

Professional Green Building Council

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Buildings Department
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Dear Dr Cheung

BD Consultancy on the Review of Promoting Quality Built Environment through GFA Concession

The captioned review untaken by the Buildings Department's consultant ADRG proposing the following changes to the existing system refers:

- 1. A stepping scale that a lower rank in BEAM Plus will get lower GFA concession
- 2. Introduce alternative means to make up the loss in GFA in case the BEAM Plus ranking cannot achieve the current full 10% GFA concession.

The proposed changes has aroused concern in the professional sectors.

The Professional Green Building Council (PGBC) comprises of representatives from the Architect, Engineer, Landscape Architect, Planner and Surveyor, we focus on the promotion of Green Built Environment in Hong Kong. PGBC supports the promotion of Green Built Environment and we appreciate the effort of the Buildings Department in this subject. Nevertheless, PGBC noticed that the professional sector is expecting a completed holistic review of the effectiveness of the current system and possible alternative systems to promote green building. Below are the key concerns of the professional sectors on the proposed changes:

1. The fundamental concept of linking GFA concession with green building performance is in doubt, we see environmental conscious design is a basic ingredient in building design like the subject of gender equality, universal accessibility, health and safety. No GFA linked mechanism is adopted in other international cities (except Singapore and one US city Arlington). In fact, Green building design is promoted by tax rebate or through mandatory requirement in most part of the World. PGBC would hope the Government would seriously consider the direction to delink GFA concession from the green building performance, promoting BEAM Plus or green target through other direct mechanism, instead of making the current system more and more complicated.



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- 2. Stepping scale linking to GFA concession will create complication to the industry and cause serious financial liability to the contractors and professional due to the uncertainty in the GFA concession area until the final assessment stage is completed. This is practically difficult to the professional sector in particular for the residential building type due to the first hand sale ordinance required all design to be frozen more than a year before completion. The entire chain including assessors, suppliers, contractors and consultant will face serious liability if the target certified ranking dropped in the final assessment stage.
- 3. Concern on the transparency and performance of the assessment process would be a concern if there is substantial financial implication involved in the stepping scale system.

Considered a balance of the social cost, complication to the development process and effectiveness, PGBC has reservation to change the current GFA concession system to a stepping scale and other approach to promote green building in Hong Kong should be explored.

We are pleased to deliberate our view further if needed.

Yours sincerely

Ir Allan CHAN Sau Kit

Chairman

Professional Green Building Council

cc: ADRG