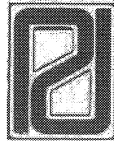


Government's Historic and Architectural Appraisal - Study Brief

By Hong Kong Government

規 劃 署

香港北角渣華道 333 號
北角政府合署



Planning Department
North Point Government Offices
333 Java Road,
North Point, Hong Kong

來函檔號 Your Reference

本署檔號 Our Reference

電話號碼 Tel. No.:

傳真號碼 Fax No.:

() in TPB/Y/H4/6(SD)

2231 4798

2577 3075

By Fax and Post

(Fax: 2858 2468)

Masterplan Limited
Room 3506
35/F, China Merchants Tower,
Shun Tak Centre,
200 Connaught Central, Hong Kong
(Attn.: Mr. I.T. Brownlee)

29 April 2011

Dear Mr. Brownlee,

SECTION 12A APPLICATION

**Proposed Rezoning from "Government, Institution or Community" ("G/IC")
to "Other Specified Uses" annotate "Heritage Precinct" or "G/IC(1)" on
Draft Central District Outline Zoning Plan No. S/H4/13**

**Central Government Offices, The Court of Final Appeal,
Battery Path and Public Toilet at Ice House Street in Central**

(Application No. Y/H4/6)

I refer to your letter to the Secretary, Town Planning Board dated 11.4.2011 which was copied to this office.

Regarding your request made in the last paragraph of your letter, the Antiquities and Monument Office which commissioned the Historic and Architectural Appraisal of the Central Government Offices (the Appraisal) has been consulted. After consideration, a copy of the Consultancy Study Brief for the Appraisal is enclosed for your information.

Yours faithfully,

(K.W. NG)

for Chief Town Planner/Special Duties
Planning Department

Encl.

Quotation Ref: AMO0901004

**Research Project on
the Central Government Offices Complex**

1. Objective

- 1.1 The objective of the project is to conduct a thorough appraisal of the historical and architectural value of the Central Government Offices Complex ('the Study Site').

2. Location of the Site

- 2.1 A map showing the location of the Study Site is at Annex A.

3. Historical Background

- 3.1 A brief historical account of the Central Government Offices Complex is at Annex B. It is only an introduction to the historical background of the Study Site. The Consultant should gather supplementary information through primary and secondary sources.

4. Focus and Scope

- 4.1 The scope of the appraisal should include, but not limited to the following-
- a) A thorough appraisal of the historical, contextual, social and architectural values of each building and structure, including the Central Wing, East Wing and West Wing within the Study Site, and the Central Government Offices Complex as a whole.
 - b) Identification of character-defining elements of all buildings including the Central Wing, East Wing and West Wing within the Study Site.
 - c) Identification of significant cultural and heritage features, such as trees, slopes, walls, steps, etc., within the Study Site;
 - d) Analysis of the existing condition of all buildings, structures and walls within the Study Site.

5. Consultants Team

- 5.1 The Consultant's team shall include at least a building conservation professional (with recognized qualification), an expert in architectural history together with other experienced members, in order that all required duties are carried out efficiently and within the timescale.

Quotation Ref.: AMO0901004

6. Timescale

- 6.1 The work is to commence as soon as possible after the Contract commences and shall be completed within twenty (20) weeks.
- 6.2 The Consultant is to decide his/ her own programme for carrying out the works to meet the time frame.

7. Assistance to be provided by the Government

- 7.1 The Development Bureau and the Antiquities and Monuments Office shall provide general liaison between the Consultant and the users/ management parties of the Study Site and other institutions, if any, for access to the Study Site.

8. Meetings and Presentations

- 8.1 Meetings may be called by the Government during the course of the study if considered necessary and at a time agreeable to the Consultant before finalizing the Heritage Assessment Report.
- 8.2 The Consultant will be required to deliver presentations on the study to the Government or other parties as considered necessary by the Government and at the time agreeable to both the Government and the Consultant.
- 8.3 The Consultant will pay at least three visits to Hong Kong for meetings and presentations as considered necessary by the Government and at the time agreeable to both the Government and the Consultant.

9. Deliverable

- 9.1 Three copies of the Appraisal Report in draft form (A4 size hardcopy) plus three softcopies (in an acceptable format) shall be delivered to the Government within fourteen (14) weeks of the Contract commencement.
- 9.2 Three copies of the finalized Appraisal Report (A4 size hardcopy) plus three softcopies (in an acceptable format) shall be delivered to the Government within two (2) weeks from the date of written confirmation by the Government on the acceptability of the Draft Report.

10. Payment Schedule

- 10.1 Payment schedule of the captioned quotation is as follows:

After completion of Deliverable;	% to be paid
Paragraph 9.1	50%
Paragraph 9.2	50%
Total	100%

Quotation Ref: AMO0901004

10.2 Payment will be made within 30 working days according to the payment schedule specified paragraph 10.1 upon the completion of the services and to the satisfaction of the AMO. Invoices shall be sent to the address on the attached covering letter quoting our reference.

11. Hong Kong Profit Tax

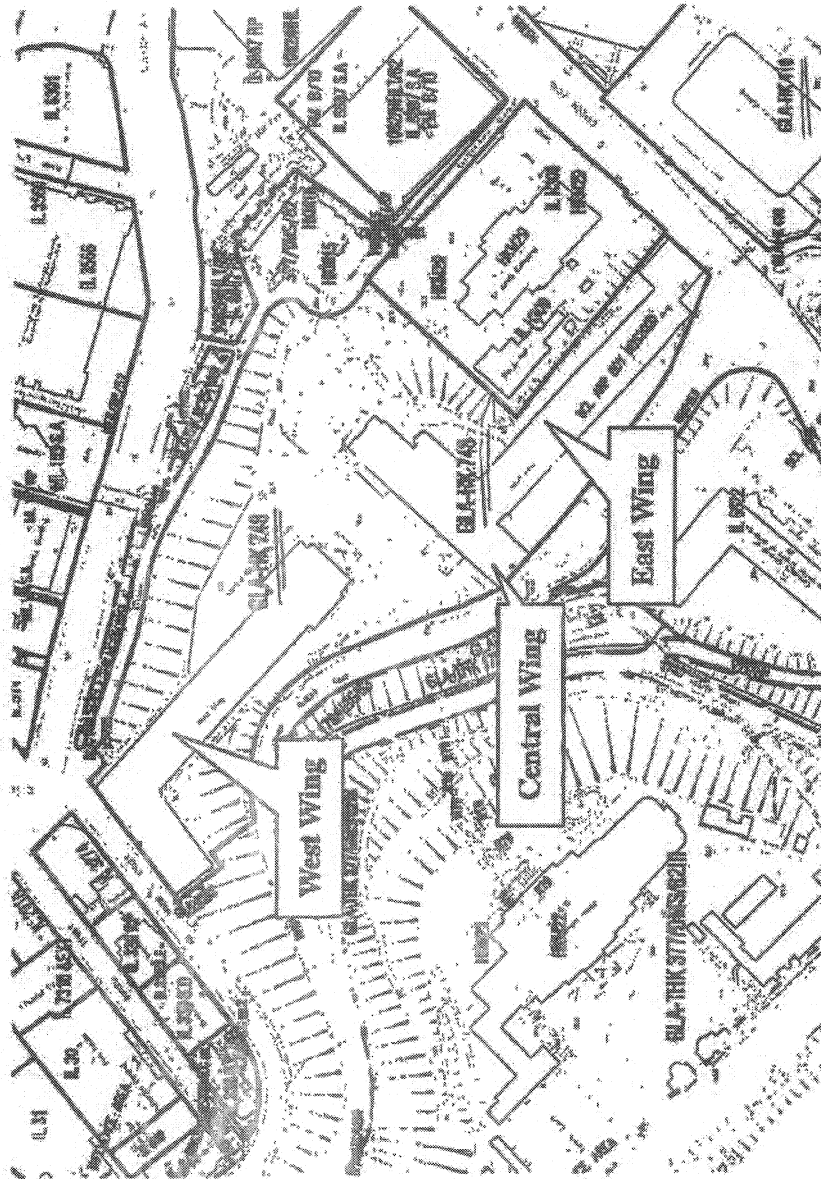
- 11.1 Where the Service Provider is a non-resident corporation or, where the Service Provider is an unincorporated joint venture or partnership or sole proprietorship, any one of the participants or partners or sole proprietor is non resident, the Government shall withhold a percentage equivalent to the prevailing Hong Kong profits tax applicable to unincorporated and incorporated business at the time the Service are rendered (the current rate being 15% for unincorporated business and 16.5% for incorporated business for the year of assessment 2008/09 respectively) of any fee payable to the Service Provider, whether by way of a lump sum, installments or discounted payments but exclusive of any reimbursement of expenses, if any, in respect of the services performed/provided in Hong Kong for the settlement of Hong Kong profits tax chargeable on the fee.

12. Terms of Quotation

- 12.1 Service Provider should ensure that the prices quoted are accurate before submitting their quotations. Under no circumstances shall the AMO be obliged to accept any request for price adjustment on grounds that a mistake has been made in the prices quoted.
- 12.2 Quoted Price should be on a lump sum basis, including all related cost. Under no circumstances shall any claim for extra payment be entertained.
- 12.3 The successful Service Provider will receive as an indication of acceptance a fax or a letter of acceptance. This fax or letter of acceptance shall constitute a binding Contract.
- 12.4 The AMO shall have the right to disclose whenever it considers appropriate or upon request by any third party (written or otherwise) information on the award of the Contract, without any further reference to the successful Service Provider.
- 12.5 Service Providers are advised that should they be awarded the contract their subsequent performance will be monitored and may be taken into account when their future quotations are evaluated.
- 12.6 The AMO is not bound to accept the lowest or any quotation or to give any reasons for doing so and reserves the right to accept all or any part of any quotation at any time within the Quotation Validity Period as specified in the Form LCS664.

Annex A

Location of the Central Government Offices Complex



Quotation Ref.: AMO0901004

Source: Lands Department, 2006

Purcell, Muller Tritton Appraisal – Meaning & Interpretation

By Ken Borthwick, Conservation Architect

**Assessment of Meaning and Interpretation with Regard to Government's Heritage
Consultant, Messrs. Purcell, Muller Tritton LLP's Historic and Architectural Appraisal of
Central Government Offices**

There follows an assessment of the interpretation and intention of the HKSAR Government's Heritage Consultant, Messrs. Purcell, Muller Tritton LLP's Historic and Architectural Appraisal of Central Government Offices and a commentary on its use by the HKSAR Government.

This is prepared by Hong Kong- based Conservation Architect Ken Borthwick. Ken trained at the Scottish Centre for Conservation at Edinburgh College of Art/ Heriot Watt University in Edinburgh, where he obtained a Postgraduate Diploma in Architectural Conservation in 1997. Since then he has been working, advising or training in Heritage Conservation for over fourteen years in the United Kingdom, Norway and Hong Kong. Among heritage buildings he has worked or advised on are the internationally renowned Robert Adam designed, 1792, Culzean Castle, in Ayrshire, Scotland, the Hong Kong Museum of Medical Sciences- (formerly the Bacteriological Institute) and the circa 1150 A.D. Ringsaker Church at Moelv in Norway. In UK he served on the Strathclyde Cases Panel for the Architectural Heritage Society for Scotland reviewing planning applications, on behalf of Historic Scotland, for listed buildings and Conservation Areas in the Glasgow area.

He has served on the Heritage and Conservation Committee of the Hong Kong Institute of Architects (HKIA) for a number of years, including serving on the Action Group in 2004 for the Hollywood Road Hong Kong Police Headquarters Building.

Ken Borthwick B Arch (Hons), PgDipArchCons, RIBA, RIAS, HKIA

May 2011

Appraisal of Central Government Offices

It is not the intention of this assessment to appraise the architecture and history of Central Government Offices. This is well covered in Government's Consultant's appraisal. It is also covered in the assessment by Vito Bertin (retired), Gu Daqing and Woo Pui-leng of the School of Architecture of the Chinese University of Hong Kong. The Hong Kong Institute of Architects (HKIA) in item 3.c of their letter ref. BLA/PD/CGOW/AK/cw/1012 dated 31 December 2010 has also gives well considered points which were presented by the President at LegCo, a copy of which is attached to this document.

Referring to the layout of the entire Central Government Offices in item 3.c of the letter entitled 'Building ensemble with a well-designed site plan' stated "The disposition of the three existing buildings 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.

The setting also of Central Government Offices is also considered to be superlative for the city of Hong Kong and both the CGO and its setting should be conserved, the latter by protecting it as an area.

A	Assessment of Meaning and Interpretation with Regard to Government's Heritage Consultant, Messrs. Purcell, Muller Tritton LLP's Historic and Architectural Appraisal of Central Government Offices
	Introduction
	<p>Under the Principles for the Conservation of Heritage Sites in China' the Government of the Hong Kong SAR should be following a number of clearly laid down Articles and procedures. For example:</p> <p>Article 2 states that 'Conservation needs to be carried out according to a sequential process. Each step of the process should comply with the pertinent laws and regulations and should observe professional standards of practice. Consultation with relevant interest groups should take place. The assessment of the significance of a site should be given the highest priority throughout the entire process.'</p>

	<p>Article 6 states that ‘Research is fundamental to every aspect of conservation. Each step in the conservation process should be based on the results of research.’</p> <p>Article 9 states that ‘Conservation of heritage sites involves six steps undertaken in the following order: (1) identification and investigation; (2) assessment; (3) formal proclamation as an officially protected site and determination of its classification; (4) preparation of a conservation master plan; (5) implementation of the conservation master plan; and (6) periodic review of the master plan. In principle, it is not permissible to depart from the above process.’</p> <p>The Central Government Offices Concern Group, which comprises a number of groups concerned with conservation of heritage and the environment in Hong Kong, is an umbrella group of the type of interest groups which Article 5 of the China Principles directs be consulted. This group has a number of concerns with regard to Government’s interpretation and use of the Heritage Consultant, Messrs. Purcell, Muller Tritton LLP’s Historic and Architectural Appraisal of Central Government Offices relating to Government’s proposal to sell the West Wing of Central Government Offices to a property developer for construction of a 32-storey office tower and a 5-storey shopping centre with a garden at the roof area. The objective for the project, as stated in the Study Brief stated that “The objective of the project is to conduct a thorough appraisal of the historical and architectural value of the Central Government Offices Complex (‘the study site’).” There was nothing in the Focus and Scope to direct the consultant to study the site for redevelopment and in view of this certain of the recommendations in the Consultant’s appraisal appear to be unusual. Also, the Concern Group has very grave concerns at the apparent misuse of the Consultant’s appraisal to justify the sale of the West Wing of Central Government Offices about what is clearly a Development Project and not a Conservation Project.</p> <p>Of particular concern is Government’s lack of honesty in portraying their commercial and office development proposals for the site of the West Wing of Central Government Offices as one of the eight projects in their Conserving Central initiative.</p>
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	The following gives a commentary on Government's disregarding/ misrepresenting of their Heritage Consultant's Recommendations:
B.	Government's Disregarding/ Misrepresenting of their own Consultant's Recommendations:
	1. High Architectural Quality of Buildings
	<p>Section 5 of Government's consultant's Heritage and Architectural Assessment, 'Conclusions and Recommendations', the first bullet point item states that "The buildings are of a high architectural quality and are exemplars of the beginning of modern office design in Hong Kong and of 1950s architecture generally." The second point goes on to state that "The Central Wing is the best piece of architecture and the East Wing is also a good piece of architecture." going on to state that "The more functionalist West Wing is the least good piece of architectural design out of the three." The Consultant has clearly stated that all three buildings are of high architectural quality, but gives a ranking.</p> <p>Section 5, General Recommendations, Setting/ Wider Context Item 5.4.3 states that "The historic buildings on Government Hill (the Cathedral, Government House, the French Mission Building and the CGO) are an interesting cultural group which should be preserved and interpreted. This clearly indicates that he has high regard for all of Central Government Offices, together with the other historic monuments and considers that the group should be conserved in its entirety.</p> <p>Secretary for Development in a recent submission to Town Planning Board with respect to a recent application by the Central Government Offices Concern Group to make the Central Government Offices into a heritage area, suggested that West Wing Central Government Offices was of low architectural merit, yet this is at variance with Government's Heritage Consultant's Report.</p> <p>The fact that the Report did not actually suggest or recommend demolishing the West Wing to make way for redevelopment was clearly stated in Item 1 (e) of the letter ref. BLA/PD/CGOW/AK/cw/1012 dated 31 December 2010 from the President of the Hong Kong Institute of Architects (HKIA) to Secretary for Development.</p>
	2. Consultant's Opposition to Commercial Use on the site
	In Executive Summary paragraph six (first paragraph on conclusions from the study)

	<p>great prominence is given by Government's consultant's opposition to any kind of commercial development on the site, where it is stressed that "It would seem to be very undesirable to have commercial use which demeaned the historic and current function of the building and site."</p> <p>This opposition is also seen in Section 4, Issues and Vulnerabilities, Section 4.5 'Future Uses and Potential Development' in the final paragraph on p. 131, where it is emphasized that "Any commercial development "on the site now seems to be inappropriate", however, going on to suggest that "a new public garden in the place of the west Wing would be a fine resource for this central part of Hong Kong."</p> <p>Government's proposals for selling the footprint area of West Wing for a commercial development of the site in the form of a 32-storey office block together with a 5-storey shopping centre on the level of Queen's Road (with a roof garden above on the level of Lower Albert Road) can be seen to be utterly against their own consultant's opposition to commercial development of the site.</p> <p>It is also assessed that such a major commercial development of the site with associated road widening of Lower Albert Road and Ice House Street, as well as huge excavation just behind Battery Path with its tree covered slope up to the existing West Wing, would significantly impair the well- wooded aspect of the area that Government's consultant so emphasizes.</p>
	<p>3. Recommendation for and Timing of Creation of Special Protected Area</p>
	<p>General Recommendations Item 5.1.1 (page 136) (the very first recommendation) urges that "Consideration should be given to creating a 'Special Protected Area' to acknowledge the well wooded spaces and low-rise buildings in the Hong Kong Park, Botanic Gardens, Government House Gardens, the CGO site, the garden between the Cathedral and the French Mission Building, the Battery Path area and the Sheung Kung Hui site.", stating under <i>Purpose of the recommendation</i> that "One of the main reasons why the CGO are significant is because they are part of a large open space made up of the above sites, which are within the centre of the urban area. A 'Special Protected Area' would be a tool which could be used to protect this area from inappropriate development." The Report then goes on to refer to area encompassing several Declared Monuments which would benefit from the retention of this open space and that such designation of this area would recognise the importance of individual historic buildings, "highlight the historic nature of Government Hill, as well as recognising the significance of the green space. " In Section 3, Significance of the Central Government Office (CGO) under Landscape</p>

	<p>and Setting it is stated that “The buildings are set within one of the few ‘green lungs’ in Hong Kong;” going on to emphasize its importance.</p> <p>The consultant’s recommendation for the creation of such a ‘Special Protected Area’ is clearly made in consideration of his assessment in his fifth bullet point item in his Conclusions and Recommendations 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. This is the site of the earlier Government Offices (demolished to allow the CGO to be constructed) and is closely related to Government House and to the Murray Building.”</p> <p>As stated above, however, under Article 2 of the China Principles, The assessment of the significance of a site should be given the highest priority throughout the entire process’ and the Consultant in recognising the significance of the area has calls for it to be made a ‘Special Protected Area’.</p> <p>In Section 4, ‘Issues and Vulnerabilities’, part 4.4, Historic Use, on page 128 the consultant further emphasizes the importance of Government Hill when the Consultant refers to it as having been described as “perhaps Hong Kong’s last remaining heritage precinct”, going on to state “It is a rare collection of historic buildings in central Hong Kong that has always been in governmental uses.”</p> <p>Clearly the consultant’s intention was obviously that such ‘Special Protected Area’ be created as a first stage in the process <i>before</i> any major decisions were made with regard to historic area or any potentially inappropriate development be planned or put underway. Government’s unseemly haste in pushing for a redevelopment of a significant of part of Central Government Offices is clearly contrary to the consultant’s recommendations and advice.</p>
	<p>4. Recommendation to adding Central and East Wings of Central Government Offices to AMO’s List of Graded Buildings</p>
	<p>General Recommendations Item 5.1.1 urges that “Consideration should be given to adding the Central and East Wings of CGO to the AMO’s list of graded buildings.” Under <i>Purpose of the recommendation</i> it goes on to state that “The CGO buildings represent an important step in the history of Hong Kong’s government and are in a significant open setting. Grading should help to protect the significance of the building and maintain the open space. “Clearly the Government consultant’s</p>

	intention with this recommendation was that the buildings should have been added to the list of graded heritage buildings prior to any major decisions were made with regard to historic area or any potentially inappropriate development be planned or put underway in order that the heritage buildings should be protected. Again Government's unseemly haste in pushing for a redevelopment of a significant of part of the area is clearly contrary to the consultant's recommendations and advice.
	5. Redevelopment of West Wing Being Last Option
	<p>Government's consultant has signified his view of demolition of the West Wing and redevelopment as being the last option that should be considered in his statement in Section 4, 'Issues and Vulnerabilities' part 4.5 'Future Uses and Potential Development' on page 130 where he states that "it may be difficult to find a use for the buildings which is both commercially viable and respects the historic significance of the site" going on to state "The demolition of some or all of the buildings and the sensitive redevelopment of the site may be favourable to the buildings being used inappropriately." This, however, he emphasizes should only be considered as a course of action when all other avenues for suitable reuse have been explored. Given the significance and architectural quality of the building such an outcome would be a cause of serious regret."</p> <p>At no place in the Report does the Consultant suggest that the CGO site should be sold. Although redevelopment has been mentioned it could be redeveloped by the Government itself.</p> <p>Government's premature rush to sell West Wing without a meaningful exercise undertaken with the community to explore other uses of West Wing is completely contrary to their consultant's recommendations</p>
	Other than the issues stated above where Government can be seen to be making proposals which are contrary to their consultant's Report there are certain anomalies in the Report. Certain of these are given below:
C	Anomalies in Government's Consultant's Report
	1. Statement of Government obligation to maximise the potential value of any site
	The statement in Section 4, 'Issues and Vulnerabilities' part 4.5 'Future Uses and Potential Development' on page 128 "that Government has an obligation to maximise the potential value of any site and the best way to do this is by permitting redevelopment has to be considered an anomaly. No reference is seen in the Consultancy Study Brief for the Appraisal that the government has such an

	<p>obligation or that such an obligation should be stated in the Report.</p> <p>We have very grave concerns indeed why a consultant appointed to carry out a thorough appraisal of the historic, contextual, social and architectural values of the Central Government Office Buildings, to identify character defining elements of all buildings, identify significant cultural and heritage features; and to analyse the existing conditions of all buildings, etc. should state that the government has an obligation to maximise the potential value of any site. Taken from this logic there would be no Central Park in New York, no Hyde Park or Kensington Park in London, no Victoria Harbour in Hong Kong and no public museums or art galleries in any major city, yet a civilised society is supposed to have values other than development of offices or shopping centres.</p>
	<p>2. Maximum Height of Building on Site</p>
	<p>In Section 5, Conclusions and Recommendations, item 5.1 General Recommendations, with regard to the well wooded spaces and low rise buildings in the area it states "Consideration should be given to creating a 'Special Protected Area' to acknowledge the well wooded spaces and low rise buildings in the Hong Kong Park, Botanic Gardens, Government House Gardens, the CGO site the garden between the Cathedral and French Mission Building, the Battery Path area and the Sheng Kung Hui site. In Section 5 Conclusions and Recommendations on page 135 it states that "Any new development should respect the low rise of the existing buildings and open space around them."</p> <p>Section 5, Conclusions and Recommendations, Setting/ Wider Context Item 5.4.6 it states that Any new building on the site should take the height of the existing CGO as a maximum height. <i>Under Purpose of the Recommendation</i> it states that "The height of the CGO buildings was discussed at length when the buildings were being designed in the 1950s. There was a clear intention to preserve the view from Government House. It goes on to state that "Whilst the view of the harbour has now disappeared, the view across the top of the offices and the former French Mission building is still significant. Other views from longer ranges, such as from the Hong Kong Park and the Peak, also benefit from the low rise of the CGO.</p> <p>There is, however, conflict between these recommendation which emphasize the low rise buildings and Section 5, Conclusions and Recommendations, General</p>

	<p>Building Recommendations, item 5.2.2, which states that “If the West Wing is demolished the part of the site that could be redeveloped is the west end on the corner of Ice House Street, with the new development occupying the area of the existing building that faces onto Ice House Street. Any new development of a building higher than the present West Wing should be contained at this west end of the site.”</p> <p>It is considered that the Consultant views the low- rise nature of the buildings as highly important, however there is concern that this inconsistency could possibly be as a result of adjustment of the Report to suit the requirements of those who commissioned the Report.</p> <p>With regard also to Government’s proposal for a 32-storey tower on the corner of Ice House Street as well as widening of Ice House Street would impair the scale of Ice House Street, lead to significant destruction of trees above the existing masonry retaining wall and impair the setting of Duddell Street Steps.</p>
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Comment on West Wing redevelopment by Hong Kong Institute of Architects



香港建築師學會
The Hong Kong Institute of Architects

31 December 2010

By Post

Our Ref. : BLA/PD/CGOWW/AK/cw/1012
Your Ref. : SD/R/GIC/14 Pt. 9

Mrs Carrie Lam, GBS, JP
Secretary for Development
c/o Special Duties Division
Planning Department
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

Dear *Carrie*

**Restoring Green Central –
The New Landscape of the Central Government Offices
Public Consultation on Proposed Scheme for the West Wing Site**

Thank you for your letter dated 17 September 2010 informing the Institute about the launching of public consultation on the proposed scheme for redevelopment of the site of West Wing of Central Government Offices.

We are pleased to deliver our written views on the proposed scheme for the redevelopment of the West Wing Site, with an emphasis on the heritage aspect. Please find our paper enclosed per attachment for your consideration. For your information, the same was presented at the special meeting of Panel on Development of the Legislative Council held on 23 November 2010.

Yours sincerely

Anna S Y Kwong MH FHKIA
President

Encl

c.c. Prof Hon Patrick Lau, Member, Legislative Council (Architectural, Planning & Surveying)



香港建築師學會
The Hong Kong Institute of Architects

**Comments on the Proposed Redevelopment Scheme for
West Wing of Central Government Offices**

Introduction

In submitting our views on Initiatives for Conserving Central to the Development Bureau in November 2009 we recommended the preservation of the entire Central Government Offices (CGO) complex, including the West Wing. We are rather perplexed by the recent approach taken by the government to change one of the original eight “conservation initiatives” into a “redevelopment proposal”, as disclosed to us in a government briefing session in October 2010. While an apparently complete deviation from the initial conservation approach has yet to be justified, we have the following views and observations regarding the government’s present proposed redevelopment scheme as well as the interpretation of the Architectural & Heritage Assessment Report (A&H Report) commissioned by the Bureau in 2009.

(1) Interpretation of the Recommendations of the A&H Report

- a. The government is advising us that, based on the recommendations of the A&H Report, the West Wing would be demolished for a commercial development. But upon close examination, we find that the A&H Report only suggests “*the West Wing may be demolished*” (General Conclusions in Chapter 5) and “*if any demolition is to be considered the West Wing is the most acceptable building to demolish.*” (Para. 5.2.1 of the report), and it is clearly a suggestion only with a provision (that there is unquestionable need for redevelopment).
- b. Instead of recommending redevelopment, the report has in fact more than once suggested or recommended the preservation of all the buildings on the site. For example, under General Recommendations para. 5.1.1, the author says “*Consideration should be given to creating a ‘Special Protected Area’ to acknowledge the well wooded spaces and low rise buildings in... the CGO site*”, and under the summarized General Conclusions of Chapter 5, “*it is suggested that there might be a case for making all the low rise and well planted area into a ‘Special Protected Area’ where the presumption would be against any significant redevelopment work.*”
- c. The report is the result of a study of the architectural and heritage value of the existing buildings, but it has rightly pointed out that the significance of the CGO site may actually lie in the overall use and setting, as illustrated in the general conclusions in Chapter 5, which says “*the site itself is arguably of higher significance than the buildings, ...[as it] has been the seat of Government since the foundation of Hong Kong as an independent colony.*” This implies that consideration should not be given only to the heritage value of the buildings, but also to the setting and disposition of the existing buildings.



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- d. The “recommendation” to demolish the West Wing is only based on the relative architectural and heritage value of the three buildings on the CGO site. It is doubtful whether this is a correct approach. Given that the conservation of the CGO site is one of the Eight Conserving Central Initiatives, it would be fundamental and logical to compare the relative architectural and heritage value of the West Wing with the other buildings in all the Eight Conserving Central Initiatives, such as the Hollywood Road Married Police Quarters and the Central Market which have both been decided to be preserved based on heritage value considerations. In fact as stated in the report, the West Wing (1959) was completed only 5 years after the East Wing (1954), and it represents another variation of the same architectural style of government buildings built in the same period, it may be worth preserving even if it is of a relatively lower architectural value among the three buildings if we consider the heritage value of buildings all over Central (or Hong Kong), rather than only those within the CGO site alone.
- e. Based on the above observations, it would not be correct to interpret that the report actually suggests or recommends demolishing the West Wing to make way for redevelopment.

(2) Challenges to the Cited Benefits of the Redevelopment Scheme

The government has cited the following benefits of the proposed redevelopment scheme (i.e. demolishing the West Wing to make way for a 32-storey office tower) but there are considerable doubts in their validity or relevance, as explained below:-

- a. **More greenery** – other than saying that more than 2/3 of the original West Wing site will be transformed into a public open space, no figures comparative with existing ones have been provided to demonstrate that there will be more greenery. The more important issue is that even if we cover all of the new open space with plants, they would be on top of a podium, which means that the lush existing planting on natural soil around the existing buildings will be replaced by planter boxes on top of a podium with limited soil depth. In fact, after 50 years’ co-existence, the trees around the West Wing have grown to such big sizes and have blended in so nicely with the building itself that they have become integral parts of a whole. The quality of greenery of the open space upon redevelopment would certainly be much lower than that around the existing West Wing, at least for several decades to come.
- b. **Better pedestrian connectivity** – while the only new pedestrian connection with the CBD featured in the redevelopment scheme is a proposed footbridge across Queen’s Road Central through the new office tower, the same footbridge connection can also be provided with the existing West Wing retained. As the A&H Report has revealed, the pedestrian connection between the CBD and the government hill, or between Queen’s Road Central and Lower Albert Road, was in fact blocked off due to the government’s erection of steel fences around the CGO site after 1997. Simply removing these fences and pedestrianizing the existing car-parking areas would enable the public from the CBD to access easily through the CGO site to the Government House, Botanical Garden, etc., starting with the gentle climb up Battery Path, which is in a more appropriate ambience than through escalators within commercial premises.



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- c. **Preserving the heritage precinct** – as the wordings of the cited intent itself explain, the heritage precinct of which the CGO forms a part needs to be preserved but not altered or removed, and it is baffling to “demolish” (the West Wing) in order to “preserve” (the heritage precinct).
- d. **Compatible building design** – the government has tried very hard to describe the proposed new office tower as compatible with the surrounding development and that it would be located as far as possible from the center of the CGO site to minimize the impact on the new open space. However, the existence of a 150m tall building on the CGO site is alienating to the low rise nature of the original site. As cited in the A&H Report (Chapter 5 Conclusions & Recommendations), *“The low rise nature of the site and the open spaces and trees around the buildings are significant. The buildings, in conjunction with the surrounding sites... make up a large, low rise, green area in the heart of this otherwise dense highly developed part of the city. Any new development should respect the low rise of the existing buildings and open space around them.”* To erect a high rise building on the CGO site is simply an incompatible design by any definition.
- e. **Difficulty in improving the traffic junction** – even if a traffic lane can be added to the downhill part of Ice House Street with the redevelopment scheme, the width of north-bound Ice House Street and west-bound Queen’s Road Central across the Ice House Street/Queen’s Road Central junction cannot be widened with the existing developments retained, and there will not be any real improvement to the traffic of the area with the proposed redevelopment scheme.

We therefore have reservation that the redevelopment scheme can actually bring about the cited benefits.

(3) More Planning Justifications for Preserving the West Wing

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 :-

- a. **Existing buildings blend in well with natural landscape** – through 50 years’ co-existence the three buildings on the CGO site blend in extremely well with the lush vegetation around them and it would be a shame to destroy this half-a-century old physical man-nature relationship and to start anew with deep excavated car-parking basements, barren building decks and curtain-walled towers on a man-made platform again.
- b. **Fine example of a “climbing building” on a slope** – the West Wing is in fact a fine example of a characteristic type of buildings in the early days of Hong Kong, with the building actually climbing up a natural sloping terrain with varying plan size/shape (new buildings today tend to involve leveling of a large piece of ground to make a building platform for sitting a tower on top), and the West Wing is one of the few buildings with such characteristics that deserves to be preserved.



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- 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.
- d. **Collective memory of the government's physical presence** – to most people the West Wing with its Ice House Street entrances is the closest and most accessible door to the central government offices. 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.
- e. **Nuisances during construction in case of redevelopment** – the scale of demolition, basement excavation, site formation and tower construction works for the “redevelopment scheme” and the nuisances (dust, noise, muddy drainage, increased traffic volume, etc.) should not be underestimated. With the redevelopment scheme, the immediate neighbourhood of the redevelopment site will suffer for years – avoidable if the West Wing is preserved.
- f. **Maintenance of the existing character of the site** – as stated in para. 5.4.2 of the A&H Report, *“The CGO complex is unusual in the busy urban environment of Hong Kong in that it has several areas of vegetation. It is also part of a wider green space stretching from the Sheng Kung Hui compound over to Hong Kong Park. This significant ‘green lung’ should be maintained and therefore no trees should be removed without good reason....”* It has yet to be debated whether “financial pressures” or “redevelopment” would be considered good reasons, but erecting a 150m tall tower is definitely not maintaining the existing character of the site.
- g. **Natural Greenery versus artificial vertical greening** – The redevelopment scheme portrays the new podium elevation of the office tower as a lush green coat of vertical greening. Although vertical greening is now a trendy building feature, its function as greenery is of much less value than natural trees that provide both greenery and shade. In fact, vertical greening does not work well in shaded areas like this part of Central and has high maintenance costs.

(4) Pre-requisites for a Redevelopment Scheme

If it is decided that there is an overriding need for redevelopment, instead of conservation, of the CGO, the government should take action on the following pre-requisites before proceeding further :-

- a. To remove the CGO Site Redevelopment Scheme from the list of Eight Conserving Central Projects, and to consult the public again under the title “Redevelopment of CGO Site” with all references to “Conservation of Central Initiatives” removed.



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- b. To provide details of any overriding need for redevelopment of the CGO Site.
- c. If the overriding need comes from financial pressure, to provide the public with the actual figures of potential revenue generation for consideration.
- d. To submit to the Town Planning Board an application for the change in use of the site with complete Environmental Impact Assessment, Traffic Impact Assessment, Social Impact Assessment and Heritage Impact Assessment (in addition to the architectural and heritage assessment already done by Messrs. M. Morrison).

Conclusion - Financial Incentive versus True Respect for Heritage

As stated in para. 5.2.3 of the Report, "*There is no need for any major intervention or repairs to keep the buildings in good condition.*" So if financial incentive is the only reason to opt for a redevelopment scheme instead of a true conservation scheme – so that the West Wing has to be removed to make way for an office development, the public needs to debate on the two schemes, with the financial and cultural merits of both schemes made available. The present consultation document provided by the government to the public is obviously inadequate, especially on the benefits of the option of keeping the West Wing and the entire existing CGO complex intact. We therefore recommend the government to carefully study the missing option of keeping the West Wing and let the public consider its benefits before proceeding further.

Hong Kong Institute of Architects
December 2010

Analysis of Grade A office supply

"Time to rethink the West Wing Office Development Proposal"
by Professor Roger Nissim

Time to rethink the West Wing Office development proposal

- an analysis of Grade A office supply in Hong Kong

Decentralization of Grade A offices is already the solution to the lack of space in Central and the Central Business District (CBD) generally so the suggestion by the planners that 28 500sq.m of Grade A office that the proposed West Wing site will provide will go towards alleviating the shortfall of Grade A space in Central is both naïve and misguided as it represents the proverbial 'drop in the bucket' in the context of the overall supply.

Given that there will be no more reclamation taking place in Victoria Harbour the lack of supply of suitable sites in Central has long been recognized by the property industry and as the following data will demonstrate decentralization of offices has been successfully taking place over the past two decades in order to meet Hong Kong's requirements during its transition from a manufacturing base to an international service centre.

At a Seminar on Office Development held on 12th March 2011 both the Secretary for Development and the Director of Planning produced some very interesting information on this subject setting out the position in Hong Kong as at the end of 2010.

Their definition of CBD covers the north shore of HK Island from Sheung Wan through to Causeway Bay and on the Kowloon peninsula from West Kowloon along to Hung Hom.

Going back to 1995 there was about 4m sq.m of Grade A office space split equally between the CBD and decentralized locations. By 2000 there was 4.51m sq.m, 66% of such GFA within the CBD with 2.37m sq.m, or 34%, elsewhere. Arriving at 2010 the figure for the CBD had only risen to 4.76m sq.m, now 53%, whereas decentralized offices had grown to 4.26m sq.m or 47% of the total stock of Grade A offices. So in the last decade nearly 2m sq.m of Grade A office has been built in decentralized locations in order to meet the ongoing demand for such quality office space.

Put another way there has been, and there always will be, a shortfall of supply in Grade A office supply in Central. This is reflected in the extremely high rentals that are being charged and paid. However with the market now providing decentralized alternatives at prices a third or half of those in Central the end users now have a genuine choice of where to locate and what price to pay and are indeed exercising such choices.

In any event there is a good case for arguing that today Central has reached saturation point as regards the provision of office space. A casual observation on

any working day will reveal congested and polluted roads that cannot cope with the existing volume of traffic, footpaths that are too narrow to cater for comfortable pedestrian movement, journeys on the MTR that are unpleasantly over-crowded and the difficulty in finding a place to eat at lunch time. In short the existing infrastructure cannot support the intake of any more people.

In his 2011-12 Budget Speech the Financial Secretary said ‘ To enhance our competitiveness we must maintain a steady and adequate supply of Grade A offices and strive to develop new high grade office clusters through land use planning, urban design, area improvements and the provision of better transport networks.’ This statement clearly recognizes that there is virtually no possibility of major supply coming from within the CBD and certainly not in Central so there is a need to look elsewhere and indeed this is what is already happening. A good example is Kowloon East that covers Kowloon Bay, Ngau Tau Kok and Kwun Tong. Already there is 1.3m sq.m of Grade A office space there. There are 6 government sale sites for commercial/business use that when sold could generate a further 0.35m sq.m and overall there are 68 hectares of redundant industrial land now zoned for OU(Business) which, assuming a plot ratio of 10, will over time produce close to 6-7m sq.m of new office space. There are other examples such as the proposed office node around Kai Tak so overall Hong Kong is well placed to meet its present and future needs for Grade A offices. One final thought, if the immediate supply of office space is so important, is why not reconsider the use of Murray Building and offer it for sale as offices, for which it was originally designed and built, rather than hotel? The existing gfa is 42560sq.m which is greater than planned for the West Wing site. The buildings characteristic window design won a Certificate of Merit of the Energy Efficiency Building Award in 1994 and further upgrading to HK BEAM or LEED environmental standards could be carried along the lines of the work currently being done on the China Resources Building in Wanchai to achieve Grade A quality.

As for the existing West Wing government offices they are now probably needed for continued government use given that their new Tamar site, with its reduced building height, cannot accommodate all the departments and bureaux as originally envisaged.

The buildings can be upgraded to present day standards as described in the preceding paragraph and Government Hill can remain as Government Hill!

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13th April 2011

Environmental Impact

By Green Sense

Environment: Green Sense's Comments on Government Hill



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政府總部西座拆卸建商場
將製造 12 萬立方米固體廢物 可填滿 32.5 個標準泳池
紅灣半島拆樓事件翻版 增加堆填區負擔

就中環政府山未來規劃，本會環保觸覺明確反對政府總部西座被拆卸及改建為商廈及商場。原因如下：

- (1) 政府總部西翼結構良好，若被拆卸，將製造大量建築廢物，猶如 2004 年紅灣半島被發展商企圖拆卸的翻版。另外，擬建的商場將挖走政府山的大量泥土，這同樣可能變成固體廢物，增加堆填區的負擔。

以地盤面積為 5720 平方米計算，並估計泥土深度平均為 20 米，挖走的泥土約為 114,400 立方米。所以，挖泥建商場是完全不負責任的做法。(以一個標準泳池 50 米 x 25 米 x 3 米 計算，這些泥可填滿 30 個標準泳池)

至於拆卸西翼，以現時西翼建築面積約為 20,000 平方米計算，樓高約 3.2 米，混凝土佔 15%，拆卸後的建築廢料將達 9600 立方米 (20,000 x 3.2 x 15%)，約可填滿 2.5 個標準泳池，同樣製造大量固體廢物。

拆泥所製造的固體廢物以及拆卸西翼的建築廢料達 124,000 立方米，足以填滿 32.5 個標準泳池。

- (2) 現時政府山附近一帶的道路已非常擠塞，若政府山改為商廈及商場，將大幅增加車流，使塞車問題更加嚴重。
- (3) 商廈及商場以密封式設計，將耗用大量空調，在夏天將排放大量熱空氣到室外，中環在夏天的熱島效應更加嚴重。
- (4) 政府山內有很多樹木，任何的改建皆有可能需砍伐樹木。若最終地皮落在發展商手裡，本會擔心會成為像尖沙咀前水警總部的情況，被發展商斬去大量樹木，並興建名店商場。

本會期望，政府總部各部份會以 不拆卸 及 不售予發展商 兩大原則進行規劃。

Tree and Landscape Report

By Conservancy Association



長春社 since 1968

The Conservancy Association

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Supplementary Information On Vegetation Around Central Government Offices

The trees or considering a wider scope, the vegetation around the Central Government Offices (CGO) is an extension of the urban forest from the Hong Kong Zoological and Botanical Gardens and Government House to the heart of Central.

Several very large trees can be found within the Government Hill area, including the most significant Burmese Rosewood (Tree King of the Central and Western District) of over 120 years old. In addition, there are 5 Old and Valuable Trees (mainly Fig species) located on the slope above Battery Path right next to the CGO West Wing. Various palm tree species (mainly Chinese Fan Palm) and surprisingly many orchard trees (mainly Longan) are the major composition of the vegetation.

Since most of the semi-natural slopes are untouched for many years, the slopes are now undertaking a process similar to forest succession, which can make the whole urban forest becoming sustainable. Many seedlings and trees of various native plant species can be found from the understorey. Ivy Tree, Lance-leaved Sterculia, Paper Mulberry, Persimmon-leaved Litsea and Chinese Privet are the most common species driving the succession.

Although the ecological value, especially in terms of the species value is relatively low, the landscape of the Government Hill looks unique and different from many other modern landscape settings. It is not designed and constructed artificially, but has been taken care by nature. The proposed development of the Government Hill may destroy the established balance, as well as the unity of the whole urban forest.

Prepared by Ken So Kwok Yin

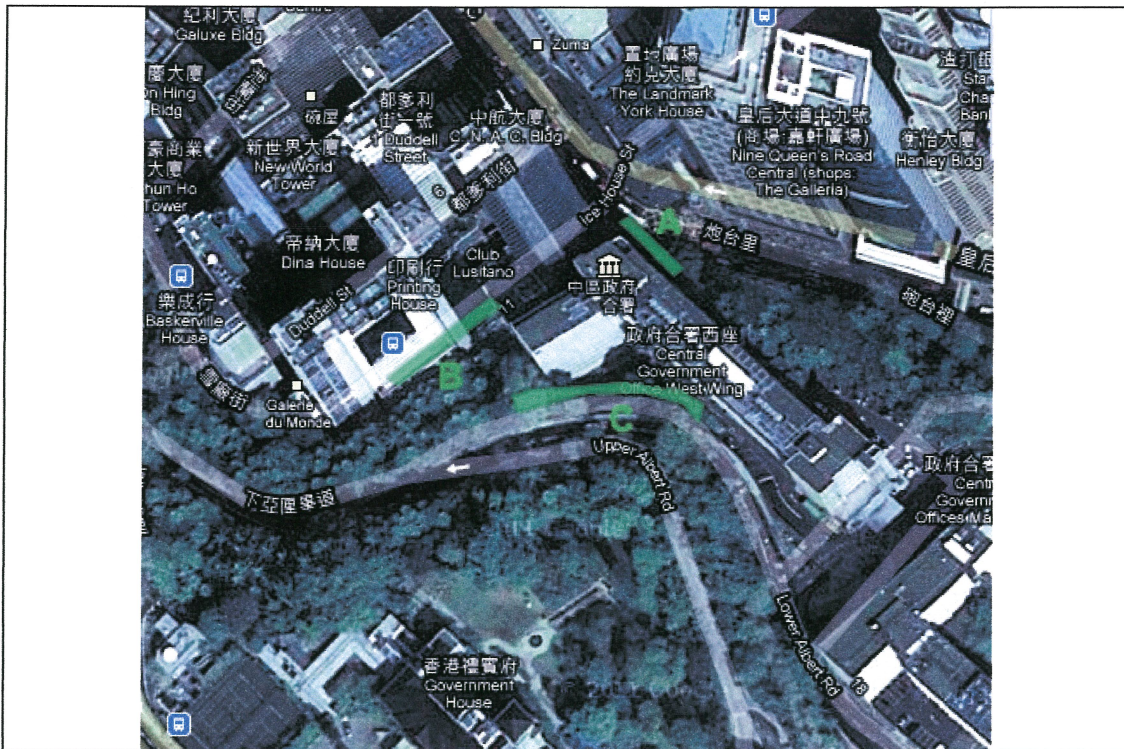
- **ISA Certified Municipal Arborist, Certified Arborist and Certified Tree Worker
#HK-0211ATM**
- **PNW ISA, Certified Tree Risk Assessor #791**



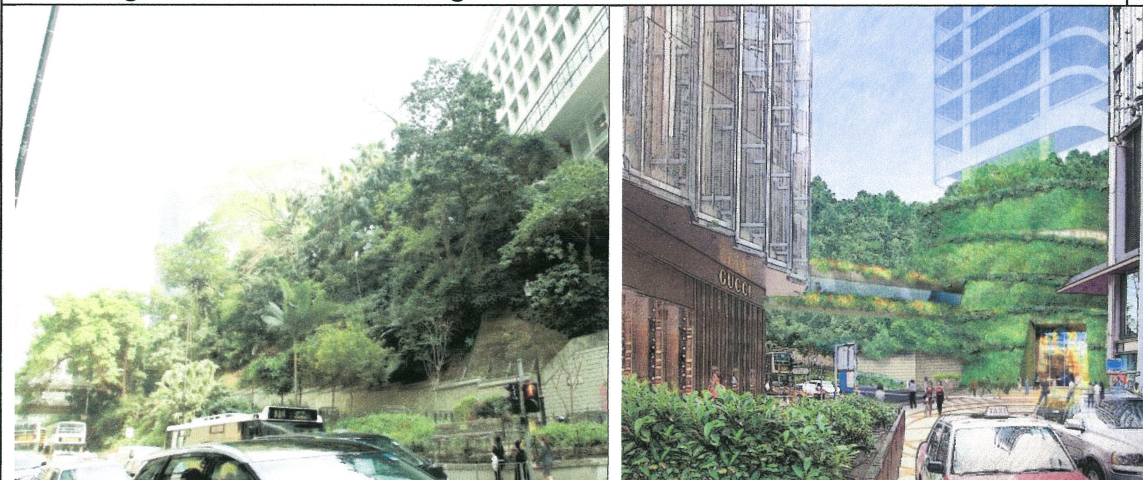
The trees locate at the CGO extending the urban forest from the Upper Albert Road and Hong Kong and Zoological and Botanical Gardens



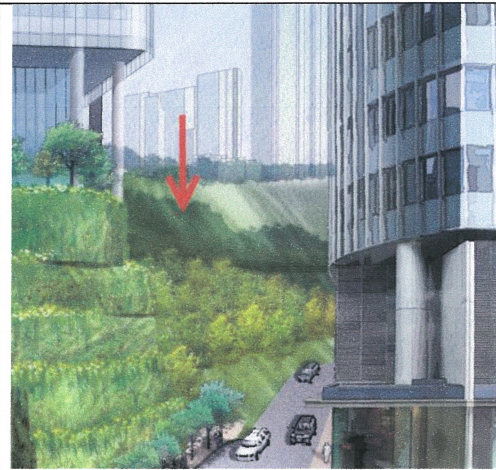
Diversify understorey driving the succession toward an sustainable urban forest



It should be noted that with the government's proposed scheme, the potential loss of semi-natural green space includes the slopes of Ice House Street (B) and Lower Albert Road (C). The vegetation on the slope portion above the granite wall in Battery Path (A) would likely be affected due to the proposed construction of a footbridge and the excavation of grounds.



Battery Path (A): The vegetation on the slope would likely be affected due to the proposed construction of a footbridge and the excavation of grounds.



Ice House Street (B): All the trees and the unique semi-natural slope would be lost and become a typical engineering slope. (Arrow indicated the existing location of the semi-natural vegetation)



Lower Albert Road (C): All the semi-natural vegetation will be lost for the proposed commercial building. (Arrow indicated the existing location of the semi-natural vegetation)

Comments on Transport Department's traffic assessment

by Hung Wing Tat, Hong Kong Polytechnic University

The following are the problems with the preliminary traffic assessment report:

- a) There is no traffic flow count data (i.e. v) to show how the v/c ratios are calculated; The footnotes only give the link capacities (ie.c)
- b) The TD must provide their set of existing traffic flow counts, with the dates and time they did the survey. The public can then judge whether the traffic count and the derived traffic assessment are reasonable.
- c) There is no assessment of the critical junctions especially Lower Albert Road/Garden Road junction. I suspect that the junction is very close to capacity, even a small additional traffic can overflow the junction; there for the conclusion of the marginal impact is unfounded.
- d) There is no assessment of pedestrian flows; especially at the entrance/exit at Lower Albert Road; and
- e) Pedestrian is endangered when Ice House Street is widened and shall suffer significant delay/inconvenience at ground level.