

**Comments by the Central & Western Concern Group
to the Administration's Submission
to the Panel on Home Affairs Sub-Committee on Heritage Conservation**

The Original Site of the Central School at Hollywood Road

Introduction: The Central & Western Concern Group (C&W Concern Group) is a heritage conservation and urban planning advocacy group and in this submission wishes to explain that it has been concerted public action over the last three years that has led to the Former Police Married Quarters now being regarded by the government as a site to again be used for community purposes. The Administration has made commendable and demonstrable efforts to re-think its heritage conservation policies since the demolition of the Star Ferry however the C&W Concern Group believes that the views of the community need to be considered with greater consideration by the Antiquities & Monuments Office and by the Administration because at the moment the public has limited access in the processes of evaluation of heritage conservation sites and urban planning decision-making.

Good Urban Planning for SOHO & Mid-levels Are Demanded: The C&W Concern Group first became concerned about the future of this site when it was placed back on the Government Land Sale List in 2005. Its impending sale would have meant another inappropriate high-rise being built in Hong Kong's historic Central district in an area already overbuilt, suffering traffic congestion and with few community facilities, including parks.



Figs 1 & 2. Two views looking up Staunton Street towards the Former Police Married Quarters with the new Centrestage development dominating the street – if construction had been allowed at this site two 30-storey residential blocks would have been constructed, a wall effect would have been created (see Fig 2. Former Married Police Quarters is on right) and another important heritage site lost.

An Important Heritage Site in a Heritage Area: In addition, the Central & Western Concern Group (CWCG) realised that this site was one of the historical 'link' sites running between Tung Wah Hospital, Man Mo Temple, Graham Street Market, the Central Police Station & Victoria Prison Compound, the Bishop's House (in Lower Albert Road), the Central Government Offices, St John's Cathedral and back towards Government House, the Zoological Gardens and Hong Kong Park – this area is the historic heart of Hong Kong; the old colonial City of Victoria and the scene of Hong Kong's initial development into the great city that it now is. A holistic approach to preserve ALL these sites is urgently needed – an approach that the Administration has not considered despite great public support to preserve Hong Kong's Central District.

Few Avenues for Public Views to be Heard: One of the very few ways for the public to make its views heard on urban planning and heritage conservation issues is to seek recourse through the Town Planning Board. The C&W Concern Group with the assistance of experienced town planner, MasterPlan Limited, made application to the Town Planning Board to stop the building of a high-rise development and to preserve this site for community use.

First Town Planning Application: In 2005 the C&W Concern Group made its first application to the Town Planning Board under Section 12 of the Town Planning Ordinance (a request for rezoning) in an attempt to preserve this site for community use – a request to return to the site's GIC status as the site had previously been GIC between 1879 to 1997 firstly as the original Queen's College and then used by the Police Department. Its rezoning in 1998 was done without any community involvement in the days when rezoning was done without placing official notices on the site nor consultation with the District Council.

At the Town Planning Board hearing to discuss this application, the Planning Department, proposed that the site, once sold at auction, should comprise of 2 residential tower blocks, an elderly people's home and a rubbish collection point. At a subsequent TPB Metro Committee meeting – at which the C&W Concern Group was denied the chance to address – the recommendations of the Planning Department were endorsed with minimal regard to the heritage features of the site.

Second Town Planning Application: A second Town Planning application under Section 12 of the Town Planning Ordinance had been made and in a detailed submission the history of the site was described for the benefit of the Town Planning Board: a site of important historical associations that housed Hong Kong's 'city' temple - the Shing Wong Temple whose memory is maintained by the Shing Wong Street, an adjacent ladder street to the site; the history of the Central School and Queen's College and the important role in Hong Kong's development of education was outlined – and, of course, this area – known as the 30 Shops area – was the district in which Sun Yat-sen and supporters of the Chinese Republican movement lived, worked and shopped. The C&W Concern Group requested that an archeological investigation be undertaken before any decision was made on the site.

During the public consultation period prior to the TPB hearing, the C&W Concern Group met the public (for three weeks setting up information displays on the Mid-levels Escalator) to explain the Planning Department's proposal for this site – and received 1,800 comments in support to rezone the site as Open Space and GIC. The Planning Department again proposed that the site should be available to be developed to house two residential tower blocks (see Fig. 3). The Town Planning Board deferred hearing this application pending the results of the Antiquities & Monuments Office (AMO) archeological investigation.

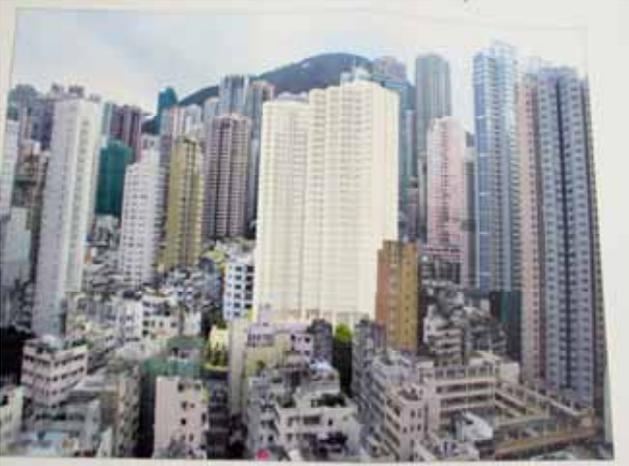


Fig 3. The Planning Department's own impression of the development it proposed and supported for the Former Police Married Quarters.

Archeological Investigation by the Antiquities & Monuments Office: The importance of this site was emphasized by the extent of the archeological investigations that the AMO undertook.

The C&W Concern Group observed these investigations (Fig. 4) and kept the public and media informed. Our Group requested that the AMO allow us to observe the excavations, but was turned down.



Fig 4. Three views of the archeological dig undertaken by AMO and observed by C&W Concern Group

The AMO appeared to be under pressure from government to not allow any information to be made public. Indeed, at a Committee meeting of the C&W District Council just prior to the 2007 District Council Election a senior Leisure & Cultural Services Department officer presented a perfunctory and inadequate 'report' to the Council on the archeological findings, while the archeologist who actually performed the dig, who was sitting next to the LCSD officer in the Council Chamber, was not allowed to speak.

The Antiquities Advisory Board were also treated in a similar manner – and further detailed discussion about this site was cut short by the AAB Chairman due to “lack of time”. The AAB has not considered, discussed in detail or visited this site since the archeological report was concluded.

The C&W Concern Group has repeatedly requested an opportunity to present our information including our 'Burra Charter' Assessment to the AAB but have not yet been asked to attend.

Indeed, the public submissions heard in today's Legco Panel should have been heard by the AAB but the AAB is presently inaccessible to the public. No grading or final decision should be made by the AAB until the public have had a chance to be heard by AAB.

The conclusions by the AMO that the Queen's College foundations uncovered during the archeological investigation are only worthy to be preserved as a small section is a decision that is premature. The site, its history and the heritage components of the area need to be considered as a total context and not just in a 'bad' archaeological assessment when determining the heritage value of the site.

There needs to be proper community and public discussion about the findings of the archeological dig; likewise other archeological and historical experts should be asked to review the work of the AMO.

The Chief Executive's Policy Address: The CE announced that the site would have a 12-month moratorium on its development and now the Development Bureau, in its paper to LegCo, appears to support - and finally taking the position of the C&W Concern Group and other members of the community - that the site be used for community purposes.

The C&W Concern Group states:

- The Former Police Married Quarters should be withdrawn from the List of Government Auction Sites – with immediate effect. However, firstly the site needs to be rezoned from its current Residential (A) zoning so the public has the chance to consider the site as a community use site.
- The C&W Concern Group Planning Application with the Town Planning Board is still current and our Group will – with the help of Landscape Architects – propose alternative uses for the site for the public and community to consider (including the Administration; C&W District Council etc) and then we will reactivate our Application and submit our findings and proposals to the Town Planning Board.
- The C&W District Council and AAB needs to be allowed to make their opinions known about this site – now that circumstances have considerably changed since the conclusion of the archeological investigation. The C&W District Council and AAB need to listen to the

community itself prior to making any decisions. The Administration has misrepresented the views of the C&W District Council and AAB in its Paper to the Panel on Home Affairs.

- The AMO should allow its archeologists to speak to the press and community groups about the findings of the archeological report.
- The Development Bureau should open the site for visits and allow the public to make frank opinions on its use.
- Any public consultation should be open, free and independent.
- The administrative procedures that presently impede the public from being involved in decision-making on heritage conservation issues with government officials (e.g. AMO, AAB, Town Planning Board committees etc) need to be significantly overhauled.

Conclusion:

The Administration has made commendable efforts to consider heritage conservation issues with a more open mind in the last 12 months – however, the historic Central District needs to be considered in a holistic way as a heritage conservation zone in its entirety with particular attention to the preservation and correct urban planning of the Graham Street Market, Central Police Station & Victoria Prison and the Central Government Offices. The current proposals for these sites are seriously inadequate and are not in keeping with public opinion – nor have they been professionally assessed: these sites must be considered by referring to the ‘Burra Charter’ – an international convention that outlines how historic sites should correctly be assessed.

The preservation of the Former Central School/Original site of Queen’s College is commendable – and now we must also quickly ensure that the other parts of old Hong Kong is also protected for the benefit of future generations.

(This paper prepared by John Batten and Katty Law – Convenors of the Central & Western Concern Group)