

**5.2.3 There is no need for any immediate major intervention or repairs to keep the buildings in good condition.**

***Purpose of this recommendation***

*The buildings are generally in good structural order and have been well maintained and looked after. A few minor defects were seen during the survey, such as staining and minor cracks. These are generally being monitored with telltale markers. Other repairs have been carried out to a good standard. A maintenance regime seems to be in place which currently works well. The building could continue in its present use or something similar to it with only routine maintenance for a good number of years.*

**6. Relevance of the Appraisal the Rezoning of the Site**

6.1 From the full consideration of the Appraisal it could be reasonably concluded that the following should be applied to the process of considering the rezoning of the CGO site:-

- (1) The site is more significant than the buildings in heritage terms and that the priority should be given to preserving the site;
- (2) The site and buildings should be considered in the context of the surrounding green and low rise heritage buildings, and the provision of some form of 'special protected area' should be considered;
- (3) The existing CGO buildings are in good physical condition and could be continued to be used for office use for many years. The West Wing could be retained and with modification could be used for commercial offices;
- (4) There is no immediate need to do anything as the existing buildings are in good condition;
- (5) While the West Wing is the building of the least architectural value, that does not mean that it should be demolished if alternative suitable uses could be found for the building. Uses by NGO's may be appropriate;
- (6) If the West Wing is to be demolished consideration should first be given to retaining the site as a public garden;
- (7) If development is considered desirable on the site of the West Wing, then it should respect the existing form and height of the building;
- (8) A high rise building on the site is not desirable, but if it should be pursued then it should be located near the junction of Ice House Street and Queens Road Central.

**7. Possible Future Use of the CGO**

7.1 The Government has indicated that the East Wing and Central Wing will be retained for use by the Department of Justice. If these two wings are to be retained for Government use, the issue to address is the possible future use of the West Wing.

7.2 The possible retention of the West Wing for alternative uses or for continued use has not been discussed in any of the documents released to the public. It is clear from

the Appraisal that the West Wing is in good physical condition and therefore could be retained. The possible future use of the West Wing building, or the West Wing site, needs to be carefully considered before a decision is made to demolish it. Possible options are:-

## **RETAINING THE EXISTING WEST WING BUILDING**

(a) Retention for Government Offices.

There is no apparent reason why the West Wing could not continue to be used for Government office accommodation. Before that option is discarded there should be information provided which indicates that there are adequate government owned offices in Central to accommodate the changing needs for government offices over the long term. The move to Tamar will have the disadvantage of moving all government offices out of Central. There will be a lack of convenient offices to serve the specific needs of the public in the CBD. There is also a need to have information provided as to the amount of office space that the government is currently renting from the private sector. Where possible the government should make use of the West Wing for providing government offices, rather than renting office space from the private sector. The long term financial savings by providing government accommodation for government offices should be a factor taken into consideration before a decision is made to not use the West Wing for government purposes. From a heritage point of view, the continued use of the site for government purposes is the most appropriate use.

(b) Use by Non-Government Organisations, Educational Institutions or Semi Government Organisations

The growth and development of an effective network of NGO's in civil society is a recognised attribute of sustainable city development. In Hong Kong, as civil society continues to develop NGO's play an increasingly important role in the welfare and social development of the city. One of the significant problems for NGO's is to find adequate premises from which they can organise themselves and provide public services. The office rents in Central also make it difficult to find suitable premises in a convenient central location. The existing West Wing building would provide an ideal premises in a central location for many NGO's, if the building was retained and managed for this purpose.

Similarly, the West Wing and the grounds could become a place for the nurturing of governance capacity. The space now should be open for various uses that boost governance capacity of various stakeholders such as:-

- spaces for public hearings, charrettes, meetings, etc.
- spaces for quasi-public agencies related to public interests and human rights such as Equal Opportunity Commission, Ombudsman, etc.
- spaces for reading public records.
- spaces for historical tours so that people can learn the history of the place on the spot and develop a relationship with this historic site.
- A place for teaching and learning in a broad sense.

The possible use of the building by NGO's, semi government organisation and educational service providers should be given serious consideration before a decision is made to demolish the existing building.

(c) Use by the Private Sector

The existing building is suitable for rental by private commercial offices of certain type, not Class A commercial offices. There may be a need for refurbishment, improvement and modification of the existing building so as to make them more suitable for use by a range of different commercial tenants. This could be carried out by government and then the building managed by the private sector for commercial office use. One possibility is for the use as legal offices or chambers to complement the move of the Department of Justice to the East Wing and Central Wing.

(d) Combinations of these Uses

There is also the possibility of using the existing building for combinations of uses such as government offices, NGO's and some commercial offices. The proportional distribution of the uses in the building could relate to the access arrangements into the building and could also change over time. Should there be little need for government offices in the near future then the NGO and commercial offices could occupy the major part of the building. In the longer future the need for government offices may result in the removal of commercial uses from the building.

## **REMOVING THE WEST WING BUILDING**

(e) Public Open Space

While the West Wing building does not need to be removed, should it be decided that it must be removed, then one option suggested in the Appraisal is that part or whole of the site could be used for public open space. It may be possible to remove only part of the existing building and to have the remaining part of the building site retained for development of a ground level public park. If all, or part, of the West Wing site was to be kept for public open space then the greening objectives that government has for the site would be better achieved. The proposed park could integrate an improved public pedestrian access through the site to the roads on other sides.

(f) Selling the site for Commercial Development

The possibility of selling the site for commercial use and demolishing the building, is the extreme opposite of the other options. The justification for taking this approach is more difficult. There are two important concerns :-

- (i) The sale of the public land on which the West Wing stands, and which is of high heritage and historical value, and to permanently alienate it for private development and ownership is a matter of great concern. There must be significant public interest to be gained from the sale of the site, and this should not only be income generated from the sale. It also needs to be considered in the context of other opportunities for obtaining income from the sale of other sites, and
- (ii) The amount of private development that should be permitted on the site. Consideration should be made of other opportunities for the

provision of a similar amount of commercial development and whether the amount to be permitted on the site is able to justify the sale of public land.

## **8. Implementation : Public or Private Ownership**

- 8.1 The government proposal for the West Wing site is to sell the site and to require the private developer to provide a public open space area in conjunction with the construction of an office building and shopping mall on the site. In doing so the public ownership of a significant portion of the site would be sacrificed.
- 8.2 The alternative is for the public ownership of the site to be retained and for the government to carry out any improvements to the public open space within the site as a normal government project. If the West Wing building is to be retained then there is a much reduced requirement for expenditure to improve public access to the site and to improve the landscaping. There would be a requirement for improving the building which would be normal costs for renovation, but there would be no other significant costs.
- 8.3 Should the West Wing building be demolished and site turned into a public park then that could be implemented by government as a normal public works project. All of the objectives stated for the provision of open space and pedestrian connectivity through the site could be implemented by government in a similar way to which it has developed Hong Kong Park and other public parks.
- 8.4 There is therefore no need to sell the site to implement the public components of the options for the West Wing site. The only reason to sell the site is to obtain income for the government from land sales. The government is not in need of additional funds as it has large financial reserves. There is no financial justification for the sale of this site.

## **9. Traffic Implications**

- 9.1 The Preliminary Traffic Assessment attached to the Town Planning Board Paper considered only the redevelopment option proposed by the administration to redevelop the West Wing for commercial office/retail development. That proposal resulted in an increase in office floor space by 6,140 sm and commercial floor space of 13,500 sm over that provided in the existing building. 70% of the traffic would be attracted to the vehicular entrance/exit to be provided on Lower Albert Road. The increase in traffic was considered to be minimal and would have marginal impact on the adjacent junctions.
- 9.2 However, given the congested nature of the street system in the area, particularly the Ice House Street/Queens Road Central junction and Queen's Road Central itself, there is concern that even the marginal increase in traffic estimated in the TIA is undesirable.
- 9.3 Also the widening of Ice House Street junction would not help smooth traffic flows because of the congestion in Queen's Road. It would also result in the removal of the retaining wall along Ice House Street, under the West Wing, which is also part of the heritage of the CGO site. The widening of Ice House Street will result in greater severance for pedestrians. Also the increased traffic flows along Lower Albert Road and the widened access into the proposed commercial site will create greater severance for pedestrians in what is presently a pleasant pedestrian environment.

- 9.4 In particular the impact of increasing vehicular traffic to Central must be questioned when the impact on the major road network is considered. Government traffic estimates have repeatedly shown that even with the completion of the Central to Wan Chai By-pass the road network would soon reach capacity. In this respect there is a concern that additional cumulative traffic generation in Central would inevitably be used by Government as justification for additional reclamation of the harbour for further road construction. In this respect the traffic generation of the proposed commercial/office development should be considered in the context of the cumulative traffic growth to be generated from the redevelopment of existing private properties in the area. As the growth in floor space from private redevelopment is inevitable, there is a good reason why this should not be unnecessarily increased through the sale and redevelopment of the West Wing.
- 9.5 It is clear that the retention of the existing West Wing building would not result in an increase in GFA on the site. If used for similar office uses to the existing use, it would not result in any increase in traffic generation. This option is therefore preferable in traffic terms over the redevelopment option.

## **10. Other Planning Considerations**

### *Compatibility with Adjacent Heritage Buildings*

- 10.1 The West Wing site is an integral part of the "Heritage Precinct" which includes the Monuments of Government House, the Cathedral and the French Mission Building. It also is an integral part of the CGO office complex for which a heritage grading is still to be made. It is also opposite the Sheng Kung Hui buildings which are also a group of heritage importance.
- 10.2 In assessing the possible future use of the West Wing site it is therefore of prime significance that any new development be considered in the context of the surrounding heritage buildings. The Appraisal has made particular reference to the importance of the grouping of historic buildings around the CGO and their linkages and proximity (5.4.3, 5.4.4).
- 10.3 In the TPB Paper, and in the consultation brochure no consideration has been given to the form or compatibility of the proposed commercial/office building with the historic buildings. The only consideration that has been made is with the form and height of the existing office buildings located outside the site and which are incompatible with the heritage context within which it is to be located.

### *Character of the Site*

- 10.4 The character of the CGO site is determined by the low-rise nature of the existing and surrounding historic buildings, the form of the buildings, the variation in levels of the site, and the dominance of well established vegetation. The existing West Wing building is part of that character. Any new development should therefore be carefully considered and have design characteristics which harmonise with the history of the site and the surrounding area.
- 10.5 The proposal in the government scheme has no characteristics which are compatible with the character of the site. It is a standard office building over a standard retail podium. The proposal to have a "green façade facing Queen's Road" for the podium is unconvincing. In fact the whole emphasis in the government concept to "Restore a Green Central" is considered to be an inappropriate objective for this important

heritage site, and to be an artificial construction to justify an inappropriate and incompatible commercial building.

#### *Visual Impact and Building Height*

- 10.6 The Appraisal has identified the importance of building height not obstructing the views of the harbour from Government House in determining the form and height of the existing CGO buildings. The height of the existing CGO buildings is approximately 55mPD. While the view of the harbour may no longer be significant, the importance of maintaining a compatible low-rise approach to any new development within the site is even more significant.
- 10.7 However, in setting the development constraints for the proposed commercial office building, it is apparent that in establishing a “Compatible Building Design” in the TPB Paper consideration has only been given to the height of existing commercial buildings in the vicinity. From this a proposed building height of 150mPD has been adopted, which is almost 3 times the height of the historic buildings in the vicinity and is therefore extremely incompatible with the context within which it is to be located. If respect is to be shown to the historical and physical characteristics of the site then a maximum building height restriction should be set at 55mPD for the whole site and for the West Wing in particular, as that is where any new building is likely to be located.
- 10.8 The visual images provided by the Government indicate that the proposed new commercial/office building is completely out of place with the heritage character of the area, in particular with the buildings of the Sheung Kung Hui to the south-west.

#### *Disposal of Fill*

- 10.9 The proposal to sell the site and require a private developer to demolish the existing building and to undertake a major excavation of the site, has been estimated to create 20,000 cubic metres of fill for disposal in landfill sites.
- 10.10 This removal of the existing building and fill is unnecessary, as the existing building is not in a condition where it requires demolition. The existing nature of the ‘hill’ is also significant and any change to the formation of the site is affecting the character and importance of the site itself. Natural resources such as this should be preserved and retained to serve the community for generations to come, rather than creating unnecessary waste for disposal.

#### *Air Ventilation Assessment*

- 10.11 There has been no air ventilation assessment (AVA) carried out by government in relation to this proposal even though there is a stated policy that any government project would be assessed as to the implications for air ventilation. An AVA should be provided before the TPB considers any rezoning proposal which would allow any form of development different to the existing form of the West Wing.
- 10.12 When an AVA is carried out it should compare any new proposal with the existing situation, and it must demonstrate a significant air ventilation advantage before it would be a factor in support of a change. The rezoning proposed in this application is to retain the existing built form and has no implications in terms of air ventilation.

#### *G/IC Sites to Provide Visual and Spatial Relief*

- 10.13 The TPB has generally adopted a policy of limiting the building height of G/IC sites to

the existing height or to a specified number of storeys. This approach has been objected to by many NGO's and GIC site owners, as it unreasonably limits the ability of the community service to optimise the use of their land to serve the needs of the community. However, the TPB has rejected such views. To be consistent, the TPB should apply this approach to the CGO site.

- 10.14 The reason given by the TPB for limiting GIC sites to the existing building height is to provide visual and spatial relief to the high density built up environment in the vicinity. This intention is possibly more relevant to the built environment in Central than in other places. To adopt this approach for this site would be confirming a long term low-rise 'green lung' function that this site has long performed for Central.

#### *Archaeology*

- 10.15 The Appraisal considered there was potential for archaeological remains to be found on the CGO site. While this potential may be low due to excavations for car parking, there may be some remains which would be of interest. Should it be decided to remove the West Wing building then it would be necessary to collect any features that may be of interest.
- 10.16 There are hidden tunnels underneath CGO site: 'Air raid shelters under Government House was part of a wider network of tunnels constructed throughout the Central District between 1940 and 1941 during the Japanese Occupation, including some underneath the Government Hills and over to the west under the Bishop's House' (Tritton, 20009, p.80).

### **11. Planning Assessment and Justification**

#### *A Place of Great Historical and Social Importance*

- 11.1 The Appraisal and public opinion have shown that the CGO site and buildings are of great historical and social interest. The importance of the whole site and the existing buildings in the public perception has not been adequately recognised in the proposal to sell a significant portion of the site for commercial and office development. Not only is the site important by itself, but it is important in the context of the other heritage buildings and sites that surround it, or are located in the vicinity. While the West Wing building is considered to be of a lower architectural value than the other two buildings, this does not mean that it has no value as part of the collection of buildings, and as an integral part of the character and heritage of the site. The West Wing building should therefore be retained for its place as part of a site of historical and social importance. It is of crucial importance to maintain the integrity of the historical site.

#### *There is No Over-riding Public Need to Sell the Site*

- 11.2 The only reason given for to the sale of the site to the private sector is the apparent need for additional Grade A offices in Central. In this respect the following points are relevant :-
- There has been no information provided to illustrate that there is an essential need to have additional office space provided in Central;
  - There is additional office space being provided in Central through the redevelopment of existing private buildings in Central;
  - Additional office space will be provided through the sale of the "Groundscraper" site on the Central Reclamation and the CDA site to the west of the Shun Tak Centre;