

July 19, 2012

To: Chairman and Members of the Antiquities Advisory Board (AAB)
c/o The Secretariat of the Antiquities Advisory Board
136 Nathan Road, Tsim Sha Tsui, Kowloon

Dear All,

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

The three CGO wings should be graded as one item collectively

1. Background of this submission

- 1.1 This letter is written in pursuance to my previous letters on the same subject that were sent to Members of the Antiquities Advisory Board and Members of the Town Planning Board on 18 November 2011 and 30 January 2012, wherein I expressed my request to conserve Government Hill and supported my request with historical information, conservation charters, and so on.
- 1.2 The chairman and members of the Antiquities Advisory Board voted at the meeting on 14 June 2012, that three items of the post-1950 former Central Government Offices (CGO) were confirmed to be given the highest Grade I heritage rating, whilst the fourth item – the West Wing – was proposed to be given a Grade II instead of the highest Grade I.
- 1.3 The voting outcome at the June 14 meeting has sparked a controversy. In the following days the row has been getting emotional. Some board members said they were angry at the “collusion” criticisms being directed at the chairman. The resignation of the chairman, now already luckily withdrawn, hasn’t helped to put the debate into proper focus.
- 1.4 The aim of this letter is to try to help put the debate into proper focus. Two main aspects are at stake in this controversy. **First**, is it appropriate to conduct separate gradings for the three CGO wings? **Second**, is the West Wing of lower value compared to the other two wings? The purpose of this letter is to respond to the **first** question.

2. The three CGO wings should be graded as one entity

- 2.1 The West Wing, Central Wing and East Wing are constituent components of the former CGO complex, which was designed as one project by the Architectural Office of the Public Works Department. In *Hong Kong Annual Departmental Report by the Director of Public Works for the Financial Years 1953-54 and 1954-55*, the CGO project was described in the following way:

- 2.1.1 The *first* phase of the project comprised 80 percent of the East Wing;
 - 2.1.2 The *second* phase included the extension of the East Wing and foundation work and basement for the Central Wing;
 - 2.1.3 The *third* phase included the remainder of the Central Wing (i.e. the Colonial Secretariat and Legislative Council Chamber);
 - 2.1.4 The *fourth* and last phase included the West Wing.
- 2.2 Michael Wright, who was Chief Architect for the former CGO, remarked in a taped interview that the three wings of the former CGO “were all designed as a whole” and “it would be a great pity to knock one of them down, for historical reasons they should be retained as a government office complex.” (YouTube: <http://www.youtube.com/watch?v=ONTaeQMZPUg>). It is beyond doubt that the three wings constitute one project completed in phases during the 1950s.
- 2.3 All along it has been a consensus among AAB members that interconnected items within a distinct historic site or compound should be assessed as a whole: “In response to a Member’s inquiry on the guidelines to divide or combine buildings within a compound for assessment, Mr Tom Ming [government staff] suggested that it was preferable to assess buildings as a whole if they formed a harmonious integral building cluster” (Board Minutes AAB/5/2009-10, p. 6).
- 2.4 The following precedent cases – a total of 12 – illuminate the grading practice of the AAB in face of several buildings within a historic site/ compound over the past three years or so. The source of the information is the AAB’s website: (<http://www.amo.gov.hk/en/aab.php>)

Case 1: Chan Study Hall in Tsung Pak Long (松柏塢 陳氏家塾)

The Main Building and Entrance Gate of the site of Chan Study Hall, which are numbered 939 and 987 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade III collectively on 31 Aug 2010.”

Case 2: Enchi Lodge in Sheung Shui (上水 恩慈之家)

The Main Building and Ancillary Block of the residential site of Enchi Lodge, which are numbered 420 and 421 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade II collectively on 31 Aug 2010.”

Case 3: Fanling Wai (粉嶺圍)

The Entrance Tower and two Watchtowers of this walled village, which are numbered 978, 979 and 980 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade III collectively on 31 Aug 2010.”

Case 4: Fong Yuen Study Hall in Ma Wan (馬灣 芳園書室)

The Main Block, Gateway, and Kitchen of this educational site, which are numbered 843, 844 and 868 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade II collectively on 31 Aug 2010.”

Case 5: Hakka Wai in Tsung Pak Long (松柏塢 客家圍)

The Houses, Watchtower & Walls & Entrance Gate, Study Hall, and Ancestral Hall of this site, numbered 23, 24, 25 and 26 on the list of 1444 buildings, were “combined as one item” and “accorded with Grade I collectively on 22 Mar 2011.”

Case 6: Ho Residence in Pak Sha O (白沙澳 何氏舊居)

The Watchtower, Side Chambers, Entrance Hall, Ancestral Hall, and Side Rooms of this site, numbered 67, 81, 86 and 192 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade I collectively on 10 Nov 2010.”

Case 7: Kat Hing Wai in Kam Tin (錦田 吉慶圍)

The Shrine, Entrance Gate, and four Watchtowers of this walled village, which are numbered 2, 3, 4, 5, 6 and 7 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade I collectively on 31 Aug 2010.”

Case 8: Mi Tak Study Hall in Lok Ma Chau (落馬洲 美德家塾)

The Main Block and Ancillary Building of this site, which are numbered 557 and 558 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade II collectively on 31 Aug 2010.”

Case 9: Old Lunatic Asylum in Sai Ying Pun (西營盤 舊華人精神病院)

The Main Building and Staff Quarters of this medical site, which are numbered 357 and 532 on the list of 1444 buildings, were “combined as one item” and “accorded with Grade II collectively on 31 Aug 2010.”

Case 10: Sik Lo in Shap Pat Heung, Yuen Long (元朗十八鄉 適廬)

The Main Building, Ancillary Block and Entrance Gate of this residential site, which are numbered 509, 872 and 1126 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade II collectively on 10 Nov 2010.”

Case 11: Wing Shing Tong in Sai Wan, Cheung Chau (長洲西灣 永勝堂)

The Main Block and Kitchen Block of this site, which are numbered 1123 and 1124 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade II collectively on 10 Nov 2010.”

Case 12: Woodside in Quarry Bay (鰂魚涌 林邊屋)

The Mansion and Garage of the Woodside site, which are numbered 478 and 479 in the list of 1444 buildings, were “combined as one item” and “accorded with Grade II collectively on 31 Aug 2010.”

- 2.5 Importantly, the buildings within a historic site can be graded by the AAB as one entity even though they are of different styles and completed in different years. In the **Woodside** site (Case 12 above), for example, the Mansion (Edwardian style, built in mid-1920s) and the Garage (Utilitarian style, built in 1947) were graded as one entity and given a Grade II heritage rating.
- 2.6 It should be obvious for all to realize that the three wings of the former CGO complex in Central, which were designed and planned together as one project and located within a distinct historic site that was confirmed Grade I by the AAB on 14 June 2012, should be treated as one totality and conferred a Grade I heritage rating in their entirety.
- 2.7 There are other examples of one grade being conferred on many different items within a distinct site. For example, **Ho Tung Gardens (何東花園)** (which is composed of structures built in different times and of different architectural styles scattered over a cultural and historical landscape) is recommended by the AAB to be declared as one single monument for legal protection.
- 2.8 The West Wing is a constituent component of the former CGO complex. The following proposal for the conservation of Ho Tung Gardens, quoted from a research paper, is also applicable to the former CGO and the Government Hill site: “Ho Tung Gardens is a complex consisting of a mansion and its associated gardens and outbuildings, and its southern prospects. **To focus on any one component undermines the significance of the place as a whole.**”¹
- 2.9 Similarly, the **St. Andrew’s Church Compound (聖安德烈堂建築群)** next to the Antiquities and Monuments Office in Nathan Road, Tsim Sha Tsui (which is numbered 42 in the list of 1,444 buildings) was proposed by the AAB to be given one single grading – that is, Grade I – although the years of construction of the historic structures therein are different, built between 1906 and 1910.
- 2.10 To take one more example, the **Dragon Garden (龍園)** which is numbered 226 in the list of 1444 buildings. The AAB decided to confer one heritage rating (Grade II) on this private garden which comprises a complex of buildings and non-buildings of varied types – including pavilions and ponds – which have been constructed over a period of 20 years from 1950s to 1970s.

¹ Quoted from a research paper prepared by Lee Ho Yin, Lynne D. DiStefano and Curry C.K. Tse (2011) *Architectural Appraisal of Ho Tung Gardens*, page 1.
(http://www.amo.gov.hk/form/briefing/htgaa_report.pdf)

- 2.11 Look at the site of **Yu Yuen (娛苑)** (numbered 380 in the list of 1444 buildings) which is relevant to the present discussion. Yu Yuen was downgraded from Grade I to Grade II because its forecourt “had undergone substantial changes” thus diminishing the heritage value (Board Minutes AAB/10/2009-10, page 5). This case shows that the demolition of the West Wing will entail elimination of mature trees and excavation of the hillside, the same as for the 1881 Heritage, thus ruining the landscapes of this green and peaceful oasis in Central that can benefit future generations.



Wooded and green hillside along Battery Path and Ice House Street (2012)

- 2.12 May I take this opportunity to quote from the Florence Charter, setting forth the principles for preserving historic gardens, which is instructive with regard to the need for protecting the **integrity** of the former CGO 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).

- 2.13 The UNESCO (that is, United Nations Educational, Scientific and Cultural Organization) advises that the constituent 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 former CGO complex is a problem that will ultimately lead to inappropriate change.

3. Way Forward

- 3.1 To grade several buildings within a historic site as one single entity and to confer a group rating on these buildings as a whole, as we have seen, has been the AAB's common practice in the past several years. This is clearly shown in the precedent cases and the cases of Ho Tung Gardens, St. Andrew's Church Compound, and Dragon Garden explained in above paragraphs.
- 3.2 May we hope that the West Wing – along with the former CGO site and the other two wings of the old government headquarters in Central – are to be collectively graded as one item, that is, to be given a **Grade I** heritage rating along with the other three items on the former CGO which have been confirmed a Grade I heritage status on 14 June 2012.

Thank you and best regards,

A Hong Kong-based conservationist

c.c. **Chief Executive's Office, Hong Kong SAR**

c/o Mr. Leung Chun-ying

Development Bureau, Hong Kong SAR

c/o Secretary for Development

Legislative Council Panel on Development

c/o Legislative Council Secretariat

Central and Western District Council, Chairman and Members

c/o Central & Western District Council Secretariat

Government Hill Concern Group

c/o Ms. Kitty Law Ngar-ling

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South China Morning Post

c/o Staff Reporter