

November 18, 2011

To: Members of the **Antiquities Advisory Board**  
c/o The Secretariat of the Antiquities Advisory Board  
136 Nathan Road, Tsim Sha Tsui, Kowloon

To: Members of the **Town Planning Board**  
15/F, North Point Government Offices  
333 Java Road, North Point, Hong Kong

Dear All,

**Inappropriate redevelopment of the  
government headquarters complex  
set within the historic Government Hill, Central, Hong Kong**

1. Purpose of this submission
  - 1.1 To appeal to members of the Antiquities Advisory Board, requesting them to consider giving a historic grading to the government headquarters complex comprising three wings which were designed and built in the 1950s.
  - 1.2 To appeal to members of the Town Planning Board, requesting them to consider rezoning the Government Hill into a heritage precinct, keeping it as a site for Government, Institution and Community ("GIC") uses.
2. Reasons for "total conservation" of the historic Government Hill
  - 2.1 The combination of government offices, Government House (i.e. the colonial governors' residence), St. John's Cathedral, the former French Mission Building, and the adjacent Botanic Gardens as well as wooded spaces and many other items gave rise to the name of Government Hill as early as the 1840s when Hong Kong Island was founded as a British crown colony.
  - 2.2 The proposal to sell a portion of the government headquarters complex to a private developer is ill-conceived. Historians, architects, urban planners, etc. have expressed that the entire Government Hill site should be preserved intact, and "any commercial development now seems to be *inappropriate* [emphasis added]" according to a government-commissioned study of the site.
  - 2.3 Despite public support to the total conservation of the Government Hill, the career bureaucrats are "cherry-picking" from the Burra Charter (ICOMOS Australia) in a wilful attempt to try to justify their redevelopment scheme (Enclosure 1, *South China Morning Post* article, "Expert insulted as charter 'misused' for hill project," Thursday, November 17, 2011, A4).

2.4 The Government Hill is a good example of "organically evolved landscape" that "results from an initial social, economic, administrative, and/or religious imperative and has developed its present form by association with and in response to its natural environment" – to borrow words from the Operational Guidelines for the Implementation of the World Heritage Convention (UNESCO 1992, Paragraph 39).

2.5 The Florence Charter, which sets forth the principles for the preservation of historic gardens, is also instructive with regard to the need for protecting the integrity of the government headquarters complex and the Government Hill as a whole:

"In any work of maintenance, conservation, restoration or reconstruction of an historic garden, or any part of it, all its constituent features must be dealt with simultaneously. To isolate the various operations would damage the unity of the whole" (ICOMOS-IFLA International Committee for Historic Gardens 1982, Articles 7 and 10).

2.6 The international preservationist groups under the auspices of UNESCO advise that different elements of a historic site should be considered together for "protection, conservation, presentation and transmission to future generations" (UNESCO 1972, Article 4). The demolition of a significant component of the historic government headquarters complex for commercial use is a problem that will ultimately lead to inappropriate change.

### 3. The Way Ahead

3.1 Please will the members of the Antiquities Advisory Board and the Town Planning Board get their acts together to facilitate the "total conservation" of the government headquarters complex and the Government Hill as a public asset inherited from the past for the present and future generations.

A Hong Kong-based conservationist

Encl. (Enclosure 1)

c.c. **Government Hill Concern Group**

c/o Ms. Kitty Law Ngar-ling

**Legislative Council Panel on Development**

c/o Legislative Council Secretariat

**Purcell Miller Tritton (HK) Ltd**, government-commissioned consultant

c/o Mr Roger Wu

**South China Morning Post Publishers Ltd**

**Enclosure 1**

An article "Expert insulted as charter 'misused' for hill project"  
by Joyce Ng, *South China Morning Post*, 17 November 2011, A4