

From: "Burke. Sheridan"  
To:  
Cc:  
Date: 14/11/2012 23:05  
Subject: FW: Heritage Alert, West Wing Central Government offices Hong Kong

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Dear Mr Chan and Mr Ming,  
Further to my email of 14th, may I ask that the letters and ISC20C documents be included in the on-line AAB public consultation submissions.  
Please do not hesitate to let me know if we can assist further  
Many thanks  
Sheridan Burke

**Burke, Sheridan | Partner**  
**Godden Mackay Logan | Heritage Consultants**

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**From:** Burke, Sheridan  
**Sent:** Wednesday, 14 November 2012 11:00 PM  
**To:**  
**Cc:**  
  
**Subject:** Heritage Alert, West Wing Central Government offices Hong Kong

Dear Messrs CY Leung, Chief Executive, HKSAR Government,

Please find attached the submission of the International Council of Monuments and Sites (ICOMOS) International Scientific Committee on Twentieth Century Heritage (ISC20C) regarding the proposals

for heritage listing and development in relation to the West Wing of the Central Government Offices, Hong Kong.

Yours faithfully



Sheridan Burke  
President ICOMOS ISC20C

Cc

Mr Gustavo Araoz, President ICOMOS  
Mr Tong Mingkang, President ICOMOS China  
Ms Kirsti Kovanen, Secretary General, ICOMOS  
Mr Kyle Normandin, Secretary General ICOMOS ISC20C  
Mr Paul Chan, Secretary for Development  
Mr Bernard Chan, Chairman of Antiquities Advisory Board  
Mr Tom Ming, Executive Secretary, Antiquities and Monuments Office (the secretariat of AAB)  
Mr. Thomas Chow, Town Planning Board  
Mr Dominic Lam, President Hong Kong Institute of Architects  
Ms Katty Law Government Hill Concern Group

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## International Scientific Committee on Twentieth Century Heritage

13 November 2012

Mr. CY Lueng  
Chief Executive,  
Hong Kong SAR Government  
Office of the Chief Executive  
Central Government Offices  
Tamar, Hong Kong

By Email: [ceo@ceo.gov.hk](mailto:ceo@ceo.gov.hk)

Ref: Reply re Proposed redevelopment, Central Government Offices West Wing Hong Kong.

Dear Mr. Lueng,

In the interest of continuing the professional dialogue about this important heritage site, we write to once again seek your reconsideration of the future conservation of the West Wing of the Hong Kong Central Government Offices, following our letters of 17 August 2012 to Mr Tony Li, and 13 June 2012 to Mr Donald Tsang Yam-kuen and issuing of the international Heritage Alert, posted 13 June 2012.

We have reviewed with interest the numerous on-line submissions received regarding the conservation of this important government building complex. Once again, our analysis of the documentation and our research confirms that the West Wing of the CGO is a vital and integral part of the whole CGO complex and cannot be treated differentially in terms of its grading or adaptation. It was designed as one entity, as a demonstration of the concept of providing centralised government services and administration in a single accessible location and it has proved to be adaptable and functionally relevant to date.

The submissions indicate that for many people in Hong Kong, the building complex has particular social (intangible) significance, as well as physical heritage values through its form, function, fabric and location. The adaptive re-use proposals already developed for the central wing demonstrate the sustainability for further functionality of the whole complex for ongoing use by future generations.

The AAB assessment that rated the whole site as being of heritage significance Grade 1, yet differentially graded the Main Wing as Grade 1, the East Wing as Grade 1, and the West Wing as Grade 2 is not logically reasoned, and deserves careful evaluation, but even so, the fact that the whole site is proposed to be Grade 1 makes it clear that the West Wing is vital to understanding the heritage of the whole complex.

Once again, we respectfully suggest that all efforts should be strongly pursued to conserve this complex. The CGO was conceived as a whole, designed as a whole and indeed built as a whole, though it was done in phases and with numerous people involved. The CGO has also functioned as a significant government complex for more

**President: 78 George Street Redfern, NSW AUSTRALIA 2016** [isc20c@icomos-isc20c.org](mailto:isc20c@icomos-isc20c.org)



than fifty years, serving the people of Hong Kong. Differentiating between the wings therefore is both philosophically contradictory and ethically troubling.

Once more, we wish to emphasise, as a group of internationally experienced professionals, that the proposed removal of the West Wing would not only be a great loss in its own right but it would also significantly diminish the cultural value and meaning of the remaining buildings and site that make up the CGO complex.

We fully support your government's plans to save and economically rehabilitate the Central Wing and East Wings. A similar opportunity should be offered to ensure that the West Wing can continue to serve the people of Hong Kong. In that way the entire CGO complex can retain its cultural value and meaning, and its heritage values can be appreciated and celebrated by future generations.

Considering the strength of the public submissions supporting its conservation, and the demonstrated capacity for the building to be adaptively re-used, we ask you once more to re-consider further the opportunity before you to conserve and celebrate the heritage significance of the entirety of the Central Government Office complex.

I attach for your consideration the current international standard guidelines for conserving and adapting significant heritage buildings of the Twentieth Century, the Madrid Document, prepared by the ICOMOS ISC20C.

We hope that it will assist the government and its advisers in making a sound decision for the future of this important building complex and cultural landscape.

**Sheridan Burke**  
**President, International Scientific Committee on Twentieth Century Heritage**

**13 November 2012**

Cc

Paul Chan, Secretary for Development

Bernard Chan, Chairman of Antiquities Advisory Board

Tom Ming, Executive Secretary, Antiquities and Monuments Office (the secretariat of AAB)

Gustavo Araoz, President ICOMOS

Tong Mingkang, President ICOMOS China

Mr. Thomas Chow, Town Planning Board; [tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk)

Mr Dominic Lam, President Hong Kong Institute of Architects;

Ms Katty Law Government Hill Concern Group;



### APPROACHES FOR THE CONSERVATION OF TWENTIETH-CENTURY ARCHITECTURAL HERITAGE, MADRID DOCUMENT 2011

Madrid, June 2011

#### FOREWORD

The International Council on Monuments and Sites (ICOMOS) works through its International Scientific Committee on Twentieth-Century Heritage (ISC20C) to promote the identification, conservation and presentation of Twentieth-century heritage places.

ICOMOS is an international non-government organisation of conservation professionals which acts as UNESCO's adviser on cultural heritage and the World Heritage Convention.

The Madrid Document makes an important contribution to one of the ISC20C's current major projects, that of developing guidelines to support the conservation and management of change to Twentieth century heritage places.

The Madrid Document was developed by members of the ISC20C during 2011 and it was first publicly presented at the "International Conference Intervention Approaches for the Twentieth Century Architectural Heritage", held in Madrid in June 2011. The conference was organized by ISC20C Vice President Fernando Espinosa de los Monteros in association with the Campus Internacional de Excelencia Moncloa – Cluster de Patrimonio, and with the collaboration of the Escuela Técnica Superior de Arquitectura de Madrid (ETSAM). Over 300 international delegates debated and amended the initial draft of the document, which was unanimously adopted by the conference delegates on June 16th, 2011 at the Palacio de Cibeles, before the City of Madrid and Ministry authorities.

The Madrid Document has now been translated into several languages which are available to download on the ISC20C website: <http://icomos-isc20c.org/sitebuildercontent/sitebuilderfiles/madriddocumentenglish.pdf>

Currently, the Madrid Document refers only to architectural heritage and specifically, looks carefully at guiding intervention and change, but the ISC20C is considering broadening the document's scope to encompass guidelines for all types of heritage places of the Twentieth Century.

After following the usual ICOMOS processes for the development of conservation guidelines and principles, the final document may take its place among ICOMOS international doctrine.

We invite comments on the Madrid Document, to assist the preparation of a second edition. Comments may be submitted in English, French or Spanish, addressed to the Secretary General of ISC20C: [isc20c@icomos-isc20c.org](mailto:isc20c@icomos-isc20c.org)

**Sheridan Burke**

President, ICOMOS ISC20C

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# APPROACHES FOR THE CONSERVATION OF TWENTIETH-CENTURY ARCHITECTURAL HERITAGE, MADRID DOCUMENT 2011

Madrid, June 2011

## PREAMBLE

The ICOMOS International Scientific Committee for Twentieth Century Heritage (ISC 20C) is developing guidelines for the conservation of heritage sites of the twentieth century during 2011–2012.

As a contribution to this debate, the International Conference "Intervention Approaches for the Twentieth-Century Architectural Heritage – CAH 20thC" adopted on 16 June 2011 the following text "Approaches for the Conservation of Twentieth-Century Architectural Heritage, Madrid Document 2011".

## AIM OF THE DOCUMENT

The obligation to conserve the heritage of the twentieth century is as important as our duty to conserve the significant heritage of previous eras.

More than ever, the architectural heritage of this century is at risk from a lack of appreciation and care. Some has already been lost and more is in danger. It is a living heritage and it is essential to understand, define, interpret and manage it well for future generations.

The Madrid Document 2011 seeks to contribute to the appropriate and respectful handling of this important period of architectural heritage. While recognising existing heritage conservation documents, the Madrid Document also identifies many of the issues specifically involved in the conservation of architectural heritage. Yet while it specifically applies to architectural heritage in all its forms, many of its concepts may equally apply to other types of twentieth-century heritage.

The document is intended for all those involved in heritage conservation processes.

Explanatory notes are incorporated where necessary and a glossary of terms completes the document.

## ADVANCE KNOWLEDGE, UNDERSTANDING AND SIGNIFICANCE

### **Article 1: Identify and assess cultural significance.**

#### *1.1: Use accepted heritage identification and assessment criteria.*

The identification and assessment of the significance of twentieth-century architectural heritage should use accepted heritage criteria. The architectural heritage of this particular century (including all of its components) is a physical record of its time, place and use. Its cultural significance may rest in its tangible attributes, including physical location, design (for example, colour schemes), construction systems and technical equipment, fabric, aesthetic quality and use, and/or in its intangible values, including historic, social, scientific or spiritual associations, or creative genius.

#### *1.2: Identify and assess the significance of interiors, fittings, associated furniture and art works.*

To understand the architectural heritage of the twentieth century it is important to identify and assess all components of the heritage site, including interiors, fittings and associated art works.

#### *1.3: Identify and assess the setting and associated landscapes.*

To understand the contribution of context to the significance of a heritage site, its associated landscape and setting<sup>ii</sup> should be identified and assessed.



For urban settlements, the different planning schemes and concepts relevant for each period and heritage site should be identified and their significance acknowledged.

**1.4: Proactively develop inventories of the architectural heritage of the twentieth century.**

The architectural heritage of the twentieth century needs to be proactively identified and assessed through systematic surveys and inventories, thorough research and studies by multidisciplinary teams, with protective conservation measures established by the responsible planning and heritage authorities.

**1.5: Use comparative analysis to establish cultural significance.**

When assessing the significance of the architectural heritage of the twentieth century, comparative heritage sites must be identified and assessed in order to be able to analyse and understand relative significance.

**Article 2: Apply appropriate conservation planning methodology.**

**2.1: Maintain integrity by understanding significance before any intervention.**

Adequate research, documentation and analysis of the historic fabric are needed to guide any change or intervention. The integrity of the architectural heritage of the twentieth century should not be impacted by unsympathetic interventions. This requires careful assessment of the extent to which the heritage site includes all the components necessary to express its significance and also to ensure the complete representation of the features and processes that contribute to this significance. Adverse impacts of development and/or neglect, including conjecture, should be avoided.

Understanding how cultural significance is manifest in the architectural heritage of the twentieth century, and how different attributes, values and components contribute to that significance, is essential in order to make appropriate decisions about its care, and the conservation of its authenticity and integrity. Buildings evolve over time and later alterations may have cultural significance. Different conservation approaches and methods may be necessary within one heritage site. The input of the original designer or builder should always be sought, where relevant.

**2.2: Use a methodology that assesses cultural significance and provides policies to retain and respect it, prior to commencing work.**

The methodology used to assess the significance of the architectural heritage of the twentieth century should follow a culturally appropriate conservation planning approach. This will include comprehensive historical research and significance analysis in the development of policies to conserve, manage and interpret the identified cultural significance. It is essential that such analysis be completed before works start to ensure that specific conservation policies are provided to guide development and change. Conservation Plans should be prepared. Regional heritage charters and site-specific conservation declarations may be developed.<sup>iv</sup>

**2.3: Establish limits of acceptable change.**

For every conservation action, clear policies and guidelines should be established before starting any architectural intervention, so as to define the acceptable limits of change. A Conservation Plan should define the significant parts of the heritage site, the areas where interventions are possible, the optimum usage of the site and the conservation measures to be taken. It should consider the specific architectural principles and building technologies used in the twentieth century.

**2.4: Use interdisciplinary expertise.**

Conservation planning requires an interdisciplinary approach, considering all attributes and values of cultural significance. Specialists in modern conservation technology and material sciences may be required to undertake



specific research and exchange of knowledge due to the use and proliferation of non-traditional materials and methods in twentieth-century architectural heritage.

*2.5: Provide for maintenance planning.*

It is important to plan for the regular preventive care and maintenance of these architectural heritage sites. Emergency stabilisation work may also be required. Continual and appropriate maintenance and periodic inspection is consistently the best conservation action for architectural heritage and reduces long-term repair costs. A Maintenance Plan will assist this process.

*2.6: Identify responsible parties for conservation action.*

It is important to identify the parties who are to be responsible and accountable for conservation actions for the architectural heritage of the twentieth century. These may include, but not be limited to, owners, heritage authorities, communities, local government and occupants.

*2.7: Archive records and documentation.*

When making changes to twentieth-century architectural heritage it is important to produce records of those changes for public archiving. Recording techniques may include photography, measured drawings, oral histories, laser scanning, 3D modeling and sampling, depending on the circumstances. Archival research is an important part of the conservation planning process.

For every intervention, the peculiarities of the heritage site and the measures taken should be documented appropriately. The documentation must record the state before, during and after the intervention. Such documentation should be kept in a secure place and in up-to-date replicable media. It will assist the presentation and interpretation of the site, thereby enhancing its understanding and enjoyment by users and visitors. Information acquired in the investigation of architectural heritage, as well as other inventories and documentation, should be made accessible to interested persons.

**Article 3: Research the technical aspects of twentieth-century architectural heritage.**

*3.1: Research and develop specific repair methods appropriate to the unique building materials and construction techniques of the twentieth century.*

Twentieth-century building materials and construction techniques may often differ from traditional materials and methods of the past. There is a need to research and develop specific repair methods appropriate to unique types of construction. Some aspects of the architectural heritage of the twentieth century, especially those created after the middle of the century, may present specific conservation challenges. This may be due to the use of new or experimental materials and construction methods, or simply due to a lack of specific professional experience in its repair. Original/significant materials or details should be recorded if they have to be removed, and representative samples should be stored.

Before any intervention, these materials should be carefully analysed and any visible and non-visible damage identified and understood. Some experimental materials may have a shorter life-span than traditional materials and need to be carefully analysed. Investigations into the condition and deterioration of materials are to be undertaken by suitably qualified professionals using non-destructive and carefully considered non-invasive methods. Limit destructive analysis to the absolute minimum. Careful investigation into the aging of materials of the twentieth century will be required.

*3.2: The application of standard building codes needs flexible and innovative approaches to ensure appropriate heritage conservation solutions.*

The application of standardised building codes (e.g. accessibility requirements, health and safety code requirements, fire-safety requirements, seismic retrofitting, and measures to improve energy efficiency) may need to be flexibly adapted to conserve cultural significance. Thorough analysis and negotiation with the relevant authorities should aim to avoid or minimise any adverse heritage impact. Each case should be judged on its individual merits.



## **MANAGE CHANGE TO CONSERVE CULTURAL SIGNIFICANCE**

### **Article 4: Acknowledge and manage pressures for change, which are constant.**

*4.1: Whether as a result of human intervention, or environmental conditions, managing change is an essential part of the conservation process to maintain cultural significance, authenticity and integrity.*

Conservation of authenticity and integrity is especially important in urban settlements where interventions may be necessary due to changes in everyday use, which may cumulatively impact cultural significance.

### **Article 5: Manage change sensitively.**

*5.1: Adopt a cautious approach to change.*

Do only as much as is necessary and as little as possible. Any intervention should be cautious. The extent and depth of change should be minimised. Use proven methods of repair and avoid treatments that may cause damage to historic materials and cultural significance; repairs should be undertaken using the least invasive means possible. Changes should be as reversible as possible.

Discrete interventions can be introduced that improve the performance and functionality of a heritage site on condition that its cultural significance is not adversely impacted. When change of use is under consideration, care must be taken to find an appropriate reuse that conserves the cultural significance.

*5.2: Assess the heritage impacts of proposed changes prior to works commencing and aim to mitigate any adverse impacts.*

Before intervening in any heritage site its cultural significance needs to be assessed, and all components should be defined and their relationship and setting understood. The impact of the proposed change on the cultural significance of the heritage site must be thoroughly assessed. The sensitivity to change of every attribute and value must be analysed and its significance accounted for. Adverse impacts need to be avoided or mitigated so that cultural significance is conserved.

### **Article 6: Ensure a respectful approach to additions and interventions.**

*6.1: Additions need to respect the cultural significance of the heritage site.*

In some cases, an intervention (such as a new addition) may be needed to ensure the sustainability of the heritage site. After careful analysis, new additions should be designed to respect the scale, siting, composition, proportion, structure, materials, texture and colour of the heritage site. These additions should be discernable as new, identifiable upon close inspection, but developed to work in harmony with the existing; complementing not competing.

*6.2: New interventions should be designed to take into account the existing character, scale, form, siting, materials, colour, patina and detailing.*

Careful analysis of surrounding buildings and sympathetic interpretation of their design may assist in providing appropriate design solutions. However, designing in context does not mean imitation.

### **Article 7: Respect the authenticity and integrity of the heritage site.**

*7.1: Interventions should enhance and sustain cultural significance.*

Significant building elements must be repaired or restored, rather than reconstructed. Stabilising, consolidating and conserving significant elements are preferable to replacing them. Wherever possible, replacement materials should be matched like for like, but marked or dated to distinguish them.



Reconstruction of entirely lost heritage sites or of their important building elements is not an action of conservation and is not recommended. However, limited reconstruction, if supported by documentation, may contribute to the integrity and/or understanding of a heritage site.

**7.2: Respect the value of significant layers of change and the patina of age.**

The cultural significance of a heritage site as historic testimony is principally based on its original or significant material attributes and/or its intangible values which define its authenticity. However, the cultural significance of an original heritage site or of later interventions does not depend on their age alone. Later changes that have acquired their own cultural significance should be recognised and respected when making conservation decisions.

Age should be discernible through all the interventions and changes that have occurred over time, as well as in their patina. This principle is important for the majority of materials used in the twentieth century.

Contents, fixtures and fittings that contribute to cultural significance should always be retained on the heritage site where possible.<sup>vi</sup>

## **ENVIRONMENTAL SUSTAINABILITY**

**Article 8: Give consideration to environmental sustainability.**

**8.1: Care must be taken to achieve an appropriate balance between environmental sustainability and the conservation of cultural significance.**

Pressure for architectural heritage sites to become more energy efficient will increase over time. Cultural significance should not be adversely impacted by energy conservation measures.

Conservation should take into account contemporary approaches to environmental sustainability. Interventions to a heritage site should be executed with sustainable methods and support its development and management.<sup>vii</sup> To achieve a practical and balanced solution, consultation with all stakeholders is needed to ensure sustainability of the heritage site. All possible options in terms of intervening, managing and interpreting the heritage site, its wider setting and its cultural significance must be retained for future generations.

## **INTERPRETATION AND COMMUNICATION**

**Article 9: Promote and celebrate twentieth-century architectural heritage with the wider community.**

**9.1: Presentation and Interpretation are essential parts of the conservation process.**

Publish and distribute twentieth-century architectural heritage research and conservation plans, and promote events and projects wherever possible among the appropriate professions and broader community.

**9.2: Communicate cultural significance broadly.**

Engage with key audiences and stakeholders in dialogue that assists in the appreciation and understanding of twentieth-century heritage conservation.

**9.3: Encourage and support professional educational programs to include twentieth-century heritage conservation.**

Educational and professional training programs need to include the principles of conservation of twentieth-century heritage.<sup>viii</sup>



## GLOSSARY

**Attributes** include physical location, design (including colour schemes), construction systems and technical equipment, fabric, aesthetic quality and use.

**Authenticity** is the quality of a heritage site to express its cultural significance through its material attributes and intangible values in a truthful and credible manner. It depends on the type of cultural heritage site and its cultural context.

**Components** of a heritage site may include interiors, fittings, associated furniture and art works; setting and landscapes.

**Conservation** means all the processes of looking after a heritage site so as to retain its cultural significance.

**Cultural significance** means aesthetic, historic, scientific, social and/or spiritual value for past, present or future generations. Cultural significance is embodied in the heritage site itself, its setting, fabric, use, associations, meanings, records, related sites and related objects. Heritage sites may have a range of significances for different individuals or groups.

**Intangible values** may include historic, social, scientific or spiritual associations, or creative genius.

**Integrity** is a measure of the wholeness and intactness of the built heritage, its attributes and values. Examining the conditions of integrity therefore requires assessing the extent to which the property:

- a) Includes all components necessary to express its value;
- b) Ensures the complete representation of the features and processes which convey the property's significance;
- c) Suffers from adverse effects of development and/or neglect.

**Intervention** is change or adaptation including alteration and extension.

**Maintenance** means the continuous protective care of the fabric and setting of a heritage site, and is to be distinguished from repair.

**Reversibility** means that an intervention can essentially be undone without causing changes or alterations to the basic historical fabric. In most cases reversibility is not absolute.

## ENDNOTES

<sup>i</sup> Relevant documents and charters include:

- The Venice Charter - [International Charter for the Conservation and Restoration of Monuments and Sites \(The Venice Charter\) 1964](#)
- The Florence Charter- Historic Gardens and Landscapes 1981
- The Washington Charter- Charter for the Conservation of Historic Towns and Urban Areas 1987.
- The Eindhoven Statement – DOCOMOMO 1990.
- The Nara Document on Authenticity – 1994.
- The Burra Charter - The Australia ICOMOS Charter for Places of Cultural Significance 1999.
- Principles for the Analysis, Conservation and Structural Restoration of Architectural Heritage – 2003.
- The Nizhny Tagil Charter for the Industrial Heritage – TICCIH 2003.
- Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas, ICOMOS 2005.
- World Heritage Convention: Operational Guidelines 2008.

<sup>ii</sup> Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas, ICOMOS 2005.

<sup>iii</sup> Open-air spaces or green areas around and between architectural objects or in urban areas often represent components of an overall composition and of a historically intended spatial perception.

<sup>iv</sup> For example, *Texto de Mexico 2011*, Moscow Declaration 2006.

<sup>v</sup> In certain cases, the materials used for built sites of the twentieth century have a shorter life span than traditional materials. Lack of conservation action and knowledge of appropriate repair methods based on their material characteristics may mean they need more drastic interventions than traditional materials and they could also require additional intervention in the future.

<sup>vi</sup> Their removal is unacceptable unless it is the sole means of ensuring their security and preservation. They should be returned where and when circumstances permit.

<sup>vii</sup> [United Nations World Commission on Environment and Development \(WCED\): "Brundtland Report". Our Common Future \(1987\), Oxford: Oxford University Press, ISBN 0-19-282080-X.](#)

<sup>viii</sup> UIA (International Union of Architects) Architectural Education Commission Reflection Group.