

From: Katty Law
To: Bernard Chan
Date: 2011/01/25 上午 01:35
Subject: CGO

, Tom Ming

Dear Bernard and Tom,

For your information, attached please find an interim assessment report by the expert panel of the Government Hill Concern Group.

Please note that the GHCG is formed by various NGOs, professionals and concerned individuals who would like to make presentations to the AAB in a public hearing.

Regards,
Katty Law
Co-convenor



Government Hill Concern Group Expert Group assessment report 101207 rev5_final (2).doc

Assessment Report on the Government's Proposal for the redevelopment of Government Hill in Central

1. Background

1.1 In September 2010 the Government commenced a public consultation on the future of the Central Government Offices Complex on Government Hill in Central. According to the government, this scheme is one of the eight projects under the "Conserving Central" initiative announced in the 2009/10 Policy Address. All existing offices in the Complex will be relocated to the new Central Government Complex at Tamar by end-2011. In 2009 the Government commissioned an Architectural and Heritage Assessment Report (A&H Report) from Purcell, Miller Tritton, a British based consultant heritage building consultant. In the Conclusions and Recommendations in Section 5 of their Report the consultant stated with regard to Central Government Offices 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. He opined, however, that "The more functionalist Wing is the least good piece of architectural design out of the three." In consideration of the Report, Government proposed to preserve the Main and East Wings, and to demolish the West Wing, which, as indicated, was deemed by the consultant to be of lower historical significance and architectural merit, and make way for public open space and commercial development.

1.2 On detailed examination, it is discovered that the scheme not only envisages the construction of a 32-storey high-rise office block, but also a 5-storey underground shopping complex and car park (with roof garden over) which will cover a large site area equivalent to approximately half of the site of the CGO Complex. This project, purportedly one of the original eight "conservation initiatives", is in reality a de-facto "redevelopment initiative" on Government Hill.

2. Heritage Value

2.1 There is no doubt that the government has acknowledged Government Hill to be a historic site, which explained why it commissioned Purcell Miller Tritton to prepare the Report. On page 135 of the Report, it is made clear 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" and "the potential significance of the site is further enhanced by the historic sites in the wider area. These sites, taken in conjunction, offer very interesting opportunities for the interpretation of the history of the development of Hong Kong."

2.2 Article 18 of the "Principles to the Conservation of Historic Sites in China" stated that "Conservation must be undertaken in-situ. Only in the face of uncontrollable natural threats or when a major development project of national importance is undertaken and relocation is the sole means of saving elements of a site may they be moved in their historic condition." In other words, in line with international best practice unless there is a demonstrable overriding public need, Government Hill should be conserved in-situ in a holistic manner. The government did not provide sufficient justification for an overriding public need in its consultation document.¹

¹ This is the first interim report from the Expert Group. We will solicit the views from the general public, as well as the stakeholders concerned in the next few weeks, and shall publish a further report in January 2011.

3. Architectural and Technical Merits

3.1 The technical justification for the government proposal is largely built upon the recommendations of the Architectural & Heritage Assessment Report (A&H Report) conducted by Purcell Miller Tritton and commissioned by the Development Bureau in 2009. On the basis of this report, government claimed that the West Wing should be demolished for commercial development. But upon close examination, we find that the A&H Report only suggests "*the West Wing may be demolished*" (General Conclusions in Chapter 5) and "*if any demolition is to be considered the West Wing is the most acceptable building to demolish.*" (Para. 5.2.1 of the report), and it is clearly a suggestion only with a qualification (that there is unquestionable need for redevelopment).

3.2 Instead of recommending redevelopment, the report has in fact more than once suggested or recommended the preservation of all the buildings on the site. For example, under General Recommendations para. 5.1.1, the author urged that "*Consideration should be given to creating a 'Special Protected Area' to acknowledge the well wooded spaces and low rise buildings in... the CGO site*", further stating in Purpose of the recommendation that: "*A 'Special Protected Area' would be a tool which could be used to protect this area from inappropriate development.*" Again, under the summarized General Conclusions of Chapter 5, "*it is suggested that there might be a case for making all the low rise and well planted area into a 'Special Protected Area' where the presumption would be against any significant redevelopment work.*" We take the view that Government should straight away make the entire area of Government Hill a 'Special Protected Area' and urge Government to do so.

3.3 The report is the result of a study of the architectural and heritage value of the existing buildings, but it has rightly pointed out that the significance of the CGO site may actually lie in the overall use and setting, as illustrated in the general conclusions in Chapter 5, which says "*the site itself is arguably of higher significance than the buildings. ...[as it] has been the seat of Government since the foundation of Hong Kong as an independent colony.*" This implies that consideration should not be given only to the heritage value of the buildings, but also to the setting and disposition of the existing buildings.

3.4 There is an unexplained conflict in the Consultant's recommendations, clearly stating in General Recommendations on Setting/ Wider Context item 5.4.6 that "Any new building on the site should take the height of the existing CGO as a maximum height.". There is a clear conflict however, between this and paragraph 7 of the Report, for example, which states that "If the West Wing were demolished and redeveloped the new development should generally respect the footprint and height of the existing building. The exception to this might be at the west end of the site where a higher rise building could perhaps be considered.". We opine that the consultant was very clearly concerned with the height of any new building on the site and we opine that any new building should take the height of the existing CGO as a maximum height.

3.5 The "recommendation" to demolish the West Wing is only based on the relative architectural and heritage value of the three buildings on the CGO site. It is doubtful whether this is a correct approach. Given that the conservation of the CGO site is one of the Eight Conserving Central Initiatives, it would be fundamental and logical to compare the relative architectural and heritage value of the West Wing with the other buildings in all the Eight Conserving Central Initiatives, such as the Hollywood Road Married Police Quarters and the Central Market which have both been decided to be preserved based on heritage value considerations. In fact as stated in the report, the West Wing (1959) was completed only 5 years after the East Wing (1954), and it represents another variation of the same architectural style of government buildings built in the same period, it may be worth preserving even if it is of a relatively lower architectural value among the three buildings if

we consider the heritage value of buildings all over Central (or Hong Kong), rather than only those within the CGO site alone.

3.6 Based on the above observations, it would not be correct to interpret that the report actually suggests or recommends demolishing the West Wing to make way for redevelopment. In fact, it would be misleading for the government to take certain analysis of the A&H Report out of context, and present its "recommendations" to the public.

3.7 As stated above the Report suggests that "*the site itself is arguably of higher significance than the buildings.*" The Report also goes out of its way to consider 'appropriate use, for example in Chapter 4 relating to new use for existing buildings where it states that conversion of the remaining buildings to housing or a hotel, for example "would entirely change the feel and character of the site in a way that would seriously compromise its significance." In paragraph six of the Executive Summary, it states, apparently with regard to Central and East Wings, but we consider to be very relevant also to the site of the current West Wing that "It would seem very undesirable to have commercial use which demeaned the historic and current functions of the site." We opine that the construction of a shopping centre (albeit with a roof garden) would very much demean the historic and current functions of Government Hill. We opine that this would significantly impair the dignity, amenity and spirit of Government Hill as a whole, as well as significantly impair the topography and sense of scale of the area.

3.8 The Report also urges in General recommendations item 5.1.2 that "Consideration should be given to adding the Central and east Wings of CGO to the A&M's list of graded buildings" stating in part under Purpose of Recommendation that "The CGO buildings represent an important part of the history of Hong Kong's government and are in a significant open setting." We urge that all the buildings, the Central, East and West Wings of CGO should be given grading by Government.

4. Community Benefits

The government has cited a series of benefits of the proposed redevelopment scheme (i.e. demolishing the West Wing to make way for a 32-storey office tower and an underground shopping arcade and carpark) but there has been no attempt to compare the benefits that may have been achieved by other options, such as preserving the West Wing, or replacing it with a low-rise building with a smaller footprint. To address this deficiency, the purported benefits of the proposed scheme are examined in detail below.

a) **More greenery** – other than saying that more than 2/3 of the original West Wing site will be transformed into a public open space, no figures comparative with existing ones have been provided to demonstrate that there will be more greenery. The more important issue is that even if we cover all of the new open space with plants, they would be on top of a podium, which means that the lush existing planting on natural soil around the existing buildings will be replaced by planter boxes on top of a podium with limited soil depth. Trees on podiums or roof gardens would have only very limited growth potential compared with trees on natural ground. In fact, after 50 years' co-existence, the trees around the West Wing have grown to such big sizes and have blended in so nicely with the building itself that they have become integral parts of a whole. The quality of greenery on such a shopping centre podium would certainly be much lower than that around the existing West Wing. We opine that to have a meaningful garden area in keeping with the very high amenity of the rest of Government Hill it must be located entirely on natural ground and not on a roof and urge that Government ensures that in the event that the West Wing is removed that such a garden on natural ground is provided.

b) **Better pedestrian connectivity** – while the only new pedestrian connection with the CBD

featured in the redevelopment scheme is a proposed footbridge across Queen's Road Central through the new office tower, the same footbridge connection can also be provided with the existing West Wing retained. As the A&H Report has revealed, the pedestrian connection between the CBD and the government hill, or between Queen's Road Central and Lower Albert Road, was in fact blocked off due to the government's erection of steel fences around the CGO site after 1997. Simply removing these fences and pedestrianizing the existing car-parking areas would enable the public from the CBD to access easily through the CGO site to the Government House, Botanical Garden, etc., starting with the gentle climb up Battery Path, which is in a more appropriate ambience than through escalators within a shopping centre..

c) **Preserving the heritage precinct** – as the wordings of the cited intent itself explain, the heritage precinct of which the CGO forms a part needs to be preserved but not altered or removed, and it is illogical to "demolish" (the West Wing) in order to "preserve" (the heritage precinct).

d) **Compatible building design** – the government has tried very hard to describe the proposed new office tower as compatible with the surrounding development and that it would be located as far as possible from the center of the CGO site to minimize the impact on the new open space. However, the existence of a 150m tall building on the CGO site is alienating to the low rise nature of the original site. As cited in the A&H Report (Chapter 5 Conclusions & Recommendations), "*The low rise nature of the site and the open spaces and trees around the buildings are significant. The buildings, in conjunction with the surrounding sites... make up a large, low rise, green area in the heart of this otherwise dense highly developed part of the city. Any new development should respect the low rise of the existing buildings and open space around them.*" To erect a high rise building on the CGO site is simply an incompatible design by any definition.

e) **Traffic congestion** – even if a traffic lane can be added to the downhill part of Ice House Street with the redevelopment scheme, the width of north-bound Ice House Street and west-bound Queen's Road Central across the Ice House Street/Queen's Road Central junction cannot be widened with the existing developments retained, and there will not be any real improvement to the traffic of the area with the proposed redevelopment scheme. We further opine that Ice House Street is a very historical street, which has an interesting scale as well as fine historic granite masonry retaining wall with mature trees above to the south of West Wing CGO. From Government's leaflet on the proposals it would appear that the sense of scale of the lower part of Ice House Street would be significantly destroyed by the development and that the historic wall or a significant part of it, together with the mature trees above it would be destroyed by the road widening. This would significantly impair the visual amenity of the setting of the Declared Monument the Duddell Street Steps. We urge that the present amenity Ice House Street with its scale and proportion, as well as its handsome and historic granite wall and tree planting above be left intact.

f) **Carbon Footprint** – the government has set itself a path to low-carbon development and is currently consulting the public on "Climate Change Strategy and Actions". Yet the proposed redevelopment plan will lead to more waste and generate more traffic, which will result in a higher carbon footprint for Hong Kong. Hence the proposal is in contradiction with the stated policy objective of combating climate change.

5. Planning and Urban Design Issues

While a Redevelopment Scheme brings no clear benefits, preservation of all three buildings (including the West Wing) on the CGO site has the following planning and design merits:-

a) **Existing buildings blend in well with natural landscape** – through 50 years' co-existence the

three buildings on the CGO site blend in extremely well with the lush vegetation around them and it would be a shame to destroy this half-a-century old physical man-nature relationship and to start anew with deep excavated car-parking basements, barren building decks and curtain-walled towers on a man-made platform again.

- b) **Fine example of a “climbing building” on a slope** – the West Wing is in fact a fine example of a characteristic type of buildings in the early days of Hong Kong, with the building actually climbing up a natural sloping terrain with varying plan size/shape (new buildings today tend to involve leveling of a large piece of ground to make a building platform for sitting a tower on top), and the West Wing is one of the few buildings with such characteristics that deserves to be preserved.
- c) **Building ensemble with a well-designed site plan** – The disposition of the three existing wings 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.
- e) **Nuisances during construction in case of redevelopment** – the scale of demolition, basement excavation, site formation and tower construction works for the “redevelopment scheme” and the nuisances (dust, noise, muddy drainage, increased traffic volume, etc.) should not be underestimated. With the redevelopment scheme, the immediate neighbourhood of the redevelopment site will suffer for years – avoidable if the West Wing is preserved.
- f) **Maintenance of the existing character of the site** – as stated in para. 5.4.2 of the A&H Report, “*The CGO complex is unusual in the busy urban environment of Hong Kong in that it has several areas of vegetation. It is also part of a wider green space stretching from the Sheng Kung Hui compound over to Hong Kong Park. This significant ‘green lung’ should be maintained and therefore no trees should be removed without good reason....*” It has yet to be debated whether “financial pressures” or “redevelopment” would be considered good reasons, but erecting a 150m tall tower is definitely not maintaining the existing character of the site.
- g) **Natural Greenery versus artificial vertical greening** – The redevelopment scheme portrays the new podium elevation of the office tower as a lush green coat of vertical greening. Although vertical greening is now a trendy building feature, its function as greenery is of much less value than natural trees that provide both greenery and shade. In fact, vertical greening does not work well in shaded areas like this part of Central and has high maintenance costs.
- h) **Destruction of Scale, Tranquility and Visual Amenity of Lower Albert Road by Road Widening and Construction of Vehicle Run-in** – The redevelopment proposals allow for a significant road widening and construction of a vehicular ingress/ egress on Lower Albert Road to the south of the existing West Wing at a point where Lower Albert Road is of high visual amenity attractiveness as well as atmosphere of tranquility. The existing vehicular entrance to CGO further to the east appears to have comparatively little traffic from observation. We opine that the road widening and construction of a run-in to a major commercial building at that point would significantly impair the visual amenity, setting and tranquility of the very attractive road at that point.
- i) **Appropriate Use of any New Development on Government Hill** – Considering the fact that “the site itself is arguably of higher significance than the buildings.” And the fact that this is perhaps the last remaining area which could be classified as a heritage site in the urban areas we opine that were there overriding public need for the West Wing be removed and replaced,

that any replacement building should be truly a building and an environment that would serve the people of Hong Kong in its wider sense and not just a developer or shoppers in an up-market shopping centre. Planning should be about people and the environment and about making Hong Kong a better place to live in. Government should engage in full, comprehensive and meaningful consultation with the people of Hong Kong about how to best use and enhance Government Hill for the people of Hong Kong, visitors as well as the nation as a whole. Ultimately to create and enhance a Government Hill fully as an asset for the community and the city would be of much greater value to society than yet another commercial tower and shopping centre which would benefit only a few. Surely we as a community can move beyond destroying our history, heritage and environment for developer gain and save Government Hill for the people and for our future generations.

6. Conclusion

6.1 The two policy justifications for the government redevelopment proposal, i.e. financial gains for government coffers and the lack of grade A office space, cannot arguably be established as overriding public needs for the destruction of a historic site. Specifically, the sale of the site could fetch no more than \$10 billion, which is insignificant compared with a total financial and exchange reserves of over \$2 trillion currently held by government. The provision of around 280,000 sq ft of office space through the new building also pales into insignificance among the 9.6 million sq ft of grade A office buildings under construction or provided for in Central reclamation area, Wanchai and West Kowloon.

6.2 As indicated above the consultant has identified a number of very important aspects of Government Hill and has indeed urged that consideration be given to making the area a '*Special Protected Area*' to protect this area from inappropriate development. We opine that Government's proposals constitute precisely the sort of inappropriate and undesirable development that their heritage consultant has in mind. To implant a significant part of Government Hill with a shopping centre and massive (compared to the existing site) Commercial Tower would significantly destroy the dignity, amenity, landscape and green environment of Government Hill and we opine that under no circumstances should the site be sold for such commercial development. Unfortunately we already have an example of what happens when a heritage building, namely the Declared Monument, the Former Marine Police Headquarters at Tsim Sha Tsui is sold by Government to a developer. Tragically the site, environment, history, topography, setting, wonderful tree cover and amenity of what was once a very historic building and setting in a rather built up area has been utterly destroyed by a developer purely for commercial profit for the company concerned. Apparently either Hong Kong's watchdogs who should be protecting Hong Kong's Architectural Heritage are woefully not up to their job or perhaps they were forced by commercial or political pressure to accept the destruction that occurred. Such transfer and destruction of a heritage building and its environment to a developer for commercial gain must not be permitted to occur.

6.3 In conclusion, in order to promote an informed public debate the government has a duty to provide comprehensive information on different options for the future of the site, including the pros and cons of preserving the West Wing and of replacing it with a more compatible low-rise building. Not only full environmental and social impact assessments should be undertaken for the proposed options, but that a full archaeological investigation of the underground relics, such as the Murray Battery and tunnel networks should be conducted prior to any development decision. Only options that fully comply with international best practice on heritage conservation should be recommended for serious consideration. The intended sale of the site to private developers, thus drastically changing its historic nature, cannot be justified on the basis of the information and arguments put

forward by the government.

9 December 2010

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