

政府總部
發展局
規劃地政科



Planning and Lands Branch
Development Bureau
Government Secretariat

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Ms. Sheridan Burke
President
International Scientific Committee on Twentieth Century Heritage,
ICOMOS

Mr. Albert Dubler
President
International Union of Architects, UIA

Ms. Ana Tostões
President
Docomomo International

c/o 78 George Street
Redfern, NSW 2016
Australia

27 June 2012

Dear Ms. Burke, Mr. Dubler and Ms. Tostões,

**Urgent Request to Reconsider
Redevelopment of
Central Government Offices West Wing
Hong Kong**

Thank you for your letter of 12 June 2012 to the Chief Executive, attaching the Government Hill Concern Group's "Proposal for Heritage Alert Action for the West Wing, Central Government Offices on Government Hill, Hong Kong SAR" and requesting the Hong Kong SAR Government to reconsider the plan to redevelop the West Wing of the

former Central Government Offices (CGO). We are authorised to reply to you on behalf of the Chief Executive.

First of all, we would like to let you know that we are greatly appreciative of your views on our plan for the former CGO. However, having read your letter, we are deeply concerned that your organisations' assessment might not have taken into full consideration Hong Kong's heritage conservation policy, the associated statutory and administrative systems at work, and the details of the former CGO site and the three buildings on it, based on which our current conservation cum redevelopment plan has been drawn up. We hope you will agree that heritage matters, as in the case of other policy matters, have to be seen in each country or city's social, political and economic context. We would therefore like to take this opportunity to provide you with a full account of the relevant issues and considerations involved and to impress upon you that the Hong Kong Special Administrative Region Government has indeed embraced heritage in our work, particularly in recent years.

Heritage Conservation Policy

In his first Policy Address for the current term of Government delivered in October 2007, the Chief Executive acknowledged that cultural life is a key component of a quality city life and made an undertaking to press ahead with our heritage conservation work. To follow that up, the Development Bureau promulgated shortly afterwards a new heritage conservation policy with a clear Policy Statement that we would "*protect, conserve and revitalise as appropriate historical and heritage sites and buildings through relevant and sustainable approaches for the benefit and enjoyment of present and future generations. In implementing this policy, due regard should be given to development needs in the public interest, respect for private property rights, budgetary considerations, cross-sector collaboration and active engagement of stakeholders and the general public*". We have since been faithfully practising this Policy Statement, which we believe reflect broad consensus in our society.

Statutory Monument Declaration System

The Antiquities and Monuments Ordinance (the Ordinance) of Hong Kong provides for the preservation of objects of historical, archaeological and palaeontological interest. Section 3 of the Ordinance

stipulates, *inter alia*, that the Antiquities Authority, i.e. the Secretary for Development, may, after consultation with the Antiquities Advisory Board (AAB)¹ and with the approval of the Chief Executive, declare any place, building, site or structure, which the Authority considers to be of public interest by reason of its historical, archaeological or palaeontological significance, to be a monument. Under section 6 of the Ordinance, the statutory protection for declared monuments includes prohibition of any excavation, carrying on building or other works on the monument, and any action to demolish, remove, obstruct, deface or interfere with the monument unless a permit is granted by the Antiquities Authority. Up to now, there are 101 declared monuments in Hong Kong.

Administrative Grading System

The above-mentioned statutory monument declaration system is different from the administrative grading system operated by the AAB, which does not carry any legal effect. This administrative grading system provides an objective basis for determining the heritage value, and hence the preservation need, of historic place, building, site or structure (referred to as "buildings" hereafter for simplicity) which are of heritage value. Since 2009, the AAB has been reviewing the grading of 1,444 historic buildings in Hong Kong. These 1,444 buildings were selected from some 8,800 buildings in Hong Kong built mainly before 1950, which were covered in a territory-wide survey conducted between 1996 and 2000 by the Antiquities and Monuments Office (AMO) which is the Government's heritage advisor. The AAB reviews the grading of the 1,444 historic buildings with regard to the assessments of their heritage value by an independent assessment panel² appointed by it, and the views and additional information received from members of the public and the owners of the buildings concerned during the public consultation exercise on the proposed grades. The review is carried out having regard to six criteria, namely historical interest, architectural merit, group value, social value and local interest, authenticity and rarity. Historic buildings are accorded with Grade 1, Grade 2 and Grade 3 status -

¹ The AAB is a statutory body established under section 17 of the Ordinance to advise the Antiquities Authority on any matters relating to antiquities, proposed monuments or monuments or referred to it for consultation under the relevant provisions of the Ordinance.

² The assessment panel comprises historians as well as members of the Hong Kong Institute of Architects, the Hong Kong Institute of Planners and the Hong Kong Institution of Engineers.

- Grade 1 status refers to buildings of outstanding merit, which every effort should be made to preserve if possible;
- Grade 2 status refers to buildings of special merit, efforts should be made to selectively preserve; and
- Grade 3 status refers to buildings of some merit, preservation in some form would be desirable and alternative means could be considered if preservation is not practicable.

Up till now, the AAB has completed the assessment of the grading of 1,221 buildings, with breakdown as follows -

- Grade 1: 162 buildings
- Grade 2: 326 buildings
- Grade 3: 449 buildings
- Nil Grade: 284 buildings

The grading will not put the buildings under statutory protection under the Ordinance. However, the Antiquities Authority may actively consider whether a building in the pool of Grade 1 buildings has reached the high threshold of "monument" for the purpose of declaration of "monument" under the Ordinance.

Apart from the 1,444 historic buildings mentioned above, the AMO receives from time to time proposals for grading some other buildings. Up till now, about 150 of such proposals have been received. The AAB has agreed to adopt a step-by-step approach, focusing first on finalising the grading of the remaining items in the list of 1,444 historic buildings before examining new items proposed by the public for consideration of grading.

Heritage Value of the Former CGO and the Conservation cum Redevelopment Plan

The former CGO falls within an area known to some as "Government Hill". However, "Government Hill" is only a conceptual description without a definite boundary. On the former CGO site, there are three buildings, namely the East Wing, the Main Wing and the West Wing, which are modern architectures built in 1954, 1956 and 1959 respectively. The former CGO, whether collectively or as individual buildings, is neither a monument nor one of the 1,444 historic buildings. It is a new item

proposed by the Central and Western Concern Group, whose convenor is also the convenor of the Government Hill Concern Group, for consideration of grading, and the AAB decided to accord priority to assessing its grading in November 2011.

Well before the AAB's decision to accord priority to assessing the grading of the former CGO, the Government appointed in early 2009 Purcell Miller Tritton (PMT), a heritage conservation expert firm headquartered in the United Kingdom, to assess the historic and architectural values of the former CGO to help the Government consider what uses should be made of it after the Government Secretariat had moved to its new headquarters at Tamar in 2011. In the course of the study, PMT researched into the relevant information and documents kept in Hong Kong as well as those preserved in the National Archives of the United Kingdom and The British Library. The expert also visited Hong Kong to inspect and make records of the CGO site, the three buildings on it (internally and externally), as well as the surroundings of the CGO site. The Appraisal of over 170 pages, which is referred to in your letter as well as available publicly on the Internet³, contains a comprehensive assessment and the experts' conclusions and recommendations. According to the Appraisal, the former CGO site itself and the history associated with it is seen as being as significant, possibly more significant, than the buildings. The site had been associated with the Government since the founding of the Colony. However, the site has been changed over time. Government offices were marked on the site in the plans dated 1845 and a larger set of offices was built in 1847-48, which remained in use until they were demolished in the 1950's to make way for the present offices. One of the main recommendations of the Appraisal is that the Main and East Wings are of high historic and architectural value and, if possible, should be retained and should be internally altered to fit some appropriate use, while the West Wing, which is of lower value, could be demolished for redevelopment. If the West Wing is cleared, any new development should either respect the footprint and height of the existing buildings or should be restricted to the western edge of the site where a more high rise development would be possible on the corner of Ice House Street and Queen's Road Central. The Appraisal also recommends that, if it is financially viable, the formation of a new small garden on the West Wing site would be very welcome.

³ The Report can be accessed via the following web link:
http://www.amo.gov.hk/form/research_CGO_e.pdf

Based on the conclusions and recommendations of the Appraisal, the Government decided and announced under the “Conserving Central” initiative in October 2009 that the Main Wing and East Wing, which are of high historic and architectural value, would be preserved and used as the new headquarters of the Department of Justice while the West Wing, which is of relatively lower value, would be cleared and redeveloped.

It has to be recognised that the above preservation cum development proposal for the former CGO aligns with the 2007 Policy Statement mentioned above given the professional assessment of the varying levels of historical and architectural merits of the three buildings. It is also worth pointing out that the “Conserving Central” initiative has included several key conservation projects (all of which were strongly advocated by the Central and Western Concern Group (the convenor of which also convenes the Government Hill Concern Group)), viz. the conservation of the Central Market Building (built in 1939) to become a Central Oasis for the public to enjoy; the conservation of the Central Police Station complex (preservation of a total of 16 historic buildings on site but removal of several ancillary buildings) and the conservation of the former Hollywood Road Police Married Quarters (preservation of two quarters blocks plus a new built to provide more space for designers to operate), etc. (Please visit our website (http://www.devb.gov.hk/en/issues_in_focus/conserving_central) for more details on “Conserving Central”.) While the Central and Western Concern Group is naturally pleased with the Government’s positive response to its long-advocated demands and aspirations in the district, it remains adamant that all the three buildings in the former CGO should remain intact, taking little account of the professional appraisal on the historical and architectural merits of the case, and the public benefits of the West Wing redevelopment scheme as discussed below.

At present, like before, the whole CGO site is out of bound of the public and surrounded by a tall security gate. Under our conservation cum redevelopment plan themed “Restoring Green Central”, the footprint of the structure within the West Wing site would be reduced by some 46% to create a new public open space of about 7,600 sq.m. with lots of greenery to be opened to the public for enjoyment. This new “green lung” within the busy Central Business District is greatly welcomed by the community, and will link up the greenery at Battery Path, which would remain intact, with the green gardens of Government House and St John’s Cathedral. Also, in

response to public views, we have cancelled the shopping mall planned earlier and would instead allocate the space to local and international non-governmental organisations related to the legal and financial fields such that they, together with the new headquarters of the Department of Justice in the preserved Main and East Wings, would form a new legal and financial hub. We have also responded positively to the concern of some in the community by dropping our original plan to sell the West Wing site and would instead use a "Build-Operate-Transfer" approach to take forward the redevelopment project, thus enabling the Government to retain the integrity of its ownership of the whole former CGO site to reflect the historic significance of the site. The new office block would only occupy less than one-quarter (23.6 %) of the West Wing site, or 7.5 % of the whole former CGO site, and is set at the western edge of the site as recommended by the experts. All these social, planning and landscape gains were explained at a recent press conference by the Secretary for Development on 14 June 2012 (see details at Annex A for reference). Your kind attention is particularly drawn to the first part of the Secretary's presentation at the press conference which provides a summary of Hong Kong Special Administrative Region Government's heritage conservation work in the past five years.

We truly believe that the conservation cum redevelopment plan has paid due regard to the historic significance of the former CGO site, as well as the relative historic and architectural values of the three buildings, has struck a reasonable balance among Hong Kong's conservation, economic development and community facility needs, and is in the overall public interest of Hong Kong. Indeed, our assessment is that our conservation cum redevelopment plan matches the main stream view in the community that we collected in a public consultation exercise between September and December 2010 (please see at Annex B the report on the results of the public consultation).

The former CGO is not a world heritage site. While the site has historic significance, the structures on it have evolved over time. We believe that heritage conservation does not mean total preservation of all physical structures. For the former CGO, how the site and each of the three buildings should be handled should accord with their individual historic and architectural value. After all, what needs to be met is Hong Kong's overall public interest. Our conservation cum redevelopment plan –

- meets our heritage conservation policy;

- fulfils our mandate of progressive development, striking a balance between economic progress and concern for the environment and conservation;
- reflects the relative historic and architectural values of Main and East Wings vis-à-vis West Wing based on a professional appraisal;
- optimises valuable land resources in the Central Business District by providing much needed office space;
- provides a rare opportunity to create a financial and legal hub to enhance Hong Kong's status a leading international financial centre and Central's image as a core financial district; and
- enhances urban design in a busy part of Central by setting back the new building from Ice House Street and Queen's Road Central to provide an enlarged, more pleasant pedestrian environment at this road junction.

Grading of former CGO - Update

In the earlier part of this letter, we have set out information on the administrative grading system operated by the AAB. By way of update, the assessment panel appointed by the AAB has submitted the following recommended grades based on their relative heritage values to the AAB for consideration –

Former CGO site: Grade 1
 Main Wing: Grade 1
 East Wing: Grade 2
 West Wing: Grade 3

The AAB considered the assessment panel's recommendations on 14 June 2012 and has put out for public consultation for a month the following proposals –

Former CGO site: Grade 1
 Main Wing: Grade 1
 East Wing: Grade 1
 West Wing: Grade 2

While we did not have the opportunity to provide you with the needed details for your comprehensive assessment of the former CGO before you issued the letter to us, we hope that the above, as well as our

detailed responses at Annexes C and D to the points contained in the Government Hill Concern Group's Proposal for Heritage Alert Action, will aid your detailed assessment. Should you require any further information or have any questions, please do not hesitate to contact us.

Yours sincerely,



(Tony LI)
for Secretary for Development

c.c.

Mr. Gustavo Araoz, President of the International Council of Monuments and Sites (ICOMOS)

Mr. Tong Mingkang, President of the ICOMOS China

Mr. Bernard Chan, Chairman of the Antiquities Advisory Board

Mr. Dominic Lam, President of the Hong Kong Institute of Architects

Ms. Katty Law, Government Hill Concern Group

Annex A

Government finalises plan for redeveloping West Wing of former Central Government Offices (with video)

At a press conference today (June 14), the Secretary for Development, Mrs Carrie Lam, reviewed the Government's heritage conservation work in the past five years and announced the final plan for redeveloping the West Wing of the former Central Government Offices (CGO). Under the plan, the Government will drop its earlier proposal to rezone part of the "Government, Institution or Community" ("G/IC") site to "Comprehensive Development Area" and will retain ownership of the West Wing site intended for office development, thereby preserving the integrity of the entire CGO site.

"This final plan, which provides for the preservation of the Main and East Wings for use by the Department of Justice and redevelopment of West Wing, has fully taken into account views expressed in the community on the future of the former CGO in the past two years. It is supported by a comprehensive historical and architectural appraisal done by the UK heritage conservation architect firm Purcell Miller Tritton. It has seized a unique opportunity to create a public open space (POS) in the upper part of Central, enhance the green neighbourhood and provide a new building to meet office and community needs," said Mrs Lam.

Under the final plan, the West Wing will be redeveloped on a much smaller footprint of 1 350 square metres at the upper, western end of the CGO site, providing 28 500 square metres gross floor area (GFA) of office and 11 800 square metres GFA for G/IC and ancillary usages.

A Build-Operate-Transfer (BOT) mode will be adopted to partner with the private sector to redevelop the West Wing. The Government will retain ownership of the site and the successful bidder for the BOT contract to be selected through a public tender will fund, design, construct and operate the new building in exchange for receiving rental income in the course of the BOT agreement.

"In the BOT tender, we will adopt a two-envelope approach to ensure that the quality and technical aspects of the project, apart from public revenue, would be given due weight in the assessment. We will carefully prepare the BOT tender documents to include all relevant terms, including the need for the developer to hand over to

Government the POS and about 4 700 square metres of GFA for G/IC use in the portion below the Lower Albert Road level upon completion," Mrs Lam said.

The new development will also provide much sought after space for NGOs involved in legal and financial affairs, thereby characterising the nature of this development, which the Administration has proposed will have the Securities and Futures Commission and the Hong Kong Exchanges and Clearing Limited as anchor tenants.

The Government will launch an Expression of Interest exercise later this year to gauge market interest. The views and suggestions received from potential bidders will be taken into account in finalising the terms and conditions of the tender documents. It is expected that public tender for the BOT will take place in the first half of 2013.

Ends/Thursday, June 14, 2012

Issued at HKT 18:15

link: <http://www.info.gov.hk/gia/general/201206/14/P201206140473.htm>



Review

香港特別行政區2007年行
2007 Chief Executive El
Hong Kong Special Admin



“Cultural life is a key component of a quality city life. A progressive city treasures its own culture and history along with a living experience unique to the city. In recent years, Hong Kong people have expressed our passion for our culture and lifestyle. This is something we should cherish.”

(extracted from para. 49 of the Chief Executive’s 2007-08 Policy Address in 2007)

“We must ..., maintain the impetus of infrastructural development while preserving our environmental qualities and preservation of our heritage”

(One of the five areas laid down by the Chief Executive in his election-platform manifesto)

Review (Cont'd)

Demolishing Star Ferry Clock Tower and Queen's Pier – 2006 and 2007



3

Review (Cont'd)

Attending Public Forum at Queen's Pier – 29 July 2007

“Friends of Local Actions...have carried forward our conservation work to a great extent.”

(extracted from the speech delivered by the Secretary for Development at the Public Forum at Queen's Pier on 29 July 2007)

“The concept of “development as primary consideration” is already out of fashion. As the Secretary for Development, my duty is to strike a balance between conservation and development, ensuring that they are not opposing forces. This difficult and challenging task is a challenging test to my capability. Nevertheless, it is a firm promise by the new term of the Government, which implements people-oriented policy and values public engagement. I am willing to work with all Hong Kong people to resolve complicated and controversial conservation issues.”

(extracted from “Letter to Hong Kong” by the Secretary for Development on 4 August 2007)

4



Review: Controversial Heritage Conservation Issues

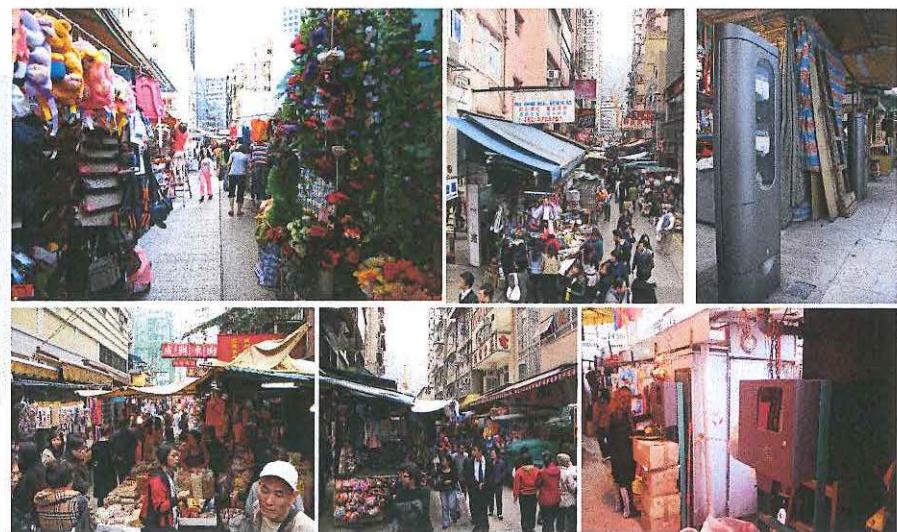
Saving King Yin Lei – September 2007



The Secretary for Development, accompanied by Mr Ho Sing Tin Edward, Chairman of the Antiquities Advisory Board, declared King Yin Lei as a proposed monument.

Review: Controversial Heritage Conservation Issues (Cont'd)

Preserving Tai Yuen Street Open-air Bazaar – November 2007



Review: Controversial Heritage Conservation Issues (Cont'd)

Changing the Original Plan of Total Demolition of Wan Chai Market and Facilitating the Urban Renewal Authority to Reach an Agreement with the Developer to Adopt "Core Elements Preservation" – December 2007



Review: Controversial Heritage Conservation Issues (Cont'd)

Removing Former Police Married Quarters on Hollywood Road from Sale and Revitalise it into a Creative Industries Landmark – February 2008

- The site will become "PMQ", providing 130 studios for designers / createpreneurs, exhibition area and 6 lodges for designers-in residence.
- New-built facilities include an i-Cube, covered and semi-covered event spaces, and an underground interpretation area in the main courtyard of former Central School.



Review: Controversial Heritage Conservation Issues (Cont'd)

Announcing the Adoption of “Retaining the Building and its Sitting Tenants” to Revitalise the Blue House Cluster – August 2009

- This “Viva Blue House” project costs HK\$79.4 million. It will be revitalised under a “Retaining the Building and its Sitting Tenants” approach. This will not only improve the living environment of the sitting tenants, but also preserves and strengthens the network of local community.



Review: Controversial Heritage Conservation Issues (Cont'd)

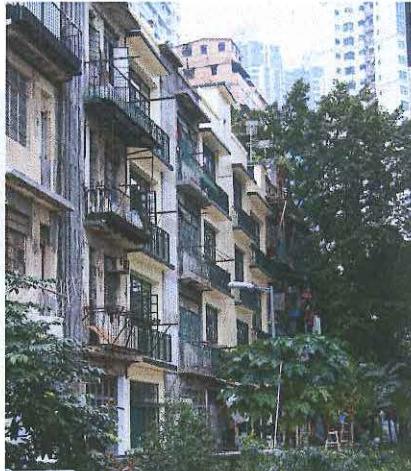
Removing Central Market Site from Sale and Revitalising it into “Central Oasis” for Public Enjoyment – October 2009



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Review: Controversial Heritage Conservation Issues (Cont'd)

Preserving Wing Lee Street – March 2010



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Review: Controversial Heritage Conservation Issues (Cont'd)

Consulting Public on Redevelopment of Central Government Offices West Wing – October 2010



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Review: Controversial Heritage Conservation Issues (Cont'd)

Declaring Ho Tung Gardens as Proposed Monument – January 2011



The Secretary for Development announced the declaration of Ho Tung Gardens as a proposed monument

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Review : Achievements in Five Years

In the past five years,
we have pressed ahead
with our
heritage conservation work

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Review : Achievements in Five Years (Cont'd)

Formulate New Heritage Conservation Policy Statement – October 2007

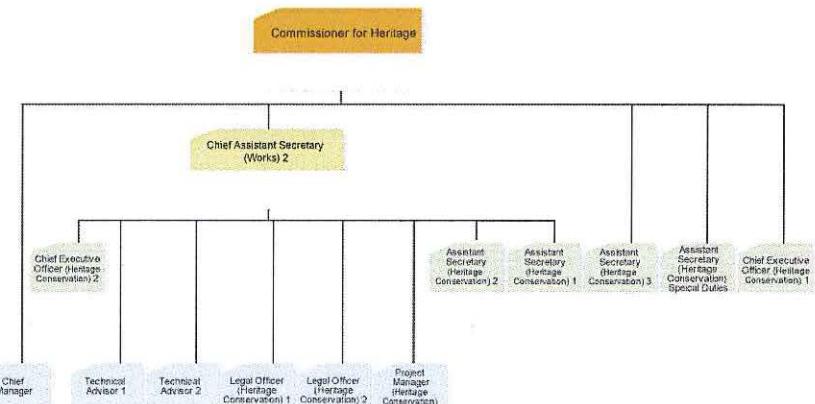
“To protect, conserve and revitalise as appropriate historical and heritage sites and buildings through relevant and sustainable approaches for the benefit and enjoyment of present and future generations. In implementing this policy, due regard should be given to development needs in the public interest, respect for private property rights, budgetary considerations, cross-sector collaboration and active engagement of stakeholders and the general public.”

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Review : Achievements in Five Years (Cont'd)

Set up a Dedicated Commissioner for Heritage's Office – April 2008

Organisation Chart for Commissioner for Heritage's Office

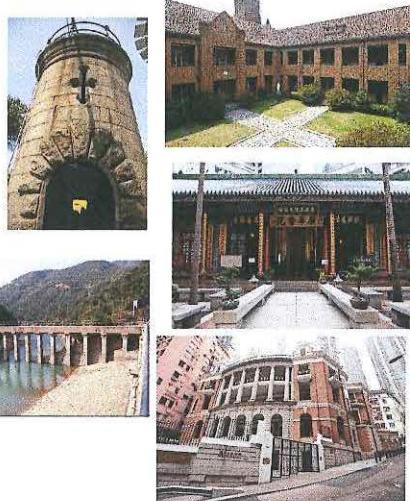


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Review : Achievements in Five Years (Cont'd)

Declaring 19 Places as Monuments, Making the Total Number of Monuments in Hong Kong to 101

- Tang Ancestral Hall
- Maryknoll Convent School
- King Yin Lei
- Green Island Lighthouse Compound
- 6 Historic Structures of Pok Fu Lam Reservoir
- 22 Historic Structures of Tai Tam Group of Reservoirs
- 3 Historic Structures of Wong Nai Chung Reservoir
- 4 Historic Structures of Aberdeen Reservoir
- 5 Historic Structures of Kowloon Reservoir
- Memorial Stone of Shing Mun Reservoir
- Residence of Ip Ting-sz
- Yan Tun Kong Study Hall
- Tung Wah Museum
- Man Mo Temple Compound in Sheung Wan
- Tang Kwong U Ancestral Hall
- Kom Tong Hall
- Fortified Structure in Ha Pak Nai, Yuen Long
- King's College
- School House of St. Stephen's College



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Review : Achievements in Five Years (Cont'd)

Endorsing the Administrative Grading System

Confirmed the grading of 909 historic buildings

- Grade 1 : 160
- Grade 2 : 309
- Grade 3 : 440



Definition of gradings

- Grade 1 refers to buildings of outstanding merit, which every effort should be made to preserve if possible;
- Grade 2 refers to buildings of special merit; efforts should be made to selectively preserve; and
- Grade 3 refers to buildings of some merit; preservation in some form would be desirable and alternative means could be considered if preservation is not practicable.



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Review : Achievements in Five Years (Cont'd)

Establishing Heritage Impact Assessment (HIA) Mechanism

- With effect from 1 January 2008, for all capital works projects, it is required to consider whether the projects will affect sites and buildings of historical and archaeological significance starting from the project inception stage; if so, the projects are required to undergo HIA.
 - Over 2,600 projects of different scale have gone through the HIA mechanism.
 - Among the 2,600 works projects, the Antiquities and Monuments Office has required 31 projects to carry out full HIA to assess their impacts on sites and buildings of historical and archaeological significance.



Establishing Internal Monitoring Mechanism

Secretary for Development		M E M O	
From	To	Distribution	
Ref. No.	Dev/BCS/CR/5/273	Date:	
Ref. No.	2818 2104	From Adj.:	
Alt. Ref.	2189 7254	Date:	
Alt. Ref.	29 March 2016	Final Page:	11
Monitoring Mechanisms for the Protection of Privately-owned Heritage Sites and Buildings			
<p>Scope</p> <p>1. This memo sets out the relevant monitoring mechanism to better protect privately-owned declared monuments, permanent monuments, and heritage sites and buildings that have been granted or proposed to be granted or that are in recorded sites of archaeological interest (hereafter collectively referred to as "privately-owned heritage sites and buildings") from threat of demolition, alteration and addition works or material changes in their which may affect their heritage values.</p> <p>2. This memo should be read in conjunction with Development Bureau (DEVB) Technical Circular (Wenky) DE/2009 on "Heritage Impact Assessment Mechanism for Capital Works Project".</p>			
<p>Background</p> <p>3. There are rising aspirations from the public for heritage conservation. In order to better preserve private sites and buildings in Hong Kong of heritage values, a memorandum of understanding was concluded in 2003 between the Commissioner's Office (CO) of the Development Bureau and the Antiquities and Monuments Office (AMO) of the Leisure and Cultural Services Department, where the Buildings Department (BD), Lands Department (Lands) and Planning Department (Planning) will receive any proposals, applications, or inquiries from the owners of their properties, including the owners of declared monuments, Registered Structural Engineers, Registered Geotechnical Engineers, architects, engineers, planners, or surveyors (hereafter collectively referred to as "inventors") about proposals/ applications that would affect these privately-owned heritage sites and buildings. For this purpose, the privately-owned heritage sites and buildings accorded with a proposed grading will also be review under this monitoring mechanism.</p>			

- Relevant departments such as the Buildings Department, Lands Department and Planning Department will alert the Commissioner for Heritage's Office (CHO) of the Development Bureau and the Antiquities and Monuments Office (AMO) regarding any identified possible threat which may affect privately-owned sites of archaeological interests, monuments and historic buildings that have been brought to departments' attention through applications and enquiries received and in the normal course of duty.
 - The mechanism enables the CHO and the AMO to take timely follow-up actions with the private owners concerned.

Review : Achievements in Five Years (Cont'd)

Publishing “Practice Guidebook for Adaptive Re-use of and Alteration and Addition Works to Heritage Buildings 2012”— May 2012



Practice Guidebook
for Adaptive Re-use of and
Alteration and Addition Works
to Heritage Buildings 2012

Provides design guidelines in terms of straight-forward practical solutions and alternative approach that may be adopted for compliance with building safety and health requirements under the Buildings Ordinance

Here comes the good news: the Buildings Department (BD) has produced the “Practice Guidebook for Adaptive Re-use of and Alteration and Addition Works to Heritage Buildings 2012” that provides performance-based (instead of prescriptive-based) guidelines that will help bridge the differences between conservation requirements and building code compliance in adaptive reuse of heritage buildings!

*Architectural Conservation Programme,
Faculty of Architecture, HKU*



Review : Achievements in Five Years (Cont'd)

Revitalising Historic Buildings to Give Them a New Lease of Life for Public Enjoyment

18 revitalisation projects completed or under way with a total commitment of over \$5 billion

- Under the Revitalising Historic Buildings Through Partnership Scheme: 3 completed projects, 6 projects in progress, 4 projects under assessment



Review : Achievements in Five Years (Cont'd)

Revitalising Historic Buildings to Give Them a New Lease of Life for Public Enjoyment (Cont'd)

- Project outside the Revitalising Historic Buildings Through Partnership Scheme: Former Police Married Quarters on Hollywood Road

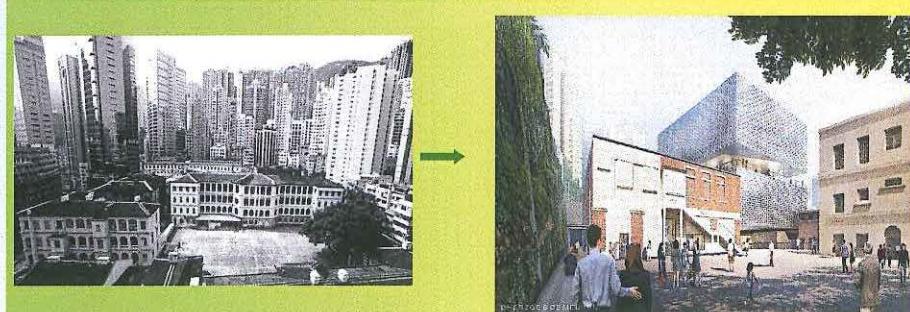


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Review : Achievements in Five Years (Cont'd)

Revitalising Historic Buildings to Give Them a New Lease of Life for Public Enjoyment (Cont'd)

- Revitalisation project undertaken by Hong Kong Jockey Club: Central Police Station Compound

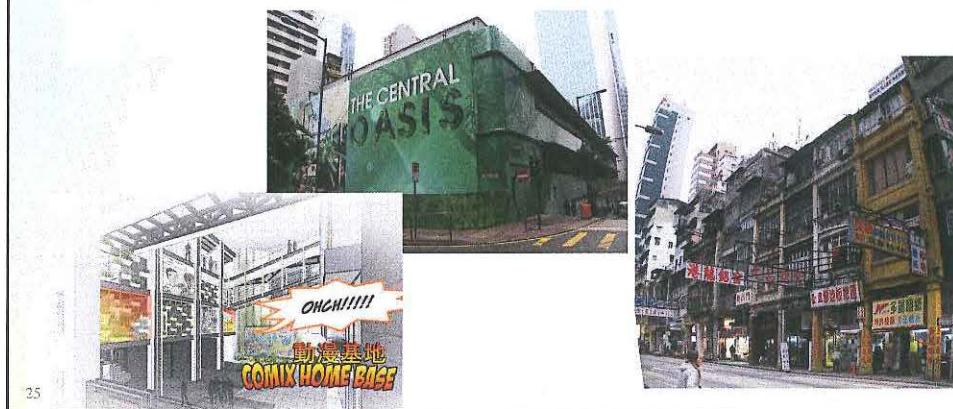


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Review : Achievements in Five Years (Cont'd)

Revitalising Historic Buildings to Give Them a New Lease of Life for Public Enjoyment (Cont'd)

- Revitalisation projects undertaken by Urban Renewal Authority: Mallory Street, Central Market, pre-war shophouses on Shanghai Street



Review : Achievements in Five Years (Cont'd)

Preserving Privately-owned Historic Buildings

Successfully sought owners' agreement to preserve (including preservation in whole, partial demolition, and preservation-cum-development) privately-owned historic buildings through the provision of economic incentives (planning and land options; without incurring public funds) in 6 cases:

- King Yin Lei (Declared Monument)
- Jessville (Grade 3 building)
- 179 Prince Edward Road West (Grade 3 building)
- 4 historic buildings in Hong Kong Sheng Kung Hui Compound (3 Grade 1 buildings and 1 Grade 2 building)
- Clock Tower of CLP Administration Building (Proposed Grade 1 building)
- 47 Barker Road (Grade 2 building)



Review : Achievements in Five Years (Cont'd)

Providing Financial Assistance for Maintenance for Privately-owned Historic Buildings

- 22 privately-owned historic buildings have completed or undergoing maintenance.
- 12 applications being processed



Tsang Tai Uk, Sha Tin



Pilgrim's Hall of the
Tao Fong Shan Christian Centre

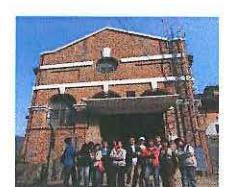
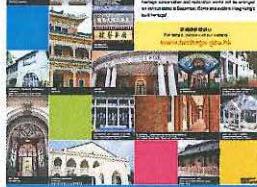


Helena May,
Central

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Review : Achievements in Five Years (Cont'd)

Actively Encouraging Public Participation and Enhancing Public Interests in Conservation



Over 300,000 people attended open days and guided tours to historic buildings

28

Review : Achievements in Five Years (Cont'd)

Receiving Awards: UNESCO Asia – Pacific Heritage Awards for Cultural Heritage Conservation

In the past 5 years, 5 historic building conservation projects in Hong Kong have received awards. The number of awards received by Hong Kong has increased to 13 since 2000.



29

Review : Achievements in Five Years (Cont'd)

Actively establish international recognition

English Heritage,
United Kingdom



Heritage Lottery Fund,
United Kingdom



National Centre
of Monuments,
France



Heritage Council of
New South Wales



New York City Landmark
Preservation Commission



New Zealand
Historic Places Trust



International Conference on Heritage Conservation 2011



30

Balance between Conservation and Development

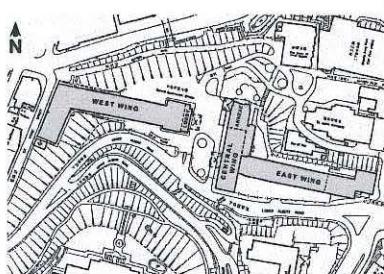
Restoring Green Central – The New Landscape of Central Government Offices

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Central Government Offices (CGO) Site

- CGO Complex at the heart of Central CBD
- East Wing, Main Wing and West Wing built in 1954, 1956 and 1959 respectively
- The site is unique:
 - High rise modern office building to the north and west
 - Low rise historic buildings, green landscape and garden to the south and east
 - Very limited open space within the site

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Historic and Architectural Appraisal

- The Appraisal completed by UK conservation expert in 2009 has the following conclusion and recommendations
 - Main Wing: most interesting architectural value characteristics and historical value
 - East Wing: elegant building transiting from classical Beaux Arts to modern functionalist style
 - West Wing: mainly functional, architectural value relatively low, with a new entrance added at east end in 1998
 - The CGO site itself and history associated with it more significant than the buildings
 - Allow public access across/around the site when contemplating new use
 - Main and East Wings to be retained; West Wing could be demolished for development
 - Higher rise building at the west end of the site may be considered if West Wing is demolished for new development
 - If West Wing is demolished, the central part may be extended as a garden to provide a green link between Battery Path and the Government House

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Future Use of CGO Buildings

- Main and West Wings are preserved for office use by Department of Justice as its new headquarters. West Wing, with relatively low historical and architectural value, will be redeveloped for commercial uses with part of its site turned into public garden to preserve existing green environment

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Public Consultation: Process

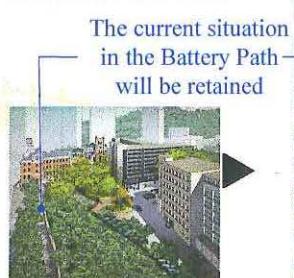
- September – December 2010 Development Bureau and Planning Department undertook public consultation on the notional redevelopment scheme
- November 2010 Released consultation findings and revised redevelopment scheme, and briefed Legislative Council Panel on Development
- Other than some organizations/individuals opposing the demolition of West Wing, the main concerns are:
 - How to ensure the public could enjoy the public open space
 - Reservation on another shopping centre in Central
 - New development might have adverse traffic impact on Central

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Public Consultation: Amendments to address the main concerns

(1) Enlarge the Public Open Space (POS)

- Enlarge the size of the POS from original 6 800 m² to 7 600 m² (area similar to Statute Square)
- May access the POS from Lower Albert Road, Battery Path and redeveloped building
- Government to own, manage and maintain the POS



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Public Consultation: Amendments to address the main concerns (Cont'd)

(2) Replace originally proposed shopping centre by space for G/IC and ancillary facilities

- Reduce excavation scale to minimize possible impact on disused tunnel network and nearby slopes
- Reduce gross floor area from 13 500 m² to 11 800 m²
- Provide office space for legal and financial related NGOs

(3) Reduce traffic flow

- Lower number of parking spaces (from 164 to 93) and loading/unloading spaces (from 32 to 13)



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Discussion on demolition of West Wing and selling of land

Justifications for demolition of West Wing

- Realize the vision of creating a POS (green lung) in upper Central (building footprint reduced from the current 2 520 m² to 1 350 m²) as green link between Battery Path and Government House
- Improve pedestrian and traffic flow in the vicinity of the area (one additional traffic lane to Ice House Street near Queen's Road Central, enlarge the space near the entrance at Ice House Street from 130 m² to 230 m², providing pedestrian footbridge connecting the new building and the building at No. 9 Queen's Road Central)
- Construct modern and green building to meet the demand for office in Central
- Enhance greenery: adopting "green terrace" design for the facade below Lower Albert Road level, extending the greenery from Battery Path to Queen's Road Central

Ownership Issue

- But we note the concern about Government parting with ownership of the West Wing site

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The final plan we have adopted

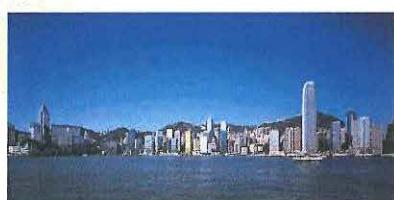
- Adopt the development parameters as revised in early 2012
- Drop the original proposal to rezone the site to “Comprehensive Development Area” while retain the existing “Government, Institution or Community” (“G/IC”) zoning to preserve the integrity of the site with historical value, and reflect the future public and quasi-public uses
- Retain Government’s ownership of the West Wing site through Build-Operate-Transfer (BOT) mode, developer to hand over to Government the public open space and G/IC space upon completion, return the site and building to Government upon expiry of the agreement (no more than 30 years)
- Enhance urban design consideration by giving due weight to quality and technical aspects in assessment of public tenders

Site area (approx.)	5,720 m ²
Gross floor area (approx.)	
Office	28,500 m ²
GIC cum ancillary facilities uses	11,800 m ²
Total	40,300 m ²
Plot Ratio (approx.)	7.05
Public Open Space (approx.)	7,600 m ²
Parking facilities	
Car parking spaces	93
Loading/Unloading spaces	13
No. of storeys	
Office tower	26
Portion below Lower Albert Road level	5
Basement	1
	32
Maximum building height	150 mPD
Site coverage of office tower (approx.)	23.6%

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Conclusion

- Redeveloping West Wing the best option in terms of public interest
- 1. It fulfils the mandate of progressive development, striking a balance between economic progress and concern for the environment and conservation
- 2. It meets our new heritage conservation policy, which requires us to give due regard to development needs in the public interest
- 3. It optimises valuable land resources in Central CBD providing much needed office space
- 4. It reflects the relative architectural and historic merits of Main and East Wings vis-à-vis West Wing based on a professional appraisal
- 5. It provides a rare opportunity to create a financial and legal related quasi-public building in a unique historic site, reinforcing Hong Kong’s role as an international financial centre and Central’s image as a core financial district



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Conclusion (Cont'd)

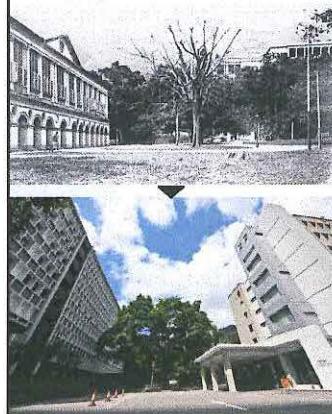
- Redeveloping West Wing the best option in terms of public interest (Cont'd)
 - 6. It enhances the urban design in a busy part of Central by setting back the new building from Ice House Street and Queen's Road Central providing enlarged pedestrian circulation space at this junction
 - 7. It improves the traffic flow in the area by widening Ice House Street and Lower Albert Road as the footprint of the new office tower (about 1 350 m²) will be substantially reduced by 46% compared to existing West Wing (about 2 520 m²) allowing setbacks from these roads
 - 8. It creates a green lung in the upper part of Central measuring 7 600 m² in the form of a LCSD-managed public garden, featuring the iconic Burmese Rosewood in front of the Department of Justice Headquarters in Main Wing, with access via Lower Albert Road, Queen's Road Central and Battery Path
 - 9. It provides G/IC space for accommodating local and overseas legal and financial organisations as well as for interpretation of the history of the site
 - 10. It has taken into account the professional and public views with entire land ownership retained to reflect the integrity of the CGO lot and its historic value



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Next Step

- Development Bureau will launch an Expression of Interest later this year, public tender may take place in the first half of 2013



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**PROPOSED REDEVELOPMENT OF
WEST WING OF CENTRAL GOVERNMENT OFFICES**

Report on Public Consultation

BACKGROUND

1. The public consultation exercise on a notional redevelopment scheme of the West Wing of Central Government Offices (CGO) was jointly conducted by the Development Bureau (DEVB) and Planning Department (PlanD) from mid-September to end-December 2010. Public comments and suggestions were collected through various public consultation activities, and the public was invited to send in their written comments.

PUBLIC CONSULTATION ACTIVITIES

2. The following public consultation activities were held:
- (a) press conference on 17.9.2010;
 - (b) two public exhibitions at the Hong Kong Planning and Infrastructure Exhibition Gallery (20.9.2010 – 31.12.2010) and the IFC Mall¹ (10.11.2010 – 26.11.2010); and
 - (c) consultation sessions with public bodies and professional institutes are :

Public bodies

- Legislative Council (LegCo) Panel on Development (26.10.2010);
- Central and Western District Council (C&WDC) (6.10.2010); and
- Town Planning Board (TPB) (5.11.2010).

¹ The public exhibition held at IFC Mall was jointly organised with the Central and Western District Council.

Professional institutes

- Hong Kong Institute of Architects (HKIA) (20.10.2010);
- Hong Kong Institution of Engineers (HKIE) (28.10.2010);
- Hong Kong Institute of Surveyors (HKIS) (9.11.2010);
- Hong Kong Institute of Planners (HKIP) (17.11.2010); and
- Hong Kong Institute of Landscape Architects (HKILA) (18.11.2010).

3. Subsequent to the briefing sessions, the LegCo Panel on Development and C&WDC organized a public hearing and a public forum on 23.11.2010 and 11.12.2010 respectively.

4. A total of 103 written submission were received, 24 from organizations (including the five professional institutes with consultation sessions arranged as mentioned in paragraph 2(c) above) and 79 from individuals. 18 of the individual submissions were in two groups of standard letters. A list of all these submissions is at **Appendix I**.

5. In overall terms, TPB members generally supported the proposed redevelopment scheme for the West Wing, while views of the LegCo Panel on Development and C&WDC members were diverse. Four of the five professional institutes consulted supported or did not raise objection to the redevelopment of the West Wing. In terms of written submissions, 12 organizations supported or did not raise objection to the redevelopment of the West Wing, while 11 organizations opposed. A large majority of written submissions from individuals were against the redevelopment of the West Wing. Details of the public views and comments received are summarized in the following parts of this report.

SUMMARY OF CONSULTATION SESSIONS AND PUBLIC HEARING/
FORUM

LegCo Panel on Development - Consultation Session on 26.10.2010

6. In the consultation session with the LegCo Panel, five LegCo Members had given their views. One member supported the construction of the office tower to provide more Grade A offices but had reservation on the proposed shopping centre, while the other four members were against the proposed redevelopment project. Their views are summarized as follows:

- (a) given that the ‘Government Hill’ was a place of political, religious and military significance, any move to “break it up” would adversely affect the completeness of an important landmark which had been in existence for over 150 years;
- (b) the redevelopment proposal would transfer the ownership of ‘Government Hill’ to private developer;
- (c) the proposed 32-storey commercial building on the site was said to deviate from the recommendations of the historic and architectural appraisal of the CGO (the Appraisal) commissioned by the Antiquities and Monuments Office;
- (d) the redevelopment scheme might cause further damage to the tunnel networks underneath the ‘Government Hill’;
- (e) it was not optimistic that the Government could effectively control private developments within the West Wing site as it had failed to learn a lesson from the bitter experiences in the “Comprehensive Development Area” (“CDA”) developments in Cheung Kong Centre and the Former Marine Police Headquarters;
- (f) the proposed multi-storey commercial building might create “wall effect” affecting air circulation and generate undue pressure to the busy traffic in Central; and
- (g) the proposal to widen Ice House Street could not relieve traffic congestion at Queen’s Road Central.

7. The following suggestions were made by some of the Members in the consultation session:

- (a) the Government should make all possible efforts to retain the ‘Government Hill’;
- (b) the West Wing could be preserved as an archive for the displays of Hong Kong’s past and future planning and infrastructure developments;

- (c) if the West Wing needed to be demolished, the whole site should be turned into public open area with no commercial building on it;
- (d) whether the West Wing should be demolished or preserved should be left for the Hong Kong people to decide through public consultation;
- (e) more environment-friendly facilities (such as cycle tracks and parking facilities for bicycles and environmental vehicles) should be brought in the ‘Government Hill’ and Central through the redevelopment scheme; and
- (f) the possibility of providing stalls and related facilities on the redeveloped site for social enterprises to operate should be explored.

8. The Panel on Development held a special meeting on 23.11.2010 to receive views from deputations on the redevelopment of CGO West Wing.

LegCo Panel on Development – Public Hearing on 23.11.2010

9. A total of 20 deputations (17 organizations² and three individuals³) attended the public hearing. The views of the LegCo Members were divided with four supporting the redevelopment of the West Wing or the Government’s approach to conservation, and three indicating their opposing views. The views of the LegCo Members are summarized as follows:

Supporting views

- (a) the Administration should be selective in choosing the sites and buildings for conservation. The retention of the East and Main Wings would be good enough for serving the conservation purpose;

² The 17 organizations are Lung Fu Shan Environmental Concern Group, Professional Commons, Civic Party, Green Sense, HKILA, Central and Western Concern Group, HKIA, Hong Kong Institute of Urban Design, Designing Hong Kong, CW Power, HKIE, Action Group on Presentation of Heritage in Central and Western District, United Social Service Centre, Heritage Guard, Central and Western District Council, Hong Kong Construction Industry Employees General Union in Hong Kong and Community Development Initiative.

³ The three individuals are Ms. Annelise Connell, Mr. Chan Hok-fung and Ms. Cheng Lai-king.

Objecting views

- (b) the Government should consider excluding the CGO from the ‘Conserving Central’ package, since its proposal was to redevelop the West Wing rather than preserve it;
- (c) the Government’s promotion leaflet was misleading since there was no guarantee that the redeveloped site would in the future appear in the same way as what had been printed on the leaflet; and
- (d) even without the redevelopment scheme, the intended purposes of having more greenery and better pedestrian connection could still be achievable.

10. Other suggestions made by LegCo Members at the public hearing were as follows:

- (a) the Government should, after listening to all the views, come up with a revised proposal for further discussion;
- (b) the intended “CDA” should be put to diverse uses, for instance, the provision of communal facilities;
- (c) the Government should continue to own the public open space (POS) to prevent abusive use and mismanagement by the private developer;
- (d) the Government should consider leasing out the portion proposed for the shopping centre to statutory bodies (such as Equal Opportunities Commission or Office of the Privacy Commissioner for Personal Data); and
- (e) given the concern on traffic congestion, the Government should launch an in-depth study on the traffic impact likely to be caused by the redevelopment scheme.

Town Planning Board - Consultation Session on 5.11.2010

11. The TPB members generally supported the proposed redevelopment of the

West Wing and some members considered that the development scheme had struck a proper balance between conservation and development. Their major views and suggestions are summarized as follows:

- (a) the design of the POS should be more pedestrian friendly to serve the general public as well as office workers;
- (b) jogging trails and more seating should be provided in the POS while food and beverage uses and kiosks should be allowed;
- (c) space should be provided in the POS for music concerts, and other art and cultural activities in weekends;
- (d) pedestrian routes to and within the POS should be designed to make the POS easily accessible and pedestrian friendly;
- (e) there was concern on traffic impact arising from the proposed commercial building on the already congested roads in the area;
- (f) if the redevelopment scheme was to be implemented by the private sector, the requirements on the future development would need to be cautiously defined and specified so that the vision of the project could be realized;
- (g) public access between Queen's Road Central and the POS through the commercial building needed to be carefully specified and monitored;
- (h) a footbridge connection between the commercial building and the Club Lusitano building across Ice House Street should be explored;
- (i) there should be requirements for the commercial building to be built as a green building (with low carbon emissions);
- (j) other attractions in the surrounding might be integrated into the design concept to expand its scope of attraction (e.g. the historic gas lamps and steps at Duddell Street and the chiming clock at The Galleria); and
- (k) the design of the entrance of the commercial development at Queen's

Road Central could be improved, and one option was to design the green facade as terraced open space.

Central and Western District Council – Consultation Session on 6.10.2010

12. The views of the DC members at this consultation session were diverse, and are summarized as follows:

Supporting views

- (a) the proposed redevelopment of the West Wing was supported in view of its low heritage value and that there are many sites proposed for conservation under the ‘Conserving Central’ initiative and an overall view should be taken;
- (b) the redevelopment of the West Wing could facilitate commercial development in Central;
- (c) the preservation of the West Wing, which was of low heritage value, would affect Hong Kong’s commercial development and Government’s revenue;
- (d) the redevelopment scheme has achieved the conservation of the historical site. Demolition of the West Wing to increase greenery is supported;

Objecting views

- (e) the proposed rezoning of the West Wing site to “CDA” and sale of the site to developers would affect the integrity of the ‘Government Hill’;
- (f) the proposed commercial building was too high which would affect the solemnity of the ‘Government Hill’;
- (g) based on the lesson learnt from Cheung Kong Park, the public would find it difficult to enjoy the proposed POS to be designed by private developer and the Government would move step by step to rezone the site for commercial use; and

- (h) the proposal to widen Ice House Street could not alleviate the traffic problem of Queen's Road Central, and the proposed commercial building would worsen the traffic condition at Hollywood Road.

13. Other major suggestions made by the C&WDC members at the consultation session are summarized as follows:

- (a) the whole 'Government Hill' should be rezoned to "Special Protected Area" to preserve its existing character;
- (b) Government departments currently located in private buildings could be moved to the West Wing for better utilisation of land resources;
- (c) the proposed POS should be implemented by the Government under the existing "G/IC" zoning with the inclusion of museum and community facilities in the West Wing site;
- (d) the redevelopment scheme should be compatible with adjacent environment with sufficient provision of greening and a clear boundary with the site to be occupied by the Department of Justice;
- (e) the redevelopment scheme should bring the 'Government Hill' and Queen's Road Central closer so that the POS would not become a private garden of the new commercial building;
- (f) the ownership of the POS should be clarified;
- (g) the POS should be completely accessible by the public with entrances and escalator facilities in the shopping centre and at Queen's Road Central; and
- (h) the number of loading/unloading spaces in the proposed redevelopment scheme should be reduced.

14. A motion and an amended motion against the demolition of the West Wing for commercial development with office and shopping facilities were rejected at the C&WDC meeting.

Central and Western District Council – Public Forum on 11.12.2010

15. About 30 persons, including C&WDC members, Area Committees members and members of the public, attended the public forum. The conclusion drawn by the C&WDC Secretariat was that different questions and views had been expressed in the public forum (e.g. preservation of the CGO as a whole, consideration of various development options, support for the demolition of West Wing and its redevelopment proposal, concern on the design of the commercial development, and request for an extension of the consultation period).

16. Attendees who did not support the proposed redevelopment mainly stated the following reasons:

- (a) any proposal to partially preserve the CGO site was a disrespect to the history of the site;
- (b) the redevelopment scheme was not in line with the Appraisal which suggested that the Government should only consider redeveloping the West Wing when under financial pressures;
- (c) the Government had insufficient market research findings to justify the proposed Grade A office use and shopping facilities in the redevelopment scheme;
- (d) since new Grade A office supply would be gradually available at the harbourfront in the future, the CGO could be retained for relocation of those Government offices still renting commercial premises;
- (e) the proposed commercial building was not compatible with the surrounding environment from architectural point of view;
- (f) consideration might be given to reducing the height of the proposed development by enlarging the building footprint;
- (g) using the lower part of the site for constructing the proposed five-storey shopping centre with car park would be equivalent to a complete removal of the ‘Government Hill’;

- (h) the proposed POS was unlikely to be freely used by the public as it would only be a roof garden on top of a shopping centre. Access to the POS would be blocked when the shopping centre was closed at night;
- (i) much information in the consultation documents was misleading, including the missing traffic lights in the photomontages and the insufficient soil depth for plant growth on the proposed green façade;
- (j) the widening of Ice House Street would only make the vehicles concentrate at Queen's Road Central, aggravating the traffic congestion problem in the area;
- (k) there was no guarantee that the future developer would redevelop the site according to Government's scheme;
- (l) there was a concern on whether many existing trees would need to be felled for the redevelopment, like the project of the Former Marine Police Headquarters in Tsim Sha Tsui;
- (m) the public was not consulted on the future use(s) of the site, but was only presented with a redevelopment scheme in the public consultation; and
- (n) the consultation period was too short.

Professional Institutes

17. All the five professional institutes consulted had made written submissions to the Government. In overall terms, HKIS, HKIE, HKIP and HKILA supported or did not raise objection to the redevelopment of the West Wing, while HKIA did not support the demolition of the West Wing. Their views are analysed with the other written submissions in the section below.

SUMMARY OF WRITTEN SUBMISSIONS

Demolition of West Wing for Redevelopment

18. A total of 25 written submissions (including 12 from organizations⁴ and a number of individuals) supported or did not raise objection to the demolition of the West Wing for redevelopment. The main reasons are summarized as follows:

- (a) the demolition of the West Wing would allow the provision of a POS, thereby giving an opportunity to rebuild the area into a “city green lung” which would also serve as a buffer between the highly dense commercial area and the historic building cluster on the ‘Government Hill’;
- (b) the demolition of the West Wing could allow office development, thereby helping to alleviate the serious shortage of office space in Central and bolster the general competitiveness of Hong Kong in relation to other world cities;
- (c) the CGO West Wing building did not have architectural merits that warrant preservation; and
- (d) the proposal showed the Government’s efforts in balancing the development and preservation needs of the Central District.

19. 11 written submissions from organizations⁵ and a majority of submissions from individuals were against the demolition of the West Wing for redevelopment. The main reasons are summarized as follows:

- (a) the ‘Government Hill’ was of high historical and heritage value and was part of Hong Kong’s history. It had been the seat of the Government since the colonial period. The site and its related history should be of higher significance than the buildings. Being a part of the ‘Government Hill’, the CGO was the result of excellent site planning with the three building blocks well positioned in relationship to each

⁴ The 12 organizations are Democratic Party, HKIS, HKIE, HKIP, HKILA, Hong Kong Institute of Urban Design, Royal Institute of Chartered Surveyors, Professional Property Services Group, St. John’s Cathedral, Hong Kong Construction Association, The Real Estate Developers Association of Hong Kong and Hongkong Land.

⁵ The 11 opposing organizations are Civic Party, six Democratic Party members in C&WDC and their advisors, HKIA, Society for Protection of the Harbour, Professional Commons, Green Sense, Conservancy Association, Designing Hong Kong, Central and Western Concern Group, Ghost Pine Organization and Community Cultural Concern.

other and the natural landscape around them. The demolition of the West Wing would not only destroy the integrity of the ‘Government Hill’, but also affect the preservation value of the entire area;

- (b) the West Wing was a fine example of buildings in early days of Hong Kong, with the buildings actually climbing up a natural sloping terrain with varying plan size and shape;
- (c) the proposed demolition of the West Wing for redevelopment was not in line with the following conclusions and recommendations of the Appraisal:-
 - (i) the Appraisal had more than once suggested and recommended the preservation of all the buildings on the site. For example, it was stated in paragraph 5.1.1 that “[c]onsideration should be given to creating a ‘Special Protected Area’ to acknowledge the well wooded spaces and low rise buildings in” and it is also stated on page 135 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”;
 - (ii) “[t]he site itself is arguably of higher significance than the buildings” on page 135 implied 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; and
 - (iii) it was stated in paragraph 5.5.2 that “..... financial pressures mean that part of the west end of the site will need to be development” while the Government had more than 2 trillion Hong Kong dollars of fiscal and foreign exchange reserves;
- (d) the West Wing was still structurally sound and reasonably well-maintained. Its demolition was not in line with the principles of sustainable development. A total of 9,600m³ of construction wastes was expected from the demolition works, equivalent to about 2.5 standard swimming pools;

- (e) the redevelopment after the demolition of the West Wing would further aggravate the existing traffic congestion problem in Central; and
 - (f) the construction works for the redevelopment scheme would cause nuisances in various aspects, including dust, noise, muddy drainage, increased traffic volume, etc..
20. The following alternative uses for the preserved West Wing were proposed:
- (a) Government offices (particularly for relocation of those still renting commercial offices);
 - (b) boutique hotel;
 - (c) eating places (including affordable food centre);
 - (d) cultural centre (such as Joint-University Institute on Culture and Creativity);
 - (e) art performance venue;
 - (f) museums (such as Hong Kong Plant and Animal Museum);
 - (g) place of entertainment; and
 - (h) Government, institution or community (GIC) uses like Consumer Council, Office of the Privacy Commissioner for Personal Data, Equal Opportunities Commission and district council offices.

Proposed Public Open Space

21. Most written submissions welcomed the proposed POS. HKIA, Professional Commons and a number of individuals however commented that the POS would only be a podium garden with limited soil depth for planting, and it would only serve the commercial complex and might not be genuinely for public use and easily accessible by the general public. Some individuals requested the whole West Wing site be redeveloped for POS only.

22. The following views on the design of the POS were also received:
- (a) the POS should be designed to mainly serve the needs of the people who live or work in Central as their recreation space;
 - (b) the POS should have a theme/identity different from the surrounding green space;

- (c) the POS should be designed to link up nearby parks in Central, Admiralty and Mid-levels to form a green open space network in Central;
- (d) the pedestrian routes to and within the POS should be designed to be easily accessible and pedestrian-friendly, without routing through the shopping mall;
- (e) the POS should provide sufficient seating areas;
- (f) food and beverage uses and kiosks should be allowed;
- (g) space could be provided for music concerts and cultural activities on weekends; and
- (h) some stalls and related facilities should be allowed.

Proposed Grade A Office

23. All the 12 organizations mentioned in paragraph 18 above and some individuals supported or did not raise objection to the proposed office tower. The main reasons cited were that there was a serious shortage of commercial office spaces in Central, making it one of the most expensive office markets in the world. There was not enough land supply for commercial property development, and the proposed office development could help address the acute shortage of Grade A office in Central.

24. 11 written submissions from organizations mentioned in paragraph 19 above and a majority of submissions from individuals were against the proposed office use. The main reasons are summarized as follows:

- (a) there was no strong evidence of acute shortage of Grade A commercial offices in Hong Kong, given that 9.60 million square feet of Grade A office space would be supplied to the market in the future and only about 280,000 square feet could be provided from the West Wing site;
- (b) the proposed office use would deprive the right of the public to use the site;

- (c) the proposed development intensity was too high;
- (d) the proposed building height of 150mPD of the office tower was more than two times higher than the existing West Wing, resulting in wall effect and affecting air ventilation. It would destroy the sense of place and setting of the low-rise heritage precinct as well as the tranquil beauty of Lower Albert Road;
- (e) the proposed building height was not in line with the conclusions and recommendations of the Appraisal as it was stated in paragraph 5.4.6 that “[a]ny new building on the site should take the height of the existing CGO as a maximum height”;
- (f) the proposed office use would aggravate the traffic load and congestion in Central;
- (g) air quality in the district would be deteriorated in view of the worsened traffic condition and canyon effect to be created by the high-rise office tower;
- (h) though the setback of the office tower would allow for one more traffic lane in part of Ice House Street downhill, the part to the further north could not be widened, and hence there would not be any real improvement to the traffic in the area. The road widening proposal might however affect a historic masonry retaining wall along Ice House Street. The physical model for the notional redevelopment scheme showed that the Ice House Street and Queen's Road Centre was designed as a piazza, which was false. The junction would remain a grid-locked traffic intersection even after redevelopment;
- (i) another road widening proposal at Lower Albert Road for vehicular entry/exit for the office tower would destroy the tranquility and natural setting of Lower Albert Road;
- (j) the proposed office tower would be an enclosed structure that required air-conditioning and in summer a large amount of hot air would be emitted, aggravating the urban heat island effect in Central; and

- (k) the proposed office tower would overlook Government House in a short distance and high angle, and hence the security of the Government House would have to be compromised.
25. Major suggestions relating to the design of the proposed office tower are summarized as follows:
- (a) the proposed development intensity (including the plot ratio and building height) was too high and needed to be reduced;
 - (b) procedures should be in place to ensure that the design of the tower would be of the highest quality rather than another glass slump in Central. Since the building would be visible from Government House and other historic buildings, it should better reflect the architectural style of Government House, Former French Mission Building or the Main and East Wings that would be preserved;
 - (c) an innovative conservation approach was recommended by retaining part or all of the existing façade and building orientation of the West Wing in the future development;
 - (d) consideration should be given to following the approach of the HSBC Main Building by setting aside the ground level of the office tower as public space or access in order to provide more green area for enjoyment;
 - (e) the tower should have better air ventilation, green features and energy performance. A ‘Green Building Labeling’ assessment or similar methodology should be adopted to ensure and promote the green standards and environmental friendliness of the development;
 - (f) the developer should open the rooftop of the tower to allow the public to enjoy the full view of ‘Government Hill’ and the bustling scenes of Central; and
 - (g) the proposed use should be compatible with the adaptive reuses of the Main and East Wings, and over 50% of the proposed tower should be for

civic-related uses such as offices for international civic and NGO/government-related organizations.

Proposed Shopping Facilities

26. Most written submissions raised objection to the proposed shopping facilities. The main reasons are summarized as follows:

- (a) there were already too many shopping malls in Central;
- (b) there were doubts on the desirability and viability of the proposed large shopping facilities in this location as they would be out of character with the rest of the site;
- (c) the excavation required for the construction of the proposed shopping facilities would affect the disused tunnel network underground, and might also pose risks to the roots of the trees and vegetation as well as slopes surrounding the site;
- (d) approximately 114,400m³ of soil would need to be excavated for the construction of the proposed shopping facilities while the debris dug out could fill up 30 standard swimming pools; and
- (e) the proposed shopping facilities would further aggravate the traffic congestion problem in the area.

27. HKIP suggested replacing the shopping facilities with exhibition and public use/gathering/heritage education purposes while Hong Kong Institute of Urban Design (HKIUD) proposed using the floor spaces as exhibition spaces to promote trade and culture, a museum of legacy of the CGO, other museum(s) of some sort with related community facilities or of Hong Kong's return to China.

Tree Preservation and Landscape

28. Three written submissions (including Green Sense and Conservancy Association) raised concerns on whether the Old and Valuable Trees (OVTs) and other trees on and in the vicinity the CGO site could be preserved if the West Wing site is to be sold to a private developer for redevelopment, quoting the lesson learnt from the

redevelopment of the Former Marine Police Headquarters in Tsim Sha Tsui.

29. Suggestions on tree preservation and landscape were received in the written submissions from HKILA, HKIUD; HKIP, HKIE, Professional Property Services Group, TFP Farrells and The Real Estate Developers Association of Hong Kong (REDA), which include:

- (a) conservation of existing trees (including OVTs) and vegetation should be the priority under the redevelopment;
- (b) a comprehensive study on the site profile and tree ecology should be conducted before demarcation of the redevelopment boundary to ensure all mature trees are properly preserved;
- (c) the existing vegetated slopes, mature trees and mellow historical character of Battery Path should be preserved;
- (d) landscaping for Battery Path and for the Cathedral site should be undertaken as a coherent whole;
- (e) landscaping for the future development should be as natural as possible so as to retain the existing milieu of the sites;
- (f) vertical greening should be adopted as much as possible in the new building;
- (g) it would be better to have a natural landscape elevation rather than an artificial green façade attached to the enclosed shopping centre;
- (h) a terraced garden approach was preferred over the proposed vertical green façade in reducing ‘canyon effect’ of the proposed building along Ice House Street and Queen’s Road Central, noting that the green façade, which had high maintenance costs, might not work well in shaded areas like this part of Central; and
- (i) the proposed green façade made the proposed shopping centre difficult to succeed as neither activated window street frontage nor visual connection to higher levels would be created.

Pedestrian Connectivity

30. HKIE suggested exploring the feasibility of using the underground space of the site as a transportation hub to further enhance the accessibility of the site. Both HKIP and TFP Farrells requested further improvements to pedestrian connectivity of the site to Murray Building and St. John's Building (Peak Tram Terminus). HKIUD proposed that a comprehensive pedestrian network urban design study for the area should be undertaken and the public spaces should be accessible by the public without having to enter the building. HKIA considered that the footbridge to The Galleria could still be constructed even if the West Wing was to be preserved. On the contrary, the Professional Property Services Group and REDA considered the footbridge not necessary as there was already one connecting between Battery Path and Standard Chartered Bank Building.

Implementation and Land Disposal

31. Those supported or did not raise objection to the redevelopment scheme generally agreed with the proposed "CDA" zoning for the site while those objected considered that the "G/IC" zoning should be retained and the site should continue to be under Government ownership so as to maintain the integrity of the whole 'Government Hill'.

32. Both HKIP and HKIUD and some individual submissions supported adopting a tendering process requiring submissions of design proposals to be publicly evaluated. HKIUD further suggested disposing the site through a "Private-Public Collaboration" arrangement. The Democratic Party requested that all the proposed public passageways within the private development be clearly specified in the lease. The Society for Protection of the Harbour considered that it was in principle wrong to surrender public land and buildings of unique history and environmental values to private developers for profit. Some submissions opined that the Government had a large reserve and did not have financial pressure to sell the site. There was also a suggestion that the Government could implement the redevelopment scheme itself and rent out the completed floor space to the private sector.

Central South Station of Shatin to Central Link

33. Noting that the CGO site is the only suitable site identified for the Central

South Station of the Shatin to Central Link, HKIP and a number of individual submissions considered that the redevelopment scheme should allow for the incorporation of this new station.

Public Consultation

34. The Central and Western Concern Group considered that the public had been presented a *fait accompli* as there had been no public consultation on alternative options. It requested the Government to further extend the consultation period to 12 months. A similar request for extension of consultation period was also made by Professional Commons and some individual submissions.

35. Some submissions (including the Central and Western Concern Group) considered that the sale of the CGO site, thereby bypassing Government funding requirement for the construction of a new building and POS, meant that public scrutiny by the LegCo would be precluded.

RESPONSE TO COMMENTS IN THE WRITTEN SUBMISSIONS

36. A more detailed summary of the written submissions and the Administration's response to the comments have been prepared and are available at the websites of DEVB (www.devb.gov.hk) and PlanD (www.pland.gov.hk)..

PLANNING DEPARTMENT
NOVEMBER 2011

Annex C

Proposal for Heritage Alert Action for the West Wing, Central Government Offices (CGO) on Government Hill, Hong Kong SAR

Summary of Responses

	Points set out in the Proposal	Responses
1.	<u>Last paragraph on p.4</u> The exaction will destroy historic World War II air-raid tunnels underneath Government Hill which are also 20 th century heritage.	Under the revised redevelopment scheme, the shopping facilities proposed in the original scheme have been replaced by 'Government, Institution or Community' (G/IC) cum ancillary office uses of a reduced scale. Besides, only one level of car parking and loading/unloading facilities would be provided. As a result, the scale of excavation as well as the quantity of debris and waste materials could be significantly reduced. The potential impact on the tunnel network underground could also be minimised, notwithstanding the assessment in the Historic and Architectural Appraisal Report (the Appraisal Report) of CGO undertaken in 2009 that the potential for archaeology on the site would be low as it had been heavily excavated. As a common practice in archaeological preservation, archaeological monitoring may be arranged in any development on or near the site with potential archaeological resources. Mitigation and monitoring plans could be developed to allow the project to proceed while preserving the essential nature of the archaeological resource

	Points set out in the Proposal	Responses
2.	<p><u>2nd sub-paragraph of paragraph 3.4</u></p> <p>The Development Bureau's proposal to demolish the West Wing and permit a private developer to construct a commercial office building will partly commercialise the site which has historically been the seat of government in Hong Kong (during both the colonial and post-colonial period).</p>	<p>A good conservation project does not mean that everything on a heritage site should be kept intact and no development thereat is allowed. Relative degrees of cultural significance may lead to different conservation actions at a place (Burra Charter Article 5.2). The proposed redevelopment plan for the West Wing is devised on the basis of the recommendations of the Appraisal Report, according to which the West Wing is of lesser significance as compared to the Main and East Wings.</p> <p>The original proposal to sell the West Wing site has been dropped. Instead, the Government will retain the ownership of the site by adopting a "Build-Operate-Transfer" (BOT) mode, thereby preserving the integrity of the entire CGO site. The existing "Government, Institution or Community" (G/IC) land use zoning of the site will also be retained. The Securities and Futures Commission, a statutory regulator, and the Hong Kong Exchanges and Clearing Limited will be anchor tenants and are expected to take up the majority of the floor space of the new office building. There will also be 4 700 m² of gross floor area available to accommodate financial and law-related non-government organisations. These potential tenants, together with the Department of Justice taking up the retained Main and East Wings, will form a new financial and legal cluster on the CGO site serving public or quasi-public functions.</p>

	Points set out in the Proposal	Responses
3.	<p><u>2nd last sub-paragraph of paragraph 4.4</u></p> <p>This is a detailed historical and architectural appraisal of the CGO – it is acknowledged the significance of the CGO and recommend setting up a “Special Protected Area” to preserve the cultural landscape of Government Hill. However, the government has deliberately taken ideas out of context to say that the CGO West Wing is “unimportant” thereby justifying the sale and redevelopment of that part of the site.</p>	<p>The recommendation (paragraph 5.1.1 of the Appraisal Report) for giving consideration to creating a ‘Special Protected Area’ was made in the context of the whole area, i.e. the Hong Kong Park, Zoological and Botanical Gardens, Government House Gardens, the CGO site, the garden between the St. John’s Cathedral and French Mission Building, the Battery Path area and the Sheng Kung Hui site. The Appraisal Report concludes that “the site itself and the history associated with it is seen as being as significant, possibly more significant than the buildings” (4th paragraph of the Executive Summary). It has not precluded the demolition of the West Wing.</p> <p>The redevelopment of the West Wing building through a BOT approach would allow the Government to continue to own the West Wing site, thereby preserving the integrity of the entire CGO site. The substantial reduction of footprint of the new office building by some 46% compared to the existing West Wing enabled the creation of a new public open space (POS) of about 7 600 m² to serve as a new green “city lung” in the busy Central Business District, with added greenery and improved pedestrian connectivity, to enhance the existing heritage precinct in the area. The POS would open up the area to the general public and link up the natural green hillside from Battery Path, which would be kept intact, all the way up to Government House to form an integral part of an extensive greenery network in Central. The POS will also serve to restore the landscape of the CGO site back to the late 19th / early 20th century before the existing Main, East and West Wings were built.</p>

	Points set out in the Proposal	Responses
4.	<p><u>1st sub-paragraph of paragraph 4.5</u></p> <p>Many professional groups made submissions with a range of supporters for the CGO's preservation.</p>	<p>During the public consultation on the redevelopment scheme of West Wing from September to December 2010, a total of 103 written submissions were received, with 24 from organisations and 79 from individuals. The 24 organisations include seven professional institutes namely the Hong Kong Institute of Landscape Architects, Hong Kong Institute of Planners, Hong Kong Institute of Urban Design, Hong Kong Institute of Surveyors, Royal Institute of Chartered Surveyors Hong Kong, Hong Kong Institute of Architects (HKIA) and Hong Kong Institute of Engineers. Except for HKIA, all the other six professional institutes are supportive of the demolition of West Wing for redevelopment. The relevant comments on the stance of all the professional institutes are set out in Annex D for reference. All the written submissions collected during the public consultation of the West wing redevelopment scheme are available on our website :</p> <p><u>http://www.pland.gov.hk/pland_en/misc/cgo/eng/ws_eng.htm</u></p> <p>Upon incorporating the major public views collected during the public consultation, we announced the revised redevelopment scheme in late 2011 which received considerable endorsement from the community, though several members of the Legislative Council and the Central and Western District Council as well as a few local concern groups are still opposed to the revised scheme.</p>

	Points set out in the Proposal	Responses
5.	<p><u>2nd bullet point of paragraph 4.7</u></p> <p>The Hong Kong Government Development Bureau proposes to put the West Wing of the CGO for sale in 2013 for demolition and redevelopment.</p>	<p>While the Government has revised the redevelopment scheme in end last year by taking into account many comments and suggestions received during the public consultation, we note the concern from some quarters that the sale of the West Wing site might affect the “integrity” of the entire CGO Complex. To address the concern, we announced on 14 June that we will retain the “G/IC” zoning of the site and its ownership, thereby preserving the integrity of the entire CGO site and reflecting the future public and quasi-public uses.</p> <p>Under the final plan, we will take forward the project by adopting a public-private partnership through a Build-Operate-Transfer (BOT) mode. The successful bidder for the BOT contract, to be selected through a public tender, will fund, design, construct and operate the new building in exchange for receiving rental incomes in course of the BOT agreement. The bidder will also need to lease floor space of the new office tower to anchor tenants of a financial or legal nature nominated by the Government. The POS and about 4 700 m² of GFA for G/IC use in the portion below the Lower Albert Road level will be handed over upon completion to Government for management. The site and building will be returned to Government upon expiry of the agreement which will not be more than 30 years. To enhance urban design consideration, we will adopt a two-envelope approach in the BOT tender to ensure that the quality and technical aspects of the project, apart from public revenue, would be given due weight in the assessment.</p>

	Points set out in the Proposal	Responses
6.	<u>Appendix 1</u> Extracts of submissions from the Hong Kong Institute of Planners (HKIP) and Hong Kong Institute of Urban Design (HKIUD)	The extracts of the HKIP and HKIUD, which have been interpreted by the Government Hill Concern Group as supportive comments for the preservation of CGO, have been taken out of context. As mentioned in the response to Point 4 above, HKIP and HKIUD are in fact supportive of the demolition of West Wing for redevelopment.

**Summary of comments of Professional Institutes on
the Demolition of West Wing of Former Central Government Offices for Redevelopment**

**(All Written Submissions are available at the websites of
Development Bureau (www.devb.gov.hk) and Planning Department (www.pland.gov.hk))**

Name	Comments/Suggestions	Government's Responses
The Hong Kong Institute of Surveyors (23.12.2010)	<p>We, in general, support the development concept of the redevelopment scheme.</p> <p>We generally support the preservation of the Main and East Wings.</p> <p>We have no objection to the redevelopment of the West Wing into public open space (POS) and a new commercial building.</p> <p>We are pleased about the Government's efforts in balancing the development and preservation needs of our Central district.</p>	Noted.
The Hong Kong Institution of Engineers (31.12.2010)	<p>The Institution had looked into three scenarios:</p> <ol style="list-style-type: none">1. The first is to maintain the site as it is to meet the yearning call to preserve the whole area as a historical site. To this end, we conclude it is not conducive to have the three buildings to remain isolated as without needed improvements in means for access, it is actually discouraging for passing pedestrians.2. The second is to have all three buildings demolished and to build or not to build. We conclude this is never a starter.3. The third scenario as suggested converting the building of the least historical value to provide room for needed improvements to the surroundings must hence be the only sustainable option.	Noted. Views of the relevant stakeholders and the public have been collected and analyzed. The redevelopment scheme has been revised taking into account public views and comments received during the public consultation exercise. It will be submitted to the Town Planning Board (TPB) for reference before relevant amendments to the Central District Outline Zoning Plan (OZP) are initiated.

Name	Comments/Suggestions	Government's Responses
	<p>We concur with the recommendation as set out in the Proposal as we believe they are in the right direction. However, we would suggest the Government to collect more views from the public before making a final decision on the land use.</p>	
The Hong Kong Institute of Planners (9.12.2010)	<p>We have no strong views on the basic rationale for redevelopment of the site subject to a lower density and balanced land use mix.</p>	<p>The original scheme has been revised taking into account public views and comments received. The revised scheme has a lower development density with shopping facilities proposed in the original scheme replaced by Government, Institution or Community (GIC) cum ancillary office uses.</p>
The Hong Kong Institute of Landscape Architects (22.11.2010)	<p>The Institute welcomes the West Wing Redevelopment in principle, subject to the Government's further review and study on the principles of Conservation, Good Urban Design and Public Accessibility before finalising the redevelopment scheme.</p>	<p>The original scheme has been revised taking into account the specific comments/suggestions made by the Institute.</p>
Royal Institute of Chartered Surveyors Hong Kong (23.12.2010)	<p>In view of the serious shortage of commercial office space in Central, making it one of the most expensive office markets in the world, the Institute supports the proposed new commercial building at the western end of the development site.</p>	<p>Noted.</p>
The Hong Kong Institute of Architects (31.12.2010)	<p>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 merits:</p> <p>(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.</p>	<p>The conservation of the Main and East Wings and the redevelopment of the West Wing are in line with the Historic and Architectural Appraisal Report (the Appraisal Report) of CGO undertaken in 2009. The Report recommends that the Main and East Wings should be retained and should be converted to some appropriate new use while the West Wing, which is of low historical significance and architectural merit, could be demolished. The demolition of the West Wing would allow for the provision of a POS, enhance both the environment and public accessibility of the site and meet the development need of Hong Kong.</p>

Name	Comments/Suggestions	Government's Responses
	<p>(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 buildings actually climbing up a natural sloping terrain with varying plan size/shape (new buildings today tend to involve levelling 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.</p> <p>(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.</p> <p>(d) Collective memory of the government's physical presence -- To most people, the West Wing with its Ice House Street entrance is the closest and most accessible door to the CGO. The scene of the West Wing climbing up Ice House Street is arguably a prime collective memory of Hong Kong citizens regarding the physical presence of the government.</p>	<p>The consultant who prepared the Appraisal Report opines that preservation of the significance of the site could be done either by conserving the buildings for suitable new uses or by partial demolition and restrained redevelopment. He also considers the Government's proposal to be in line with the recommendations of the Appraisal Report.</p> <p>One of the main conclusions from the Appraisal Report is that the West Wing is of lower historical significance and architectural value and could be demolished for redevelopment.</p> <p>The existing landscape and lush vegetation around the site would be largely retained under the redevelopment scheme. As compared with the existing West Wing Building, the footprint of the new office building will be substantially reduced to allow for the provision of a POS in the eastern portion of the site with an area of about 7,600m² under the revised redevelopment scheme. It will extend the green area that is part of an extensive greenery network existing in Central.</p> <p>There is an existing car parking basement in the West Wing site. In the revised scheme, the scale of excavation below Lower Albert Road level would be further reduced.</p>