

- The CBD function in Hong Kong is being progressively expanded into Sheung Wan and to Wan Chai and Causeway Bay, and convenience of access does not mean that new office space needs to be in Central to serve the CBD function;
- More discrete decentralised office centres have already been established in Tsim Sha Tsui, Quarry Bay and Kwun Tong. Additional areas have been zoned by the TPB in Kai Tak and West Kowloon for expansion of the CBD function

11.3 The fact is that there is a physical limitation to the capacity for the accommodation of the CBD function in Central as there is just not sufficient space. There are other options in Hong Kong that can accommodate this function, and they need to be developed to accommodate expansion of Hong Kong's economy. The key to the success of these other CBD centres is the convenient transport connections between the new centres, and the expansion of the railway network that is now in progress will achieve this.

11.4 Furthermore, the size of the proposed office building at 28,500 square metres is a relatively small office building and would not make a significant increase in office floor space. Also the provision of 13,500 square metres of additional retail space is considered unnecessary in Central and out of context with the history of the site and the retention of the East and Central Wings of the CGO.

Trees at Risk

11.5 The visual character of the site is determined largely by the size and extent of the significant trees on the site. Even though it has been stated that the 11 Old and Valuable Trees on the site would be retained, the extent of intervention proposed in the CDA zone, and amount of excavation, would place a significant number of these trees and other vegetation under risk. It would be much more responsible to adopt a precautionary approach and retain the existing formation of the site as much as is possible. It would likely severely disrupt the slope and trees adjoining Battery Path.

11.6 No tree survey or tree assessment has been prepared by the Government to indicate that their proposal to retain the trees is actually feasible. This would normally be an important part of any rezoning or redevelopment on a site with such a large number of Old and Valuable Trees. Minimal disturbance to the extensive vegetation on the site can be achieved by retaining the site much as it is at present.

Consistency of Planning Approach

11.7 The Board should be consistent in its approach to G/IC sites. Throughout all of the amended OZP's the Board has established building height restrictions on G/IC sites equivalent to the height of the existing buildings. One of the important reasons is to ensure that the G/IC sites remain as areas of contrast and variety in the dense urban environment. The CGO complex provides this contrast, and a maximum building height of 55mPD should therefore be applied. This would be consistent with recommendation 5.4.6 of the Appraisal.

Priority of Retaining Public Ownership

11.8 The Appraisal indicates that the existing West Wing building is in good condition and does not need to be demolished. The Appraisal indicates that if an appropriate use could be found for the existing building it could be retained for that use. The following table summarises the options that are available for the site. Selling the site for private development is the option of last resort when all others have been shown to be unacceptable or impractical.

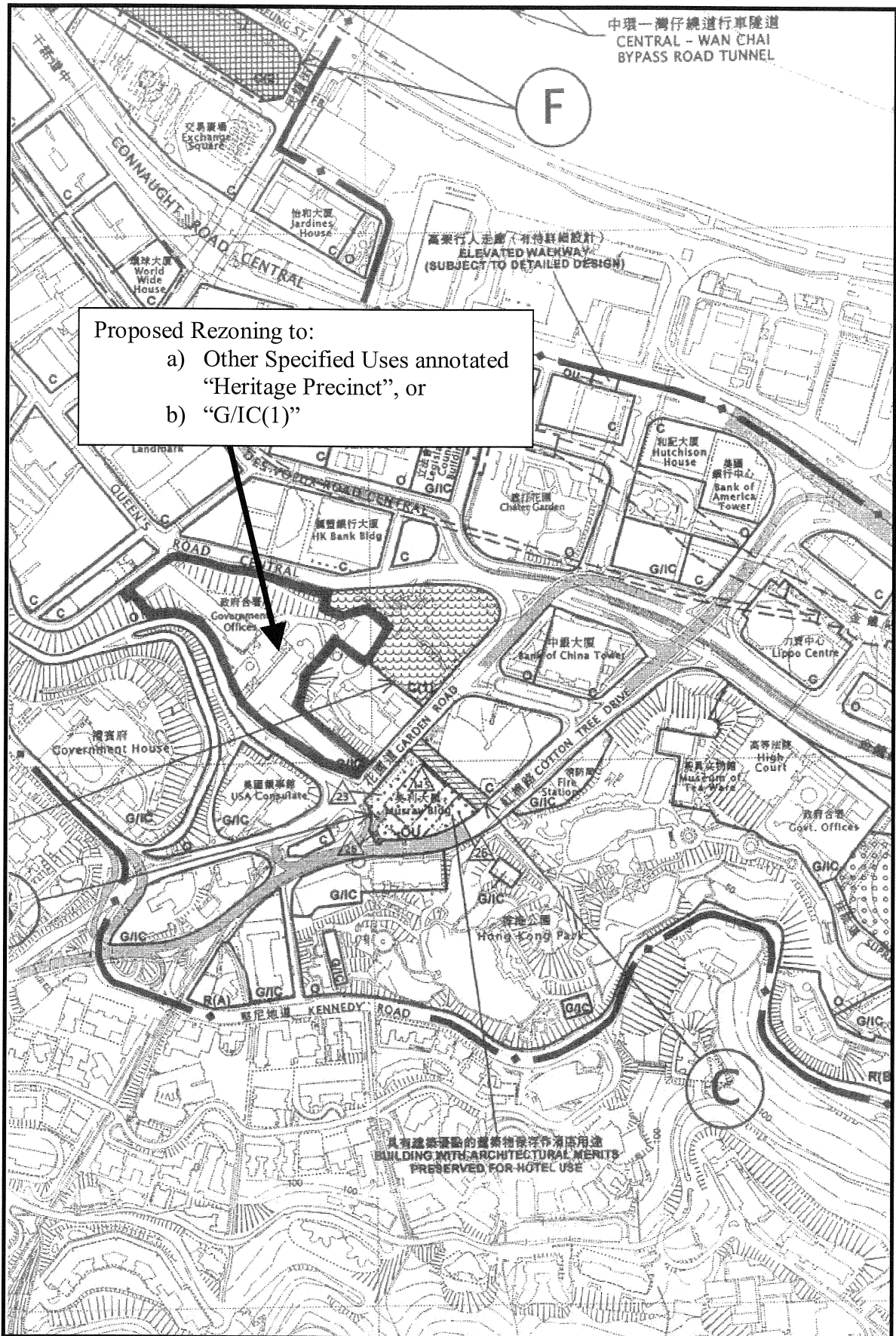


Figure 2: Proposed Amendment to Zoning of Central Government Offices Site on an Extract of OZP No. S/H4/13

- 11.9 There is also a matter of principle in that in terms of sustainable development the best long term use of this site is as a government or community property.

Priority of Alternative Uses And Ownership

Use	Public Ownership	Private Ownership
RETAINING WEST WING BUILDING		
Government Office	Yes	
Semi Govt Organizations : Ombudsman; EOC, etc	Yes	
Educational Organizations	Yes	
NGO's	Yes	
Rental offices to private sector	Yes	
Combination of Above	Yes	
REMOVING WEST WING BUILDING		
Public Park	Yes	
Commercial Development		Yes

12. Proposed Changes to the Outline Zoning Plan

- 12.1 The government's proposal to change a major portion of the site to a CDA zone with a permitted building height of 150mPD is considered inappropriate. It is completely incompatible with the heritage and low rise nature of the site, and with the importance of retaining the site in public ownership. This application proposes two alternative zoning changes for the site.

"Other Specified Uses" annotated "Heritage Precinct"

- 12.2 This alternative is taking the concept proposed in the Appraisal and applying it to the specific site occupied by the CGO and the French Mission Building. All of this land is public land, and the historic and landscape features of the whole site would be protected as one important feature of the "Conserving Central" theme. Within this zoning a maximum building height of 55mPD or the height of the existing building would apply. The range of permitted uses in Column 1 would be very limited, with most in Column 2 requiring approval of the Board. Any changes to the existing buildings would require the approval of the TPB. The demolition of the buildings within the "Heritage Precinct" would be prohibited. The extent of the site is illustrated in **Figure 2**.

- 12.3 The OU "Heritage Precinct" zone would exclude the Cathedral, as it is private land and the Cathedral is already a designated Monument under the Antiquities and Monuments Ordinance.

Government Institution and Community Use (1)

- 12.4 This would be a special G/IC zone relating to the same area and is also shown in **Figure 2**. It is not as restrictive as the OU(Heritage Precinct) zoning proposed

above, but would have a stated planning intention for retaining the character and heritage importance of the site. Within this zone the 55mPD building height restriction would apply. Any demolition of any building would require the approval of the TPB and any new building would be limited to the foot-print of the existing building it may replace. The use of any new building would be restricted to the uses permitted under the G/IC zoning. Any sale of part of the site for non-G/IC uses would be prohibited and the requirements of Town Planning Board Guideline No. 16 would apply. The importance of the site for the long term benefit of the community and for government uses would then become the most important factor in deciding the long term use of the site.

- 12.5 Under this option the West Wing building could be demolished, but any new building could only be of the same height and in the same footprint as the existing building, and could only be used for community or government uses.

13. Conclusion

- 13.1 The future of "Government Hill" is a major issue of significant public concern. The NGO's which are the applicants for this application are concerned with the inadequate information that has been provided to the TPB, and the public, in relation to the Appraisal. The information provided in TPB Paper No 8661 on the 5 November 2010 did not address many important planning and heritage issues. This application has attempted to provide a more balanced assessment
- 13.2 The applicants are of one view that the rezoning of a large part of the GCO to CDA is not the appropriate way forward in terms of the best long term interests of Hong Kong. This important heritage site should not be sold for private commercial development. Two options are provided for the rezoning of the site and either of these would ensure the long term community ownership and use of the site for Hong Kong people, and would properly recognise the heritage important of the site within the concept of "Conserving Central".