

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, Hong Kong

Dear All,

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

**Urgent Request to Reconsider
Redevelopment of Central Government Offices West Wing
Hong Kong**

1. Background of this submission

- 1.1 I am writing to seek the Antiquities Advisory Board's support in the preservation of the old CGO West Wing. This submission is written in pursuance to my previous submissions on the same subject sent to the AAB on the following dates:
 - 1.1.1 November 18, 2011
 - 1.1.2 January 30, 2012
 - 1.1.3 July 18, 2012
 - 1.1.4 July 19, 2012
- 1.2 The first and second submissions are my written requests to conserve Hong Kong's Government Hill and the old CGO complex. The third and fourth submissions, dated July 18-19, 2012, were prepared in response to the public consultation on the heritage rating of the old CGO West Wing launched by the government. The initial consultation period was 'one month' up to July 20, 2012.
- 1.3 The head of **Development Bureau** said on June 13, 2012, that she would write to the ICOMOS regarding an alert from the ICOMOS drawing attention to plans for the West Wing. Although the Bureau's response (in the form of a letter, signed Tony Li) was issued on June 27, 2012, it was not until after the one-month consultation that the Bureau's letter was uploaded to a government website for public perusal.
- 1.4 There are many problems with Development Bureau's arguments for demolishing the old CGO West Wing. It suffices to state here that it doesn't prove anything by giving mere assertions in the Bureau's letter. We have to consider the weight of the evidence and the process of reasoning, and judge for ourselves. What is also needed is a sound factual knowledge of the issues involved.
- 1.5 This is a submission as to the points on which I dissent from the opinions expressed in the Bureau's letter on June 27, 2012. This I will do, first, by giving some more historical information on Government Hill, secondly, by pointing out the Bureau's misrepresentation of the concept of 'integrity' in heritage conservation, and, thirdly, by giving some true facts about 'public access' to the old CGO complex.

2. The “Government Hill”

2.1 Let us start with **Government Hill** - a subject Development Bureau oversimplifies as “only a conceptual description without a definite boundary.” “The former CGO,” it is also stated, “falls within an area known to some as “Government Hill” (Bureau’s letter, page 4) – as if the term **Government Hill** is accepted as true only by someone but regarded as vulnerable or only partly true by others. But the evidence is too detailed to be simply explained away by this means.

2.2 **Government Hill** became a place name as early as 1841, when Mr. A.R. Johnston (deputy of Sir Henry Pottinger) wrote letters with his Hong Kong correspondence headed **Government Hill**. To quote a historian and professor of law who wrote in 1968 “there is no doubt that this was the area later, and right up to the present day, reserved exclusively for Government buildings.”¹ Here is transcript of one such letter written from **Government Hill** dated 24 August 1841.²

From A.R. Johnston Esq. Deputy Superintendent of Trade charged with the Government of the Island of Hong Kong.

To G.A. Bushby Esq. Secretary to the Governor of India

24 August 1841

Sir,

His Excellency Sir Henry Pottinger, Bart., having expressed his intention to retain the Settlement of Hong Kong until Her Majesty's further pleasure on the subject is known and as the Government of Hong Kong is placed under the charge of the Superintendent of Trade of British subjects in China. I have now to inform you that I have made regulations for a Post Office at this point, and I have to request that instructions may be given to the proper authorities.... to address all mails for the Chinese Expedition as well as others that may be made up at the different Post Offices for this country, to the Postmaster at Hong Kong.

Taking advantage of the discretionary authority conveyed to me in your letter of 3 February, I shall pay to the clerk in charge of the Post Office here, the sum of twenty Spanish dollars per mensem on account of the Indian Government, as well as the requisite expenses incurred in the details of packing and sending letters to the different points in China where portions of the Expedition may be.

The allowance of twenty-five dollars per mensem made to the person in charge of the letters at Macao will cease after the 31 October next, by which time I trust all mails will be addressed to Hong Kong alone, and the service of the above mentioned person will no longer be necessary.

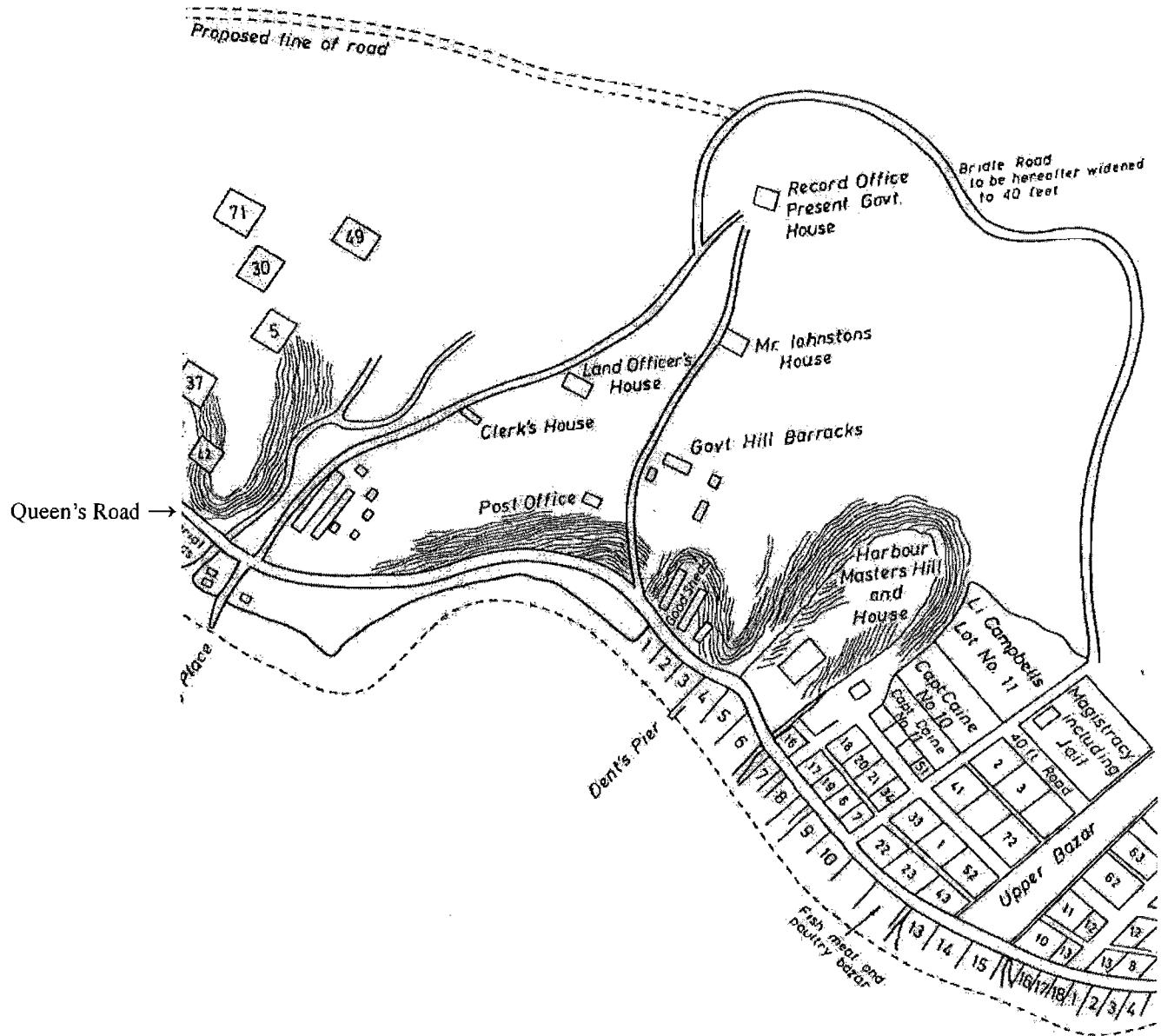
If all mails though addressed to the Postmaster at Hong Kong be further addressed "to the care of the Superintendent of the Trade of British subjects in China", it will be a good precaution in case they should be landed at Macao, from whence I will direct the proper person, belonging to the Superintendent's establishment to forward them to Hong Kong without delay.

*(Signed) A.R. Johnston
Deputy Superintendent charged with the Government of the
Island of Hong Kong
Government Hill, Hong Kong.*

¹ Dafydd Emrys Evans, “Hong Kong’s First Government House,” *Journal of the Hong Kong Branch of the Royal Asiatic Society (JHKBRAS)*, Vol. 8, 1968, pp.157-8.

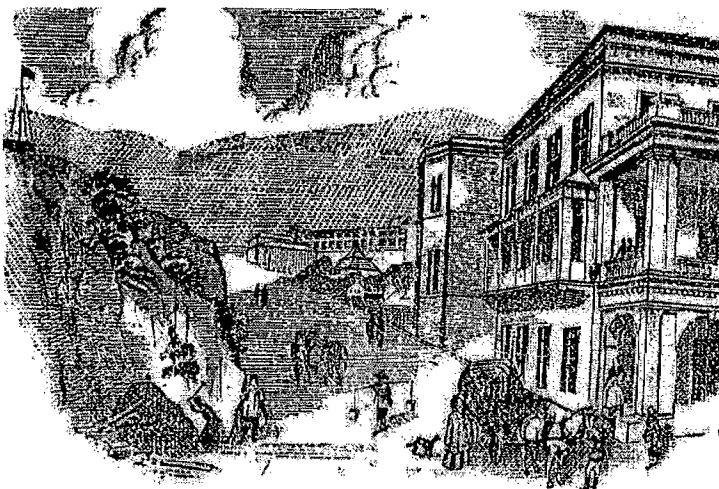
² The transcript is extracted from Edward B. Proud, *The Postal History of Hong Kong 1841-1997* (Heathfield, East Sussex: Proud-Bailey, 2004), pp. 23-24.

2.3 Government Hill is shown in an 1842 Hong Kong map (pictured below). Note the position of 'Govt Hill Barracks' in today's old CGO West Wing site; also 'Record Office' which combined the functions of general government offices and the residence of the head of government; 'Mr Johnstons House' which is in today's the Court of Final Appeal site. At that time, Queen's Road (the earliest road built on the island of Hong Kong) was just above the watermark.



Map in 1842. Source of illustration: Hal Empson, *Mapping Hong Kong: A Historical Atlas* (Hong Kong: Government Printer, 1992), p. 160.

2.4 With reference to the 1842 map above, another hillock further down Queen's Road is 'Harbour Masters Hill'. Lieutenant W. Pedder, RN, was appointed Harbour Master on July 31, 1841, hence another name of this hillock was Pedder's Hill. The first Harbour Master's office and residence was located on a bluff at the junction of today's Wyndham Street and Queen's Road. Nestling close against it and fronting on to Queen's Road is the first Hongkong Club building. (Please refer to the picture in the upper portion of page 4 of this submission).

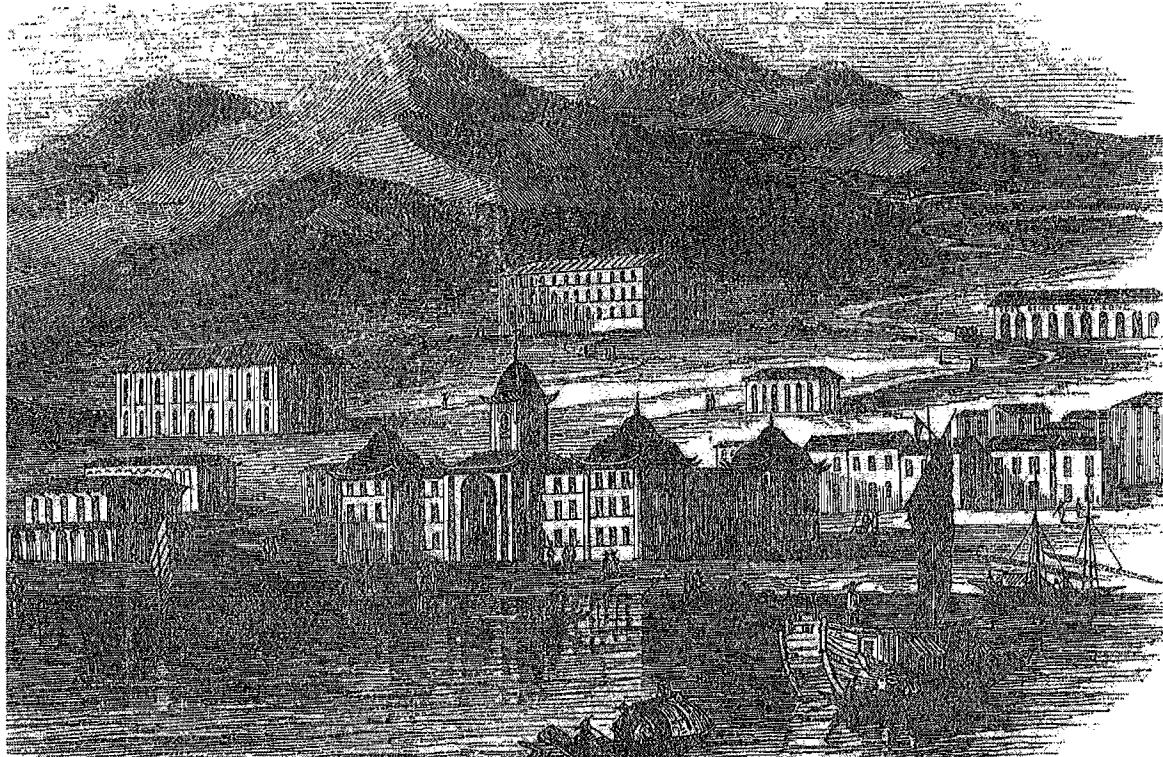


Wyndham Street in 1846.

On the right is the first Hongkong Club building and on the left Pedder's Hill.

Copy of the engraving from *South China Morning Post* article, "Time to Remember - The Times 'Thunders' Against Hongkong," October 19, 1964.

2.5 The Post Office shown in the 1842 map (page 3 of this submission) was probably established on October 1, 1841, as the salaries started on that date. A correspondent for *The New Monthly Magazine* who visited Hong Kong in 1843 described this Post Office as "a particularly small building cocked up on a little hill near the road."³



The one-storey building on the right says "POST OFFICE HONG KONG" on the front in tiny lettering, 1845-46. This print is reproduced in Edward B. Proud, *The Postal History of Hong Kong 1841-1997* (Heathfield, East Sussex: Proud-Bailey, 2004), p. 26.

³ G.T. Bishop, C.S. Morton and W. Sayer, *Hong Kong and the Treaty Ports, Postal History and Postal Markings* (London: The Postal History Society, 1949), p. 38.

2.6 **Government Hill** was also the site where the 1842 Treaty of Nanking was ratified in the presence of China's imperial commissioner Kiyng—or Ke-ying [Putonghua version being Qiying 耆英]. Below is an anonymous British official's account of the arrival of Kiyng and two other high officials (Kiyng's assistants) on June 23, 1843, which found its way to a weekly paper *The Friend of China and Hongkong Gazette* (29 June 1843), and which said:

"At an early hour in the morning [of the 23d inst.] the H.C. Steamer Akhbar, cast anchor in the bay, and a discharge of fifteen guns about 5 P. M., announced to the astonished Hong-Kongians, that their veritable Excellencies had at last arrived and were about to leave the vessel. I accordingly proceeded to the spot, and was much rejoiced to remark that they were received with all the honour and dignity becoming their exalted rank, KE-YING being no less a man than an Imperial Commissioner, a near relation of the Emperor, guardian to the heir apparent, and the third man in rank and authority in China."

The same eyewitness added quickly:

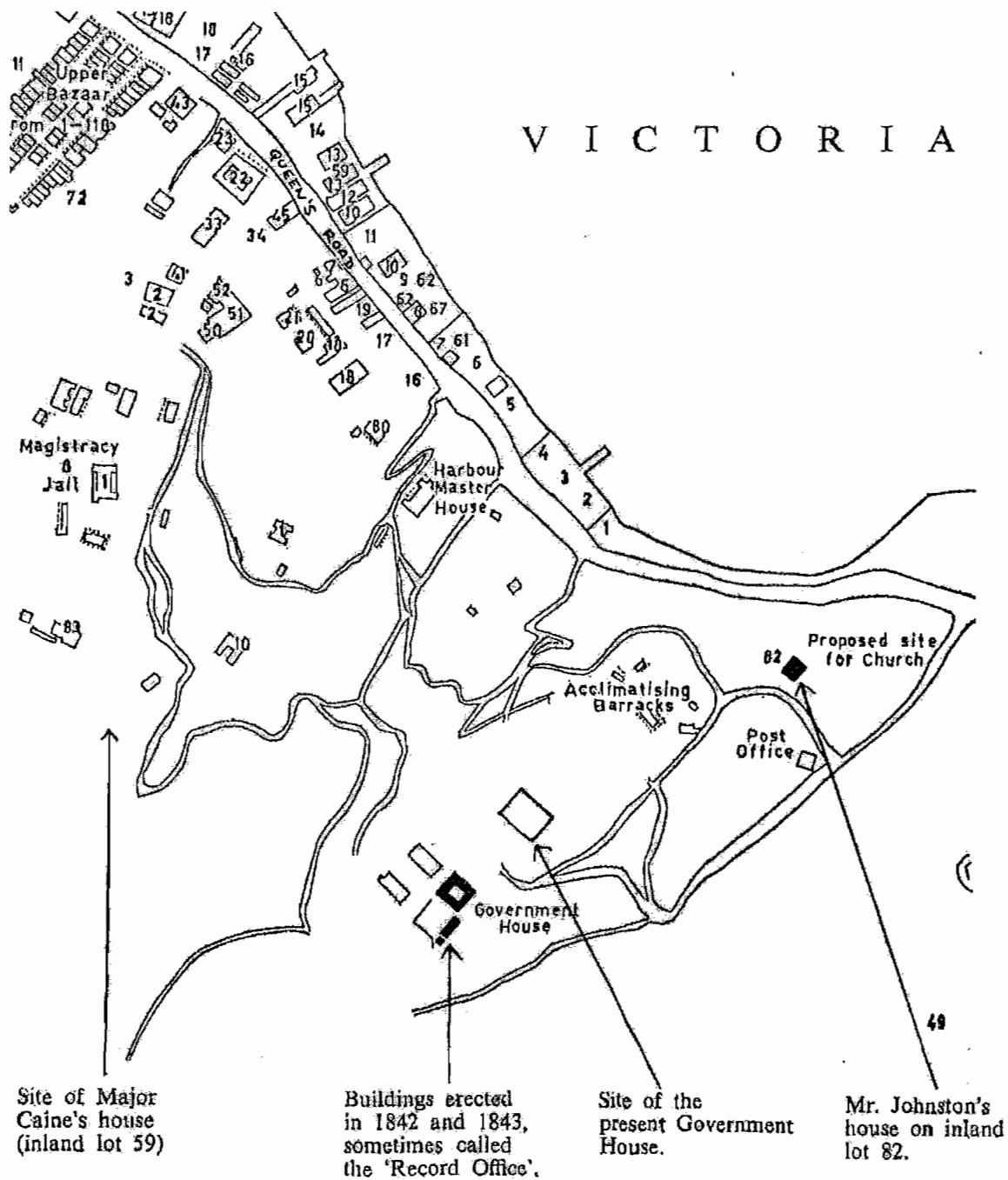
"On descending the hill to the wide street running along the harbour, and known by the name of the Queen's Road, I found it crowded with coolies, rolling with machines its mountains, vallies, and lakes into as smooth a surface as possible. *Allah il Allah ! Allah Chalim dur !!* this is indeed benevolence, for doubtless the three great men have dined on board the Steamer, and a smooth road with an easy course mightily assists digestion."

2.7 Here is a watercolour by an unknown artist—an item of the Hong Kong Museum of Art's collection of nineteenth-century paintings—which vividly illustrates the historic moment of the welcoming ceremony when China's imperial commissioner Kiyng arrived in Hong Kong on June 23, 1843:



Copy of the watercolour from Joseph S.P. Ting's article in an edited volume *Collected Essays on Various Historical Materials for Hong Kong Studies* (Hong Kong: Urban Council, 1990), p. 77.

2.8 During his stay in Hong Kong in June 1843, Kí-ying mainly lived in a bungalow by the 'Record Office'—south of the present Government House and within the area of the present Zoological and Botanical Gardens.⁴ *The Chinese Repository* Vol. XII, June 1843, No. 6 reported: "On Saturday, Kíying dined in private with sir H. Pottinger, and on Monday, the 26th, at 5 o'clock P. M. the ceremony of the exchange of the ratifications of the treaty of Nanking took place,—ten months after the agreement thereto by the same high officers on the banks of Yangtsz' kiang."



2.9 Those with an adequate acquaintance with Hong Kong's history all recognize that it was the combination of the Governor's residence and major government offices since Hong Kong's earliest history as a city and crown colony that has given rise to the name **Government Hill** for the area directly above Queen's Road. Writing in the 1930s, a correspondent from *South China Morning Post* put it like this:

“There is the Post Office and Land Office, on, and above, the site of St. John’s Cathedral, apparently the only administrative offices of the earliest years. Approximately on the Botanic Gardens site is the first Government House (the present Government House was completed in 1856). A house on the site of the present French Mission is marked “Johnston,” and was most probably the property of Mr. A.R. Johnston, who was Acting Governor for a period in 1841. The whole area is named **Government Hill**; while the military area became known as Cantonment Hill.”⁵

2.10 As a sideline to Cantonment Hill, according to a distinguished historian G.R. Sayer in his book *Hong Kong 1841-1862: Birth, Adolescence and Coming of Age* (first published 1937, reprinted 1980) the British navy and army were quick to establish themselves on the island of Hong Kong in the early years of British rule:

“The Navy has, I think, already laid claim to ‘Navy Bay’, lying due east (not west) of the bluff now known as Belcher’s Battery.... The Army meantime has selected two camps, one on Cantonment Hill (later known as the ‘Artillery’ and later still ‘Victoria’ Barracks, and Seven-and-six-penny Hill) running through the present military section and meeting the sea just opposite the present Wellington Barracks, and the other on the long slope which now carries on its shoulders the Hong Kong University and at its foot the old Reformatory Building.” (pp. 98-99)

2.11 **Government Hill** (Chinese version being 政府山) was a term destined not to be forgotten, as it refers to an icon landmark area directly associated with the history of Hong Kong from the early 1840s. Another distinguished historian Yeh Ling-feng (葉靈鳳), who originated from China and spent a total of 37 years here from 1938, described it just like this (in Chinese):

「皇后道花園道轉角處的那一塊空場，普通稱作“瑪利練兵場”。從這座練兵場的操場沿上，包括聖約翰大教堂以至工務局等機關在內，這地方在昔日稱為“政府山”，因為早年的政府行政機關，總督府，郵政局，都設在這座小山上。」⁶

⁵ V.H.G. Jarrett [‘Colonial’ pseud.] *Old Hongkong*, Vol. 2, D-H, p. 401. (xerox copy of transcripts of a series of articles taken from *South China Morning Post*, June 17, 1933 – April 13, 1935, and rearranged alphabetically by subject).

⁶ Cited from an article re-published posthumously: 葉靈鳳《香島滄桑錄》，香港：中華書局，1989年。第16章〈政府山和督轄〉，第89頁。

2.12 **Government Hill**, as has before been explained, is a fascinating part of modern Chinese and Hong Kong history that we cannot afford to be ignorant. Jan Morris who is professionally a journalist and a noted chronicler of the rise and fall of the British empire, in *Hong Kong: Xianggang* (London: Viking, 1988)⁷ has managed to put the early colonial record straight, writing:

“There was as yet no Government House, such as provided the traditional focus of the imperial order in other colonies. Throughout the 1840s Governors variously inhabited rented accommodations and furnished rooms attached to the Record Office (also used for weddings). The slope behind Central had however been nominated **Government Hill**, and around it an incipiently Establishment style was already becoming apparent.” (p. 81)

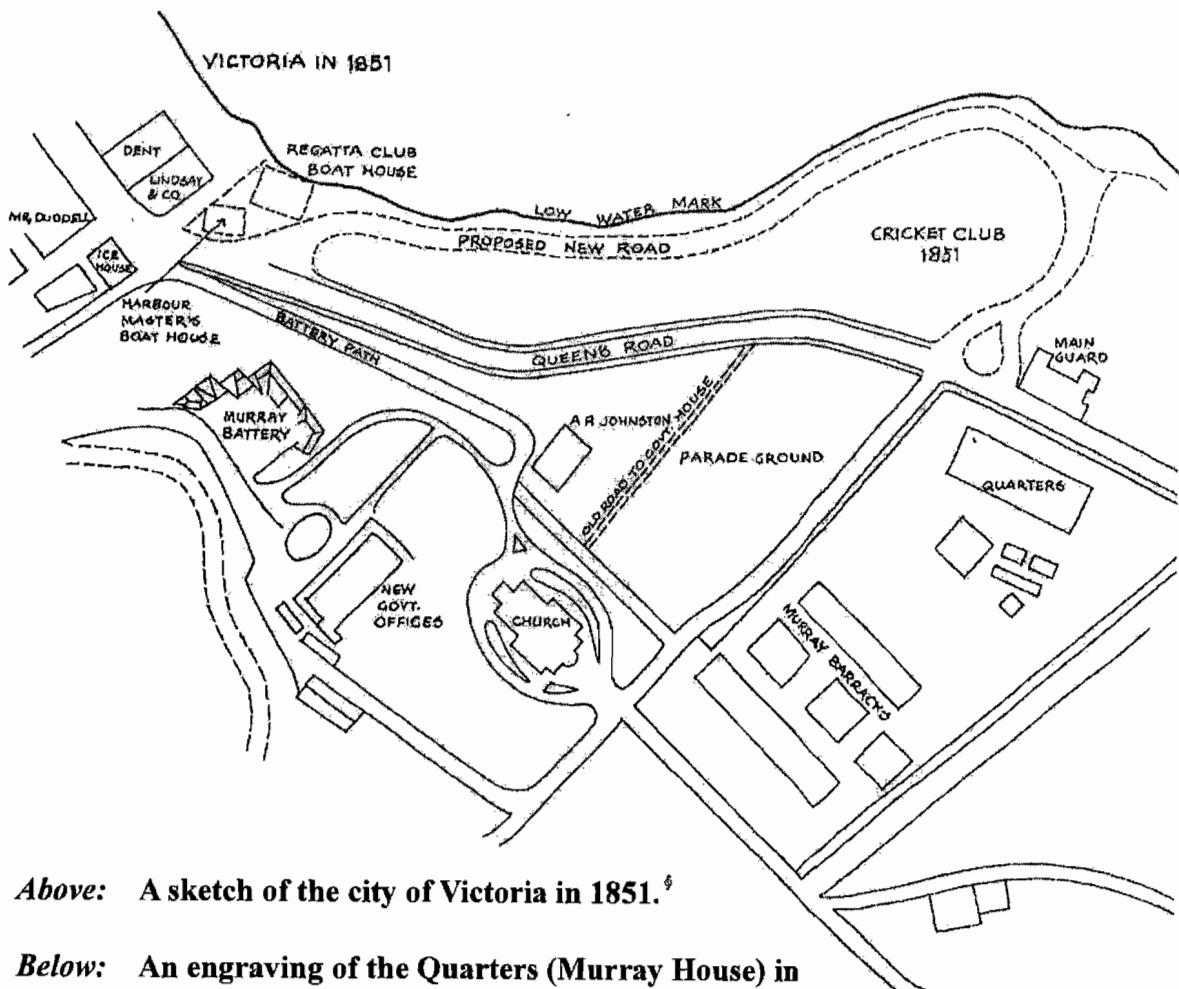
Reflecting on the spatial configuration of Government Hill, with special reference to Government House, Jan Morris commented that:

“[The present Government House completed in 1856] stood on a plateau beside Upper Albert Road, on what used to be called **Government Hill**, opposite the Botanical Gardens, not far from military headquarters and the Anglican Cathedral, and looking down to the harbour in a posture of unmistakable authority. Every view-picture showed it.” (p. 137)

2.13 Hong Kong’s **Government Hill**, as I point out in my submission to the AAB on November 18, 2011, is an 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 UNESCO Operational Guidelines for the Implementation of the World Heritage Convention (UNESCO 1992, paragraph 39). The origin and evolution of **Government Hill** was dictated by interplay of human activity and the topography of the north side of Hong Kong Island.

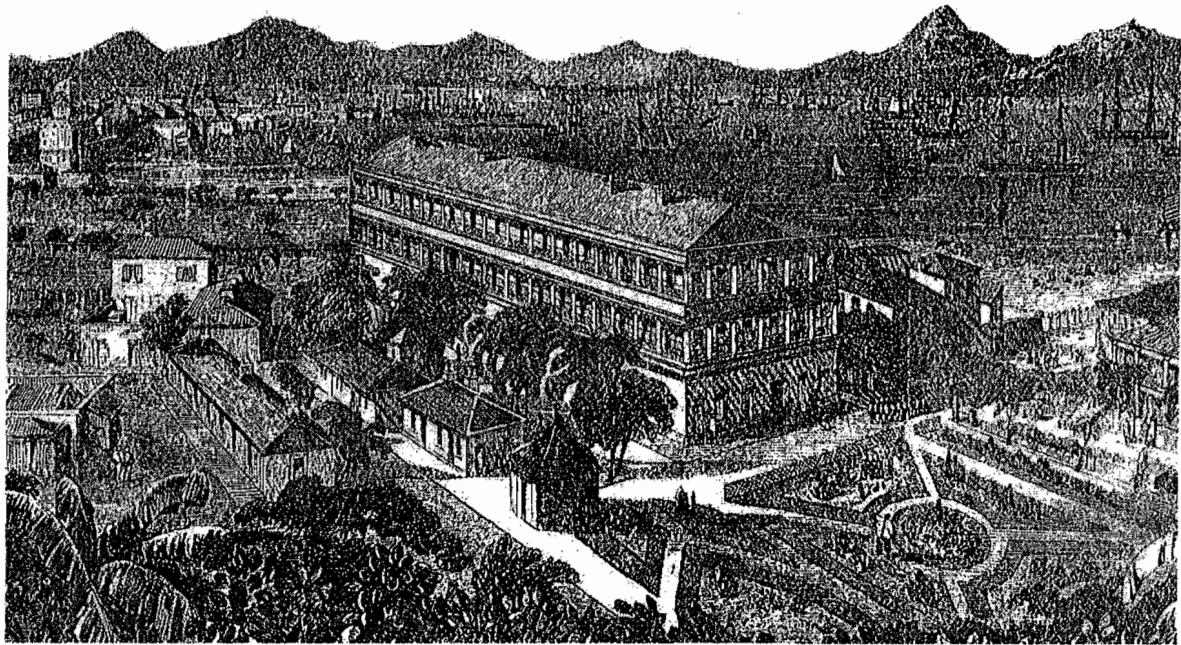
2.14 **Government Hill**, like any other organically evolved landscapes, is not totally pristine. An 1851 sketch (overleaf, page 9 of this submission) demonstrates some of the changing appearance that has taken place since those early years of colonial Hong Kong. In brief, it was more built-up during the first decade of its existence and progressed rapidly as far as the erection of buildings is concerned. Amongst the earliest were, namely, a new block of **New Govt Offices** dated from 1847, Murray Barracks’ **Quarters** (later known as Murray House, completed by 1845) and a **Church** (St. John’s Cathedral, the nave was completed in 1849 and the tower was added three years later, to replace a Colonial Church mat shed on the parade ground where the church service had been conducted).

⁷ The fourth and final edition of Jan Morris’ 1988 book, published in 1997, is titled *Hong Kong: Epilogue to an Empire*.



Above: A sketch of the city of Victoria in 1851.⁶

Below: An engraving of the Quarters (Murray House) in Murray Barracks and surrounding area, c. 1850



Sketch and engraving extracted from Nigel Cameron, *Hong Kong: The Cultural Pearl* (Hong Kong: Oxford University Press, 1978), p. 24.

⁶ The 1851 sketch is based on a map accompanying a paper of the then Governor Sir S.G. Bonham, and adapted from T.R. Tregear and L. Berry, *The Development of Hongkong and Kowloon as told in maps* (Hong Kong: Hong Kong University Press, 1959), p. 6.

2.15 The surrounding area of **Government Hill** is in a state different from what showed in the 1850s (e.g. the parade ground and quarters of Murray Barracks have given way to commercial use) but the Hill itself remains relatively unchanged when the remainder of the city has practically been completely rebuilt over the last decades. It exhibits significant evidence of its evolution and retains important connections to its past. Jan Morris tells the story with verve, feeling that it gives a sense of order and control completely at odds with the confusion of the busy streets below:

“Even today, among the apparently anarchic office blocks of Central, I fancy I can detect a heavy swathe of Authority running allegorically down the slope they used to call **Government Hill**: down from the symbolic Peak through Government House and its gardens, through the Anglican Cathedral and its close, across the Government offices and the Murray Road Car-Park, the Supreme Court and the Legco building, to end at the military headquarters still at the old dockyard by the sea. It is like one of the energized ley-lines supposed to link holy places in England, or like the mystic route the Manchu Emperors used to follow, when they left the Forbidden City to commune with the gods in the Temple of heaven.” (Jan Morris, *Hong Kong: Xianggang*, pp. 227-8)

2.16 A book on Hong Kong history published in 2008 (in Chinese) notes that the old CGO is an integral part of **Government Hill** shaped by the British since 1841. **Government Hill**, it continues, is a site with clear physical boundary, including the foothills above **Battery Path** (in parallel to Queen's Road) at its lower end up through **Government House** which is situated on the slope just below **Zoological and Botanical Gardens**, bounded by **Garden Road** and the present road known as **Glenealy**⁸ all the way down to Ice House Street:

「一八四一年英國人佔領香港後，以中環一帶作為行政中心，將現今的花園道、上亞厘畢道至忌連拿利的山坡劃為政府山(Government Hill)，建立殖民地政府。香港禮賓府位於政府山上亞厘畢道即以維多利亞女皇夫婿亞厘畢親王命名，背山面海，地理優越，前方遠眺維多利亞港，俯瞰中區景致，下達政府總署、聖約翰座堂，旁為金鐘軍區營房，後有花香林蔭的動植物公園，選址用心，能反映英人的管治與生活模式。」⁹

2.17 Investigating the story of **Government Hill** is not only valid—and fascinating—in its own right, but it can lead into many aspects of our historical past. Walk around this area and you can taste cultures of East and West, and different layers of history. **Government Hill** is a heritage place which we are blessed with.

⁸ **Glenealy ravine**—at one time known as **Elliot's Vale** named after Captain C. Elliot who declared British sovereignty over the island of Hong Kong in 1841—separates **Government Hill** in the east and **Pedder's Hill** in the west.

⁹ Cited from the book with a noted historian Joseph S.P. Ting as chief editor: 丁新豹 (主編)：《香港歷史散步》，香港：商務印書館，2008年，第64頁。

2.18 **Development Bureau** has commissioned a heritage consultant to conduct a study of the CGO in 2009. The output is an appraisal report by Purcell Miller Tritton (available in http://www.amo.gov.hk/en/research_cgo_20091015.php) which is concluded with findings and recommendations, some of which are (to quote the heritage consultant's original wording):

2.18.1 “Since the end of the Second World War, when Hong Kong was fast becoming a commercial centre, the rest of the city rapidly expanded upwards while **Government Hill** remained an area of low rise building and green, open space.... The CGO are therefore an unusual low rise survival in Central.” “Any new building on the site should take the height of the existing CGO as a maximum height.” (pp. 107, 145)

2.18.2 “There is some potential for archaeological remains under the CGO. It is known that air-raid tunnels exist underneath **Government Hill**, which extend underneath Government House and the Sheng Kung Hui compound. These are an interesting reminder of the 2nd World War and the struggles Hong Kong went through during that time. Above ground evidence still exists in the form of the tunnel portals and ventilation shafts.” (p. 122)

2.18.3 “Consideration should be given to creating a ‘**Special Protected Area**’ to acknowledge the well wooded spaces and low rise buildings in the Hong Kong Park, Botanic Gardens, Government House Gardens, the CGO site, the garden between the Cathedral and French Mission building, the Battery path area and the Sheng Kung Hui site.” (p. 136)

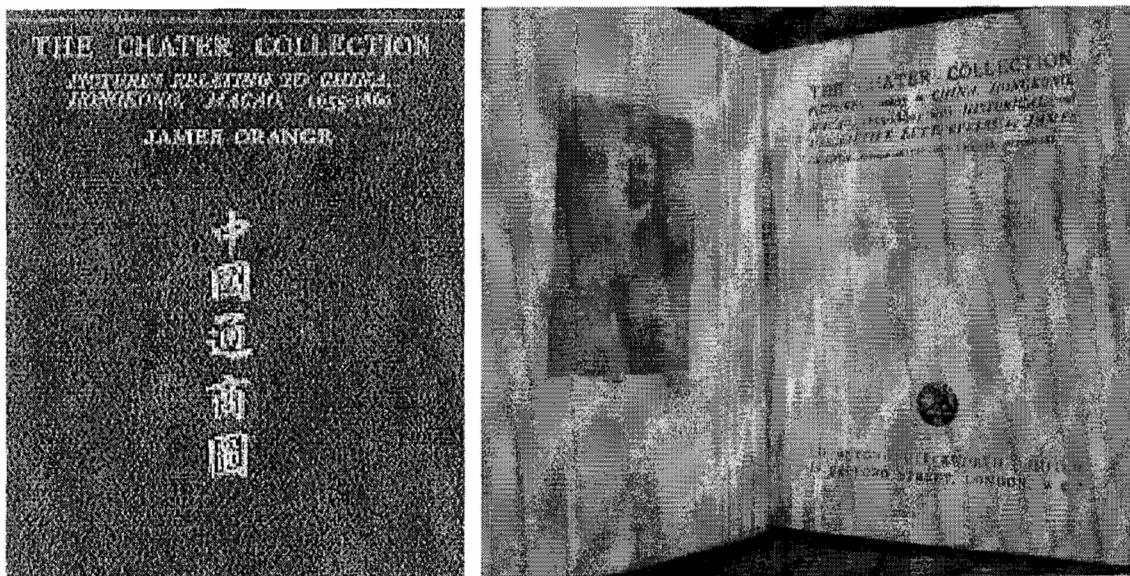
2.18.4 “A ‘Special Protected Area’ would be a tool which could be used to protect this area from inappropriate development.... The designation of the area would recognise the importance of the individual historic buildings and also highlight the historic nature of **Government Hill**, as well as recognising the significance of the green space.” (p. 136)

2.18.5 The consultant's “*purpose of the recommendation*” is: “The height of the CGO buildings was discussed at length when the buildings were being designed in the 1950s. There was a clear intention to preserve the view from Government House. Whilst the view of the harbour has now disappeared, the view across the top of the offices and the former French Mission building is still significant. Other views from longer ranges, such as from the Hong Kong Park and the Peak, also benefit from the low rise of the CGO.” (p. 145)

2.19 Regrettably, **Development Bureau** officials feel apart from **Government Hill** and willfully ignore the heritage consultant's recommendations for conservation. They unjustifiably insist to demolish what would be half of the old CGO site, which includes extensive excavation of the historic hillside and construction of a 150m 32-storey commercial tower to replace the old CGO West Wing, thus causing damage to the character of the heritage place.

2.20 The West Wing redevelopment project may entail destruction of archaeological remains and cultural relics that may be underground. When the Japanese invaded Hong Kong in December 1941, the best paintings of an art collection—The Chater Collection—were stripped from frames and put into sealed metal tubes, and then concealed beneath Government House.¹⁰ But the men involved all died during the war, and the mystery of the artworks was buried with them. Liz Chater, a distant relative of Sir Catchick Paul Chater, reported:

“Intriguingly, whilst Hong Kong was occupied by the Japanese, a Hungarian, Von Kobza Nagy had told the editor of the *South China Morning Post*, the Japanese are going to rebuild Government House and they are getting So-and-so of the PWD....to advise them about the foundations especially that air-raid shelter.....I’m afraid they’ll find the secret chamber. We hid there the best of the Chater collection.”¹¹



James Orange, *THE CHATER COLLECTION Pictures Relating to China, Hongkong, Macao, 1655-1860* (London: Butterworth, 1924).

¹⁰ During his lifetime, a prominent businessman Sir Catchick Paul Chater (1846-1926) collected paintings, sketches, prints, porcelain pieces, etc. which formerly decorated his house in Conduit Road and which he bequeathed to the Hong Kong government on his death. Regrettably, only 94 of the more than 400 original artworks are known to have remained today, largely because of the vicissitudes of war.

¹¹ Liz Chater, *A Prominent Armenian from Calcutta and the Grand Old Man of Hong Kong: Sir Catchick Paul Chater* (Kolkata: Armenian Church, 2005), p. 60.

2.21 It is also shocking that **Development Bureau** induced the government-appointed Town Planning Board to defer a meeting on the Government Hill Concern Group's application (submitted in early 2011) to designate the old CGO site as a "heritage precinct"—keeping it as a site for "government, institutions and community uses—which is complimentary to the heritage consultant's recommendation for creating a '**Special Protected Area**' for **Government Hill** (above said).

2.22 **Development Bureau** officials should not be permitted to fool the people of Hong Kong by professing ignorance of **Government Hill**, as this place—Government Hill—has indeed taken a prominent place in a Hong Kong government-sponsored 113-page book. The book points out, *inter alia*, that the 'Government House' when Sir John F. Davis, the second Governor, arrived in 1844 was still a temporary residence by the 'Record Office' then situated on **Government Hill**.¹²

2.23 The claim that **Government Hill** is "only a conceptual description without a definite boundary" is a myth which should be set aside once and for all. It is rather a peacefully green and leafy area (pictured below) embedded with many layers of history, giving it unique qualities that cause it to stand out from the concrete jungle of the central business district. It is a good time now to designate **Government Hill** as a '**Special Protected Area**' for appropriate conservation.



Photo extracted from China Southern Airlines in-flight magazine, in Chinese 《南方航空报-精英生活Elite》, Vol. 465, 25 June 2012, pp. 18-19.

¹² Katherine Mattock, *This is Hong Kong: The Story of Government House* (Hong Kong: Government Information Services, 1978). See especially chapter 1 'Record Office on Government Hill (1841-44)'.

3. The “integrity” of the former CGO site

- 3.1 The plan of **Development Bureau** to redevelop the old CGO West Wing using a “build-operate-transfer” model does not make sense. This plan, which would allow a developer to build a commercial block on the site and profit from rental income for 30 years before handing the block to government control, does not do justice to the site’s heritage value. We fail to see why it can “[enable] the Government to retain the integrity of its ownership of the whole former CGO site to reflect the historic significance of the site.” (Bureau’s letter, page 7).
- 3.2 **Integrity** is a key concept against which heritage sites are assessed. Have the Bureau officials ever read conservation charters and guidelines for protection of cultural heritage, such as the UNESCO *Operational Guidelines* (Feb. 2005 edition) defining **integrity** as “a measure of the wholeness and intactness of the natural and/or cultural heritage and its attributes” and in relation to heritage sites there is an advice that the “relationships and dynamic functions” that are “essential to their distinctive character should also be maintained” (paragraphs 88 and 89)
- 3.3 Another important reference may be *Principles for the Conservation of Heritage Sites in China* (中国文物古迹保护准则) (hereafter, “China Principles”) which was endorsed in 2002 by ICOMOS CHINA. The preface of the China Principles points out that “it is the responsibility of all to bequeath these sites [that is, sites of cultural heritage] to future generations in their full integrity and authenticity.” (Preface, p. 3). The China Principles elaborate on integrity and authenticity – two closely related concepts – in the following terms:
 - 3.3.1 “The aim of conservation is to preserve the authenticity of all the elements of the entire heritage site and to retain for the future its historic information and all its values.” (Chapter One, General Principles, Article 2, p. 4)
 - 3.3.2 “Physical remains must be in their historic condition. This includes a site’s condition as it was originally created, its condition after undergoing repeated adaptation throughout history, or its condition as a result of deterioration or damage over a long period.” (Chapter Two, On Heritage Sites, 2.2.1, p. 15)
 - 3.3.3 “Large complexes of buildings or historic precincts within villages and townships should retain their overall historic appearance. Modern additions, alterations, or loss should constitute only a small proportion of a site.” (Chapter Two, On Heritage Sites, 2.2.2, p. 15)
 - 3.3.4 “Social benefits are maximized through effective conservation measures that reveal a site’s authenticity and its intrinsic historical character.” (Chapter Four, On the Social and Economic Benefits of Heritage Sites, 4.1.3, p. 17)

3.4 Therefore, an essential aim of conservation is to preserve a heritage place in such a way that its **integrity**—defined in terms of the historical origins and relationships between the various elements that create a sense of place and contribute to the cultural significance of the place—will be ensured. “New construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate” (Burra Charter, Article 8). **Development Bureau** missed the point that it is not a site’s ownership that is of importance, but rather the functional as well as artistic and material continuity of the heritage place.

3.5 Let us be clear that the three wings of the old CGO were designed as one entity and have a certain architectural uniformity. This has been explained in my previous submissions and no further elaboration is warranted. Demolishing the West Wing, therefore, means the old CGO complex will be truncated forever.

3.6 The CGO West Wing redevelopment plan (pictured below) shows that the proposed 150m 32-storey commercial tower does not form a pleasing whole with the 1950s low-rise, functionalistic architecture design of the old CGO. This plan, which will lead substantially to the loss of **integrity** in the old CGO site, is a far cry from being a “conservation cum redevelopment plan” that “has paid due regard to the historic significance of the former CGO site” (Bureau’s letter, p. 7).

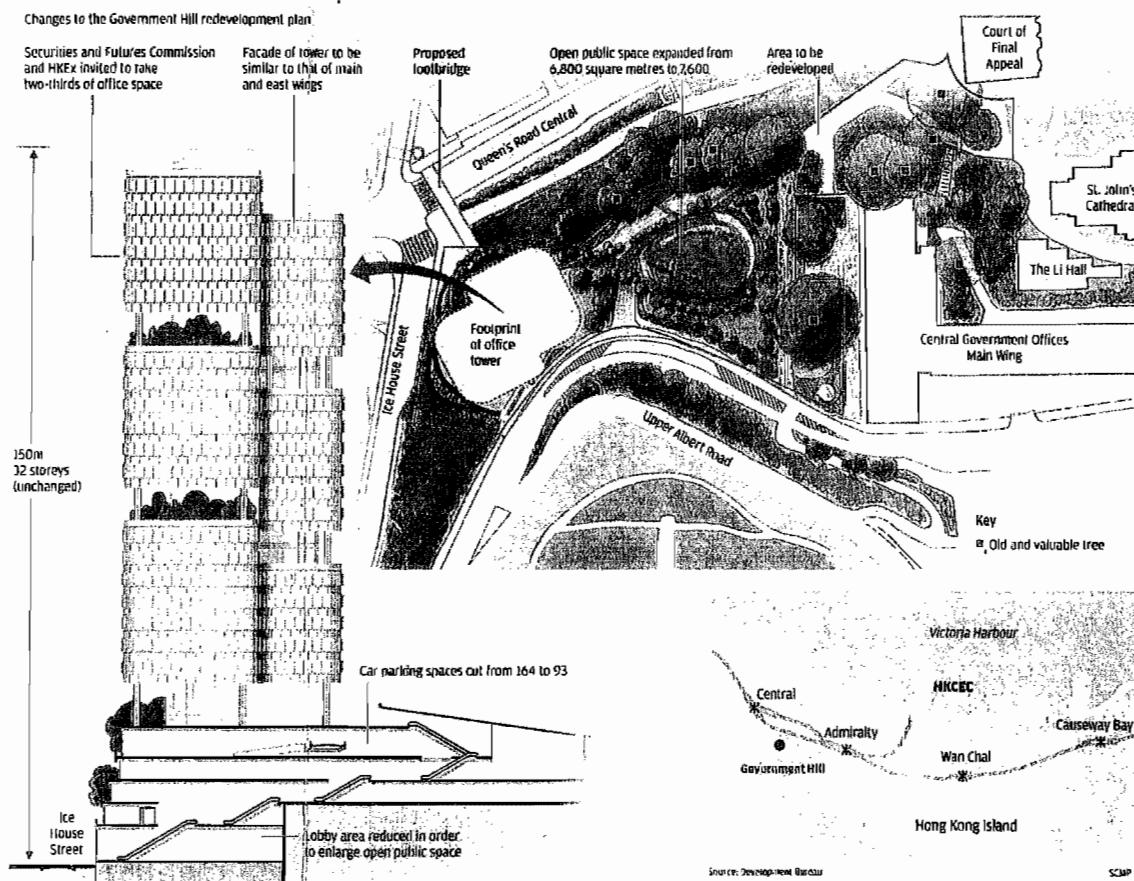


Illustration extracted from *South China Morning Post* article, “Hurdles stay for Government Hill,” November 16, 2011, A4.

4. Public access to the old CGO complex

4.1 As a Hong Kong resident, I am appalled by the way in which **Development Bureau** tells an untruthful story of the old CGO site and cast the West Wing demolition plan in a favourable light despite obvious opposition from the informed members of the community. Consider the following statements in page 6 of Bureau's letter:

“At present, like before, the whole CGO site is out of bound of the public and surrounded by a tall security gate.”

The demolition and reconstruction of the CGO West Wing will:

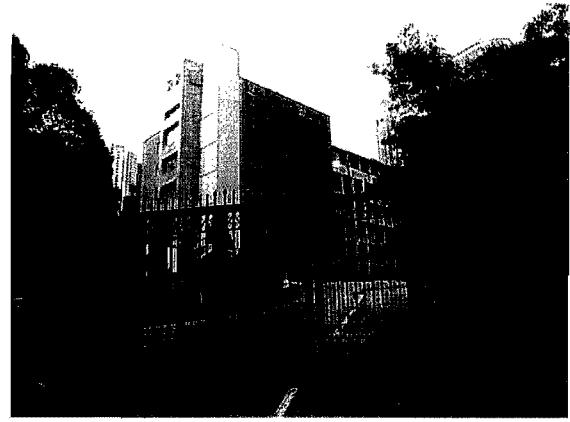
“create a new public open space of about 7,600 sq.m. with lots of greenery to be opened to the public for enjoyment. This new “green lung” within the busy Central Business District is greatly welcomed by the community....”

4.2 It is doubtful if any informed, fair-minded, and conscientious person in Hong Kong would care to endorse the statement “at present, like before, the whole CGO site is out of bound of the public” which does not match reality. We don't forget the good days when the old CGO open space was pedestrian-friendly and freely accessible to the public, providing a convenient short-cut for people walking from Battery Path to Lower Albert Road.

4.3 It was not until after 1997 that the Hong Kong SAR government erected metal gates (pictured below) to restrict public entry into the old CGO open space. As a Hong Kong citizen I know of this story, so I am sure **Development Bureau** officials do as well. They were fully aware of all this, so why didn't they reveal the whole truth? What's wrong with the Hong Kong SAR government officials, anyway – especially those in high positions?



Lower Albert Road, 2012



Battery Path, 2012

4.4 The erection of metal gates—to deny the public's free access to the old CGO open space—goes against not only the wishes of the people, but also the guidelines in the China Principles: “As a general principle, except in cases in which a site needs to be closed for conservation purposes or in order to facilitate scientific research, the site should be open and used for the public good.” (Chapter 4, On the Social and Economic Benefits of Heritage Sites, 4.1.2, p. 17).

4.5 I would point out that it is unjustified to tear down the old CGO West Wing and build anew with an artificial park. As explained, the old CGO site as it exists is part of a distinctive tranquil urban oasis among much lush tropical vegetation linking up various points of interest of Government Hill. If the metal fences are removed, the people of Hong Kong can—again—enjoy the old CGO space and Government Hill and experience its history as it is without having what Development Bureau called a new “green lung” which is simply an artificial small park.

4.6 **Development Bureau** is biased in its assessment of public opinions. The Bureau’s statement that the old CGO West Wing redevelopment plan “matches the main stream view in the community” (Bureau’s letter, p. 7) is really the Bureau’s judgment and not the simple truth. What logics drive the Bureau to make such a statement when “views of the LegCo Panel on Development and C&WDC members were diverse” and “a large majority of written submissions from individuals were against the redevelopment of the West Wing”? (Annex B of the Bureau’s letter)

4.7 The redevelopment of the old CGO West Wing is given the thumbs down by many people in Hong Kong – including professionals, academics and retired officials at the highest echelon of government¹³ who don’t often disapprove what their work peers have done unless there are compelling reasons to do so. The people of Hong Kong protested for a simple but important reason: they want the integrity of the historic Government Hill to be preserved, not to be compromised, to better retain cultural significance.

5. Conclusion

5.1 Given the proper care and maintenance, the old CGO West Wing can play a more useful and vibrant role in the future, bearing testimony to its rich history. After all, the 12th floor has been used for three months from March 25, 2012, as temporary office of the then chief executive-designate Mr. Leung Chun-ying.

5.2 Hong Kong is a city of diversity where different views are respected, but the views should be grounded on reason. In defense of its West Wing redevelopment plan, however, the Bureau played with words and resorted to the practice of one-sided presentations. There are oversimplifications, distortions and deliberate omissions.

5.3 At the risk of sounding impolite (which I am not), may I call on the chairman and members of the Antiquities Advisory Board (AAB) to be very cautious in dealing with the information they are given, especially the Bureau’s untruthful and biased materials with preconceived views imposed.

¹³ They include, for example, David Akers-Jones (Chief Secretary 1985-87), Elizabeth “Libby” Wong Chien Chi-lien (Secretary for Health and Welfare 1990-14) and Joseph Wong Wing-ping (Secretary for Civil Service 2000-06).

Your attention to this matter is very much appreciated.

With best regards,

A Hong Kong-based conservationist

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

c/o Mr. Leung Chun-ying

Chief Secretary for Administration's Office, Hong Kong

c/o Carrie Lam (Immediate Past Secretary for Development Bureau)

Development Bureau, Hong Kong

c/o Secretary for Development (attention: Mr. Tony Li)

Town Planning Board, Chairman and Members

c/o The Secretariat of the Town Planning Board

Government Hill Concern Group

c/o Ms. Katty Law

Hong Kong Institute of Architects, President

c/o Mr. Dominic Lam

South China Morning Post, Hong Kong

c/o Staff Reporter

ICOMOS CHINA (中国古迹遗址保护协会)

c/o Mr. Tong Ming-kang, President (理事长童明康先生)

International Scientific Committee on Twentieth Century Heritage, President

c/o Ms. Sheridan Burke

International Union of Architects, President

c/o Mr. Albert Dubler

Docomomo International, President

c/o Ms. Ana Tostões