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19 November 2010

Clerk to the Panel on Development

Legislative Council Secretariat

3/F Citybank Tower

3 Garden Road, Central

Hong Kong

Dear Sirs

Destruction of Government Hill by Totally Out-of Scale, Insensitive and Inappropriate Commercial Development

I was at the presentation at Hong Kong Institute of Architects (HKIA) recently by government on CGO west wing and expressed my very grave concerns at it. Government's proposals for this area are a matter of the most extreme outrage.

The HKIA have previously discussed at committee the importance of Government Hill area (which includes say CGO, St John's Cathedral, former French Mission Building, Government House, US Consulate, Botanic Gardens, Lower and Upper Albert Roads). The area also extends across Garden Road on the east side to Helena May and to Ice House Street and on to say the Dairy Farm Building (now Fringe Club and FCC) and the Bishop's House. See item 3 in the attached Press HKIA Press Statement which refers to Government Hill.

At that presentation by government at HKIA I expressed a number of very strong concerns. I conveyed my concerns to Professor Patrick Lau our LegCo member on 25 October 2010 and wish to express them again now.

I would firstly like to emphasize most strongly that the present corner frontages on Ice House Street and Queen's Road are remarkably restrained, dignified and well designed. One is aware that the building is there but its design is dignified, restrained and fitting. It fits into the dignified and leafy Ice House Street and quickly merges into the slope alongside Battery Path. The building has considerable merit and would be infinitely better than a developer would produce motivated only at maximizing profit. I attach with this letter four photos showing that important corner. We have already seen the substantial destruction of one of Hong Kong's Declared Monuments by a property developer concerned only with profit and not at all for heritage.

My concerns with the scheme include the following:

- That it is a redevelopment scheme, not a Conservation Scheme or a landscaping scheme, which government is trying to sell it as;
- That the proposed tower is totally out of scale and out of context with the area, which at the moment is substantially intact and has not yet been destroyed by Government or property developers. (Pacific Place and its hotels, etc. together with the Law Courts, QGO, etc.) took a huge lump out of the former Victoria Barracks a number of years ago;
- Government Hill is historically a government area and has and had a great sense of dignity about it with CGO Cathedral, Botanic Gardens, etc. which would be severely impaired if not destroyed by the encroaching into it of a huge Commercial Tower. To put a commercial building into the area would impair the dignity, Sense of History of the area and Spirit or Sense of Place of the area;
- We should strive to keep the area as a government/ institutional area and keep out commercial;
- The shape and scale of the existing East Wing CGO is in scale and proportion to the area but I consider that the Sense of Space in its more artistic sense would be fundamentally destroyed by the intrusion of a modern commercial tower in the area;

- The topography of the area would be significantly destroyed or impaired by the intrusion of such a building of the wrong scale, proportion and height;
- The height of the tower would destroy views of the area from along Queen's Road and would impair the environment of the Ice Hose Street area which has also a sense of dignity and history;
- Upper and Lower Albert Roads have a sense of dignity and are of great amenity and attractiveness in their own right. To have road widening scheme on Lower Albert Road incorporating a run-in to a Commercial Building to be used by large numbers service vehicles and commercial parking for the Commercial Building would substantially destroy the amenity and attractiveness of Lower Albert Road;

We have seen so much destruction of our environment and heritage recently for reasons largely of greed and insensitivity. It is now time to conserve this wonderful area and not progress further to turning Hong Kong into a bland Commercial Development devoid of its heritage, history and environment. This outrageous Commercial Tower must not proceed and the Government must make the whole of Government Hill and surrounding area into a Special Conservation Area.

I am, Yours Sincerely



KJR Borthwick

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香港建築師學會

The Hong Kong Institute of Architects

Press Release

18 January 2007

The Hong Kong Institute of Architects Response to Built Heritage Conservation Policy Public Consultation

We appreciate the efforts of the Home Affairs Bureau in addressing the issue of Built Heritage Conservation Policy as well as their intention of issuing a Consultation Paper and inviting the views of both the public and professionals in the implementation of future policies in this important subject. The Hong Kong Institute of Architects has always urged the formulation of a comprehensive policy and effective mechanism to protect and enhance the built heritage environment of Hong Kong.

In our view, on the basis of the preliminary information that we have seen of this consultation, it still falls short of providing concrete proposals and options, yet nevertheless it is a useful step in the right direction. We understand that the forthcoming consultation paper is based on the broad framework of the previous consultation paper of 2004.

In general, we support the following directions:

A. Support to Wider Community Representation & Participation

Public sentiment is an important aspect in the process of determining heritage sites. We concur with the suggestion to include local or sector representatives in the relevant boards/committees. We support wider community participation, including public education and Private-Public Partnerships be further enhanced to foster an environment more respectful of heritage.

B. Support to Disclosure of Graded Buildings and Criteria for Wider Discussion

The publishing of the previously internal list of Graded Buildings and the intention of disclosing its criteria for selection is applauded. We opine that age should not be the only criterion in determination for protection, and support the consideration of various factors such as rarity, representativeness, aesthetics, architectural significance, general historical significance, social values, scientific values, and context etc. for listing.

C. Support to Set up Fund and Assisting Private Initiatives

The HAB indicated the possibility of setting up Heritage Funds, with contributions from both the Government and the private sector. We support such idea and urge the Government to encourage private initiatives for long term support in managing and maintaining heritage sites or for public use. Sympathetic adaptive re-use of heritage buildings by the private sector should be permitted and facilitated under a more flexible regulatory mechanism.

However, especially in the particular context of Hong Kong, we re-iterate that no heritage policy will be possible to implement successfully without a comprehensive review, together with tackling fundamental issues ranging from planning and lands, urban design, cultural landscape to building regulations that are in need of critical review at the same time:

1. Need for Integration with Planning and Lands Policies

The protection of heritage buildings and sites must integrate with planning and land use policies. The avoidance of this issue in this consultation makes it unworkable. On the other hand, the development rights of private heritage site owners and related Government compensation have to be addressed, but this consultation still fails to propose methods or options to deal with this. We urge the Government to seriously consider incentives such as Transfer of Development Rights, Compensation, Tax Exemption, Off-site Land Exchange, etc. to tackle important heritage buildings or cultural landscapes under development pressure, such as the Wan Chai Market, for which our Institute has pushed strongly for conservation.

(? cont.)

Fairon: The Honourable Donald Tsang Yam-Kuen, Chief Executive, Hong Kong Special Administrative Region
A Member of The International Union of Architects (UIA), Commonwealth Association of Architects (CAA) and Architects Regional Council Asia (ARCASIA)

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

2. Need for Prioritization on Cultural & Environmental Sustainability in Planning Strategies

The current planning strategies are commonly infrastructure engineering-led, where roads, railways, tunnels and flyovers often dictate the shape and layout of the city. An advanced city like Hong Kong should ensure that its planning strategies fully integrate infrastructure requirements with its great natural assets like the harbour, environment, traditional urban fabric, major public open spaces, as well as cultural and built heritage. These sensitive areas must be identified at an early stage so that the infrastructure is carefully designed in order to avoid later difficult conflicts such as have occurred with Central Reclamation, Star Ferry and also possible conflicts involving Queen's Pier.

3. Need for Integration with Urban Design Considerations

The current ordinance limits the conservation mechanism to declaration of physical buildings or features. We opine that heritage values of sites and zones include architectural and planning characteristics such as usage, density, heights, proportions, views, dispositions, routes, open space, buffer zones, street activities, landscape and most importantly local lives, which can only be dealt with by urban design criteria. Major zones of particular architectural or planning heritage qualities like the City Hall / Statue Square / Queens Pier group or Government Hill require particular overall design to protect the heritage integrity when faced with infrastructural or developmental pressures.

4. Need for Extension to Conserving Cultural Landscape & Beyond

We support the extension of the scope of conservation from the current limit of individual buildings into wider groups or areas in the form of heritage ensembles, areas, streets, zones and cultural landscapes. The idea of extending from point to line to plane suggested by the 2004 Consultation Paper is an admirable step. Examples include the former Central Police Station Compound and Tai O Village. We also support the inclusion of intangible elements such as customs, festivals, associations and collective memory for conservation. Heritage conservation should be widened to include cultural heritage and other intangible heritage, and not to deal solely with 'antiquities'.

5. Need for Review of Building Regulations to Facilitate Conservation & Adaptive Reuse

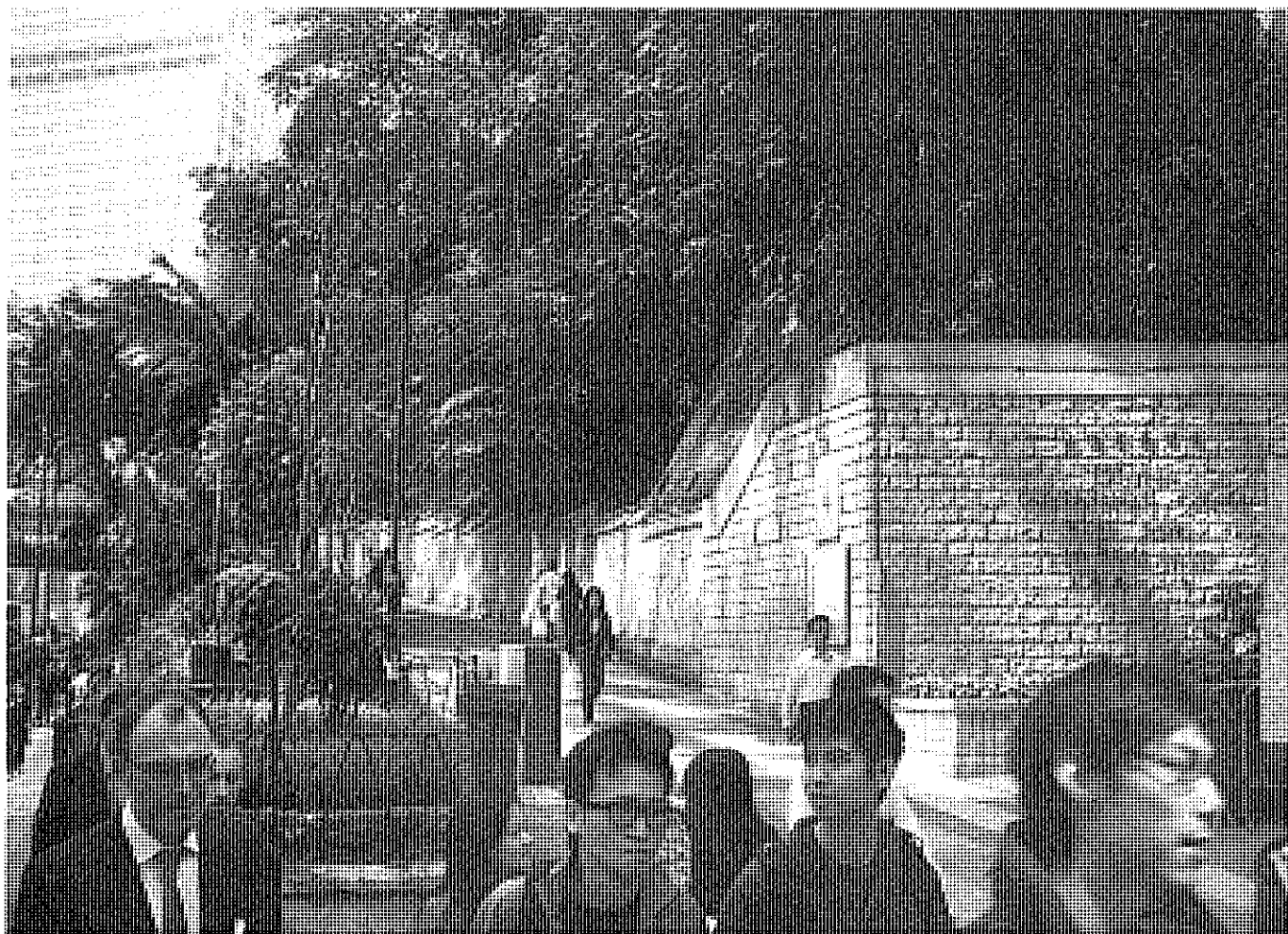
The current building regulations should be reviewed with provision to facilitate the conservation of heritage buildings for beneficial use or adaptive reuse. In many cases, heritage buildings have difficulty in complying with current statutory or licensing standards due to genuine technical and physical constraints. We strongly believe that relevant regulatory authorities should adopt more sympathetic requirements and controls in such cases without compromising public safety or hygiene. Otherwise, many of these buildings may not be able to be adaptively re-used and thus face demolition for redevelopment.

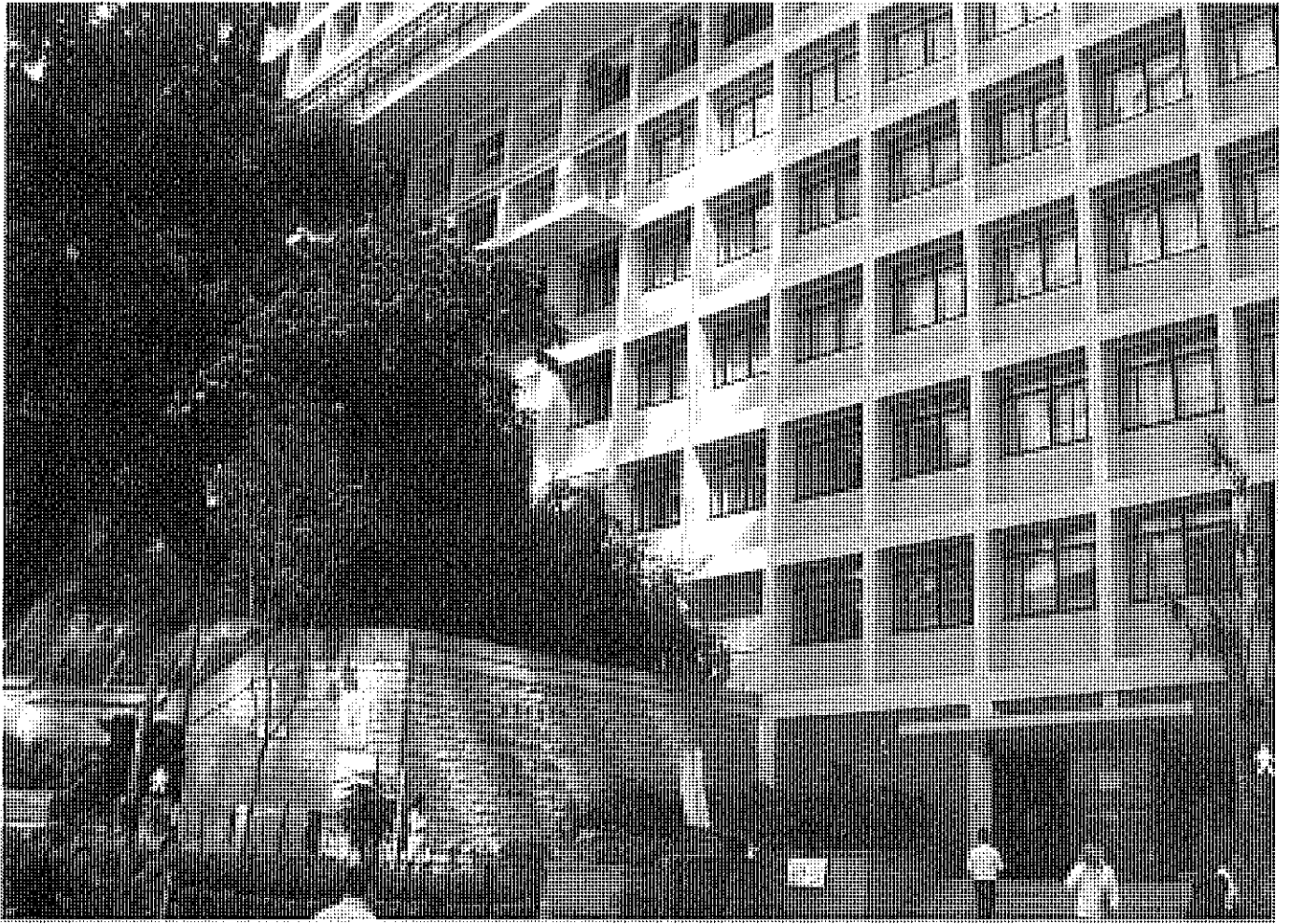
Besides, the Government should provide funds and leadership in the documentation of heritage buildings and sites, scientifically to determine their various values in the form of Conservation Plans. Such will serve as the basis for public information and consultation, so that proper decisions could be made by the community and Government in the formulation of policies and actions.

The Hong Kong Institute of Architects will study the consultation paper upon its issuance and offer further comments and views to the general public and the Government in due course.

For enquiries, please contact Dr Ronald Lu, President of the Hong Kong Institute of Architects at 2511 6323.

The Hong Kong Institute of Architects





Restoring Green Central - The New Landscape of Central Government Offices

保育中環
己丑送春

The Central Government Offices (CGO) Complex is one of the eight projects under the 'Conserving Central' initiative announced in the 2009-10 Policy Address. All existing offices in the Complex will be relocated to the new Central Government Complex at Tamar by end-2011. Based on the recommendations of a historical and architectural appraisal undertaken in 2009 by a British firm of architects and historic building consultants, the Main and East Wings will be preserved while the West Wing, which is of low historical significance and architectural merit, will be demolished to make way for public open space and commercial development.

The West Wing occupies a prominent location in the heart of Central. Demolition of the existing building would provide a good opportunity for a new public space in Central. There will be added greenery, improved pedestrian connectivity and a better setting for the heritage precinct in Central.

The proposed scheme is to redevelop the West Wing into a public open space in the eastern portion and a commercial building with Grade A offices and shopping facilities at the west end. The commercial building would accommodate a total gross floor area of about 42,000m².



Conceptual Master Layout Plan



More Greenery



More than two-third of the West Wing site will be transformed into a public open space. With an area of 6,800m², which is of similar size of Statue Square or about half of the size of Chater Garden, the public open space will become an "oasis" within the bustling Central Business District.



Statue Square (left) and Chater Garden (right)



The public open space will restore the appearance of the CGO site back to its condition before the existing Main, East and West Wings were built. It will extend the greenery from the Government House down to Ice House Street and Battery Path, forming an integral part of an extensive greenery network in Central.



Above : Photograph taken in the late 19th century (the building to the left was a demolished Government office building built in 1847) (Source: Government Records Service)
Below : Proposed public open space with preservation of a Burmese Rosewood already existed in the late 19th century



A green façade concept with a vegetated podium will be adopted for the lower part of the new commercial building facing Queen's Road Central and Ice House Street. This design concept is to extend the greenery of Battery Path, providing a visual relief for this busy road junction in Central. Skyrise greenery will also be provided in the building.



Existing Old and Valuable Trees

The existing 11 Old and Valuable Trees on site (including the Burmese Rosewood in the central courtyard already existed in the late 19th century), along Battery Path and in the vicinity will be preserved.



Greenery network in Central

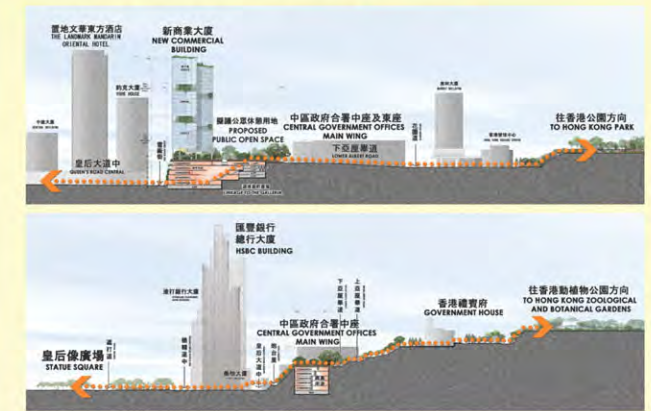
In sum, the public open space will form an important part of the existing extensive greenery network in Central encompassing:

- the Hong Kong Zoological and Botanical Gardens
- the Government House
- Hong Kong Park
- Cheung Kong Park
- Statue Square
- Chater Garden

Better Pedestrian Connectivity



New pedestrian connection via the new commercial building will better link up Queen's Road Central and Lower Albert Road which have a difference in level of about 25m.



A new landscaped footbridge to The Galleria at Queen's Road Central will connect the site to the existing footbridge network in Central, bringing pedestrians to different parts of the Central Business District.



Pedestrian connectivity to other buildings

Both the public open space and the new commercial building are highly accessible from all directions. Buildings on Garden Road, including Murray Building, St. John's Building with Peak Tram Terminus and Citibank Plaza will find new connections to Queen's Road Central and Ice House Street via the new commercial building.

NEW LANDSCAPE 新貌

Preserve the Heritage Precinct



The site, being surrounded by declared monuments, historical landmarks and other 'Conserving Central' projects (including the Former French Mission Building, St. John's Cathedral, the Government House, the Main and East Wings, Murray Building and the Hong Kong Sheng Kung Hui Compound), will become a key destination on the Central Route of the Central and Western Heritage Trail.



Declared monuments, historical landmarks and other 'Conserving Central' projects in the surroundings



The public open space with its preserved trees and green backdrop will enhance the setting of the declared monuments and other historical landmarks in the surroundings.



Compatible Building Design



The new commercial building comprising Grade A offices and commercial facilities will be located at the west end of the West Wing site at the junction of Queen's Road Central and Ice House Street.

Site Area	5,720m ² approx
Gross Floor Area	
Office	28,500m ² approx
Commercial	13,500m ² approx
Total	42,000m ² approx
Plot Ratio	7.34
Site Coverage	23% approx (at Lower Albert Road level)
No. of Storeys	32
Maximum Building Height	150mPD

The height and bulk of the new commercial building will be compatible with the surrounding developments. The maximum building height of 150mPD will be lower than most of the adjacent buildings, including The Galleria (about 158 mPD), Standard Chartered Bank Building (about 183 mPD) and HSBC Main Building (about 179 mPD), creating a stepping height profile in the area.



The new commercial building will be setback to facilitate widening of Ice House Street and provide more pedestrian circulation space. It will be meticulously orientated to avoid creating canyon effect on Ice House Street. The green façade at the lower part of the commercial building together with the entrance plaza at the junction of Queen's Road Central and Ice House Street will become a new green focus in Central.



Lower Albert Road will be widened to facilitate vehicular ingress/egress to the site which will also facilitate a restricted vehicular access to St. John's Cathedral. All drop-off/pick-up, car parking and loading/unloading facilities are provided below the Lower Albert Road level. An emergency vehicular access from Lower Albert Road through the public open space to the Former French Mission Building will also be provided.



Further details of the proposed scheme for the West Wing site are available at the websites of the Development Bureau and the Planning Department at <http://www.devb.gov.hk> and <http://www.pland.gov.hk> respectively. Public exhibition on the proposed scheme will also be organized. It will be publicized at the websites.

Views Are Welcome



We welcome your views and suggestions on this proposal. Please send them to us on or before 30 November 2010:

By post Special Duties Section,
Planning Department
15/F North Point Government Offices,
333 Java Road,
North Point, Hong Kong
(Ref: Public Consultation on CGO)

By fax 2577 3075

By email sdpd@pland.gov.hk

Development Bureau
Planning Department
September 2010



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