

To: <panel_dev@legco.gov.hk>
From: 拉拉 拉拉
Date: 12/27/2010 12:03AM
Subject: 所有發展事務委員會的委員

政府山不但是目前特區政府總部所在，更是香港城市最早規劃的核心地帶，早在1841年開埠時已劃為政府用地，該區的文化景觀保存160多年至今，承載着香港的管治及發展歷史，是重要的公共文化資產。發展局建議，當政府總部於2011年底遷往添馬艦後，將政府山一大片地盤售予地產商，拆卸中區政府合署西座，重建成為30多層高的寫字樓，並將半個政府山挖空，變成5層商場和停車場。

這個名為「保育中環」，實為重建地產的項目，當局以精美的說明書及模型向市民及城規會推介，似乎要製造一個必然賣地、必然重建的既定事實。我們發覺，政府所提出重建政府山的理據，顯然是斷章取義，歪曲事實的。

其中政府斷章取義，歪曲事實的理據如下：

一) 所謂「建築及文物評估顧問報告支持重建」：政府支持其計劃的技術性理由，主要是建基於由發展局於2009年委託賽爾米勒特里頓的建築及文物評估報告（下稱「報告」）所進行的建議。但該報告其實建議，應該“考慮在政府山建立一個“特別保護區”，以確認中區政府合署中地段的林地空間和低層建築的重要性”（報告第五章）。

二) 所謂「財政壓力」：該報告其實沒有真真正正建議把西翼拆卸重建，而是說「因財政壓力，意味著西翼的一部份需拆卸重建」（報告第5.5.2段）。這顯然是顧問在特定假設下的無奈選擇，林鄭月娥局長在2010年11月23日回答立法會提問時已表明財政壓力並不是出售中區政府合署西翼的原因；事實上，港府的財政及外匯儲備共逾二萬億元，因此我們認為，實屬沒有必要賣掉一個極具歷史價值的用地，而作商業性重建。因此，政府賣掉中區政府合署西翼的建議，錯誤引導和嚴重扭曲了該報告的原意。

三) 違反高度限制：引述該報告第5.4.6段，“任何在該地段的新的建設上，應採納對現有政府總部的高度為最高的高度。”我們認為，顧問高度關注並清楚表明，在地段上的任何新建築物要以現有政府總部高度標準為最大限度；在中區政府合署上興建一座150米高的高層建築，明顯違反了顧問的建議。

四) 所謂「更多綠化地帶」－根據政府的建議文件顯示，被規劃署形容為有如皇后像廣場般大小的公共空間，由於位處商場頂部，極其量是一個平台花園，將由發展商全權設計，加上文件只說會保留現址11棵樹，現有政府山上的大片綠色地帶根本毫無保障，有機會因重建工程影響而受大規模的損害，方案的所謂「更多綠化地帶」，可能最終只是披在大商場外的一層「綠色外衣」而已。這意味著在現有建築物周圍的植被和自然土壤，將被替換成只是長在淺薄土壤“植物箱”中的“大盆栽”而矣！

五) 所謂「改善與行人連接」 – 在政府提出的重建計劃中，行人連接是通過新的辦公大樓，橫跨皇后大道中到中心商業區；但中心商業區和政府山之間，或介乎皇后大道中及下亞厘畢道的行人連接，實際上是由於在1997年後，政府在中區政府合署的地段周圍架設鋼圍欄後才堵塞了。只需拆除這些圍欄和將現時停車場位置開放給予公眾橫過，這便可從中心商業區很容易通過政府總部地段上達至禮賓府，動植物公園等。因此，以「改善與行人連接」為理由，拆除西翼，顯然是沒有足夠理據所支持的。

六) 所謂「建築設計兼容」 – 政府很努力地描述建議的新辦公大樓會與周邊的發展有所兼容。但是，在中區政府合署上興建一座150米高的高層建築，便正正與原址的低層建築群相違背。引述報告第五章指出“任何新的發展應尊重現有的低層建築和周圍的空地。”在中區政府合署的地段豎立一個高層建築，根本在任何設計原則定義之下，都是不可能相容的。

七) 所謂「改善交通擠塞」 – 在政府的計劃中，建議擴闊雪廠街，增加一條行車線，如果政府增建辦公大樓和商場。這樣做只會增加更多車輛數目，令到原本已很擠塞的道路，便會更為擠塞。因此，擬議重建計劃不會有任何真正能改善該區交通的措施。

八) 違背「減低碳足跡」 - 政府已為低碳發展擬定了自己的路徑，並正徵詢公眾對“氣候變化戰略和行動”的意見。然而，擬議重建計劃將導致更多的浪費，並產生更多的交通流量，這將在香港產生更高的碳足跡。因此，建議與應對氣候變化的既定政策目標互相矛盾。

我們要求：

1. 政府應該如顧問報告所建議，將整個政府山地段劃為一個“特別保護區”。
2. 政府確認由公眾繼續持有政府山的業權，並保留現時政府山的規劃用途（即「政府、機構及社區」用途）。
3. 政府重新草擬以「不賣地」為原則的新規劃方案，進行為期十二個月的公眾諮詢，與民共議該用地在政府總部遷出後的合適公共用途。
4. 政府舉辦政府山開放日，方便市民入內參觀，並委托獨立專家進行考古調查，以了解政府山的地下遺跡，如探索政府山地下秘道和其歷史意義等等。

[Please sign this petition before 31 December 2010, and email the petition to

- 1] Carrie Lam, Secretary for Development, the email address is sdev@devb.gov.hk;
- 2] The Special Duties Section of the Planning Department (Ref: Public Consultation on CGO). sdpd@pland.gov.hk;
- 3) The Panel on Development of the Legislative Council; panel_dev@legco.gov.hk, and specified that the petition shall be sent to all the members of the Panel on Development.]

Government Hill, where the current Central Government Offices are, has been the seat of the government since the foundation of Hong Kong as a city. It is an important heritage site where the historic landscape reflects the original planning of the area over 160 years ago. The Development Bureau has proposed, after the CGO offices are to be moved to Tamar by end 2011, to sell half of Government Hill to a developer, demolish the West Wing, hollow out the hill to build a five-storey shopping mall and carpark, and build a 32-storey commercial tower on top.

Although the Government named it as “Conserving Central”, it is essentially a real estate project. Although the authorities are using well illustrated booklets and models to present its case to the general public, as well as to the Town Planning Board, it seems that the Government’s intention is to create a predetermined fact in which the land would necessary be sold, and the site would be redeveloped. We found that the Government proposed the rationale for the redevelopment of the Government Hill is apparently out of context and a distortion of facts.

Such distortions of facts are listed as follows:

1) So-called “The Architectural & Heritage Assessment Report recommends the Redevelopment of the Site”: The technical justification for the government proposal is largely built upon the recommendations of the Architectural & Heritage Assessment Report (hereafter the “Report”) conducted by heritage consultant Purcell Miller Tritton and commissioned by the Development Bureau in 2009. Instead of recommending redevelopment, the report has in fact suggested or recommended the preservation of all the buildings on the site. For example, in Chapter 5 of the Report, “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.”

2) So-called “Financial Pressure”: The report is not really recommended demolition and redevelopment of the West Wing, but said, "financial pressures mean that part of the west end of the site will need to be redeveloped." (paragraph 5.5.2). On her reply to the questions from legislators on 23 November 2010, the Secretary for Development, Carrie Lam, has specified that financial pressure is not the reason behind the selling of the West Wing of the Central Government Office. In fact, as the Government's fiscal and foreign exchange reserves total is amounted to more than 2 trillion Hong Kong dollars. We think that there is absolutely no need for the Government to sell off such a site of historical

value, and to use it for commercial purposes. Hence, the suggestion in which the Government sells the West Wing of the Central Government Office has indeed led the conclusions to the Report to the wrong way, and twisted the true intention of the conclusions of the Report.

3) So-called “Height Restriction”: In paragraph 5.4.6 of the Report that “Any new building on the site should take the height of the existing CGO as a maximum height.” We opine that the consultant was very clearly concerned with the height of any new building on the site, and we opine that any new building should take the height of the existing CGO as a maximum height.

4) So-called “More greenery”: As indicated by the documents from the Government’s proposal, the area in which described by the Planning Department as a “public space” of the size of Statue Square is merely a “podium garden” situated on top of a shopping centre, and it would be designed solely by the developer. In addition, the document suggested that it would preserve 11 trees in the existing site. There is no protection for the massive green areas in the Government Hill area, as they might be under threat as a result of the massive redevelopment exercise in the area. The so-called “more green area” would simply be is simply a “green-coloured coat” fitted on the exterior of a big shopping mall. This would also 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.

5) So-called “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 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. Hence, the argument in which for the demolition of the Government Hill under the excuse of “better pedestrian connectivity” simply could not be substantiated.

6) So-called “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 Report (Chapter 5), “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.

7) So-called “Resolving Traffic Congestion”: In the Government’s plan, it is suggested the broadening of Ice House Street, and increase one further traffic lane. Should the Government decide to construct office towers and shopping centers in the area, this would only increase even more traffic, making the already very congested road to become even more congested. Hence, there will not be any real improvement to the traffic of the area under the proposed redevelopment scheme by the Government.

8) Violates the “Reduction of Carbon Footprint”: The government has set itself a path to low-carbon development and is currently consulting the public on “Climate Change Strategy and Actions”. Yet the proposed redevelopment plan will lead to more waste and generate more traffic, which will result in a higher carbon footprint for Hong Kong. Hence the proposal is in contradiction with the stated policy objective of combating climate change.

We strongly request that:

1. We take the view that Government should make the entire area of Government Hill a “Special Protected Area”, as recommended in the Architectural & Heritage Assessment Report
2. The government acknowledges the public ownership of the site and retain its current land use (that is, Government, Institution and Community)
3. Based on the “no land-sale” principle, the government should seek public opinions through a 12-month consultation as to how the CGO Complex should be used by the public after the relocation of the offices to Tamar.
4. Meanwhile, open days should be organized for the public to visit the CGO complex and an independent preliminary archaeological investigation should be conducted.