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Central & Western Concern Group

a heritage conservation & good urban planning advocacy group
www.centralandwestern.org

The Central & Western Concern Group (C&WCG) is a group dedicated to heritage conservation and good urban planning. We are independent, politically non-aligned and entirely self-funded by our members, receiving no private or public funding to do our advocacy work.

The Central Government Offices (CGO) on Government Hill

The C&WCG has studied the models by the DevB on display at IFC Mall; read the Development Bureau's recent presentation to the Town Planning Board and visited the CGO site.

We strongly object to the government's proposed plan to sell and inappropriately redevelop the Government Hill site.

Problems of the Proposed Scheme

1/. Development Mindset

The government continues to believe that some public assets and facilities should give an economic return. However, which asset it chooses to demand a return is highly selective. The CGO site is adjacent to the Central Business District and is monetarily 'valuable', but that value is latent. Its importance as a site is intrinsic: a quiet, historic, publicly owned site that (like a tree that bears fruit) should be kept for future generations to benefit from. The CGO site should be treated as other similar adjacent sites: for example, Chater Garden and the toilet block next to the Cheung Kong Centre - there is no suggestion that either of these places should be redeveloped and become economically productive.

The need to construct a high-rise 'Grade A' office building, shopping complex and carpark begs the question - why on this site? Why not at another (non-historic) site anywhere else in Hong Kong?

There is no logical reason for selling and developing this site.

By wishing to sell the CGO site to a property developer the government merely reflects an uninspired, narrow view of possibilities for the site - an inappropriate development mindset for a site that should never have been considered for sale and development.

It also begs the question: why should it be private-developer led?

There has been no public consultation with community stakeholders about the use of the site, but we assume that government has consulted property developers. Giving preferential treatment to this one influential business group is both highly inappropriate and against the principles of fair and open governance. Having already announced advanced plans and models and presented its preferred use of the site to the Town Planning Board, the government is merely offering a *fait accompli* to the public.

Community groups presented many ideas for the Tamar redevelopment to the Legislative Council between 2004-2006, these same groups also asked what the government would do with the CGO site once it was vacated. The government did not give answers and community groups demanded

that the site continue to be kept for public use. These requests have been ignored.

2/. The 'Economics' of the Scheme

The site of the Government Hill is an important public asset, which is presently in the public domain. It is presently an integrated site made up of similar uses (roughly running from Robinson Road to Queen' s Road and bounded by Glenealy and Ice House Street and Garden Road), running (except crossed by roads) uninterrupted from the Botanical Gardens, Government House, extant Government Hill buildings and down to Queen' s Road Central. There are a number of public buildings within the site, in addition to some semi-public facilities (e.g. St John' s Cathedral and the Anglican Church premises on Glenealy and Lower Albert Road).

There is no financial reason for the government, which currently has reserves of over HK\$520 billion and is under no financial pressure whatsoever, to sell off a large portion of such an important site to a commercial developer.

The opportunity costs of developing the site have not been adequately explained to the public: an increase of traffic, increase in pedestrian traffic, more air pollution and blocked views from Central towards The Peak etc.

Importantly, there is no overriding public need to turn the site into commercial use.

3/. Heritage

This site is historically significant and relates to Hong Kong's earliest history as a city. The area, which comprises the Central Government Offices (CGO), the Former French Mission Building, St John's Cathedral, Government House, together with the surrounding green area and the historic Battery Path, forms an integrated heritage zone. Conservation should include the whole area with the aim to preserve its physical integrity.

The West Wing building (proposed to be demolished) matches the East Wing and Main Wing in the form of a horizontal and low-rise functionalist architecture design, typical of the 1930s in Europe and 1950s in Hong Kong. It is a building in excellent physical condition.

Commercialization of this site will critically demean its historical value. This is an important GIC site and we strongly believe that it should remain so.

4/. A Conservation Project?

The proposed scheme is a property development project, not a conservation project.

Although the government has branded the CGO redevelopment as one of its eight projects under the "Conserving Central" initiative, it is clearly a property development project. Almost half of the Government Hill (site area 5,720 square metres) will be sold to a developer and the West Wing will be demolished to make way for a 32-storey commercial tower and the hill will be excavated to make way for an underground 5-storey, 13,500 square-metre shopping mall and a carpark.

The current GIC (Government, Institution and Community) use will be changed to largely commercial and the developer will be in charge of the design and construction of the proposed park.

It is a developer-steered project and we question the reason for this: is it because the government
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has purposely decided this approach to allow a property developer greater freedom than would be possible for a government-led initiative? Is it a benefit to Hong Kong's property developers?

5/. Traffic

The Central Business District is currently over-congested with traffic and there are traffic jams throughout the day in the section on Queen's Road Central outside the site.

The administration is proposing to build another lane on Ice House Street at its intersection with Queen's Road - why? Ice House Street between Queen's Road to Des Vouex Road is essentially one lane due to illegally parked cars and trucks. And having another lane for left turning traffic into Queen's Road from Ice House Street will not help traffic flow: the Queen's Road section between Ice House Street to Pedder Street is always congested (including drop-off near the New World Centre).

The fact is: this section of Central has reached a traffic-saturation point and is presently a traffic congestion black-spot. Encouraging any more traffic to the area will just make the congestion even more congested and it will be an even greater traffic congestion black-spot.

The most serious proposed change to present traffic flows due to this project is on Lower Albert Road. There will be three proposed entry points for cars to enter the site. Lower Albert Road is one of the few free-flowing roads in this area and a particularly pedestrian friendly road - introducing more traffic to this road is both silly and dangerous: fire service vehicles based on Garden Road use Lower Albert Road as one of the few entry points into Central.

At the Town Planning Board on 5 November 2010, the Planning Department said that a traffic-consultant study indicated that this project would not cause any increase in traffic conditions. This is wrong! Traffic will increase and it will be detrimental to all traffic conditions in Central.

In its recent submission to the Outline Zoning Plan, Cheung Kong submitted a letter stating that its current carpark in the Cheung Kong Centre was not being utilized by the public for carparking and they wished to convert a section to shops - it indicates that Central does not require any further carparking facilities. Indeed, it is the current opinion of the Town Planning Board to not allow carparking facilities in buildings in the vicinity of areas with traffic congestion problems. The CGO should not have any carparking facilities.

The CGO development model currently on exhibition at IFC Mall shows that the Ice House Street and Queen's Road Central corner is designed as a piazza: this is amazingly false. The Ice House Street and Queen's Road Central corner will remain a grid-locked traffic intersection even after redevelopment (see attached photographs)

6/. Large-scale Demolition and Excavation of the Site

Demolition of the West Wing and the large-scale excavation of half of the Government Hill will create massive construction waste and unnecessary burden for our landfills.

This will be similar to the destruction (removal) of Tsim Sha Tsui Hill where a developer was granted the right to turn the former Marine Police Headquarters into a hotel (Heritage 1881). An entire hill and hundreds of mature trees were removed to make way for the hotel development.

Similar excavation could damage potentially significant underground archaeological remains within

Government Hill and steep slopes in the area could be geotechnically unsafe for large-scale excavation.

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7/. Deceptive Park and Greenery

The lower part of the commercial development will have a green 'façade' and a roof garden (on top of the underground shopping mall) - this greenery is only skin-deep. We have no idea how many trees will be felled during the redevelopment process (Heritage 1881 is a typical example of how developers remove trees).

From the physical 3-D model and artist impressions, the park appears to merely be an area used by pedestrians to enter the shopping centre and as carparking. There appears to be no grassed areas for people to sit or walk on, nor are there usable areas for relaxation and physical activities. The trees are in lineal formation (e.g. in rows) rather than an organic and open park. The present Battery Park is currently an unique walkway that is peaceful and has an almost-tropical canopy of trees and vegetation that should remain undisturbed. It appears that the 'park' is just the backyard of a commercial complex.

The proposed commercial tower will form a canyon along Ice House Street and destroy the original green and open landscape which is a highly valuable breathing space in the area.

Conclusion:

Consequently - we call on Legislators to demand that:

1. The government cancels its redevelopment proposals for the CGO site.
2. The government acknowledges public ownership of the site and retain its current land use (that is, Government, Institution and Community).
3. Based on the "no land-sale" principle, the government should seek public opinion through a 12-month consultation as to how the CGO site should be used by the public after the relocation of government offices to Tamar.
4. Meanwhile, open days should be organized for the public to visit the CGO site and a preliminary archaeological investigation should be conducted.

The Central & Western Concern Group reserves its right to use statutory measures to inform the Hong Kong public about the inappropriate redevelopment proposals for the CGO site.

Attachments: Photographs of CGO DevB 3-D model and DevB artist impressions that were on display at IFC Mall, November 2010.

For further information - contact the Convenors of the Central & Western Concern Group:

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