

**Assessment of Meaning and Interpretation with Regard to Government's Heritage
Consultant, Messrs. Purcell, Miller Tritton LLP's Historic and Architectural Appraisal of
Central Government Offices**

There follows an assessment of the interpretation and intention of the HKSAR Government's Heritage Consultant, Messrs. Purcell, Miller Tritton LLP's Historic and Architectural Appraisal of Central Government Offices and a commentary on its use by the HKSAR Government.

This is prepared by Hong Kong-based Conservation Architect Ken Borthwick. Ken trained at the Scottish Centre for Conservation at Edinburgh College of Art/ Heriot Watt University in Edinburgh, where he obtained a Postgraduate Diploma in Architectural Conservation in 1997. During his course he took part in study tours to Sweden and Finland. Since then he has been working, advising or training in Heritage Conservation for over fourteen years in the United Kingdom, Norway and Hong Kong. Ken's work has included a year spent with the Ayr, Scotland, - based consultant architect for the internationally renowned Robert Adam designed, 1792, Culzean Castle, in Ayrshire, Scotland, working on projects funded through an international appeal. He served on the Strathclyde Cases Panel for the Architectural Heritage Society for Scotland reviewing planning applications, on behalf of Historic Scotland, for listed buildings and Conservation Areas in the Glasgow area. He has served on the Heritage and Conservation Committee of the Hong Kong Institute of Architects (HKIA) for a number of years, including serving on the Action Group in 2004 for the Hollywood Road Hong Kong Police Headquarters Building. He has advised the Hong Kong Museum of Medical Sciences for a number of years on architectural conservation and was one of those responsible for their gaining the 2004 Hong Kong Merit Award for Heritage Conservation. Ken's design of an infill housing project in the Lochwinnoch High Street Conservation Area, in Lochwinnoch Scotland, in 1980 was highly commended by the then Scottish Georgian Society. In 2009 he reported on roof defects in the circa 1150 A.D. Ringsaker Church at Moelv in Norway.

Ken Borthwick B Arch (Hons), PgDipArchCons, RIBA, RIAS, HKIA

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Appraisal of Central Government Offices

It is not the intention of this assessment to appraise the architecture and history of Central Government Offices. This is well covered in Government's Consultant's appraisal. It is also covered in the assessment by Vito Bertin (retired), Gu Daqing and Woo Pui-leng of the School of Architecture of the Chinese University of Hong Kong. The Hong Kong Institute of Architects (HKIA) in item 3.c of their letter ref. BLA/PD/CGOW/AK/cw/1012 dated 31 December 2010 has also gives well considered points which were presented by the President at LegCo, a copy of which is attached to this document.

Referring to the layout of the entire Central Government Offices in item 3.c of the letter entitled 'Building ensemble with a well-designed site plan' stated "The disposition of the three existing buildings in the CGO complex is the result of excellent site planning with the three building blocks well positioned in relationship to each other and the natural landscape around them. Removal of the West Wing and building a new office tower on the site is like amputating an arm from an otherwise healthy and integral body and attaching an oversized prosthetic arm to the disintegrated body.

The setting also of Central Government Offices is also considered to be superlative for the city of Hong Kong and both the CGO and its setting should be conserved, the latter by protecting it as an area.

A	Assessment of Meaning and Interpretation with Regard to Government's Heritage Consultant, Messrs. Purcell, Miller Tritton LLP's Historic and Architectural Appraisal of Central Government Offices
	Introduction
	<p>Under the Principles for the Conservation of Heritage Sites in China' the Government of the Hong Kong SAR should be following a number of clearly laid down Articles and procedures. For example:</p> <p>Article 2 states that 'Conservation needs to be carried out according to a sequential process. Each step of the process should comply with the pertinent laws and regulations and should observe professional standards of practice. Consultation with relevant interest groups should take place. The assessment of the significance of a site should be given the highest priority throughout the entire</p>

process.'

Article 6 states that 'Research is fundamental to every aspect of conservation. Each step in the conservation process should be based on the results of research.'

Article 9 states that 'Conservation of heritage sites involves six steps undertaken in the following order: (1) identification and investigation; (2) assessment; (3) formal proclamation as an officially protected site and determination of its classification; (4) preparation of a conservation master plan; (5) implementation of the conservation master plan; and (6) periodic review of the master plan. In principle, it is not permissible to depart from the above process.'

The Central Government Offices Concern Group, which comprises a number of groups concerned with conservation of heritage and the environment in Hong Kong, is an umbrella group of the type of interest groups which Article 5 of the China Principles directs be consulted. This group has a number of concerns with regard to Government's interpretation and use of the Heritage Consultant, Messrs. Purcell, Miller Tritton LLP's Historic and Architectural Appraisal of Central Government Offices relating to Government's proposal to sell the West Wing of Central Government Offices to a property developer for construction of a 32-storey office tower and a 5-storey shopping centre with a garden at the roof area. The objective for the project, as stated in the Study Brief stated that "The objective of the project is to conduct a thorough appraisal of the historical and architectural value of the Central Government Offices Complex ('the study site')." There was nothing in the Focus and Scope to direct the consultant to study the site for redevelopment and in view of this certain of the recommendations in the Consultant's appraisal appear to be unusual. Also, the Concern Group has very grave concerns at the apparent misuse of the Consultant's appraisal to justify the sale of the West Wing of Central Government Offices about what is clearly a Development Project and not a Conservation Project.

Of particular concern is Government's lack of honesty in portraying their commercial and office development proposals for the site of the West Wing of Central Government Offices as one of the eight projects in their Conserving Central

	initiative.
The following gives a commentary on Government's disregarding/ misrepresenting of their Heritage Consultant's Recommendations:	
B.	Government's Disregarding/ Misrepresenting of their own Consultant's Recommendations:
	1. High Architectural Quality of Buildings
	<p>Section 5 of Government's consultant's Heritage and Architectural Assessment, 'Conclusions and Recommendations', the first bullet point item states that "The buildings are of a high architectural quality and are exemplars of the beginning of modern office design in Hong Kong and of 1950s architecture generally." The second point goes on to state that "The Central Wing is the best piece of architecture and the East Wing is also a good piece of architecture." going on to state that "The more functionalist West Wing is the least good piece of architectural design out of the three." The Consultant has clearly stated that all three buildings are of high architectural quality, but gives a ranking.</p> <p>Section 5, General Recommendations, Setting/ Wider Context Item 5.4.3 states that "The historic buildings on Government Hill (the Cathedral, Government House, the French Mission Building and the CGO) are an interesting cultural group which should be preserved and interpreted." This clearly indicates that he has high regard for all of Central Government Offices, together with the other historic monuments and considers that the group should be conserved in its entirety.</p> <p>Secretary for Development in a recent submission to Town Planning Board with respect to a recent application by the Central Government Offices Concern Group to make the Central Government Offices into a heritage area, suggested that West Wing Central Government Offices was of low architectural merit, yet this is at variance with Government's Heritage Consultant's Report.</p> <p>The fact that the Report did not actually suggest or recommend demolishing the West Wing to make way for redevelopment was clearly stated in Item 1 (e) of the letter ref. BLA/PD/CGOW/AK/cw/1012 dated 31 December 2010 from the President of the Hong Kong Institute of Architects (HKIA) to Secretary for Development.</p>

	<p>2. Consultant's Opposition to Commercial Use on the site</p>
	<p>In Executive Summary paragraph six (first paragraph on conclusions from the study) great prominence is given by Government's consultant's opposition to any kind of commercial development on the site, where it is stressed that "It would seem to be very undesirable to have commercial use which demeaned the historic and current function of the building and site."</p> <p>This opposition is also seen in Section 4, Issues and Vulnerabilities, Section 4.5 'Future Uses and Potential Development' in the final paragraph on p. 131, where it is emphasized that "Any commercial development "on the site now seems to be inappropriate", however, going on to suggest that "a new public garden in the place of the west Wing would be a fine resource for this central part of Hong Kong."</p> <p>Government's proposals for selling the footprint area of West Wing for a commercial development of the site in the form of a 32-storey office block together with a 5-storey shopping centre on the level of Queen's Road (with a roof garden above on the level of Lower Albert Road) can be seen to be utterly against their own consultant's opposition to commercial development of the site.</p> <p>It is also assessed that such a major commercial development of the site with associated road widening of Lower Albert Road and Ice House Street, as well as huge excavation just behind Battery Path with its tree covered slope up to the existing West Wing, would significantly impair the well- wooded aspect of the area that Government's consultant so emphasizes.</p>
	<p>3. Recommendation for and Timing of Creation of Special Protected Area</p>
	<p>General Recommendations Item 5.1.1 (page 136) (the very first recommendation) urges that "Consideration should be given to creating a 'Special Protected Area' to acknowledge the well wooded spaces and low-rise buildings in the Hong Kong Park, Botanic Gardens, Government House Gardens, the CGO site, the garden between the Cathedral and the French Mission Building, the Battery Path area and the Sheung Kung Hui site.", stating under <i>Purpose of the recommendation</i> that "One of the main reasons why the CGO are significant is because they are part of a large open space made up of the above sites, which are within the centre of the urban area. A 'Special Protected Area' would be a tool which could be used to protect this area from inappropriate development." The Report then goes on to refer to area encompassing several Declared Monuments which would benefit from the retention of this open space and that such designation of this area would recognise</p>

	<p>the importance of individual historic buildings, “highlight the historic nature of Government Hill, as well as recognising the significance of the green space. “ In Section 3, Significance of the Central Government Office (CGO) under Landscape and Setting it is stated that “The buildings are set within one of the few ‘green lungs’ in Hong Kong,” going on to emphasize its importance.</p> <p>The consultant’s recommendation for the creation of such a ‘Special Protected Area’ is clearly made in consideration of his assessment in his fifth bullet point item in his Conclusions and Recommendations that “The site itself is arguably of higher significance than the buildings. This has been the seat of Government since the foundation of Hong Kong as an independent colony. This is the site of the earlier Government Offices (demolished to allow the CGO to be constructed) and is closely related to Government House and to the Murray Building.”</p> <p>As stated above, however, under Article 2 of the China Principles, The assessment of the significance of a site should be given the highest priority throughout the entire process’ and the Consultant in recognising the significance of the area has calls for it to be made a ‘Special Protected Area’.</p> <p>In Section 4, ‘Issues and Vulnerabilities’, part 4.4, Historic Use, on page 128 the consultant further emphasizes the importance of Government Hill when the Consultant refers to it as having been described as “perhaps Hong Kong’s last remaining heritage precinct”, going on to state “It is a rare collection of historic buildings in central Hong Kong that has always been in governmental uses.”</p> <p>Clearly the consultant’s intention was obviously that such ‘Special Protected Area’ be created as a first stage in the process <i>before</i> any major decisions were made with regard to historic area or any potentially inappropriate development be planned or put underway. Government’s unseemly haste in pushing for a redevelopment of a significant of part of Central Government Offices is clearly contrary to the consultant’s recommendations and advice.</p>
	<p>4. Recommendation to adding Central and East Wings of Central Government Offices to AMO’s List of Graded Buildings</p>
	<p>General Recommendations Item 5.1.1 urges that “Consideration should be given to adding the Central and East Wings of CGO to the AMO’s list of graded buildings.”</p>

	<p>Under <i>Purpose of the recommendation</i> it goes on to state that “The CGO buildings represent an important step in the history of Hong Kong’s government and are in a significant open setting. Grading should help to protect the significance of the building and maintain the open space.” Clearly the Government consultant’s intention with this recommendation was that the buildings should have been added to the list of graded heritage buildings prior to any major decisions were made with regard to historic area or any potentially inappropriate development be planned or put underway in order that the heritage buildings should be protected. Again Government’s unseemly haste in pushing for a redevelopment of a significant of part of the area is clearly contrary to the consultant’s recommendations and advice.</p>
	<p>5. Redevelopment of West Wing Being Last Option</p>
	<p>Government’s consultant has signified his view of demolition of the West Wing and redevelopment as being the last option that should be considered in his statement in Section 4, ‘Issues and Vulnerabilities’ part 4.5 ‘Future Uses and Potential Development’ on page 130 where he states that “it may be difficult to find a use for the buildings which is both commercially viable and respects the historic significance of the site” going on to state “The demolition of some or all of the buildings and the sensitive redevelopment of the site may be favourable to the buildings being used inappropriately.” This, however, he emphasizes should only be considered as a course of action when all other avenues for suitable reuse have been explored. Given the significance and architectural quality of the building such an outcome would be a cause of serious regret.”</p> <p>At no place in the Report does the Consultant suggest that the CGO site should be sold. Although redevelopment has been mentioned it could be redeveloped by the Government itself.</p> <p>Government’s premature rush to sell West Wing without a meaningful exercise undertaken with the community to explore other uses of West Wing is completely contrary to their consultant’s recommendations</p>
<p>Other than the issues stated above where Government can be seen to be making proposals which are contrary to their consultant’s Report there are certain anomalies in the Report. Certain of these are given below:</p>	
C	Anomalies in Government’s Consultant’s Report
	<p>1. Statement of Government obligation to maximise the potential value of any site</p>

	<p>The statement in Section 4, 'Issues and Vulnerabilities' part 4.5 'Future Uses and Potential Development' on page 128 "that Government has an obligation to maximise the potential value of any site and the best way to do this is by permitting redevelopment has to be considered an anomaly. No reference is seen in the Consultancy Study Brief for the Appraisal that the government has such an obligation or that such an obligation should be stated in the Report.</p> <p>We have very grave concerns indeed why a consultant appointed to carry out a thorough appraisal of the historic, contextual, social and architectural values of the Central Government Office Buildings, to identify character defining elements of all buildings, identify significant cultural and heritage features; and to analyse the existing conditions of all buildings, etc. should state that the government has an obligation to maximise the potential value of any site. Taken from this logic there would be no Central Park in New York, no Hyde Park or Kensington Park in London, no Victoria Harbour in Hong Kong and no public museums or art galleries in any major city, yet a civilised society is supposed to have values other than development of offices or shopping centres.</p>
	<p>2. Maximum Height of Building on Site</p>
	<p>In Section 5, Conclusions and Recommendations, item 5.1 General Recommendations, with regard to the well wooded spaces and low rise buildings in the area it states "Consideration should be given to creating a 'Special Protected Area' to acknowledge the well wooded spaces and low rise buildings in the Hong Kong Park, Botanic Gardens, Government House Gardens, the CGO site the garden between the Cathedral and French Mission Building, the Battery Path area and the Sheng Kung Hui site. In Section 5 Conclusions and Recommendations on page 135 it states that "Any new development should respect the low rise of the existing buildings and open space around them."</p> <p>Section 5, Conclusions and Recommendations, Setting/ Wider Context Item 5.4.6 it states that Any new building on the site should take the height of the existing CGO as a maximum height. <i>Under Purpose of the Recommendation</i> it states that "The height of the CGO buildings was discussed at length when the buildings were being designed in the 1950s. There was a clear intention to preserve the view from Government House. It goes on to state that "Whilst the view of the harbour has now disappeared, the view across the top of the offices and the former French Mission building is still significant. Other views from longer ranges, such as from</p>

the Hong Kong Park and the Peak, also benefit from the low rise of the CGO.

There is, however, conflict between these recommendation which emphasize the low rise buildings and Section 5, Conclusions and Recommendations, General Building Recommendations, item 5.2.2, which states that "If the West Wing is demolished the part of the site that could be redeveloped is the west end on the corner of Ice House Street, with the new development occupying the area of the existing building that faces onto Ice House Street. Any new development of a building higher than the present West Wing should be contained at this west end of the site."

It is considered that the Consultant views the low- rise nature of the buildings as highly important, however there is concern that this inconsistency could possibly be as a result of adjustment of the Report to suit the requirements of those who commissioned the Report.

With regard also to Government's proposal for a 32-storey tower on the corner of Ice House Street as well as widening of Ice House Street would impair the scale of Ice House Street, lead to significant destruction of trees above the existing masonry retaining wall and impair the setting of Duddell Street Steps.