

14 December 2011

Dear Chairman and Members of the Antiquities Advisory Board,

On behalf of the Government Hill Concern Group, I would like to thank the Chairman and Members of the Antiquities Advisory Board for meeting with us on November 23, 2011 and listening to our preliminary views with regard to the conservation of Government Hill.

Some of our members also attended the International Conference on Heritage Conservation 2011 (Dec 12 and 13) where academics and professionals from all over the world discussed new instruments and made recommendations for heritage conservation.

In view of the discussions we participated in, we would like to make the following points:

1. From the discussion at your meeting on November 23, we concur with the opinion of many of your members that there should be a **holistic protection of Government Hill as an integrated cultural landscape or historic urban landscape**. A Conservation Area or Special Protected Area encompassing the entire Government Hill with conservation as the prime objective should be adopted for this significant heritage precinct.

In November this year, UNESCO formally adopted a Recommendation on the Historic Urban Landscape (<http://unesdoc.unesco.org/images/0021/002110/211094e.pdf>) which provides important instruments and guidelines on protecting historic urban landscape such as Government Hill. The recommendation defines the historic urban landscape as *the urban area understood as the result of a historic layering of cultural and natural values and attributes, extending beyond the notion of "historic centre" or "ensemble" to include the broader urban context and its geographical setting*.

This wider context includes its topography, geomorphology, hydrology and natural features; its built environment, both historic and contemporary; its infrastructures above and below ground; its open spaces and gardens, its land use patterns and spatial organization; perceptions and visual relationships; as well as all other elements of the urban structure. It also includes social and cultural practices and values, economic processes and the intangible dimensions of heritage as related to diversity and identity.

This definition provides the basis for a comprehensive and integrated approach for the identification, assessment, conservation and management of historic urban landscapes within an overall sustainable development framework.

Government Hill is an historic urban landscape - its protection should follow the principles, policies and tools outlined in this important document. During the International Conference, this issue was raised by participants and speakers (see President of ICOMOS Advisory Committee, Mr John Hurd's paper) and it is clear that the historic urban landscape approach is ideally suited for adoption with regard to the conservation of Government Hill. Conservation Areas and Historic Districts have been protected in the UK and the US since 1960s and 70s, and recently Hong Kong's Ho Tung Garden was declared a statutory monument because of its value as a cultural landscape. These precedents support the protection of Government Hill via the use of the historic urban landscape approach whereby a wide area including Battery Path, Central Government Offices, the Court of Final Appeal, St John's Cathedral, Government House as well as the Botanical Garden should be granted full protection.

2. We are concerned that the usual grading exercise for historic buildings, which the Chairman intends to pursue and complete in two months, may not reflect the significance of this historical urban landscape. We would like to point out that our request is NOT just about grading but rather to integrate the Central Government Offices into the protection of its historic urban landscape. If the notion of historic urban landscape is not fully acknowledged and adopted, simplistic grading of

the historical buildings will be meaningless and even detrimental. We are strongly against any hasty and simplistic grading of the Central Government Offices. The entire process must be conducted with due care. We would like to reiterate that our prime concern is the declaration of Government Hill a Special Protected Area, as recommended by the government's own consultant (Purcell Miller Tritton) and supported by the UNESCO recommendation on historic urban landscape.

3. We would also insist that the government's sale plan for the site be immediately withdrawn as the existence of this proposal is undoubtedly exerting political pressures on both the AAB and AMO, so much so that they will not be able to proceed with the assessment and declaration in an appropriately objective manner.

4. Members of the public should be involved as much as possible in the assessment and conservation process. We understand that the government's consultant report is an historic and architectural appraisal only, and, as such, should be supplemented by additional research on the social, cultural and archaeological significance of the site. Therefore, professionals and academics including public historians, archaeologists and, most importantly, members of the community should be involved in establishing the true significance of the site and in developing policy for its protection. We recommend sessions of workshops and hearings to be conducted jointly by AAB, AMO, professional institutes and NGOs in the coming months. On top of that, an archaeological investigation of the site, as well as a study of the air-raid tunnels beneath Government Hill, should be conducted as soon as possible and a report to be produced. There is also a need for transparency with regard to the composition of the panel of experts, their affiliations, the terms of reference and the decision-making process. We are still waiting for the AMO to supply us with the name list of the expert panel and we opine that this panel should include experts from our Concern Group.

In line with the views expressed by the eminent speakers at the conference that public participation is paramount to a successful outcome with regard to heritage conservation, we welcome further discussion with the AMO and the AAB on the above matters.

Yours sincerely,

Katty Law

Convener, Government Hill Concern Group

Postal Address: