

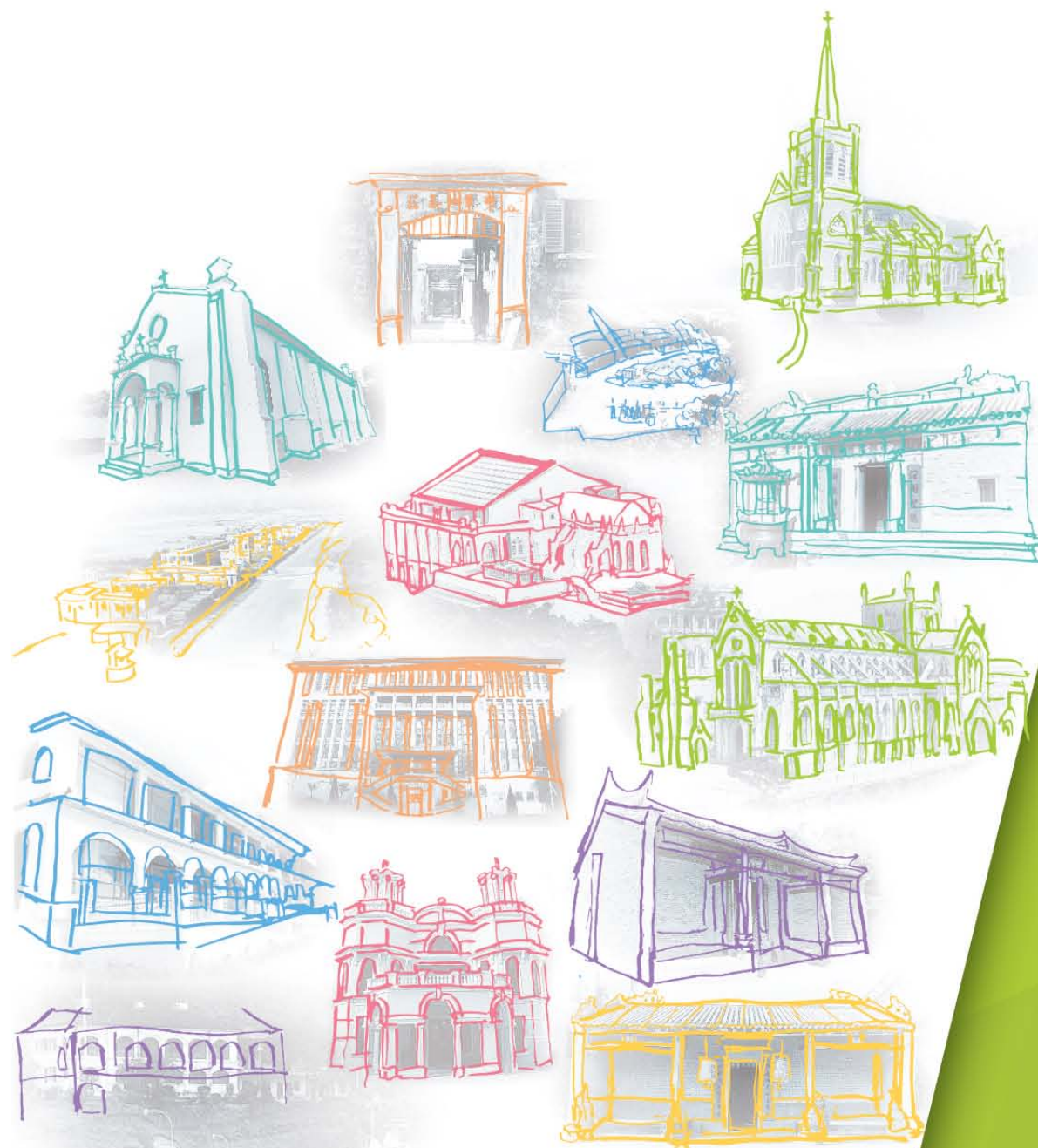


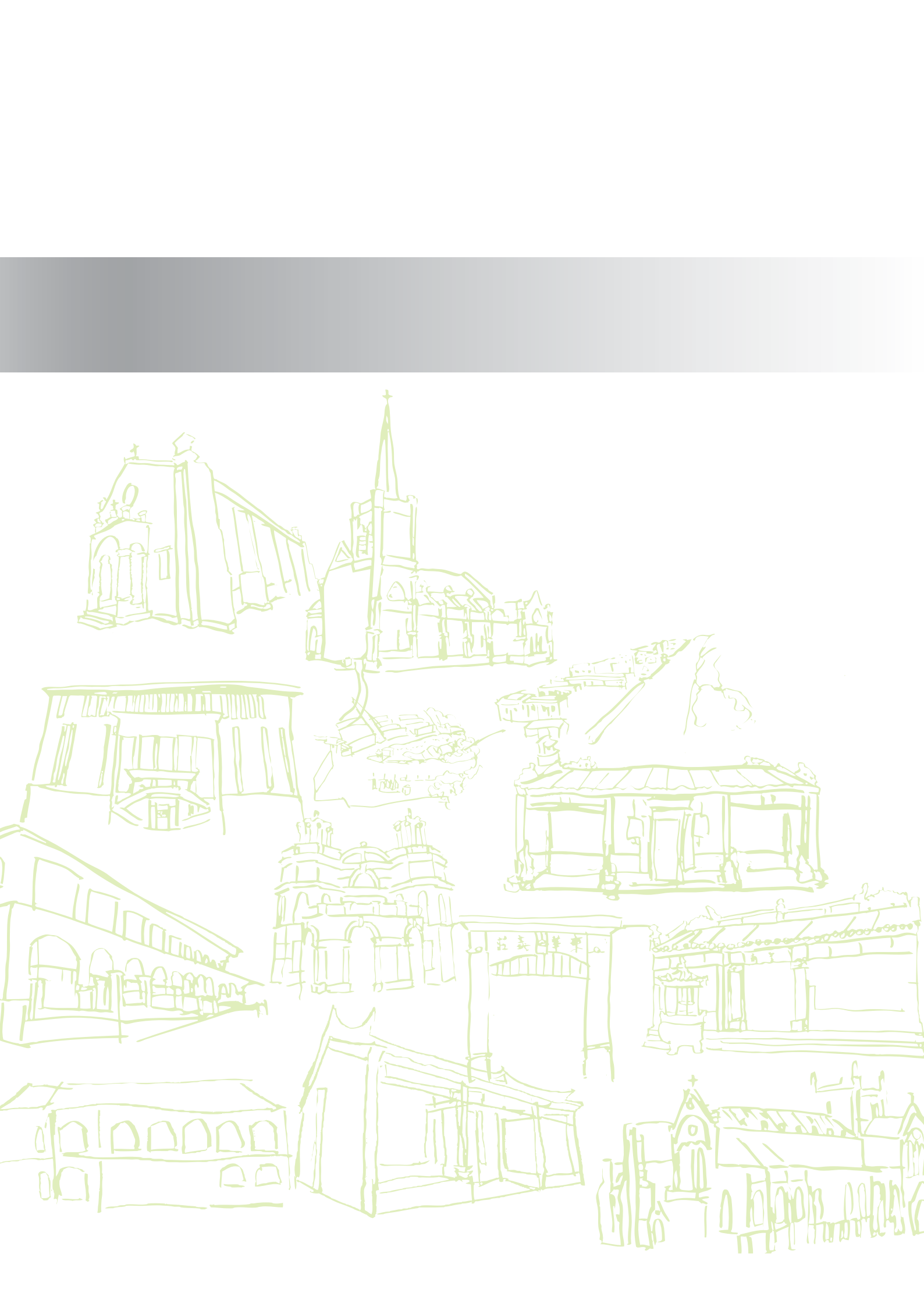
古物諮詢委員會  
Antiquities Advisory Board

# Respecting *Our* Heritage *While* Looking Ahead

Policy on Conservation of Built Heritage

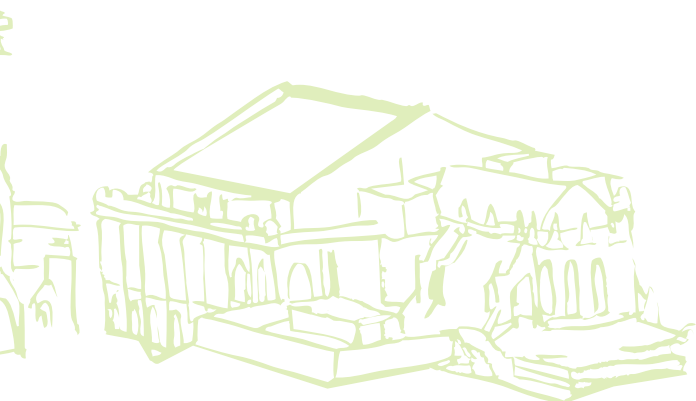
Consultation Paper





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# Chairman's Foreword

Over the past ten years, the various projects and issues relating to heritage conservation have become a matter of increasing public concern, and the discussion of built heritage conservation is no longer just confined to a small group of people. In fact, the conservation of built heritage is of paramount importance to showcase the cultural and historical landscape of a city, foster a sense of belonging among the community and promote the soft power of urban development. Nevertheless, the concepts involved are not as readily comprehensible as something visible and tangible or our personal interests, and obviously pose a formidable obstacle to the further development of our heritage conservation policy.

The Antiquities Advisory Board has all along been making recommendations to the Antiquities Authority for monument declaration and assessment on historic buildings in an open and professional manner. While some of the conservation decisions agreed upon have garnered wide recognition, others have triggered disagreement. For example, there may be disagreement on cases involving a historic building no matter whether it is public or privately-owned; whether it should be preserved or demolished; whether it should be closed or open to the public; whether it is seldom heard of or well known among the public; and whether it has caused controversy or not. When handling the outstanding cases, we surely continue to adhere to the established practice. Yet, we should not turn a blind eye to the flaws of the existing mechanism, in particular taking into consideration the issues arising from social changes.

During the assessment of the 1,444 historic buildings, we often faced with a dilemma in cases which involve private property rights. Ho Tung Gardens is a case in point. In light of such difficulties, the Chief Executive highlighted the need to conduct a review on ways to enhance the policy on the conservation of privately-owned historic buildings in the 2013 Policy Address. Subsequently, the Secretary for Development has invited the Antiquities Advisory Board to assist in the public consultation for the policy review.

As an advisory body to the Government on heritage conservation, the Antiquities Advisory Board is obliged and required to fulfill its role and function in furthering the development of the heritage policy. It is with this objective of taking the policy forward that the consultation document has been drafted. Followed the direction and based on the foundation of the previous heritage policy reviews, we will put our focus to explore questions related to heritage conservation policy with principles and direction. In doing so, we do not mean to exclude any views during the consultation process, but to focus our attention on a number of critical issues, with the aim of identifying the preferred way forward as well as reaching a consensus in society.

We can tell clearly from our experience that members of the public somehow differ on their awareness, understanding and appreciation of heritage conservation. Enhanced initiatives on the conservation of privately-owned historic buildings will inevitably touch upon various major considerations, such as the





interpretation of private property rights, as well as the use and allocation of public resources. While laying emphasis on the value of heritage conservation, we should also give due consideration to the need for changes. And we should not overlook the issue of cost when exercising public authority. The question is: how can we strike a balance and what is the right choice? Instead of solely relying on our Members' commitment to take decisions on heritage conservation matters, it is essential to have a good grasp of public opinions before advising the Government on ways to improve the policy.

A common set of values forms the bedrock of our culture. Though the experiences of and the practices adopted by our overseas counterparts can very well serve as reference, we should also be mindful of the Chinese saying that "the same tree planted in a different environment would bear a different fruit". I hope this consultation exercise will not only raise public awareness of the need for heritage conservation, but also help to chart the way forward on the basis of our shared cultural values. To ensure that we are getting on the right track rather than chasing rainbows, your comments and suggestions are most welcome.



**Andrew Lam**  
**Chairman**  
**Antiquities Advisory Board**



# 1. Background and Purpose

## Why Should Historic Buildings Be Conserved

1. Since opening its port for trade, Hong Kong has undergone countless changes on its way to become the international financial centre of today. Historic buildings reflect the living conditions of people in different social strata in the past eras and bear witness to the social changes. With proper conservation and good use, historic buildings can become unique landmarks. They can also enhance the aesthetics of our urban landscape and facilitate our transformation into a quality city. Moreover, conserving historic buildings can bring indirect advantages to our city. They can promote tourism, reduce building density in the urban areas, educate the younger generation about the history of Hong Kong, foster social cohesion, etc. Manifesting Hong Kong's unique culture, historic buildings are our precious cultural heritage and warrant our best endeavours in conservation.

## Heritage Conservation Policy Promulgated in 2007

2. The rapid surge in the population of Hong Kong in the 1950s and 1960s strained our land supply and accelerated the pace of urban development. To meet the demands for urban development, the Government as well as the community accorded priority to development in the past. As a result, many buildings with historic value and character, such as the Former General Post Office in Central and the Kowloon-Canton Railway Terminus in Tsim Sha Tsui, were demolished.
3. With growing awareness of heritage conservation in the Government and the community in recent years, many demolition or redevelopment plans of historic buildings (such as demolishing the Queen's Pier to make way for transport infrastructures) have become controversial issues in town. Today, we aspire for a better quality of life in addition to economic development. We hope to conserve our historical legacy while pressing on with development.



Former General Post Office in Central



The Kowloon-Canton Railway Terminus in Tsim Sha Tsui

4. In light of growing awareness of heritage conservation in the Government and the community, the Government promulgated a new heritage conservation policy in 2007. The objective is to implement a heritage conservation policy that gives due regard to development needs in the public interest, respect for private property rights, budgetary considerations, cross-sector collaboration and active engagement of stakeholders and the general public. The Government has also launched a series of heritage conservation initiatives. It sets an example by conducting Heritage Impact Assessment for new government



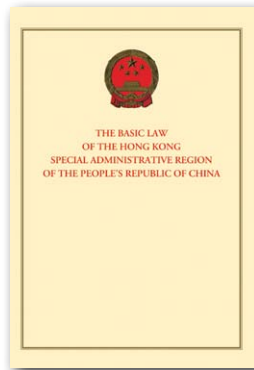
Queen's Pier



works projects, and works with non-profit-making organisations to preserve government-owned historic buildings through creative approaches and identify new uses for these buildings through the Revitalising Historic Buildings Through Partnership Scheme. In addition, it actively discusses economic incentives (including land exchange and transfer of development rights) with owners of historic buildings, to encourage them to conserve historic buildings under their ownership, and offers financial assistance to private owners to carry out maintenance works for historic buildings in order to arrest their deterioration from lack of maintenance.

## Challenges for Heritage Conservation

5. In Hong Kong, privately-owned historic buildings, including those owned in the name of an individual, a company or an organisation (such as a charitable organisation or “tso tong”), are private property protected by the Basic Law. Private owners have the rights to determine how their historic buildings are to be used, developed and altered (which may involve alteration, redevelopment or demolition works) in accordance with the current legislation. The Government has provided economic incentives and maintenance grants for the private owners. However, in the face of high land premiums and maintenance costs, many of them tend to consider demolishing their buildings for redevelopment. As a result, many privately-owned historic buildings have been inappropriately altered or have to face the threat of dilapidation and demolition.



6. Preservation of historic buildings will undoubtedly be beneficial to society. However, preservation costs will always be involved no matter whether the historic buildings are privately- or government-owned and can be very substantial. High maintenance costs for historic buildings, coupled with the high land cost in Hong Kong, mean that the Government may have to compensate significant amounts to owners for their loss of development rights arising from the preservation of historic buildings.

### DATABASE

#### Articles 6 and 105 of the Basic Law

Articles 6 and 105 of the Basic Law are important provisions of the Basic Law which protect private property rights in Hong Kong.

Article 6 provides that “The Hong Kong Special Administrative Region shall protect the right of private ownership of property in accordance with law.”

Article 105 provides that “The Hong Kong Special Administrative Region shall, in accordance with law, protect the right of individuals and legal persons to the acquisition, use, disposal and inheritance of property and their right to compensation for lawful deprivation of their property. Such compensation shall correspond to the real value of the property concerned at the time and shall be freely convertible and paid without undue delay. The ownership of enterprises and the investments from outside the Region shall be protected by law.”

### DATABASE

#### Distribution of Declared Monuments and Graded Historic Buildings

As at the end of March 2014, there are 105 declared monuments in Hong Kong. Their ownership distribution is as follows:

Government-owned	59
Non-government-owned <sup>1</sup>	46

In addition, the Antiquities Advisory Board has confirmed the grading of 1,274 historic buildings. Their ownership distribution is as follows:

Government-owned	231
Non-government-owned <sup>1</sup>	1,043

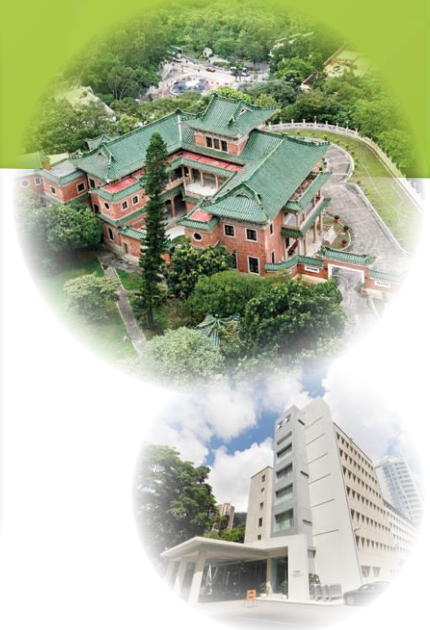
<sup>1</sup> Including privately-owned building (those owned by a company or an individual) and those owned by religious groups, educational institutions, clans or other organisations.



### Cost for Conservation – King Yin Lei and West Wing of the Former Central Government Offices

In 2008, the Government preserved King Yin Lei (a declared monument) through land exchange. The main building of King Yin Lei, together with its garden, was surrendered to the Government and a new lot adjacent to King Yin Lei was granted to the owner in exchange. The new lot of 4,706 square metres granted to the owner is in similar size as the lot where King Yin Lei is located. At that time, a newspaper reported that the property sector estimated that the value of the lot exchanged adjacent to King Yin Lei was over \$500 million.

In December 2012, the Government announced to drop the plan to demolish the West Wing of the Former Central Government Offices (Grade 1 Historic Building). A newspaper then reported that the property sector roughly estimated that the Government would suffer a loss of \$4.3 billion to \$6.4 billion in land revenue for preserving the West Wing.



### Buildings that have been Demolished in the Recent Years

As at today, 18 buildings on the list of the 1,444 graded or proposed graded historic buildings were found to be demolished. Besides, eight buildings on the list were extensively altered. The case of Ho Tung Gardens, which has been designated as a Grade 1 historic building, is one of the examples. The Development Bureau had arranged several meetings with the owner to discuss with her various conservation options and appropriate economic incentives. However, all proposals were rejected by the owner. Subsequently, the then Secretary for Development initiated the statutory procedures to declare Ho Tung Gardens as a monument, with a view to providing permanent legal protection for the Gardens. The owner of Ho Tung Gardens expressed her objection to such declaration. Finally, the Chief Executive in Council decided not to declare Ho Tung Gardens as a monument. Now, the main building and some of the structures of Ho Tung Gardens have been demolished. The case of Ho Tung Gardens clearly reflects the challenges for heritage conservation.



### Review of Current Policy

- 7. In view of the challenges for the conservation of built heritage, in particular those privately-owned historic buildings, the Chief Executive in his 2013 Policy Address indicated that the current policy on the conservation of privately-owned historic buildings should be reviewed. As the advisory body to the Government on heritage conservation, the Antiquities Advisory Board takes part in the policy review at the invitation of the Development Bureau.
- 8. We have a responsibility to do our best to protect our historic buildings and preserve these precious heritage for our future generations. However, we wish to know the views of the public on the following major issues: how to enhance protection for historic buildings while giving due regard to private property rights and development needs; how to share the cost of conservation; and the amount of resources the community is prepared to invest in conservation work. At the same time, this consultation document sets out the current situation and policy initiatives as well as the difficulties and challenges regarding heritage conservation in Hong Kong. We hope that this document will enhance public awareness and understanding of the heritage conservation work in Hong Kong.

### 2013 Policy Address

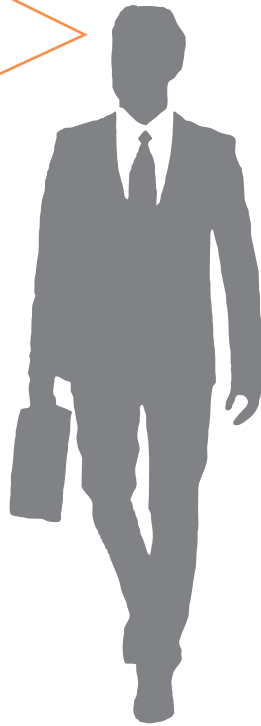
“We have worked to strike a balance between the need to respect private property rights and the need to preserve our heritage. On the premise of respecting private property rights, we need to offer appropriate economic incentives to encourage private owners to either hand over or conserve historic buildings in their ownership. In light of the experience gained over the past few years, we need to review the policy on the conservation of privately-owned historic buildings. This will include formulating a set of more detailed mechanism and criteria for determining the extent and means to use public resources for the conservation of privately-owned historic buildings, and studying whether there is a need to enhance conservation of such buildings in the context of town planning.”







I have just purchased a historic building. I want to preserve and revitalise it with a view to promoting local economic development and establishing a cultural landmark in the district. However, the new use which I proposed for the historic building was objected by the neighbourhood, while having it demolished and redeveloped into residential premises will bring more profits to the company. Business is business. I have decided to have the historic building demolished.



Historic buildings are our precious cultural heritage. It is our responsibility to preserve them for our future generations.



Although our ancestral house has a high historic value, it is dilapidated and has only limited space. We want to demolish it and build a larger and more comfortable modern house for our descendants.



Our church building is an old building, which requires higher costs and technical requirements for its maintenance than other ordinary buildings. Since extra expenditure is incurred, we always have to raise funds for the maintenance of our church building. However, the church building constitutes our identity, as well as signifies the history and origin of our church. We should treasure this historic building and will preserve it.

# 2. Protecting Historic Buildings

## Existing Measures to Protect Historic Buildings

9. In this chapter, we will introduce the existing measures to protect historic buildings and explore ways to enhance their protection.

## Monument Declaration and Grading Systems

10. Buildings of heritage value are classified as declared monuments, as well as Grade 1, Grade 2 and Grade 3 historic buildings.

Nature	Type	Heritage Value / Conservation Requirement	Example
Statutory Protection	Declared Monuments	Historic buildings or archaeological or palaeontological sites or structures of very high heritage value which are given statutory protection	St. John's Cathedral in Central <sup>1</sup> Man Mo Temple in Sheung Wan <sup>2</sup>
Administrative Measure	Grade 1 Historic Buildings	Buildings of outstanding merit, which every effort should be made to preserve if possible	Tsang Tai Uk in Sha Tin <sup>3</sup> Old Dairy Farm Depot in Central <sup>4</sup>
	Grade 2 Historic Buildings	Buildings of special merit; efforts should be made to selectively preserve	47 Barker Road at the Peak <sup>5</sup> The Woodside in Quarry Bay <sup>6</sup>
	Grade 3 Historic Buildings	Buildings of some merit; preservation in some form would be desirable and alternative means (such as keeping photo records) could be considered if preservation is not practicable	179 Prince Edward Road West <sup>7</sup> 19 Hing Hon Road in Sai Ying Pun <sup>8</sup>
Not Applicable	Nil Grade Buildings	Buildings of no or lower heritage value	-

1



2



3



4



5





List of Declared Monuments  
[http://www.amo.gov.hk/form/DM\\_Mon\\_List\\_e.pdf](http://www.amo.gov.hk/form/DM_Mon_List_e.pdf)



List of Graded Historic Buildings  
<http://www.aab.gov.hk/form/AAB-SM-chi.pdf>



11. Declared monuments have the highest heritage value. Only historic buildings with the highest heritage value are given statutory protection under the Antiquities and Monuments Ordinance (Cap 53).
12. In accordance with the Antiquities and Monuments Ordinance, the Antiquities Authority (i.e. the Secretary for Development) may, after consultation with the Antiquities Advisory Board and with the approval of the Chief Executive, by notice in the Gazette, declare a place, building, site or structure as a monument. In considering whether a building should be declared as a monument, the Antiquities Authority not only considers its heritage value, but also other factors in the overall community interest.
13. In addition to declared monuments, there are also proposed monuments within the legal framework. Declaration of proposed monuments is an interim contingency arrangement. The Antiquities Authority will immediately declare a Grade 1 historic building a proposed monument if it is under demolition threat. This not only provides the building with protection comparable to that for a declared monument, but also allows time for the Antiquities Authority to consider whether the building should be declared as a monument.
14. Any person who intends to undertake any works within the area of a declared monument or proposed monument should first obtain a permit from the Antiquities Authority. The Antiquities Authority may prohibit any alterations to a declared monument or proposed monument, or impose conditions upon any proposed alterations as he/she thinks fit in order to give protection to the declared monument or proposed monument. The owner or the legal occupier of a declared monument or proposed monument may claim compensation in respect of any financial losses suffered by reason of the refusal to grant the permit.

## DATABASE

### Compensation Mechanism

There is a compensation mechanism under the Antiquities and Monuments Ordinance. Even if public funds are used to compensate an owner, no matter the amount, it does not mean that the historic building must be open to the public. So far, there has been no case of granting compensation to private owners under the Ordinance.







15. Buildings of heritage value but have not been declared as monuments may be accorded a Grade 1, Grade 2 or Grade 3 status according to their heritage value, with the heritage value of Grade 1 historic buildings being the highest and so on.
16. The grading of historic buildings is an administrative measure. The Antiquities Advisory Board is responsible for the grading assessment, which targets at buildings constructed mainly before the 1950s. The grading exercise is conducted according to the following six criteria:
  - Historical Interest
  - Architectural Merit
  - Group Value
  - Social Value and Local Interest
  - Authenticity
  - Rarity



Assessment Criteria for Grading of Historic Buildings  
[http://www.aab.gov.hk/form/special\\_meetings/AAB-SM-B.pdf](http://www.aab.gov.hk/form/special_meetings/AAB-SM-B.pdf)



17. The administrative grading system does not give any statutory protection to Grade 1, Grade 2 or Grade 3 historic buildings. Some liken the system to a “toothless tiger”. As long as the owners comply with the relevant requirements for land, buildings and town planning, etc., there is no way the Government can stop the owners from demolishing the historic buildings under their ownership. On the other hand, if we give the grading system statutory effects (i.e. to regulate the demolition and alteration of historic buildings through law), some people may think that it is too rigid, restricts development and deprives private property right. Owners may object to the grading of their historic buildings and may claim the Government for their losses.
18. The Government has put in place a monitoring mechanism to better protect privately-owned historic buildings. Under the mechanism, the relevant departments will alert the Commissioner for Heritage’s Office of the Development Bureau and the Antiquities and Monuments Office of the Leisure and Cultural Services Department of any works to historic buildings that have been brought to departments’ attention to facilitate the Commissioner for Heritage’s Office and Antiquities and Monuments Office to persuade the owners concerned for conservation.
19. In some cases (such as some minor building works, including the alteration of drains and removal of architectural projections, and building works of some village houses in the New Territories (i.e. Exempted Houses in the New Territories)), owners are not required to submit applications for the demolition or alteration works. Since these cases will not be detected by the monitoring mechanism, the Government will not be aware of the need to persuade the owners.
20. Even if the Government realises that a historic building is under threat of demolition or alteration, government officers are not empowered to enter the graded historic buildings concerned for inspection or making of records without the consent of the owners. Neither can they stop the works from being conducted.

## “Point”, “Line”, “Plane”

21. At present, the conservation targets are primarily individual historic buildings (i.e. “points”). In recent years, there have been calls for a “point-line-plane” approach in conservation that seeks to extend the scope of conservation beyond an individual building (“point”) to a “line” (such as a particular street) and even the whole “plane” (such as a particular district). Some conservationists also start to advocate the concept of “historic urban landscape”. They believe that since built heritage bears witness to the social, economic and cultural development of a city, the relationship between heritage conservation and development should be established and thoroughly considered in the overall planning to pave the way for sustainable development.





Heritage Impact Assessment  
<http://www.heritage.gov.hk/en/impact/index.htm>



22. We will encounter many difficulties in extending the scope of conservation to preserve the surroundings of historic buildings (such as regulating the development within a certain radius of a historic building) or even an entire district in order to retain the local features and landscape. In establishing the “line” and “plane” for conservation, due regard should be given to the authenticity and integrity of the historic buildings and their surroundings. At the same time, the development needs, respect for private property rights, budgetary considerations, impacts on stakeholders and the general public, as well as the feasibility of implementation, must also be taken into account.
23. The first step to establish the “line” and “plane” of conservation is to define the characteristics and features of the “line” and “plane” before formulating a set of widely acceptable conservation criteria.
24. Take Tai O, “the Venice of the Orient”, as an example. It is not easy to set criteria for the conservation of Tai O stilt houses. Although the Tai O stilt house cluster can date back over 200 years, most of the existing stilt houses were built in the past two decades. If Tai O stilt houses are conserved by the “plane” approach, should the new constructions be conserved as well? Should we preserve the original building components or materials of the stilt houses or allow alterations to the stilt houses? If alterations are allowed, which elements (such as the number of storeys, design and materials used) should be required to preserve? Furthermore, the greatest feature of the Tai O stilt houses is their ambience of a fishermen’s village. To preserve this, the lifestyle of the residents is just as important as the stilt houses. Therefore, apart from preserving the hardware such as the stilt houses, how can we preserve the lifestyle of the fishermen’s village? Further study and consultation are required for the community to reach a consensus on these questions.

#### DATABASE

### “Point-line-plane” Example Outside Hong Kong

Take the Areas with Historical and Cultural Features in Gaoqiao Laojie, Pudong of Shanghai as an example, the Administration has divided the buildings there into several categories with different planning standards and protection requirements for buildings in different categories. For example, the Administration does not allow buildings with significant heritage value to be demolished. As regards, buildings of ordinary feature value, their owners may apply for addition, alteration or demolition for redevelopment purposes depending on the circumstances, but the new buildings should be in harmony with the features of the Areas with Historical and Cultural Features, and should be constructed in the same scale and size as the old ones. Besides, the Administration will request owners to demolish incompatible structures that impair the heritage value of the Areas with Historical and Cultural Features.

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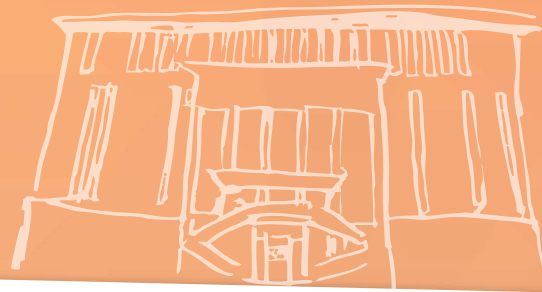
### Heritage Impact Assessment Mechanism and Environmental Impact Assessment

Under the Heritage Impact Assessment mechanism, project proponents for all new capital works projects initiated by the Government are required to consider, before commencement of works, whether their projects will affect the sites or buildings of historic or archaeological significance. If the answer is in the affirmative, then an Heritage Impact Assessment will be required under the mechanism set up by the Development Bureau, and mitigation measures should also be devised. Also, under the Environmental Impact Assessment Ordinance (Cap 499), an environmental impact assessment, including studies on whether declared monuments will be affected, should be conducted for all large-scale designated projects before implementation.

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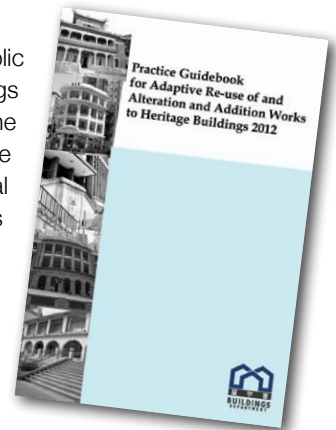
### Special Design Area

The Administration has considered designating Special Design Area in Hong Kong. For development within the Special Design Area, the applicant must furnish a civic design plan or a landscape plan, which demonstrates that the proposed development is compatible with the surrounding environment, and obtain the approval of the Town Planning Board. During the deliberation of the Town Planning Bill 2000, members of the public were divided over the proposed designation of Special Design Area. As such, the Special Design Area proposal requires further study and consultation.



## Mechanism for Approving Alteration and Addition Works to Privately-owned Historic Buildings

25. Revitalisation works for privately-owned historic buildings that may change the original design and approved uses or entail alteration and addition works must comply with the prescribed standards under the current Buildings Ordinance (Cap 123) to ensure the safety of users.
26. Since most historic buildings were built a long time ago, compliance with the current standards under the Buildings Ordinance may require extensive alteration works to the buildings that may affect their original architectural features.
27. Subject to compliance with the prescribed standards of structural stability and public health under the buildings regulations by the buildings concerned, the Buildings Department may consider modification of or exemption from the provisions of the Buildings Ordinance according to the special circumstances of individual cases. The Buildings Department has an established mechanism, based on the performance-based approach, for determining whether the alternative approaches can meet the relevant standards of building safety and health requirements. In this connection, the Buildings Department published the *Practice Guidebook for Adaptive Re-use of and Alteration and Addition Works to Heritage Buildings 2012*, which provides many practical advice, alternative approaches and case studies to help make sure that the revitalisation, alteration and addition works to historic buildings comply with the building safety and health requirements under the Buildings Ordinance.



### DATABASE

#### Example of Performance-based Alternative Approach

The Former Tai O Police Station (Grade 2 historic building) has been revitalised as the Tai O Heritage Hotel. When processing the applications for alteration and building works to the Police Station, the Buildings Department has accepted performance-based alternative approaches having due regard to the specific circumstances. For example, the original means of escape, fire resistance structures and emergency vehicular access of the Former Tai O Police Station do not meet the current standards under the Buildings Ordinance and its associated regulations. The Buildings Department accepted the fire engineering approach (such as sprinkler system and smoke detector system) as the performance-based alternative approach to achieve the performance prescribed by law.



Practice Guidebook for Adaptive Re-use of and Alteration and Addition Works to Heritage Buildings 2012  
<http://www.bd.gov.hk/english/documents/guideline/heritage.pdf>



28. Some professionals think that since the current Buildings Ordinance mainly targets at multi-storey buildings, if its provisions are to be applied to historic buildings which generally have fewer storeys, this may lead to over-specification of requirements and a higher project cost. Therefore, in order to encourage private owners to revitalise and re-use their historic buildings, some professionals suggest that the Buildings Department may consider relaxing some provisions or exempting historic buildings from certain requirements under the Buildings Ordinance in light of individual circumstances and on the basis that the owners undertake to provide proper management.

29. However, there are also concerns that relaxing regulation or granting exemption may affect the safety of the historic buildings concerned. Generally speaking, the fire services equipment, as well as the number, width and fire resistance properties of the escape routes of historic buildings may not comply with the requirements under the existing legislation. Fire risks would increase if such domestic buildings with insufficient escape routes and fire resistance properties are to be converted into commercial buildings (or even food premises visited by large numbers of people) without enhancing fire safety to meet the current standards. Moreover, relaxation of the barrier-free access requirement will also violate the principle of equality under which a barrier-free environment should be provided for people with disabilities.

#### DATABASE

The Buildings Department has commissioned a consultancy study to develop comprehensive design guidelines for the revitalised historic buildings to comply with the building safety requirements under the current Buildings Ordinance. The scope of the study covered the relevant legislation and requirements in eight countries, namely the United Kingdom, Australia, Canada, China, Singapore, Japan, the United States and Germany. The study found that none of these countries (except California and New Jersey in the United States) have relaxed the building safety requirements or health standards for historic buildings across the board. Among them, the United Kingdom and Australia will consider accepting performance-based alternative approaches having due regard to the building safety and health requirements under the existing legislation. The alternative approaches in individual cases will be processed by professionals in light of the specific circumstances to ensure that they achieve the standards of performance prescribed by law. The mechanism in Hong Kong is similar to the practices adopted by the countries under study.

## Views are Welcome

30. To ensure better protection of our historic buildings, do you think that:

1

Should we regulate or restrict private owners from demolishing or altering their graded historic buildings through the law? If affirmative, what should be the scopes and ways to do so? Should different treatments be applied to buildings with different gradings?

2

Should we, on the grounds of conservation, purchase or resume historic buildings from private owners? Should there be any predominate requirements (such as depending on the heritage value of the buildings, criteria for and means of compensation or whether the buildings are open to public)?

3

Should we impose restrictions on the development (for instance, to impose restrictions on the heights, uses and designs of buildings, as well as the width of streets) of certain streets or areas (such as Tai O, Kowloon City, Tai Hang and Sai Ying Pun) in order to preserve their heritage merits?

4

Should we allow relaxation of or exemption from the legislative requirements for historic buildings while the primary objective of the Buildings Ordinance is to protect structural safety and health standard?

# 3. Resources For Protecting Historic Buildings

## Introduction

31. Historic buildings serve as cultural carriers for a place. Through the appreciation of historic buildings, we can learn about the unique history and culture of Hong Kong. Historic buildings are therefore valuable cultural resources of our community. At the same time, conservation involves the utilisation of public resources. In this chapter, we will discuss how to enhance resources for the protection of historic buildings through different channels.

## Heritage Trust

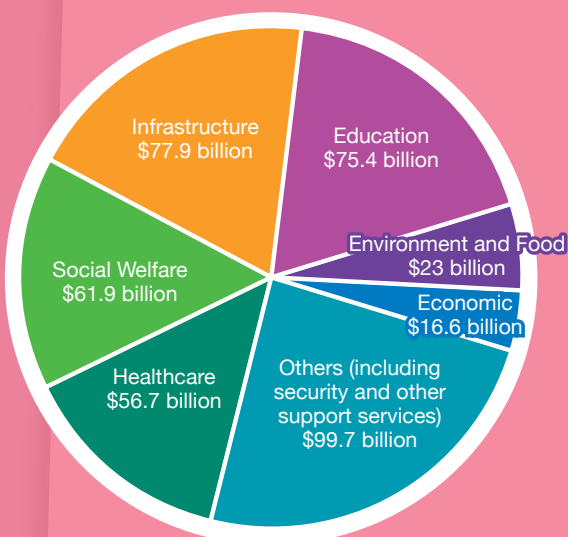
32. We consider that setting up a heritage trust in Hong Kong not only helps promote public participation in heritage conservation, but also tries to find new sources of funding, including donations, membership fees, property rentals, as well as income from fee-charging activities and the sale of souvenirs, for heritage conservation activities.

33. In late 2011, the Development Bureau commissioned a consultant to conduct a study on the feasibility, framework and implementation plan for setting up a heritage trust in Hong Kong. According to the consultant's analysis, the setting up of the trust will require a one-off provision from the Government to cover the annual expenditure of the trust. Regarding functions, the consultancy report suggests that the trust can share some of the Government's work by taking up non-statutory responsibilities in heritage conservation, such as outreach and education, academic research and archive management, as well as developing relationships with its international counterparts and the private sector. Other functions may include the administration and monitoring of the Financial Assistance for Maintenance Scheme and the Revitalising Historic Buildings Through Partnership Scheme currently under the purview of the Development Bureau (for instance, under the Revitalising Historic Buildings Through Partnership Scheme, the newly established trust may be responsible for assessing all applications received, thus taking up the existing role of the Advisory Committee on Revitalisation of Historic Buildings), as well as the maintenance, conservation and revitalisation works of the buildings concerned.

### DATABASE

## Government Revenue

In the past five years, the recurrent expenditure on heritage conservation has been over \$571 million, averaging over \$114 million per year. Furthermore, the Development Bureau has earmarked \$2 billion to implement the Revitalising Historic Buildings Through Partnership Scheme and related revitalisation projects.



(2014-15 Government Expenditure)



Final Report on the Study on the Feasibility, Framework and Implementation Plan for Setting up a Statutory Heritage Trust in Hong Kong  
[http://www.devb.gov.hk/filemanager/en/content\\_31/EngFullRep.pdf](http://www.devb.gov.hk/filemanager/en/content_31/EngFullRep.pdf)







34. However, we understand that even the setting up of a heritage trust may not be the solution to the various problems associated with heritage conservation in Hong Kong. For example, the scarcity of land for development in Hong Kong results in strong market pressure for redeveloping privately-owned historic buildings. Furthermore, while there is increasing public concern about heritage conservation, relevant civil society organisations are in their infancy and conservation culture (including making donations and participating as members) is yet to mature. Since the main source of income would presumably come from government funding and property rentals, the continuity and flexibility in the operation of the heritage trust is in doubt.



Revitalising Historic Buildings Through Partnership Scheme  
<http://www.heritage.gov.hk/en/rhbtp/about.htm>



Financial Assistance for Maintenance Scheme  
<http://www.heritage.gov.hk/en/maintenance/about.htm>



Lord Wilson Heritage Trust  
<http://www.lordwilson-heritagetrust.org.hk/en/index.html>



## Economic Incentives

35. The Government has been encouraging private owners to preserve their historic buildings through the provision of different kinds of economic incentives. The Government seeks to strike a pragmatic balance between heritage conservation and the respect for private property rights. In the past, the Government has devised various planning and land use options (such as relaxing plot ratios and land exchange) to encourage owners to adopt preservation-cum-development options in place of demolition plans.
36. Given that the provision of economic incentives involves the use of public resources, the Government has adopted a case-by-case approach in order to put forward the most appropriate incentive options for the conservation of the historic buildings in light of their unique circumstances (such as the unique features of each building and the wishes of the respective owners).

37. At present, the Government will compensate the owners for the loss of developable area as a result of preserving their historic buildings. In the case of the King Yin Lei, for example, the Government granted a new lot in similar size adjacent to King Yin Lei to the owner in exchange for the conservation of the mansion.

### DATABASE

#### Lord Wilson Heritage Trust

In Hong Kong, there is the Lord Wilson Heritage Trust, whose aim is to preserve and conserve the human heritage of Hong Kong by organising activities and providing funding support to assist community organisations and individuals to undertake heritage related activities and research projects. This year, the trust will focus on promoting and supporting the preservation of local intangible cultural heritage so as to facilitate the sustainable development of the local cultures and traditions.

DATABASE

Cases of Economic Incentives

The Government has strived to encourage private owners to preserve their historic buildings through different kinds of economic incentives including land and planning measures. Here is a case in point:

**Address of building**

47 Barker Road, Hong Kong

**Grading of building**

Grade 2 historic building

**Economic incentives**

Minor relaxation of the maximum plot ratio from 0.5 to 0.545 for the lot where the building is located. It is approximately equivalent to the floor area required for preserving part of the façade of the historic building. This serves to compensate the owner for the loss of development parameters as a result of preserving that part of the building.

According to the consultancy study commissioned by the Development Bureau, overseas Governments also provide different kinds of incentives to encourage private owners to preserve their historic buildings. For instance, the Government of Canada has provided financial subsidies for heritage restoration works or concession for the property tax of built heritage.



- 38. The Government will require the owners to accept certain conditions, such as allowing reasonable public access to their buildings, in return for the economic incentives provided. Some people consider that historic buildings that use public resources for conservation should be open to the public, while others believe that the conditions suggested by the Government would put off many owners of privately-owned historic buildings.
- 39. Besides, regular and proper maintenance can extend the lifespan of historic buildings while the lack of it would lead to disrepair. Therefore, the Development Bureau launched the Financial Assistance for Maintenance Scheme in 2008 to provide financial assistance for private owners of graded historic buildings to carry out maintenance works by themselves. The amount of grant for each successful application will be determined according to the information provided by the applicant, with the ceiling of the grant set at \$1 million. Some consider that the financial assistance inadequate and unattractive, and suggest that the higher the grading of a historic building, the larger the amount of grant should be.
- 40. Similar to accepting economic incentives provided by the Government, on accepting the grants under the Financial Assistance for Maintenance Scheme, the owners are required to accept a number of conditions including not to demolish their buildings or transfer the ownership without the approval of the Government, and to allow reasonable public access to their buildings for appreciation within an agreed period of time after the

DATABASE

Cases of the Financial Assistance for Maintenance Scheme

As at March 2014, the Development Bureau has approved 37 applications. Graded historic buildings that have received financial assistance include temples, ancestral halls, study halls, churches, etc. The total amount of grants is about \$33.59 million.



Lo Pan Temple



Jamia Mosque



maintenance works have been completed. While there is a general consensus on the prohibition against demolition and transfer of ownership to ensure that the buildings would be preserved after the maintenance works, some consider that whether the buildings have to be open to the public should be determined on the actual circumstances of each case. We will discuss the issue of the opening of historic buildings to the public in Chapter 4.

41. We understand that some members of the public would like to see the Government putting more resources on heritage conservation and providing more incentives to encourage private owners to preserve their historic buildings. But at the same time, there are others who expect that public resources should be spent on other policy aspects (for example, health care and education). Besides, we also understand that some people hope that the Government will increase transparency in the provision of economic incentives to private owners or even conduct a comprehensive public consultation. However, the suggestion may not be feasible in certain circumstances, especially when the Government and the owners have divergent views on the conservation of the buildings concerned. In such cases, open discussion of the issue may put pressure on the owners and thwart the conservation efforts.

## Revitalising Historic Buildings Through Partnership Scheme

42. To enhance heritage conservation, the Development Bureau launched the Revitalising Historic Buildings Through Partnership Scheme in 2008 to invite non-profit-making organisations to take part in conservation by revitalising government-owned historic buildings in an innovative manner and make good use of these buildings for public enjoyment.



St Stephen's College



Tsang  
Ancestral Hall

Tsung Tsin Mission  
of Hong Kong  
Kau Yan Church







DATABASE

### Revitalising Historic Buildings Through Partnership Scheme

The Government has selected a total of 16 government-owned historic buildings for revitalisation and renovation in four batches under the Revitalising Historic Buildings Through Partnership Scheme. A sum of \$2 billion has been earmarked for funding the scheme and related construction works projects.



43. Selected non-profit-making organisations will run suitable government-owned historic buildings in the form of social enterprises. These non-profit-making organisations will be provided with a one-off grant to cover, in part or in full, the cost of major renovation to the buildings. They will also be given a one-off grant to meet the starting costs and operating deficits of the social enterprises for the first two years of operation at a ceiling of \$5 million.
44. We have received positive feedback since the announcement of the Revitalising Historic Buildings Through Partnership Scheme. Over 180 applications have been received in the three phases of the scheme, and the fourth batch of applications of the Revitalising Historic Buildings Through Partnership Scheme is now under assessment. In addition, the revitalisation projects of a number of historic buildings under the scheme have won international awards. For example, the conversion of the Former North Kowloon Magistracy into Savannah College Of Art and Design Hong Kong Campus, and the Former Tai O Police Station into the Tai O Heritage Hotel have both won the United Nations Educational, Scientific, Cultural Organization Heritage Awards for Culture Heritage Conservation.

## Views are Welcome

45. We would like to enlist your views on the following issues in respect of the use of public resources for the conservation of historic buildings:

1

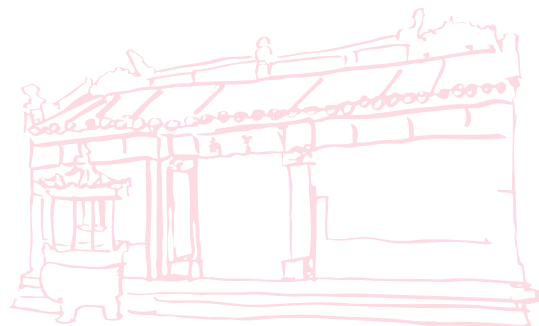
Do you think that Hong Kong should set up a heritage trust? If so, what should be its functions? Is it appropriate to support the trust with public funds? If yes, which functions of the trust should be supported by public funds?

2

Do you think that we should provide more incentives to private owners in order to encourage them to preserve their historic buildings? If yes, what kind of incentives should be provided (for example, should we provide extra developable area in addition to the compensation for the exact loss of developable area as a result of conservation, or should we set up a heritage conservation award for Hong Kong to recognise the efforts of private owners and various organisations in heritage conservation)?

3

In addition to providing subsidies for heritage maintenance works, should we provide subsidies for consultant's fees and additional construction costs arising from preservation? Should the higher the grading of a historic building, the larger the amount of grant would be given?



# 4. Public Participation In Built Heritage Conservation

## Introduction

46. We must bear in mind that public participation is essential to formulating policies on heritage conservation and implementing related initiatives. At present, the Government encourages various stakeholders, including professional and academic organisations, non-governmental and private organisations, as well as the public, to actively participate in heritage conservation.

## Public Engagement and Consultation

47. To engage the public in heritage conservation, the Government and the Antiquities Advisory Board encourage members of the public to discuss and express their views on conservation issues. For example, the Antiquities Advisory Board has opened its meetings to the public since 2005. In respect of the grading exercise for historic buildings, the Antiquities Advisory Board not only takes into account the experts' advice but also attaches great importance to public engagement. Between 1996 and 2000, the Antiquities Advisory Board conducted a territory-wide background survey on the historic buildings in Hong Kong, covering some 8,800 historic buildings. Between 2002 and 2004, the Antiquities and Monuments Office selected 1,444 buildings of higher heritage value and referred them to an assessment panel (comprising historians and experts in the fields of architecture, town planning and engineering) for in-depth assessment. Having ascertained the heritage value of these historic buildings, the panel put forward their grading proposal to the Antiquities Advisory Board. Following the announcement of the grading proposal, the Antiquities Advisory Board conducted a four-month public consultation exercise to seek the public's views on the proposal. In addition, the Antiquities Advisory Board also invited public views on what other buildings should be graded, and consider the proposals received. So far, the Antiquities Advisory Board has received over 200 proposed items for grading assessment. To enhance public engagement and the transparency of the grading mechanism for historic buildings, the Antiquities Advisory Board also sought the views of the private owners concerned and conducted a one-month public consultation exercise before finalising the proposed grading.

48. In considering the provision of economic incentives, the Government keeps the public informed of the options through different mechanisms, and takes forward the proposals in accordance with the statutory procedures. The conservation of King Yin Lei is a case in point. The Government followed the established town planning procedures, including public consultation, in taking forward the land exchange proposal. The public can express their views during the procedures.

### DATABASE

## Overseas Examples

The consultant commissioned by the Development Bureau has studied the government practices and legislation regarding the conservation of historic buildings in eight places (including the United Kingdom, Singapore, Shanghai of China, New York of the United States, British Columbia of Canada, New South Wales of Australia, Kyoto of Japan and Macao SAR of China). According to the consultancy study, most of the Governments under study will designate a historic building a monument, graded building or protected historic building only if they have obtained the consent of the private owner and been briefed by the expert committee on the assessment of the heritage value of the building concerned.



Consultancy Study on the Heritage Conservation Regimes in Other Jurisdictions  
[http://www.heritage.gov.hk/en/doc/Policy\\_review\\_20140416.pdf](http://www.heritage.gov.hk/en/doc/Policy_review_20140416.pdf)





## Public Education and Publicity Work

49. The Government spares no efforts in carrying out public education and publicity work by various means, such as the setting up of the Friends of Heritage Scheme and the organisation of guided tours to historic buildings, thematic talks, roving exhibitions, competitions and the annual Heritage Fiesta. All these activities aim to highlight the importance of heritage conservation and arouse public interest in it.
50. In addition to promoting public education and publicity activities, the Government has also organised thematic exhibitions, lectures and guided tours to historic buildings with professional institutions (including The Hong Kong Institute of Architects, The Hong Kong Institution of Engineers, Hong Kong Institute of Planners, The Hong Kong Institute of Surveyors, The Hong Kong Institute of Architectural Conservationists, etc.), practitioners in the conservation field and conservation concern groups. Renowned scholars from the Mainland and overseas were also invited to participate in international conferences on heritage conservation with a view to promoting the continual professional development of heritage conservation work and facilitating experience sharing among the practitioners in the relevant fields.

### DATABASE

#### Heritage Fiesta

Since 2011, the Government has organised the annual Heritage Fiesta under which some historic buildings have been selected for public access. The number of participants in the past three years are 35,600, 122,808 and 48,000 respectively.



51. To enhance the public's knowledge and interests in different aspects of heritage conservation, the Antiquities Advisory Board, the Commissioner for Heritage's Office and the Antiquities and Monuments Office have set up websites to provide information on heritage conservation. The Geographical Information System on Hong Kong Heritage also facilitates the public to research information on historic buildings.



Website of the Antiquities Advisory Board  
<http://www.aab.gov.hk/en/index.php>



Website of the Commissioner for Heritage's Office  
<http://www.heritage.gov.hk/en/index.htm>





Reference

Website of the Antiquities and Monuments Office  
<http://www.amo.gov.hk/en/main.php>



52. The Commissioner for Heritage's Office and the Antiquities and Monuments Office have published different kinds of publication, including a bi-monthly newsletter "活化@Heritage" to update the public on the Government's latest conservation efforts. The Commissioner for Heritage's Office and the Antiquities and Monuments Office have also published the *Hong Kong Heritage: Liberal Studies Teaching Kit*. By incorporating heritage conservation into the curriculum of Liberal Studies, it is hoped that the interests and knowledge of the younger generation in heritage conservation can be enhanced.

Reference

Publications by the Commissioner for Heritage's Office  
<http://www.heritage.gov.hk/en/online/publication.htm>



Reference

Publications by the Antiquities and Monuments Office  
[http://www.amo.gov.hk/en/education\\_publications.php](http://www.amo.gov.hk/en/education_publications.php)



53. Besides, District Councils, as well as some private organisations and non-government organisations, also take part in heritage conservation works through various ways. For example, District Councils advocated the setting up of local heritage trails and issued publications on the heritage of their districts. Moreover, the "Our Home, Our History – The Hong Kong Heritage Project" commissioned by the Kadoorie Family has provided a detailed visual and documentary archive of Hong Kong.

## Public Access to Historic Buildings

54. At present, public access to a historic building is not a prerequisite for its declaration as a monument or a graded historic building. On the other hand, the declaration of a historic building as a monument or a graded historic building will neither affect its ownership nor grant the public access to the building.
55. We understand that the public would like to visit and appreciate historic buildings, no matter they are government- or privately-owned. We hope that the public will have a better understanding of



Hong Kong's history through the appreciation of historic buildings. The Government has always encouraged owners of historic buildings, including policy bureaux or departments, to open their historic buildings for public visits wherever practicable. While providing financial assistance for maintenance and economic incentives for owners to preserve their buildings, the Government will negotiate with the owners and require them to allow reasonable public access to the monuments or historic buildings concerned. Through the organisation of publicity activities such as the Heritage Fiesta, the Government has opened suitable historic buildings to the public and organised guided tours at suitable places.



1



2

#### DATABASE

### Examples of Privately-owned Historic Buildings Required to be Open to the Public

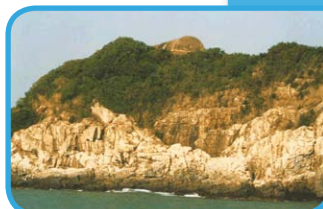
Name of building	Main building of Helena May, Central, Hong Kong <sup>1</sup>	179 Prince Edward Road West, Kowloon <sup>2</sup>
Grading of building	Grade 2 historic building	Grade 3 historic building
Amount granted	Accepted a grant of \$600,000 under the Financial Assistance for Maintenance Scheme	Minor relaxation of the maximum plot ratio from 9 to 10.23 for preserving the front portion of the historic building
Arrangements for public access	The building is open for public visits through guided tours organised once a month as well as open days and charity bazaars	History of the building will be showcased in the preserved portion of the historic building which will be open to the public free of charge

56. We understand that there is growing public interest in visiting historic buildings. While hoping for the opportunity to appreciate historic buildings, due regard should be given to private property rights, including the owners' wishes, their rights to use and dispose of the property as well as their concerns on privacy and security. In fact, not all historic buildings are suitable for opening to the public. For instance, there are practical difficulties in allowing public access to historic buildings that are private residences or opening them to the public. Moreover, remote buildings that are difficult to access may not be able to draw a sufficient number of visitors to make their opening cost-effective.

#### DATABASE

### An Example Showing that Opening a Historic Building to the Public may not be Cost-effective – Magazine Building on Magazine Island

Magazine Building, a Grade 3 historic building, is located on Magazine Island adjacent to Ap Lei Chau in the Southern District of Hong Kong Island. The Magazine Island is not accessible by public transport and there are no visitor facilities on the island. Given its remote location and lack of other tourist attractions, opening the Magazine Building to the public may not be able to draw a large number of visitors and its cost-effectiveness would be in doubt.



DATABASE

### Virtual Heritage Explorer of King Yin Lei

Apart from visiting King Yin Lei, a declared monument, in person, the public may also join its virtual guided tour through the Generic Platform for Virtual Reality Touring Programme for Monuments. With computer 3D modelling technologies, the virtual tour allows the public to view the overall layout, exterior and interior design of King Yin Lei from different angles as if they were actually there. They may also watch the on-line video to get a better picture of the history, architectural features and restoration process of King Yin Lei.

57. Although some of the historic buildings cannot be open to the public, the community can still appreciate their exterior in most cases. We believe that the preservation of historic buildings alone can capture our history, which will certainly benefit the public and our future generations.



Generic Platform for Virtual Reality Touring Programme for King Yin Lei  
[http://vrs.lcsd.gov.hk/vrs/project/KYL\\_PRD/en/important.html](http://vrs.lcsd.gov.hk/vrs/project/KYL_PRD/en/important.html)



## Views are Welcome

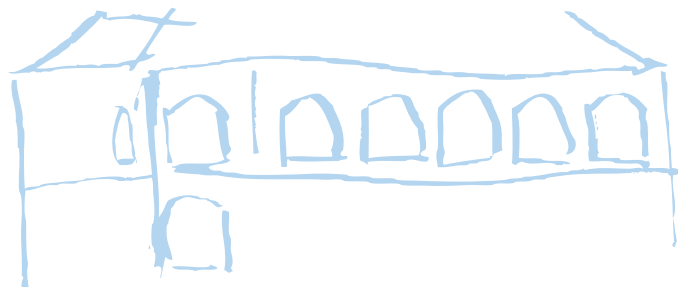
58. We hope to do more and better in public engagement and wish to know your views on the following issues:

1

Which aspects in the public education, consultation and publicity works in relation to heritage conservation should be further enhanced? What channels can be used to enhance such works?

2

If certain historic buildings cannot be open to the public, do you accept other viewing methods (such as 3D laser scanning, as well as photographic and cartographic recording, for the public to appreciate the interior of declared monuments and historic buildings)?



# Public Consultation

Through this consultation document, we hope to raise the awareness and concerns of various sectors of the community about the conservation of historic buildings, and to explore how we can optimise the current heritage conservation policy and initiatives. We would also like to invite views from the public on the various conservation issues we have raised in this document.

We look forward to your views. Please send us your views by using the attached Feedback Form or through the following channels on or before 4 August 2014:

E-mail: [comment@builtheritagereview.hk](mailto:comment@builtheritagereview.hk)

Fax: (+852) 2189 7264

Post: Secretariat, Antiquities Advisory Board, 136 Nathan Road, Tsim Sha Tsui, Kowloon (please indicate "Heritage Conservation Policy Review")

In addition to soliciting written response, we cordially invite various sectors to our public forums and related activities organised to collect views for this consultation. Please visit our dedicated website [www.builtheritagereview.hk](http://www.builtheritagereview.hk) or facebook page [www.builtheritagereview.hk/facebook.html](http://www.builtheritagereview.hk/facebook.html) for further details.

We may cite the views submitted by various sectors in response to this document during future public or private discussions or in any subsequent reports. Any request to treat all or part of the views in confidence will be respected. If no such request is made, your identity and views may be disclosed during future public or private discussions or in subsequent reports.





# Feedback Form

## Public Consultation on Policy on Conservation of Built Heritage

Please send us your views through the following channels on or before 4 August 2014

Post : Secretariat, Antiquities Advisory Board, 136 Nathan Road, Tsim Sha Tsui, Kowloon

E-mail : [comment@builtheritagereview.hk](mailto:comment@builtheritagereview.hk) Fax : (+852) 21897264

This is from  Individual  Organisation  
 Owner of Historic Building

Name / Organisation \_\_\_\_\_

E-mail \_\_\_\_\_

### Views are Welcome

**(1)** Should we regulate or restrict private owners from demolishing or altering their graded historic buildings through the law? If affirmative, what should be the scopes and ways to do so? Should different treatments be applied to buildings with different gradings?

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\_\_\_\_\_  
\_\_\_\_\_

**(2)** Should we, on the grounds of conservation, purchase or resume historic buildings from private owners? Should there be any predominate requirements (such as depending on the heritage value of the buildings, criteria for and means of compensation or whether the buildings are open to public)?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_





- (3) Should we impose restrictions on the development (for instance, to impose restrictions on the heights, uses and designs of buildings, as well as the width of streets) of certain streets or areas (such as Tai O, Kowloon City, Tai Hang and Sai Ying Pun) in order to preserve their heritage merits?

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- (4) Should we allow relaxation of or exemption from the legislative requirements for historic buildings while the primary objective of the Buildings Ordinance is to protect structural safety and health standard?

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- (5) Do you think that Hong Kong should set up a heritage trust? If so, what should be its functions? Is it appropriate to support the trust with public funds? If yes, which functions of the trust should be supported by public funds?

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- (6) Do you think that we should provide more incentives to private owners in order to encourage them to preserve their historic buildings? If yes, what kind of incentives should be provided (for example, should we provide extra developable area in addition to the compensation for the exact loss of developable area as a result of conservation, or should we set up a heritage conservation award for Hong Kong to recognise the efforts of private owners and various organisations in heritage conservation)?

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**( 7 )** In addition to providing subsidies for heritage maintenance works, should we provide subsidies for consultant's fees and additional construction costs arising from preservation? Should the higher the grading of a historic building, the larger the amount of grant would be given?

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**( 8 )** Which aspects in the public education, consultation and publicity works in relation to heritage conservation should be further enhanced? What channels can be used to enhance such works?

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**( 9 )** If certain historic buildings cannot be open to the public, do you accept other viewing methods (such as 3D laser scanning, as well as photographic and cartographic recording, for the public to appreciate the interior of declared monuments and historic buildings)?

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**( 10 )** Other comments

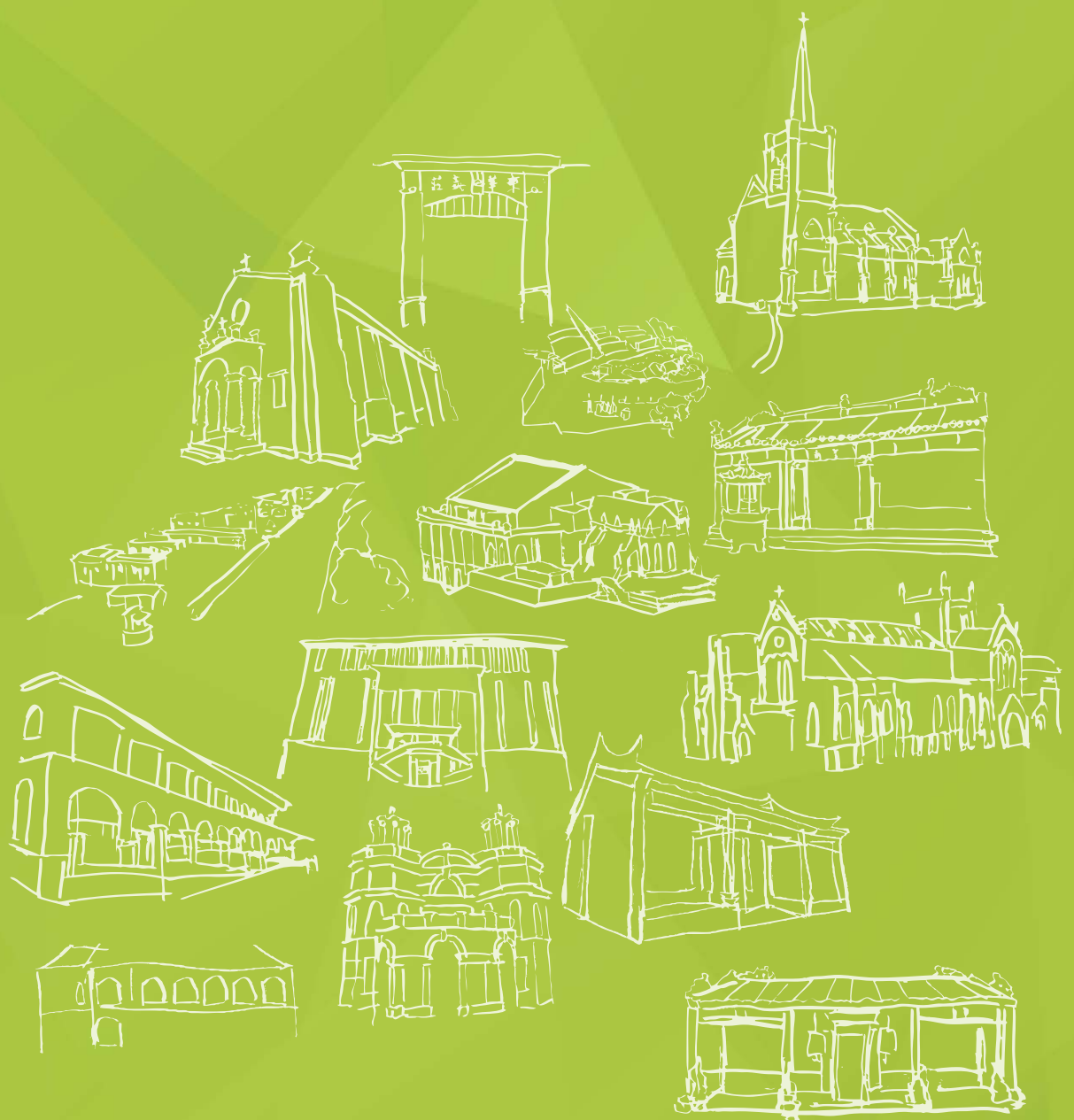
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古物諮詢委員會  
**Antiquities Advisory Board**