

**Legco Sub-committee Meeting on Antiquities and Monuments on 12<sup>th</sup> March 08 regarding  
Withdrawal of Declaration of Proposed Monument  
No 128 Pok Fu Lam Rd (commonly known as Jessville)  
Statement of the Hong Kong Institute of Architects (HKIA)**

Owing to the non-transparency of the heritage assessment as well as the uncertainty of the new development, HKIA is not in a position to make any solid comments on the details. In relation to the incidence about withdrawal of declaration of the proposed monument status on Jessville, however, HKIA can offer the following general opinions:

**1. Concern about the Depth of Study on Architectural Values**

Architectural Values should be assessed by detail studies and wider considerations. The paper by the Bureau reports that “the architectural merits are not high” and interior design “is not extraordinary one” based on inspection occasions by AMO allowed by owners and visual visits by some AAB members. While HKIA is not yet privileged to read the material or visit the place, we stress that Architectural Values encompass many essential aspects such as Stylistic Influences, Design Inspirations, Spatial Planning, Functional Designs, Environmental Controls, Social Meanings of Accommodations, Gardening and Landscaping, and Relationship with Settings, which cannot be found on Bureau’s paper. We urge that assessment of Architectural Values of potential heritage buildings be carried out under comprehensive research and not limited to visual inspections.

**2. Concern about the Non-transparency of Assessment on Built Heritage**

HKIA urges the assessment of heritage values be more transparent together with wider involvement of relevant stakeholders and professionals. The Bureau’s paper reports that AMO recommended the withdrawal based on “comprehensive assessment completed” which we do not have possession of.

In the future, we opine that any such detail assessments be made more transparent by both involvement of relevant stakeholders and professional bodies, and also adoption of a more publicly involved process – which is the current international trend as advanced from the traditional methodologies.

**3. Concern about the Inadequacy of System with respect to Heritage Conservation**

This incident reveals the inadequacy of the current system. The current available system for built heritage protection is limited to Declaration as Monument which should, rightly, be maintained at higher threshold but imposes severe limitations on alternative conservation approaches including Adaptive Re-uses and associated political or economic implications, or left as Graded under the non-statutory internal reference system.

We suggest the Government to pursue urgent review of this system to introduce proper statutory protections of all identified built heritage. Such system should focus only on establishing the relative cultural and heritage values and significances based on criteria and evaluation methodologies recognized by international best practices, and not mixed with political or economic constraints, which can be dealt by subsequent executive actions.

**4. Concern about the Uncertainty of New Development with effect on the Cultural Landscape**

HKIA requests for a higher level of certainty/monitoring of conservation. We appreciate active dialogues between AMO and the owner, which arrives at the stage that the owner intends to conserve the main building with re-zoning application for residential development.

However, we look forward to having a better assurance of the conservation of this piece of built heritage together with its cultural landscape, once the Proposed Monument status is removed. We anticipate some effective mechanism to monitor the quality of conservation works in proper respect of the heritage values.

HKIA is willing to offer further assistance in relation to the above concerns with a view to better conserving the built heritage of Hong Kong.