

## Say No to "Developer Hill"

## **Government Hill for the People**

Government Hill, where the current Central Government Offices are, is one of the most important heritage sites for Hong Kong. The government has proposed last month to demolish the CGO West Wing, sell a large chunk of the site to developers, and redevelop it into an office and commercial complex. After thorough studies, there is ample evidence that the government has made at least three misleading claims in its proposal:

Claim 1: The site should be sold off to developers for commercial development In the "Historic and Architectural Appraisal" report (the 'Report') commissioned by Government and conducted by Purcell Miller Tritton, it is made clear that "the site itself is arguably of higher significance than the buildings. This has been the seat of Government since the foundation of Hong Kong as an independent colony" and "the potential significance of the site is further enhanced by the historic sites in the wider area. These sites, taken in conjunction, offer very interesting opportunities for the interpretation of the history of the development of Hong Kong."(p.135) It is unthinkable that for a SAR Government that has a reserve of over HK\$2000 billion and is under no financial pressure whatsoever, a proposal would be made to sell off a large chunk of such an important site for just a few billion dollars.

Claim 2: CGO West Wing can be demolished because it is of little or no architectural value

In the Report, no recommendation has been made to redevelop any part of the site. In fact the report pointed out that "the CGO's physical setting is significant as it is located near to several of Hong Kong's most important historic buildings and also some of its most iconic modern buildings" (p.108) and "the buildings are of a high architectural quality and are exemplars of the beginning of modern office design in Hong Kong and of 1950s architecture generally" (p.135) and "there is little doubt that it is feasible to reuse the existing buildings" (p.128). Furthermore, the government's emphasis purely on architectural value has clearly ignored the historic, cultural and community value of the site and the buildings.



Claim 3: The redevelopment of CGO West Wing into a commercial complex will not affect the integrity of the site

From a careful examination of the government's proposed plan, it is discovered that not only an office block (with some covered area claimed as green space by the government) of over 40 storey's high will be developed, but that about half of the hill will be hollowed out to make way for a multi-storey underground shopping complex and car park. The green hill which appeared on the plan will effectively be a landscaped terrace similar to what can be found now on Heritage 1881 after the hollowing out of the former Tsimshatsui hill. In other words, Government Hill will no longer exist after the proposed development.

We believe that the government has a duty to provide satisfactory answers to the following queries before the proposal should be considered any further:

Planning Issues:

1. Does Government not consider Central is saturated with commercial development and that the correct planning strategy should now be to de-centralise and move development of additional office space out of Central? Does Government not consider that there is no overriding public need for any further retail developments in Central? Does Government not consider that any further office and commercial development in Central is inconsistent with its claim to develop West Kowloon into another Central Business District?

2. What is the total tonnage of construction waste which is expected to be generated by the demolition of the West Wing and to which landfill will it be taken? What is the total tonnage of excavated material which is expected to be generated by the hollowing out of Government Hill and to which landfill will it be taken?

3. How much office space is the Government currently renting in Central and Western District, and how much office space will still be needed after all space in the new CGO/LegCo complex is allocated ?

Transport Issues:

3. What road widening is involved in the proposal? If so, where and what are the proposed alignments and levels of the roads concerned? Will such road widening be paid for out of the public purse? Will such road widening



involve destruction of greenery which currently exists and will it involve cutting into vegetated slopes?

4. What is the traffic and environmental impact on the already congested Des Vouex Road Central and Garden Road, both during construction when the excavated materials have to be moved out, and during operation when more traffic is generated from the office and commercial complex?

Heritage Issues:

5. Does the proposed plan fully comply with the Burra Charter and the China Principles for the Conservation of Heritage Sites, in which there is a presumption against development for heritage sites?

6. The CGO West Wing was built on top of the historic Murray Battery. What is the likelihood of archaeological relics under the site area? Has any archaeological survey been done?

7. There is an elaborate network of tunnels under Government Hill. Will the hollowing out of the hill bring about irreparable damage or permanent loss to these tunnels and the related historic structures?

Community Issues:

8. By rezoning the site from GIC to Commercial, how can the public's right for community and open space be protected?

9. Does the Government consider that there will be a bigger planning gain for the public if the site, including CGO West Wing, is opened up for community use rather than be sold to developers?

We strongly believe that Government has the public obligation to preserve the entire Government Hill as a public asset, and the integrity of the site must be strictly protected. Commercial development on this heritage site should not be allowed as it will demean the historic value of Government Hill. It will be very sad if the Government Hill is to become a "Developer Hill". The site should be preserved for Hong Kong people and our future generations to understand the history of our city, and the open space and the buildings therein should be maintained for public use.

On this basis, we request the government to take the following steps promptly:



1. Conduct a series of open days so as to allow the general public to understand and appreciate the site and the buildings;

2. Conduct a broadbased pubic engagement exercises including public hearings and workshops, to consult the community on how best the site should be utilized by the public;

3. Commission an archaeological dig at the site by an independent team and publish its findings;

4. Extend the public consultation period to 12 months to coincide with the archaeological survey and the engagement exercise.

In addition, the Professional Commons is in the view that as the new development plans announced by the Government indicated that there will be an ample supply of Grade A office space in the future and there is no overriding need to have new grade A office space on the sites of conservation value. The Financial Secretary Mr. John Tsang disclosed in the 2008/09 Budget that the government is actively studying to relocate the three government buildings of 1.3 hectares in Wan Chai to Kai Tak and the new areas in the Tseung Kwan O District, the land can be released to be used in the construction of Grade A offices in the central business districts, according to press reports, the new gross floor area created will reach 2.1 million square feet.

In addition, according to press reports, in the documents that the Planning Department submitted to the Town Planning Board in May 2009 that the West Kowloon reclamation area is located near four existing or new railway lines, including the Tung Chung Line, Airport Express Line, Guangzhou-Shenzhen-Hong Kong Express Rail Link and Kowloon Southern Line, it could have the potential to become another business district, in terms of the location, size, connectivity and in terms of the level of concentration. The International Commerce Centre (ICC) and the West Kowloon Cultural District will provide about 2.49 million, and 1.16 million square feet of Grade A office space respectively, the rooftop area of the Express Rail Link terminus will occupy an area of about 5.88 hectares of "Comprehensive Development Area" with a plot ratio of 5 times , of which at least the plot ratio of 4.5 times are earmarked for the development of Grade A office, with up to about 2.85 million feet of office space, the entire area could provide a total of about 6.5 million feet of Grade A office space.

In addition, in accordance with the Central Harbourfront Development plan released in November 2009, the area could provide about 930,000 square feet of Grade A office space in Central.



These three projects, with a total of 9.53 million of Grade A office space, is 34 times higher than the 280,000 square feet of gross floor area created, through the reconstruction of the West Wing of the Government Offices. Hence, this proves that the future supply of Grade A office space is adequate, there is no overriding need for the construction of such office space in areas of high conservation value.

In addition, the Government's proposal definitely resulting in increased traffic flow. This will make the already serious air pollution problem in the Central District to become even more serious. The level of roadside air pollution index in Central has been maintained at the very high level of 100 for a substantial period of time. According to the Air Pollution Index from the Environmental Protection Department, it is indicated that in just the past 3 weeks, there are 15 days in which the air pollution index reached the level of more than the very high level of 100 in the roadside air monitoring stations in Central. **Therefore, the Government's proposal to redevelop the West Wing of the Government Offices will only worsen the already very severe air pollution problem in Central District** 

The Professional Commons 23 November 2010