over time. However, this particular aspect of social and cultural value does not get prioritized in the current society unless there is an economic value, or a political significance attached. Still, Tay argued that “the state seems to pay more attention on sentimental value now”¹⁰⁹, as the society progresses and social elites become more outspoken.

3.2.3 Heritage value of GMC as modernist icon

Our findings under this section are mainly derived from our participation in public forums on heritage conservation and discussions related to Singapore’s modernist icons as well as our interview with Tay. As he was part of the trio who designed GMC in the 1970s, his views on heritage conservation would be especially insightful. Apart from the socio-cultural elements that have been discussed in the earlier section, we found two poignant themes.

¹⁰⁸ From our interview with Lai 2018

¹⁰⁹ From our interview with Tay 2018

The GMC is an architectural landmark of its times. Built in the early 1970s, it was designed and constructed entirely by Singapore's first generation of architects¹¹⁰ and was also architecturally significant as it formed part of the greater movement of Brutalism, a global trend during the post-war years. Brutalist architecture became popular after the second World War because of "its low-cost construction and design method in the context of economic depression".¹¹¹ The concepts came to Singapore in 1960s, during the nation-building phase and influenced the private sector-led urban redevelopment projects facilitated by the government. As such, these "modernist icons" represented modern architectural concepts as well as the nation-building phase. Given the fact that Singapore was also rapidly industrialising in the 1970s, the brutalist style of GMC symbolised practicality and innovation during the time of its inception and has also been described as an "architectural and cultural marvel" in a documentary.¹¹² In fact, many of the participants in the public forum we attended cited the architectural innovation of GMC as a key reason for conserving the building as its style and façade was unique to its time and a witness to the global ambitions of local architects in the nascent years of Singapore's independence.

The historical value of the GMC was often stressed in discussions related to the building. This was especially driven by the fact that the building was constructed during Singapore's early years of independence, which ushered in a flurry of building and construction activities. Participants in the forum had expressed that the GMC was an important historical monument as many of Singapore's modernist icons built around the nation-building era (1960s-1970s) had been demolished, such as the old National Library and the National Theatre by Alfred Wong. This meant that there was a possible lacuna in Singapore's historical narrative of its development and progress in its post-independence years compared to its colonial years, where many buildings had been designated "heritage buildings" by the National Heritage Board.

Ironically, buildings that Singaporeans identified with in its post-colonial years have been torn down as a result of economic imperatives and today, less than 50 remain.¹¹³ Tay remarked that only buildings that had tourism value would remain in land-scarce Singapore and the socio-historical elements of landmarks were subsumed under economic imperatives. However, the participants in the public forum noted that post-independence buildings, such as the GMC were "markers of identity" in Singapore's landscape and they helped to strengthen one's visual sense of belonging in a country where the landscapes change rapidly. Moreover, participants emphasised less on the architectural significance of GMC and more on their personal and lived experiences within GMC, which reiterates the possibility of buildings as a conduit through which a sense of belonging and rootedness to the space are fostered. This has an implicit impact on the

¹¹⁰ SHS 2018, p. 6.

¹¹¹ SHS 2018, p. 22

¹¹² Chng, H. (2017) "Golden Mile complex called an architectural cultural marvel in documentary", *Mothership*, May 6. Retrieved from: <https://mothership.sg/2017/05/golden-mile-complex-called-an-architectural-cultural-marvel-in-documentary/>. [Accessed 11 Jan 2019].

¹¹³ Public forum, 24 September 2018.

cultivation of national identity in Singapore and potential demolition would result in the loss of such a conduit for nation-building.

3.3 Gap in the collective sales process

Our findings on the case of GMC reveal that a site encompasses more than land value, but also socio-cultural and heritage values which are valuable to relevant stakeholders and the society as a whole. Table 3 summarises the different types of value, relevant stakeholders and why these gaps occur as discussed in the previous section.

Table 2: Values not captured in collective sales process

Value not captured in collective sales process	Stakeholder(s)	Why the gap exists
Architectural heritage value of building	Architects and society at large	Owners and developers drive process to sell and/or demolish building. No mandatory heritage-impact assessment and way to quantify monetary value of heritage
Modernist heritage value of building	Society	
Sense of belonging and place that members of the public hold of the place	Some members of the public	
Value of community network of other GMC users	GMC users	Financial considerations drive decision of owners to agree to sale, only 80% majority need to agree, only way to object to a sale is financial loss
Value of Thai community networks specifically	Thai community at GMC	Similar to above. In addition, Thai community who are tenants have no say in collective sales process

3.3.1 Factors affecting viability of conservation

Instead of demolishing an en bloc site, conservation is an option. However, there are trade-offs involved when comparing redevelopment and conservation. The collective sales process is designed to respond to economic values of land, while conservation may take into account other types of value in a building site. Our interviews suggest that the most important factor involved in the consideration stands opposite to profit-driven feature of collective sale from both developers and owners. For developers, the financial feasibility of the project depends on the

extension of the conservation required and the individual sites themselves.¹¹⁴ This is because conservation usually requires higher construction costs and does not allow for rebuilding using newer, more cost-efficient technology and designs. If the conservation route was to be taken, one way to do so is for owners to ask for lower reserve price. This is not often the case.

Nevertheless, conservation does not necessarily oppose urban redevelopment. Recent conservation planning advice for GMC from URA has raised the possibility of adaptive reuse and the question of to what extent the building should be conserved.¹¹⁵ URA has acknowledged that “modern architecture, dating from our recent past, is a significant aspect of our built heritage and we have selectively conserved a number of such buildings” and would work with stakeholders if there is strong support and merits for conservation.¹¹⁶ In fact, the state has already moved to conserve modernist icons like the Jurong Town Hall (completed in 1974) and old National Aerated Water Company building (active in the 1950s to 1970s).¹¹⁷ Critically, these tend to be owned by single owners or the state and thus easier to conserve compared to strata-titled buildings. In this regard, URA’s consultation is considered a step into the direction of closing such gap between urban redevelopment and conservation for strata-titled buildings.

Finally, we also note that in comparison to cities quite similar to Singapore, such as Hong Kong, there is no mandatory heritage impact assessment regime in Singapore. Heritage Impact Assessment (HIA) is defined as the process which allows architects and urban planners to understand and evaluate the potential impact of a proposed development policy on the current institutions, sites and communities. Findings from the HIA are best used to inform the planning and decision-making process, so as to “mitigate adverse impacts and enhance positive outcomes”.¹¹⁸ The only countries in Asia Pacific that have adopted HIA are Thailand and Hong Kong.¹¹⁹ In the case of Hong Kong, the HIA legislation was introduced in the then Chief Executive’s 2007/2008 budget speech “in response to rising aspirations from the public on heritage conservation...”.¹²⁰ However in Singapore, HIA is not mandatory and there are no clear legislations governing the introduction of a HIA. This has resulted in a scenario where site assessment tends to be reactive e.g: when a site is deemed under threat and hence efforts are poured into the documentation of specific sites, such as Bukit Brown and in our case, GMC,

¹¹⁴ From an interview with Melissa Lo 2019

¹¹⁵ Lim 2019

¹¹⁶ Channel News Asia (2019), “Golden Mile Complex may be conserved even as en bloc tender is launched”, *Channel News Asia*, March 27. Retrieved from: <https://www.channelnewsasia.com/news/singapore/golden-mile-complex-up-for-second-en-bloc-bid-at-s-800-million-11382782> [Accessed 29 March 2019].

¹¹⁷ URA 2019

¹¹⁸ International Association of Impact Assessment (2019), Retrieved from <https://www.iaia.org/about.php> [Accessed 17 March 2019].

¹¹⁹ Yeo, KS (2019). “Mandatory Heritage Impact Assessment in Singapore”, IPS Seminar on Heritage in Singapore, 27 February 2019.

¹²⁰ Development Bureau (2009). Heritage Impact Assessment Mechanism for Capital Works Project, September 18, Government Secretariat, Hong Kong, p. 1.

which has been subjected to a one-year conservation study by URA. These suggest that conservation in Singapore is more of an afterthought and the economic imperatives of redevelopment are often prioritised over socio-cultural elements.

In conclusion, given that the economic aspect of a building is so important to its future-use in the existing collective sales process, whether it is conserved or not depends on economic arguments. The argument for conservation can thus be framed in similar terms — **the cost of conservation and maintenance, the development cost and the economic gains of a conserved site, such as the strong unique identity of the site leading to demand for units.** Another approach is to adapt the sales process to better account for social and cultural value, using heritage and social impact assessments. Our overseas case studies have shown that adaptive land use, civil society, and building conservation policy had been vocal and instrumental in recognizing and taking different values and public interest of heritage buildings into account. Locally, public interest in conserving modernist post-independence era has risen, based on our observations at public events on the modernist icons and continued online buzz. Our policy recommendations in the next section are based on these considerations.

4. Recommendations

Our policy recommendations are measures preceding a potential collective sale, and after a sale has been closed. In both sections, we evaluate the role of the government and the role of SHS. The table below summarises our recommendations as such. Finally, we evaluate our recommendations and highlight three broad thrusts.

Table 3: Summary of recommendations for government and SHS

	Role of Govt	Role of SHS
Pre sale	<ol style="list-style-type: none"> 1. Tighten criteria for sale of younger sites 2. Encourage better maintenance of older buildings 3. Encourage representation of tenants and minority owners in the CSC 	<ol style="list-style-type: none"> 6. Produce a handbook to guide developers on the considerations of HIA 7. Organize heritage awareness campaigns and engage relevant stakeholders to prevent the sale
Post sale	<ol style="list-style-type: none"> 8. Encourage adaptive reuse and placemaking with Strategic Development Incentive scheme 9. Mandate HIA for buildings with significant impact on site 	<ol style="list-style-type: none"> 10. Organise heritage awareness campaign to encourage adaptive reuse

4.1 Pre Sale

4.1.1 Role of Government

1. We propose that **the government can tighten the criteria for the sale of strata-titled buildings**, such as increasing the minimum share of consent owners for younger buildings while relaxing it for older buildings, to prevent the “premature death” of buildings and facilitate the targeted redevelopment on aged buildings¹²¹:
 - The government could consider banning the collective sales for buildings under certain years, like 20 or 30 years old, unless there are exceptional circumstances such as major structure defects. For instance, this practice has been implemented in Hong Kong which allows collective sale for buildings with 50 years of age among other conditions. Even for the eligible buildings, Hong Kong also requires the owners to prove that the redevelopment is necessary regarding the existing conditions of the buildings besides the majority consensus.¹²²¹²³
 - The government could modify the requirements on the proportion of consent owners based on the ages of buildings. By adjusting the required proportion of consents according to the buildings’ ages, it would better facilitate and accelerate the redevelopment of older buildings.
2. We propose that **the government should encourage building owners and occupants to keep heritage buildings in a good state of maintenance**.
 - We propose that the government should mandate the compulsory maintenance of heritage buildings with detail guidelines so that the heritage buildings could be better sustained for the future. Currently, Building and Construction Authority indeed mandates the maintenance of buildings, but the frequency and standards are unclear, which leaves much flexibility in the hands of owners. In addition, considering the time and money needed for the routine maintenance, the owners might choose to minimize the efforts and fail to maintain as necessary, which could cause neglect of some critical issues and even result in early aging and ending of buildings.
 - We propose that the related agencies should provide the technical and professional support to the homeowners. As building maintenance covers a wide range of areas including construction, financing and legislation, most of the homeowners may not have capacity to deal with it solely on their own. Therefore, government should facilitate the process by connecting families with accredited professionals, who could assist on a series of preparatory, planning, implementation and closure for building maintenance projects. These forms of support cover from the initial stage to the end, including examining the building conditions, offering maintenance advices and budget analysis, evaluating the

¹²¹ Chang 2018

¹²² Hong Kong Institute of Surveyors 2011

¹²³ Refer to Appendix 3 for more details of Hong Kong’s collective sale regulation

qualifications and past records of contactors, making the contracts, till inspecting the progress and checking the final quality of projects.

3. We propose that **the government should encourage the involvement of minority owners and tenants of en bloc buildings in a collective sale process** in order to ensure a fairer collective sale for everyone.
 - The government should consider including the minority owners, like tenants, as non-voting representatives or observers of Collective Sale Committee (CSC). As the existing members are solo owners or their appointed personals, having tenants on board to CSC would help produce a more balanced view and fairer application process when addressing certain issues such as setting the reserve price. Moreover, their involvement can potentially smoothen an intense atmosphere and reduce the risks of conflicted issues among owners and tenants of collective buildings during the application process.

4.1.2 Role of SHS

1. We propose that **SHS plays a role in spreading awareness towards the implementation of a HIA by producing a handbook** on how HIA can be conducted, and the various best practices adopted by other countries. This handbook can serve as a document to guide developers on the considerations of HIA, as well as provide available contacts of organizations or companies that can conduct HIA.
2. We propose that **SHS engage relevant stakeholders in campaign to prevent a sale of a site with acknowledged socio-cultural and heritage value and take a more proactive role in the conservation efforts** by engaging the stakeholders, especially tenants, and a wider public regarding advocacy for conservation, apart from the formal engagement between the government and NGOs.
 - This is the area where NGOs like SHS has an existing strong presence. With SHS's current tasks in research, public education, and advocacy, the role will be suitable as it will ensure public trust and community support in conservation. As it is difficult to secure consensus of the matter, especially amid the different values of the building as we found, the crucial aspect of this role will help fill the gap of collective sale regarding intangible values of a building
 - In this case, SHS can look at the previous example of civil society engagement in the case of Dakota Crescent estate's redevelopment proposal by NGOs and architects the and other campaigns through media, such as Dakota Adventures initiative, artwork exhibition, feature film, and even Instagram posts, aiming to raise public awareness and protect the heritage of Dakota Crescent from demolition.¹²⁴ The conservation campaign was somewhat successful and the

¹²⁴ Ng, D. Tiah, C and Lam, S. (2018). "From the occult to a derelict pool: 12 things about Golden Mile Complex you didn't know". *Channels News Asia*. Retrieved from <https://www.channelnewsasia.com/news/cnainsider/golden-mile-complex-occult-pool-conservation-brutalist-10772498>

redevelopment proposal had reached local Member of Parliament, culminating in the decision to preserve certain parts of the building by the government. These activities can be learned and adapted to encourage the grassroots public advocacy of building with socio-cultural and heritage values.

To wrap this section, we argue that based on the the recommendations proposed for the government, tightening the criteria for the sale of buildings would be most effective. While this policy may face some resistance from disgruntled owners who would not be able to capitalise on the sale, we argue that this would still prevent the unwarranted early demolition of younger buildings that may have heritage value. This is taking into consideration the other recommendation on maintenance, where maintenance costs of buildings tend to be more expensive as buildings age and government support for the maintenance of strata-titled buildings tend to be harder to justify. The best way to incentivise better maintenance of older buildings is to, as we suggest, discourage the sale of younger buildings. While we also have a recommendation on the inclusion of minority owners and tenants in the CSC, and this recommendation may face pushback from the other owners, the fact that these tenants do not get a voting role may still be acceptable. Finally, the SHS can play a supplementary role in spreading awareness towards modernist buildings that are of heritage value. However we argue that since the root cause of potential demolition stems from the poor maintenance and low minimum age of eligible buildings for sale, we strongly recommend increasing the minimum age of the buildings that can be sold.

4.2 Post-En Bloc

4.2.1 Role of Government

Should the collective sale of the buildings be inevitable, we propose that the government facilitate the rejuvenation and conservation of parts of a site to protect the heritage and socio-cultural value of the place. This can be done by incentivising adaptive re-use and conservation by increasing gross plot ratio and other development controls.

1. We propose that **the government support developers using the newly launched Strategic Development Incentive (SDI) scheme to conserve modernist icons sold en bloc through adaptive reuse.**
 - The SDI scheme, launched with the Draft Master Plan 2019, encourages redevelopment of older buildings to “positively transform the surrounding urban environment”, including adaptive reuse and conservation¹²⁵. For GMC specifically, it has potential to be developed as part of a larger “Little Thailand” site through creative placemaking and adaptive reuse of older buildings, including the adjacent Golden Mile Tower. This would resemble adaptive reuse of old

¹²⁵ Urban Redevelopment Authority (2019). “Rejuvenation Incentives for Strategic Areas: Strategic Development Incentive (SDI) Scheme.” *Urban Redevelopment Authority*. Retrieved from <https://www.uragov.sg/Corporate/Guidelines/Circulars/dc19-03>

shophouses in Chinatown, Little India and Kampong Glam, in a similar effort to preserve and celebrate multicultural heritage and diversity in Singapore. A crucial difference is that GMC's cultural value is not so related to the physical architecture, but in the concentration of shops, cultural activities and demographic makeup of the place. Thus, adaptive reuse must be sensitive so as to retain a similar community after redevelopment. At the same time, GMC also has architectural value as a modernist symbol of post-independent Singapore, and this should be conserved too.

- Thus, we propose that the SDI be used to incentivise developers adequately with increased gross plot ratio, land use quantum and building height. GMC will be eligible for the scheme as a development more than 20 years old, with predominantly commercial uses, but the redevelopment will also need to have a transformational impact on the precinct if it is a single site. If Golden Mile Tower is also sold, and to the same developer, the two sites would qualify for the SDI for adaptive reuse. However, to ensure that the architecture is well-conserved, the government can also mandate the compulsory conservation of parts of the building, such as the facade, through the employment of development control regulation.¹²⁶

2. We propose that **the government should mandate Heritage Impact Assessment (HIA) for buildings above a certain age.**

- As discussed earlier, Heritage Impact Assessment is lacking in Singapore and this creates a situation where buildings easily come under threat of demolition. We recommend that Singapore government puts forth a mandatory HIA regime for buildings of a certain age in order to pre-empt and mitigate the adverse effects of proposed redevelopment policies on the building and its surrounding site. Developers will have to conduct a HIA after they have acquired a building, when producing their development plans for approval, if redevelopment entails significant impact on the site. Further study is needed to determine the age of buildings that would mandate a HIA. While the implementation of a HIA may be potentially costly, we suggest the government can waive off the necessity of a HIA if the developers could submit development proposals that could have minimal impact* on the site and its surrounding environment.¹²⁷

¹²⁶ As of January 2019, the Urban Redevelopment Authority has mandated the compulsory retention of the 16th storeyed building of GMC and allowing the addition of a new building.

¹²⁷ Ng, T (2015). "Striking the balance between heritage conservation and urban renewal in Singapore: Advocating for a mandatory Heritage Impact Assessment (HIA) regime" Policy Analysis Exercise, Lee Kuan Yew School of Public Policy, pp. 19-20.

*Minimal impact refers to cosmetic changes to facade of building/limited renovation with building structures kept intact.

4.2.2 Role of SHS

We propose that **SHS work with the stakeholders of the site to organise heritage awareness campaigns and encourage adaptive reuse.** In this case, SHS can engage more with GMC owners and tenants to highlight the value of “Little Thailand” and promote the placemaking potential of the site. Its “Too Young to Die” campaign has built greater public awareness of the heritage value of modernist icons like GMC. Based on both local and overseas cases, we find that the key success factors to heritage conservation is civil society engagement, apart from adaptive reuse. Such engagement will ensure the conserved site has viable potential, its value is well-appreciated by the public and conservation is sensitively achieved.

To close this section, we suggest that the strategy of placemaking and adaptive reuse supported by the SDI scheme would be more effective for the potential conservation of the building rather than the recommendation of conducting a HIA, which has its own share of challenges, such as the high costs incurred by developers in conducting HIA and the tight timeline involved. The strategy of placemaking through adaptive reuse allows the site to be given a “new lease of life” and may reap financial returns for the developers in the long run. The government can provide some numbers on the incentives available for developers under the Strategic Development Scheme beyond the current vague promise of increased planning parameters. This would encourage developers to consider adaptive reuse as they would have a clearer idea of the viable prices for the site. In this regard, the developer can also work with SHS and the government for successful adaptive reuse of the site and ensure that socio-cultural and architectural value of the sites are maintained. The role of SHS in spreading awareness of adaptive reuse is especially important as SHS can play an instrumental role in providing information towards the various forms of adaptive reuse and the most cost-effective measures in attaining the desired objectives.

5. Conclusion

We began our study on the premise of reviewing the collective sales process and chose GMC as a site to examine the potential gaps in en bloc policy, the key tool used in the collective sales process to enable urban redevelopment. To gather our necessary data, we embarked on several trips to GMC to interview users on their views of the collective sale process and impact of a potential collective sale. Our research is also supplemented with public seminars on heritage that we attended in 2018 and secondary literature on urban redevelopment and heritage conservation in Singapore. Throughout the course of our fieldwork, we noted that the collective sale process was fraught with contention between the various stakeholders and the economic motivations prevailed. This was at the expense of some in the GMC community, especially tenants without a say, disenfranchised from the collective sales process.

From our fieldwork and research, we found that the economic justifications and benefits of en bloc overrode all other considerations in the collective sales process, such as the architectural and heritage value of GMC as a modernist building and the sense of belonging and community

value accorded to GMC by the public and the Thai community which inhabited the space. Strata-titled buildings with rich heritage and socio-cultural significance are threatened under the argument of urban redevelopment for profit due to the low minimum age to sell a building and uncertain costs and benefits to conservation and adaptive reuse. We thus recommend various strategies to conserve GMC while ensuring that the socio-cultural fabric of community networks are preserved. Our recommendations also aim to ensure that there is a holistic assessment of the various facets of GMC and all stakeholders are adequately consulted before a building is placed on collective sale. Further, we highlight the role of SHS in raising public awareness and supporting potential conservation efforts. This is in light of growing heritage consciousness in Singapore today, with appreciation for how tangible and intangible heritage are living exemplars of our society's culture, tradition and values.

While we acknowledge that some of our recommendations may not sit well with the market motivations of collective sale and deter potential developers from participation in the urban redevelopment effort, we argue that Singapore has reached a mature state of development. Thus, more attention should be shifted to the safeguarding of our country's socio-cultural heritage and built form, instead of solely prioritizing economic imperatives. As Professor Emeritus Wang Gungwu notes, "for a community to thrive, it is vital...to defend the right to preserve what its members want."¹²⁸ Singapore has progressed to a level where economic imperatives alone should not govern and dictate its urban priorities. Furthermore, the country's urban policies should also reflect its cosmopolitan character and its cherished values of diversity and multiculturalism. Thus, policymakers should be sensitive to the values associated with our urban landscape and facilitate conservation and adaptive reuse efforts. We have shown in our recommendations that the conservation of our heritage need not necessarily accrue excessive economic expenses—by tapping on expertise in-house (professional and technical expertise in government agencies) as well as working with non-governmental organizations such as SHS, urban redevelopment can achieve the objectives of strengthening belonging and rootedness in Singapore and spatial justice. Through the recommendation of adaptive reuse, we also minimize the impact that building demolition has on the environment. Thus, we suggest that in the long run, conservation brings more benefits to Singapore and it need not be at the excessive expense of economic priorities. It is also critical to understand that the process of heritage conservation not only allows Singapore to safeguard its past and current socio-cultural fabric, but also promotes resilience against the vicissitudes of an unknown future.

(12981 words)

¹²⁸ Wang GW, 2014, "The power of local culture", 28 Jan 2014, *The Straits Times*, <https://www.straitstimes.com/singapore/the-power-of-local-culture> [Accessed 2 April 2019].

Appendix 1 Facts and figures of the three buildings

Facts and figures of the three buildings

	People's Park Complex	Golden Mile Complex	Pearl Bank Apartments
Age	46 years (1972)	45 years (1973)	42 years (1976)
Origin	People's Park Market	Woh Hup Complex	n/a
Developer	People's Park Development Ltd	Singapura Development Pte Ltd	Hock Seng Enterprise Pte Ltd
Firm	DP Architecture (formerly Design Partnership)		Archynamics
Architectures	William SW Lim, Koh Seow Chuan, and Tay Kheng Soon	William SW Lim, Tay Kheng Soon, and Gan Eng Oon	Tan Cheng Siong and Mok Yew Fan
Site Area	10,358.6 m ²	13,525.3 m ²	7,942.1 m ²
Location	Eu Tong Sen Street	Beach Road	Pearl Bank, Outram
Cost	\$40 million	\$18 million	\$13 million
Usage	Retail / Office / Residential flats		Residential
Zone	- 6-storey podium block for 333 retail and office units - 25-storey slab block for 264 residential units	- 411 shops - 266 offices - 68 residential units	- 288 residential units- 4 shops (ground) - nursery, gym, launderette, clubhouse etc
Characteristics	"The people's living room", "streets-in-the-air", "city room", "condensed version of a Chinese downtown"	"Self-contained city", "stepped-back terrace"	"Broken cylinder"
En bloc status	Just begun the en bloc process by setting up a collective sales committee in March 2018	More than 80% of owners at GMC agreed, in August 2018, to an en bloc sale tender ending in Jan 2019	Sold for \$728 million to private developer CapitaLand in February 2018

Appendix 2 List of Interviewees

The following is the list of 10 interview we have conducted throughout our project, categorized by different role of interviewees regarding en bloc policy and GMC.

1. Primary users or owners of GMC:

- 1.1. Ande Lai, Residential unit and commercial unit owner and member of the Collective Sales Committee, 70, Dec 10 2018, Jan 17 2019 and Jan 19 2019
- 1.2. Ponny Kalastree, residential unit owner, Jan 6 2019
- 1.3. Ong Chong Huat, residential unit owner, 50, Feb 8 2019
- 1.4. Choo Swee Lee, residential unit owner, 70, Jan 29 2019
- 1.5. Tenant from clothing retail unit, Malaysian in late 20s, Dec 3 2018
- 1.6. Tenant from massage parlour, Ms Vivian in late 40s, Dec 3 2018

2. Real Estate Researchers:

- 2.1. Christine Li, Senior Director and Head of Research, Cushman and Wakefield, Dec 16 2018
- 2.2. Melissa Lo, Capital market executive, Jones Lang LaSalle (JLL), Jan 29 2019

3. Architect of GMC

- 3.1. Prof. Tay Kheng Soon, Adjunct Professor, Department of Architecture, National University of Singapore; One of three architects of GMC, Dec 16 2018

4. Government officials:

- 4.1. Ms Karen Lee and Rachel Phoa, Ministry of Law (Land Policy), Jan 16 2019

Appendix 3 Hong Kong's Compulsory Sale Legislation

Having shared several similarities on land scarcity constraints and high urban density development, collective sale policies in Hong Kong and Singapore produce an instructive comparative case. Hong Kong promoted urban redevelopment with collective sale policy in 1999 when it legislated the Land (Compulsory Sale for Redevelopment) Ordinance in order to “help private development efforts complement the URA (Urban Renewal Authority)’s endeavours and to “tackle the problem of urban decay more effectively¹²⁹. Later in 2010, the legislation lowered the compulsory sale application threshold from 90% to 80% of undivided shares of a building (Section 3 of the Land Ordinance) for three specific types of buildings. Despite the similar majority consensus, the Hong Kong case requires that owners have to prove that the redevelopment is necessary regarding the existing conditions of the building¹³⁰. If the majority consent is met at 80%, the buildings under the following conditions are eligible for collective sale application: (1) when each of the units represent more than 10% of all shares; (2) a site with all the buildings aged 50 years or older; or (3) a site that is not located in an industrial zone and each of the buildings is an industrial building at least 30 years old.

The above additional conditions have made collective sale in Hong Kong unlikely to be widely feasible. By contrast to the Singapore’s case without these conditions, Hong Kong’s compulsory sale policy strictly emphasizes the justification of redevelopment based on the age and the state of repair of the existing building. Despite the relaxation of consensus level similar to Singapore, the change did little to help incentivize private developers and owners to participate in collective sales¹³¹. As a result, Hong Kong’s version of en bloc policy does not facilitate sufficient urban development, with many old buildings standing without rehabilitation. As estimated in 2011, there were approximately 4,000 buildings with more than 50 years in Hong Kong. These buildings have reached their designed working life and lacked repairing and maintenance works¹³². This is the other extreme of too little redevelopment, which Singapore should avoid.

¹²⁹ Lai, L.W., Chau, K. & Cheung, P.A.C. (2018). “Urban renewal and redevelopment: Social justice and property rights with reference to Hong Kong’s constitutional capitalism”, *Cities*, Vol.74, pp.240–248.

¹³⁰ Hong Kong Institute of Surveyors (2011). An Overview to "Compulsory Sale for Redevelopment, Hong Kong.

¹³¹ Hui, ECM, Wong, JTY and Wan, JKM (2008). "A review of the effectiveness of urban renewal in Hong Kong", *Property Management*, Vol.26, No.1, pp.25-42.

¹³² Community Legal Information Center (CLIC) (n.d.). “Compulsory Sale”, Property Arrangement, University of Hong Kong. Retrieved from: <http://familyclhc.hk/en/topics/Properties-arrangements/Redevelopment-and-acquisition-of-property/Compulsory-sale/>.