



## Professional Green Building Council

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Mr Bernard C Chan  
Chairman  
Council for Sustainable Development  
c/o Sustainable Development Division  
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By Fax and By Post  
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Dear Bernard

### **Public Engagement on Building Design to Foster a Quality and Sustainable Built Environment**

Further to our acceptance of your invitation to be a partner organization for the captioned public engagement exercise launched by the Council for Sustainable Development in June 2009, the Professional Green Building Council (PGBC) co-organized a forum on 11 July 2009 in which members of the HKIA, HKIE, HKILA, HKIP and HKIS expressed their initial views on this topic. In October 2009, the PGBC also organized two site visits to some of the awarded / short-listed buildings under the Green Building Award 2008 with a view to letting students experience what better and more sustainable designs mean in dense urban context.

The goal of the PGBC is to promote a better sustainable built environment through professional involvement. We certainly support building designs that would foster a quality and sustainable built environment for Hong Kong, including the proposed sustainable building design guidelines about building separation, building setback and green coverage. From our professional viewpoint, the resultant reduction in podium coverage and addition of green space are of utmost significance in our dense urban areas. To this end, we are keen to further offer our professional views at two levels – the overall framework and the feature details. Please find enclosed herewith our written views for your consideration and record.

We earnestly look forward to seeing quick steps for transforming the practice towards a quality and sustainable built environment for Hong Kong. Since this public engagement exercise was only limited to a few key aspects and merely applicable to new constructions, we also anticipate a more comprehensive framework together with regulatory measures to accelerate the market transformation, including both new and existing buildings. The PGBC also looks forward to having a continued collaboration with the Council for Sustainable Development to promote a quality sustainable built environment for the betterment of our community.

Yours sincerely



K S Wong  
Chairman

Encl

- c.c. Prof Hon Patrick Lau, SBS, JP, Legislative Councillor (Architectural, Surveying & Planning)  
Ms Anna S Y Kwong, MH, President, The Hong Kong Institute of Architects  
Ir Dr Andrew Chan, JP, President, The Hong Kong Institution of Engineers  
Mr Evans Lu, President, The Hong Kong Institute of Landscape Architects  
Mr P Y Tam, President, The Hong Kong Institute of Planners  
Mr Francis Leung, President, The Hong Kong Institute of Surveyors



## Professional Green Building Council

### Public Engagement on Building Design to Foster a Quality and Sustainable Built Environment The PGBC Responses

The PGBC refers to the invitation to participate in the public engagement exercise on the issue of “Building Design to Foster a Quality and Sustainable Built Environment” launched by the Council for Sustainable Development in June 2009. As one of the partner organizations in this public engagement exercise, the PGBC co-organized a forum on 11 July 2009 in which members of the HKIA, HKIE, HKILA, HKIP and HKIS expressed their initial views on this topic. In October 2009, the PGBC also organized two site visits to some of the awarded / short-listed buildings under the Green Building Award 2008 with a view to letting students experience what better and more sustainable designs mean in dense urban context.

The goal of the PGBC is to promote a better sustainable built environment through professional involvement. We certainly support building designs that would foster a quality and sustainable built environment for Hong Kong, including the proposed sustainable building design guidelines about building separation, building setback and green coverage. From our professional viewpoint, the resultant reduction in podium coverage and addition of green space are of utmost significance in our dense urban areas. To this end, we are keen to further offer our professional views at two levels – the overall framework and the feature details:

#### 1. Overall Environmental Performance vs. GFA Concession

It appears that most of the latest discussions focus on capping the GFA concessions for green and amenity features. While less GFA concessions tend to result in a smaller overall building bulk, there is no objective correlation between this numerical adjustment and the actual building environmental performance. In other words, such numerical adjustment based on a chain of prescriptive “green features” cannot ensure any real gain in terms of quality and sustainability of our built environment – unless and until the building control measure can be more closely dovetailed with effective sustainable building design guidelines (such as building separation/permeability, podium setback facing deep and narrow street canyon and green coverage, and their equivalence in term of environmental performance) and/or comprehensive building environmental assessment method.

For example, starting from April 2009 in Singapore, GFA concessions are granted for private developments on a sliding scale with reference to individual development’s rating in term of Green Mark (Singapore’s building environmental assessment method). For transforming such a progressive eco-concept in Hong Kong, we should consider to require all private developments to adopt a recognized local building environmental assessment method as the pre-requisite if they would like to get any GFA concessions for green and amenity features; and the higher their achieved rating is, the more their GFA concessions may be available. As such, we can truly encourage private developments to achieve higher building environmental performance.

With respect to the issue of a recognized building environmental assessment method, it is important for the local rating scheme to specifically address the key environmental challenges such as air ventilation assessment, heat island mitigation, green coverage, etc.

#### 2. Details of Green / Amenity Features to foster Desirable Environmental Performance

While progressing towards a more effective, performance-based regulatory framework as mentioned above, we have to understand that the details of building design control are equally important. God (or the devil) is in the details. Some of the green / amenity features are in need of timely review so as to foster a higher building performance. With reference to the latest regulatory experience of Singapore which shares a similar urban context, the refinement in details such as the following should be duly considered in Hong Kong:

- Promotion of lofty, permeable and lushly landscaped podium gardens for fostering better air ventilation and greenery for the city (and their areas should not be mixed with the proposed GFA concession capping for other green and amenity features); and
- Deletion of the incentive for bay windows which increase not only the overall building bulk by a notable % but also the overall thermal transfer value, thereby discouraging energy efficiency. (Note: In Singapore, the exemption for bay windows will no longer apply from January 2009 based on these reasons.)

We earnestly look forward to seeing quick steps for transforming the practice towards a quality and sustainable built environment for Hong Kong. Since this public engagement exercise was only limited to a few key aspects and merely applicable to new constructions, we also anticipate a more comprehensive framework together with regulatory measures to accelerate the market transformation, including both new and existing buildings.