



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

11 June 2012

By Post

Our Ref. : BLA/DevB/CGOWW/DL/cw/1205

Mrs Carrie Lam, GBS, JP
Secretary for Development
Development Bureau
18/F, West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

Dear *Carrie.*

Redevelopment of the West Wing, Old CGO

We refer to our letter of 31 December 2010 regarding the development proposal for the West Wing of Central Government Offices and the revised proposal published by the government subsequently.

The Institute has always emphasized on a balanced approach towards development and heritage conservation and our views and recommendations regarding the Central Government Office Ensemble are put forward herewith for your consideration:-

The HKIA maintains the views that:

1. The entire Central Government Office Ensemble has particular architectural, planning and heritage value; the overall integrity of which should not be altered unless the above issues have been properly addressed to the benefits of the community at large.
2. The entire Ensemble must be retained by the government and no part of any such should be delineated for private ownership or development.
3. The grading exercise currently undertaken by the Antiquities Advisory Board is supported. We are of the opinion that the entire Ensemble should be graded as one entity, taking into consideration the overall architectural, historical, and social values, together with the collective memory of the community as a whole.
4. If financial incentive or office demand in the Central is the reason to opt for a redevelopment scheme instead of a full conservation scheme – by which the West Wing has to be removed to make way for a new development, the public needs to deliberate on the two options, with financial and cultural merits of both schemes made available.



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The HKIA recommends the following:-

1. We recommend the government to carefully study the alternative option of keeping the West Wing and let the public considers the merits of both schemes before proceeding with the final decision.
2. The future development and usage of the entire Central Government Office Ensemble should be examined together with the public in a holistic manner including the possibility to allow the entire Ensemble be accessible and for the enjoyment of the public.
3. To this effect, the HKIA proposes to launch an open Project Design Competition, in joint-hand with the government and other professional institutes, by which different facets of redevelopment / conservation possibilities of the entire Government Hill Precinct together with its adjoining areas could be explored and followed by more comprehensive public consultations.

Yours sincerely

Dominic K K Lam *CHKIA RA*
President

Encl

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



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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)



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**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**