

## **Submission to the Legco Joint Panel on Environment and Development Green Building Features**

Masterplan Limited was part of a multidisciplinary consultants team which was commissioned by The Real Estate Developers Association to prepare an independent study on the Consultation Document issued by the Council of Sustainable Development. Our study found, amongst other things, :-

- (a) Proposition that GFA Concessions Create Excessively Bulky and Tall Buildings not Substantiated

The information provided in the Consultation Document regarding excessive increase in building height and bulk was not supported by detailed technical information. When survey information from the relevant Bureau was requested they declined to provide it. An application under the Code on Access to Information was made and an incomplete response was provided on the day before the consultation closed. Subsequent requests have not been met, and they have yet to provide information on the height, site coverage and plot ratio of the buildings surveyed. A delay of four months in providing the information could be taken too indicate that the propositions in the Consultation Document cannot be substantiated.

- (b) Brief too Narrow

By looking only at buildings within their own site the brief made the consultation too narrow to be useful. Our study showed that there was little benefit that could be obtained without looking at the wider neighbourhood, and the space and benefits that could be obtained outside the private lots.

- (c) Main Issues Not Addressed

The main issues to be addressed are the Urban Heat Island Effect, poor Air Quality, poor Air Ventilation and high densities on a neighbourhood basis. The means for solving these major problems already identified by scientists cannot be solved by looking at GFA concessions or the small spaces created within private sites.

- (d) Districts with Inadequate Open Space Provision have Poorest Quality Environment

There are many old areas of Hong Kong and Kowloon which have the worst air ventilation and highest Urban Heat Island effect, such as Sham Shui Po, Cheung Sha Wan, Mong Kok, Hung Hom, North Point and Kennedy Town. These areas also have substandard provision of public open space and greening. Government land should not be sold in these areas, or on the fringes where the air ventilation would become even worse, and where even greater density of development would result.

- (e) Need to Distinguish between New Development Areas and Older Developed Areas

The Consultation Document considers all areas to be the same. In new development areas all of the spacing and setback requirements can be included in the lease conditions and all bidders know the constraints. For instance, height limits and plot ratio limits should be set in the lease and a requirement for car parking to be provided underground. The main concern is how to deal with the older existing areas while having to respect the ownership rights of the existing private land owners. This is not addressed in the Consultation Document.

(f) Town Planning Board Imposing Building Height Restrictions

The Town Planning Board is systematically imposing building height restrictions and also measures to ensure better air ventilation on redevelopment, throughout Hong Kong. In view of this there is no need to remove GFA concessions to prevent excessive building heights.

(g) Scope to Refine GFA Concessions

There is scope to refine and modify the GFA concessions so as to give greater certainty to the public, the developer and the government officials processing applications. Some of the modifications that are usually granted should become disregarded GFA such as pipe ducts, guardrooms, management counters, etc. Bonus GFA for provision of space at ground level for greening and public access should be given bonus GFA similar to public passage. Some provisions should be changed from prescriptive to a performance standard basis so as to get a better environmental outcome.

(h) Balance Between Minimum Requirement and Incentives

It is generally accepted in other places that the needs to be a balance between what is required as a minimum standard and what is desirable beyond that standard. Incentives need to be included for those desirable features such as sky gardens, balconies, non-structural prefabricated external walls and noise barriers, as they are greater than the minimum necessary.

(g) Removal and Reduction in Incentives will result in Poorer Quality Buildings

Without incentives the quality of buildings will decline below a standard which has now become acceptable. There needs to be provision of adequate space within the building for electrical and mechanical equipment, provision of recreational facilities for residents and adequate provision of parking facilities to meet transport policy requirements.

(h) A Separate Discussion to Saleable Floor Area

There has been some confusion between the consultation on green building features and issues relating to saleable floor area. The two should not be confused as this consultation is to look at the provisions in buildings, and neighbourhoods, which make the urban built environment more sustainable.

(i) Need for A Sustainable Development Strategy

Hong Kong lags behind other cities where sustainable development is treated with greater importance. There is a need to establish a holistic framework in a Sustainable Development Strategy to ensure that the many constituents of the Government and the private sector can work together towards clearly stated objectives and targets. By doing this unintended consequences can be minimised and significant changes achieved more quickly.