

The Role of CHIA in the Evaluation of Heritage Significance: The Hong Kong Experience

Ellen Cameron

Abstract / Summary

Hong Kong is often thought of as a modern city of densely populated urban spaces. In fact, the modern urban centres of Hong Kong take up only a small percentage of available land space, with 40% being occupied by ecological conservation areas or country parks (*HK Government Website*). As well, much of the terrain of Hong Kong consists of steep hillsides and mountains leaving only about 25% of the 1104 square kilometre territory developed (*HK Government Website*). With an ever increasing population (*Hong Kong Government Website*) and restrictions on future reclamation, the existing urban landscape of Hong Kong is constantly being considered for redevelopment. With only a short history of heritage legislation (*AMO Ordinance 1971*) and a long term lack of heritage policy dating back many decades, the question of heritage significance arises time and time again during the development process. Not surprisingly the question of who should be responsible for evaluating the significance has also turned into a contentious issue with the various stakeholders all having strong vested interests in the outcome.

This paper will present the CHIA system in Hong Kong, specifically as it deals with built heritage and development. A brief background will be provided on the development of Built Heritage Impact Assessment since its introduction in 1997 and a case study on the demolition of a Hong Kong Landmark will also be presented that will hopefully illustrate how our impact assessment system has been involved in addressing the important issue of involving all stakeholders in the process of determining what heritage sites have significance and the means needed to be employed in conserving these sites.

Cultural Heritage Impact Assessment in Hong Kong

Cultural Heritage Impact Assessment in Hong Kong is part of an Legislated Environmental Impact Assessment System that was established in 1998 (EIAO CAP 499). EIA's in Hong Kong are conducted for certain development projects the conditions of which are defined in the EIA Ordinance. Over the past 15 years CHIA's have been undertaken for projects such as construction of railway and road networks, infrastructure projects for drainage, water supply, sewerage and waste management, airport decommissioning/redevelopment, reclamation and theme park construction (*Website of the Environmental Protection Department of the HKSAR*).

The Cultural Heritage Impact Assessment process discussed in this paper is that demanded by Hong Kong law based on the technical requirements of the Environmental Impact Assessment Ordinance. CHIA's in Hong Kong include terrestrial and marine archaeological sites and built heritage resources that may be directly or indirectly impacted by a development project. This paper will concentrate on the built heritage aspect of CHIA, in urban Hong Kong Island, with specific emphasis on the Central Business District. This area was the original commercial settlement of Colonial Hong Kong and has been subject to land scarcity and development pressures from the earliest colonial days right into the present (Ng 2008).

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Legislative Background and Development of Heritage Significance Evaluation

Apart from the EIAO mentioned above, the only other heritage legislation in Hong Kong is *The Antiquities and Monuments Ordinance* enacted in 1971 (AMO CAP 53). The legislation provides statutory protection for buildings and sites that are deemed by the government to warrant preservation. The legislation, however, does not provide criteria for the evaluation of heritage significance and only states broad definitions on what sorts of items will be considered to have heritage value, specifically, any artefact, building or site created before the year 1800 (regardless of modifications made after the year 1799) or any building or structure that has historical significance. Unfortunately, as mentioned above no criteria is provided on how the significance should be determined and it has been left to the relevant government boards to make decisions based on what they feel is in the best public interest.

Apart from the above mentioned legislation, there is also a government administrative mechanism for the classification of heritage buildings in Hong Kong. This was introduced in 1980 when the government appointed advisory board on heritage matters (known as the Antiquities Advisory Board or AAB) adopted a grading system. The system was designed for internal government use only and did not provide any statutory protection for buildings and structures that have been granted graded status (Website of the Antiquities and Monuments Office). Three grades of historical buildings were created with the intention of providing government departments with guidelines for preservation within the development process.

At this point in time, there had never been a large scale survey of historical buildings in Hong Kong and it was not until 1996 that such an endeavour was undertaken. This was the first territory wide survey of historic buildings and prior to this information on the extent and condition of heritage buildings in Hong Kong was unavailable. The survey was commissioned by the Antiquities and Monuments Office and teams from local and mainland institutions were employed to carry out the survey which was completed in 2000.

One of the shortcomings of the survey was a lack of defined scope and methodology. Criteria to evaluate heritage significance were also not included and as a result the definition of items to be included was generally set as all buildings and structures built before 1950. The results of the survey were that over 8000 items were recorded. Unfortunately, the information was not disseminated outside of government departments and the majority of the recorded structures were not evaluated with respect to their heritage significance.

After a review of the findings of the survey, the government determined that further investigation was needed and the 8000 resources underwent a further evaluation between 2002 and 2004. This time an expert panel of professionals, including architects, planners and engineers were appointed by the Antiquities Advisory Board to evaluate the heritage significance of the buildings and structures. Standards based on International Documents on Heritage Conservation, such as the *Venice Charter*, the *Burra Charter* and the *Principles for the Conservation of Heritage Sites in China* were included and local evaluation criteria were set as; historical interest, architectural merit, group value, social value and local interest, authenticity and rarity.

The process of evaluation is still ongoing and so far 1444 items have been evaluated with 931 having been confirmed as Graded Historic Buildings and 160 of these being given a status that would allow them to be gazetted under the Antiquities and Monuments Ordinance

and receive statutory protection (*Website of the Antiquities and Monuments Office*). There are currently 143 Graded Historic Buildings in Central and Western District of Hong Kong Island and 21 have been granted statutory protection under the Antiquities and Monuments Ordinance (*Website of the Antiquities and Monuments Office*).

Integration of Heritage Significance into the CHIA

The criteria for categorising historical buildings for Built Heritage Impact Assessment in Hong Kong were based on a set of guidelines prepared by the government office responsible for overseeing the CHIA process. The guidelines did offer some guidance on the basic types of resources that needed to be included, such as all pre 1950 buildings and structures, but failed to provide any criteria for determining inclusion or exclusion of resources that did not fit into this set. As a result, any buildings or structures that did not fall within the clear cut categories were often not included in a CHIA. As well, the guidelines were focussed on individual structures and did not take into account factors such as group value, authenticity or collective memory.

At the time of the introduction of CHIA's in Hong Kong, the territory wide survey discussed above had been conducted. Unfortunately, the information gathered during the survey enabled only a broad idea of the number and types of heritage resources that existed in the Territory. As a result, the early CHIAs undertaken in Hong Kong were overwhelmed by a lack of information on what heritage resources were present in a project Study Area. Hong Kong Island was one of the best recorded areas in the territory and a number of prominent public buildings had already been made Declared Monuments prior to the survey. It soon became obvious however, that even here the vast majority of historical buildings and structures had not been recorded or provided with any official or unofficial status.

Over time, as the information on the heritage significance of more and more resources became available, CHIA practitioners began to have access to the body of data needed for the evaluation of the heritage significance as part of a CHIA study. The results of this were that it now became possible to make mitigation recommendations, such as preservation in-situ, relocation or preservation by record based on widely recognised heritage values. It is important to note that at the same time this information was being made available not only to heritage professionals but also to a broader range of stakeholders creating a situation where members of the public were also becoming more involved in having a say on matters of heritage significance. As well, from 2004 onwards revisions to the Town Planning Board Ordinance enhanced public consultation requirements and this influenced the direction of public engagement in EIA studies as well.

In the next section a case study will be presented to illustrate how CHIA's contributed to the process of evaluating heritage significance in Hong Kong. The CHIA discussed was undertaken at about the same time as the introduction of the EIA Ordinance. The case was highly controversial and has often been referred to as a turning point in how the public's view of heritage and heritage significance needs to be better incorporated into the development process in Hong Kong.

Case Study: The Demolition of the Central Star Ferry Pier

This case study illustrates the problems that arose when the government failed to acknowledge public sentiment and a broader interpretation of heritage values in the decision to demolish a well established landmark, the Central Star Ferry Pier on Hong Kong Island. The development project was devised and carried out by the Hong Kong Government for the provision of transport infrastructure and commercial development in an extension to the existing Central Business District on Hong Kong Island. The works consisted of the reclamation of a section of Victoria Harbour in various phases. The Phase III portion of the project included the area directly in front of the existing Star Ferry Pier, thus making the function of the building redundant and requiring a replacement building to be constructed on the new coastline. The Phase III reclamation project was in itself controversial and prior to the demolition of the ferry pier and the size of the reclamation had been reduced from 32 to 18 Hectares (Doody et al 2006). This was a major setback for the government as it meant that the revenue generated for the government from the project had fallen substantially from its original level.

This reclamation project was conceived long before a requirement for CHIA came into effect and much of the preliminary planning was completed without the need for any heritage assessment at all. With the introduction of the EIA system in Hong Kong in 1998, however, any phases of the project that had not yet been completed now required a CHIA. As a result, a Built Heritage Impact Report was submitted in 2001 for Phase III of the project and it clearly stated that the Central Star Ferry Pier was an important landmark and that its demolition would likely cause public outcry. It also noted that it was not by government definition an historical building as it was constructed after the year 1950 (Chan 2001).

The government chose to ignore the interpretation of the building as an important local landmark and heritage item and instead upheld the earlier plans for demolition of the building, putting emphasis on the fact that the Star Ferry Pier did not fit into the government definition of an historical building and that all legal requirements had been adhered to during the development process. Explanations for this position have been suggested over the years following the demolition, for example, the refusal of the government to accept the special circumstance of Hong Kong as having a local heritage “that includes everyday lived-in spaces and places that evoke memories of common experience” (Barber 2009). However, the general view has been that the government reasoning was based on financial concerns, specifically income-generation and that the heritage issues were not really considered at all (Tsui 2013).

Not surprisingly the government’s position and justification for their decision was not accepted by the public or the concern groups who challenged the government’s stand. The government’s decisions have been continually criticised and used as a warning for proceeding in a similar manner for other development projects. The case has also necessitated that development proponents must recognise heritage sites as acknowledged by the public (whether they fall within the strict criteria of the government guidelines or not) or face the strong negative public reaction that could create costly delays or even cause projects to be completely cancelled. As a result, the inclusion of public input in the determination of heritage values has been evolving, through the incorporation of public

consultation and engagement (Veg 2007) as part of both the Planning process and impact assessment projects.

The Future

Hong Kong is a city that has always been and remains focussed on the future. In the past, the government policy has been to let market forces lead the way forward with little regard for preserving the past. Not surprisingly this policy did not cultivate a need for the determination of heritage significance within the development process. It also emphasised a top down development model that did not incorporate public opinion, but instead favoured infra-structure and commercial development that were seen as the most efficient means of increasing the prosperity of Hong Kong with little advantage seen in engaging the public in the planning process (Ng 2008).

Since the introduction of the CHIA system in 1997, a gradual shift has been seen in government and public sentiment with CHIA findings being presented to the public during various stages of development projects from planning and feasibility studies right up to design and construction. This has not always ensured positive results for Hong Kong's urban heritage resources in the face of development, but it has definitely brought some quite controversial issues out into the open and broadened the range of stakeholders who are able to have input into how a development should incorporate heritage as one of the factors in both location and design.

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