



長春社 Since1968

The Conservancy Association

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The Conservancy Association Comments on Review of the Mechanism for Encouraging a Quality Built Environment through GFA Concession

Building design and construction process are important factors in achieving quality and sustainable environment especially in the densely-developed high-density city like Hong Kong. The Conservancy Association fully support building design that is sustainable and pay due consideration to economic, social and environmental perspectives to meet the needs of the present and the future.

The system of giving GFA concession to encourage sustainable building design under PNAP-APP 151 has been in force since 2015. Under the current arrangement, a private housing development project is required, among other things, to register for Building Environmental Assessment Method Plus (BEAM Plus) as a prerequisite for application for GFA concession for amenity features. The GFA concession can be up to 10% of the overall permitted GFA of the development project, in addition to other exemption of GFA (up to 5% of the total GFA) for private club house, and others exemptions, etc. The total exemption to GFA is very substantial.

It is noted that as stated in the Policy Address, the Government will review, we will consider tightening the prerequisite by requiring a development project to attain specific standards of performance in environmental protection, or even adopt performance-based and site-specific approaches to determine the maximum GFA concession.

We consider that it should be the responsibility of the developer/ project proponent to achieve a sustainable built environment and minimize the impact on the natural environment. Giving substantial exemption of GFA will mean increasing the building bulk and will actually offset some of the effects achieved by green building design. Besides, it is noted that not all projects participated in PNAP APP-151 with regard to sustainable building design, including 35% of the domestic projects, 59% of non-domestic projects and 23% of composite projects. Although these projects did not apply for exemption of GFA under PNAP-APP151, their building design would likely not be achieving sustainable design and therefore were not desirable for the society.



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In fact, the Government has promulgated since 2015 that “New government buildings with construction floor area of > 5,000s.m. with central air-conditioning of >10,000s.m. to achieve at least BEAM Plus Gold; and New public housing to achieve at least BEAM Plus Gold”. This is a very good initiative that Government has set good examples to other stakeholders in the development and construction industries.

Besides, it is noted that the Singaporean Government has incorporated a Mandatory Requirement for Green Mark for all buildings with total GFA \geq 2,000 s.m.. For buildings achieving higher Green Mark rating, GFA exemptions will be given according to their level of achievement.

The Conservancy Association is of the view that the developers, as major stakeholders in the built environment, should bear responsibility in enhancing a sustainable built environment. It should be made clear that while they are making profits in the development, they should also perform duty in maintaining a sustainable environment. Singaporean experience is a very good reference. Our Government should set up a mandatory system to require all developments with total GFA \geq 2,000 s.m should achieve at least BEAM Plus Gold (without any bonus). Only those who can achieve higher ratings could be given exemption of GFA. The total GFA exemption should also be capped as not more than 10% to avoid abuse.