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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.

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**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

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