

CONSERVATION OF MERIDIAN MARKS AND OTHER UNUSUAL ITEMS IN HONG KONG

REFLECTIONS ON GOVERNMENT'S POLICY ON HERITAGE
CONSERVATION

ANTIQUITIES AND MONUMENTS IN HONG KONG (HIST5559)

MA PROGRAMME IN COMPARATIVE AND PUBLIC HISTORY

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1. BACKGROUND

1.1 During 2016-2018, the author of this essay, together with Dr Stephen Davies and Mr Yip Tsan-pong, discovered two sets of four long-forgotten Meridian Marks built by the Hong Kong Observatory (HKO) in 1884 and 1913 respectively (Figures 1-4). They are stone pillars, two built within the premises of the Observatory's Headquarters (the Old North Mark (ONM) and the New South Mark (NSM)), one built on a north-facing slope above Bowen Road, Wanchai (the Old South Mark (OSM)) and one built on a south-facing slope of Beacon Hill (the New North Mark (NNM)). Each pair of meridian marks (viz. the ONM-OSM pair and the NSM-NNM pair), together with the transit instrument used by HKO to determine the local time for Hong Kong during 1885-1941, defined the Hong Kong Meridian (Figures 5 and 6). While similar meridian marks can be found in some countries in Europe (including the UK¹ and France²), North America (including the USA³ and Canada⁴) and in South Africa⁵ and Japan⁶, it is believed that the Hong Kong Meridian Marks may be the only known meridian marks in China⁷. In particular, the OSM has a late Victorian British Colonial design which is rather unique in East Asia⁸.

1.2 The NSM had been removed in 1933 or possibly before, leaving only its foundation (Figure 3), whereas the ONM and the OSM are still standing today (Figures 1 and 2). The NNM was intact when discovered by an expedition team in January 2018 (Figure 4a), even though it was in poor condition with cracks, but was found in December 2019 to have partially collapsed (Figure 4b), probably due to the passage of Supertyphoon Mangkhut on 16 September 2018.



Figure 1: The Old North Mark, having an Art Deco design, may have been modified in the 1930s. (Source: HKO)



Figure 2: The Old South Mark, having a late Victorian British Colonial design. (Source: HKO)



Figure 3: The New South Mark. (foundation only) (Source: SHUN Chi-ming)



Figure 4a: The New North Mark in January 2018, having a rather basic design with large, roughly cut granite blocks cemented together. (Source: SHUN Chi-ming)



Figure 4b: The partially collapsed New North Mark in December 2019, revealing the rubble fill inside the cemented granite blocks. (Source: Daniel WONG)



Powered by Geoinfo Map: <https://www.map.gov.hk>

Figure 5: Meridian marks at the HKO Headquarters. (Source: Hong Kong Lands Department)



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Figure 6: The Hong Kong Meridian. (Source: Hong Kong Lands Department)

1.3 The discovery of the Meridian Marks attracted public and media interests, especially after promotion by a series of four educational videos of HKO in late-2018.

After the partial collapse of the NNM found in December 2019, conservation of the OSM and restoration of the NNM became issues for HKO. This essay attempts to elaborate on these issues and reflect on the government's policy on heritage conservation as these issues unveiled.

2. THE ISSUES

CONSERVATION OF ONM AND OSM

2.1 While the ONM is located within the premises of the HKO Headquarters, a declared monument since 1984⁹, which is therefore protected by the Antiquities and Monuments Ordinance (A&M Ordinance — Cap. 53)¹⁰, the OSM is however located on Unallocated Government Land (UGL). Access to the site is possible from Bowen Road (Figure 7) through a staircase but is restricted by Highways Department (HyD) for slope maintenance purpose (Figure 8). According to a report by the Director of Audit in 2013¹¹, even though UGL is under the purview of the Lands Department (Lands D), Lands D does not take up the management and maintenance of graded buildings on UGL, not to mention such a stone pillar without any grading. The author is also given to understand that HKO has no intention to consider allocation of the land associated with the OSM to HKO as the OSM no longer serves any operational function and due to the long-term financial burden in maintaining the associated slope¹². Regardless of these issues, with assistance of HyD, HKO has fixed a plate with explanatory information (Figure 9) near the OSM and plans to organize guided tours for members of the public when the opportunity arises.

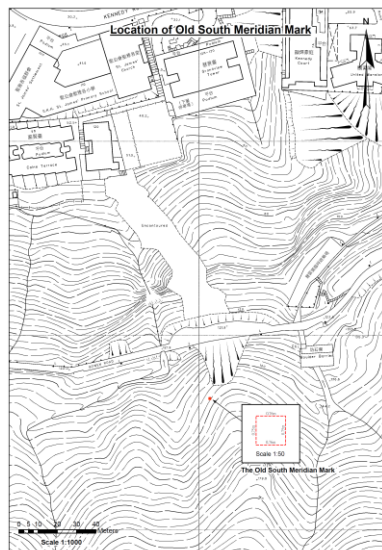


Figure 7: Location of the OSM above Bowen Road, Wanchai. (Source: Hong Kong Lands Department)



Figure 8: The OSM is accessible from Bowen Road through a staircase but access is restricted for slope maintenance. (Source: HKO)



Figure 9: Explanatory plate installed near the OSM. (Source: HKO)

RESTORATION OF NNM

2.2 It is unfortunate that the NNM has partially collapsed (Figure 4b). Unlike the OSM, which is accessible from Bowen Road, the NNM is not readily accessible. It is located on UGL on a steep slope of Beacon Hill with an angle of around 40 degrees, and without even footpath access (Figure 10). HKO has explored the possibility of restoring the NNM and consulted the Geotechnical Engineering Office (GEO) for preliminary geotechnical assessment of the site, especially expert advice on the stability of the NNM and the associated slope¹³. While GEO assesses that the slope is in a fair condition and there is no immediate danger of landslide, it however also advises that detailed study, ground investigation works as well as geotechnical assessment should be carried out to assess the stability of the mark. GEO also recommends that safe access to the site will be needed to facilitate the restoration works. These additional geotechnical studies, works and assessment, and the provision of safe access to the site in particular, mean that the restoration works will be very expensive¹⁴. Given the current economic climate of the Government, the chance of obtaining additional resources for restoration of the NNM is very slim. The chance of obtaining other funding resources, e.g. Lord Wilson Heritage Trust, Jockey Club Charities Trust, etc for the restoration works is also considered low¹⁵.

2.3 The issues mentioned above regarding the lack of management and maintenance of graded buildings on UGL also apply to the NNM.

2.4 Due to the lack of safe access to the site, a further complexity is that the Government is extremely reluctant to promote the NNM to the public in order to avoid attracting visitors to the NNM and thereby increasing the risks of accidents to them.

Guided tours to the NNM will be difficult to arrange and this will render any request for additional resources for restoration of the NNM to be considered unjustifiable due to low value for money.



Figure 10: Location of the NNM on the slope of Beacon Hill. Red dotted line indicates the path hacked out from the existing footpath by the expedition team in January 2018. (Source: Hong Kong Lands Department)

3. HERITAGE CONSERVATION POLICY

3.1 The A&M Ordinance was enacted in 1971 and became effective in 1976. Under the Ordinance, the Antiquities Authority¹⁶ may, after consulting the Antiquities Advisory Board (AAB) and with the approval of the Chief Executive of the Hong Kong Special Administrative Region (HKSAR), declare any place, building, site or structure, which the Authority considers to be of public interest by reason of its historical, archaeological or palaeontological significance, to be a monument, historical building or archaeological or palaeontological site or structure. A monument or a proposed monument, declared under the A&M Ordinance, is protected from unlawful acts except in accordance with a permit granted by the Antiquities Authority¹⁷. The AAB is supported by the Antiquities and Monuments Office (AMO), both established in 1976. The AMO is currently under the Commissioner for Heritage's Office, Development Bureau of the HKSAR.

3.2 Apart from declaration of monuments, the AAB has also operated an administrative grading system for classifying historic buildings into Grade 1, 2 or 3 based on their heritage significance. Graded buildings however are not legally protected by the A&M Ordinance. Following a public consultation on heritage conservation in 2004, the AMO formulated six criteria for assessing the heritage value of historic buildings:

- (1) Historical Interest
- (2) Architectural Merit
- (3) Group Value
- (4) Social Value and Local Interest
- (5) Authenticity
- (6) Rarity

3.3 These criteria are used by the AMO to assess 1,444 selected historic buildings shortlisted from some 8,000 buildings identified from a territory-wide survey conducted between 1996 and 2000 of buildings built before 1950 and those with historic significance. These criteria are also used by the AMO to assess new items identified in addition to the 1,444 historic buildings.

3.4 At the writing of this essay, there are a total of 129 declared monuments¹⁸ and the number of graded buildings arising from the 1,444 historic buildings and the additional new items are as follows (as at 9 September 2021)¹⁹:

Type of Historic Building	Number of Graded Buildings		
	From 1,444 Historic Buildings	From New Items	Total
Grade 1	173	26	199
Grade 2	338	53	391
Grade 3	515	78	593

There are still some 200+ items of remaining buildings on the list of 1,444 buildings and additional new items pending finalization of the grading assessment²⁰.

3.5 The heritage conservation policy today could be traced back to October 2007 when the Government released the Heritage Conservation Policy²¹ (the “Policy”) which announced, *inter alia*, the following Policy Statement which was ordered by the Chief Executive of the HKSAR on advice by the Executive Council:

“To protect, conserve and revitalise as appropriate historical and heritage sites and buildings through relevant and sustainable approaches for the benefit and enjoyment of present and future generations. In implementing this policy, due regard should be given 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.”

3.6 The Policy also announced that the Government would focus on the use of administrative means instead of legislative means for implementing measures on heritage conservation for the time being. In the Government domain, these administrative means included:

- (1) Setting up an internal Government mechanism requiring Heritage Impact Assessment (HIA) to be conducted for new capital works projects involving historic and built heritage; and
- (2) Introducing a scheme for adaptive re-use of Government-owned historic buildings by engaging non-profit making organizations for running social enterprises.

The other administrative means pertaining to the private sector domain will not be discussed in this essay as they are not relevant to the present study.

3.7 As part of the Policy, the Government also set up a Commissioner for Heritage's Office (CHO) in the Development Bureau to provide a focal point for the Government's heritage conservation work in 2008. The AMO came under the CHO in 2019.

3.8 Arising from 3.6(1) above, capital works projects proponents and relevant works departments are required to consider whether their projects will affect sites or buildings of heritage sites, which include, *inter alia*, the Government Historic Sites Identified by AMO (GHSIAs), and if so, Heritage Impact Assessment (HIA) will need to be conducted. At the time of writing, there are 30 GHSIAs, which include boundary stones, foundation stones, milestones, stone tablets, arches, and obelisks²². In case impacts to heritage sites are identified by the HIA, mitigation measures will be required to be implemented to reduce the impacts.

3.9 The GHSIAs are however not graded, and therefore there is no formal channel for them to be considered as monuments by the AAB. This situation arose from the 177th Meeting of the AAB held on 9 March 2017. In this Meeting, the AMO, with a view to expediting the ongoing grading assessment, proposed rationalizing the grading of the list of new items (and new categories) suggested by the public into two lists:

- (1) List (a), a list of new items for grading assessment; and
- (2) List (b), a list of items not falling under the usual category of "buildings / structures".

The Meeting was also informed that "the prevailing grading assessment criteria, designed specifically for pre-1950 "buildings / structures", took two years to draw up from 2003. Setting up a standard of assessment and conducting extensive researches

on historic items would be prerequisites for establishing a set of grading assessment criteria ” for the List (b) items. Splitting of the list of new items (and new categories) into List (a) and List (b) (so-called the “unusual items”) was agreed by the AAB.

4. HERITAGE VALUE OF THE MERIDIAN MARKS

4.1 The Meridian Marks testify the history of provision of time service in Hong Kong through astronomical observation from 1885 to at least 1933⁷, possibly until December 1941 when Hong Kong was invaded and occupied by the Japanese. The transit instrument used by HKO for determining the local time was taken away by the Japanese during the occupation. Provision of time service through astronomical observation did not resume after the war – instead the time service was based on a standard pendulum clock regularly checked with radio time signals from overseas centres after HKO resumed its operations in 1946.

4.2 While the AAB had agreed in 2017 that the “unusual items” will not be assessed for grading, and a new set of assessment criteria would be needed to assess the List (b) items (see 3.9 above), the heritage value of the Meridian Marks cannot be underestimated. First of all, it is noted that the ensemble of buildings at Greenwich, England, associated with the Prime Meridian (named “Maritime Greenwich”) was inscribed in 1997 as a World Heritage. It meets criteria (i), (ii), (iv) and (vi) for the assessment of Outstanding Universal Value laid down by the United Nations Educational, Scientific and Cultural Organization (UNESCO)²³. In particular, under criterion (i) “represent a masterpiece of human creative genius” and criterion (vi) “be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance”, the assessments for Maritime Greenwich are:

Criterion (i): The public and private buildings and the Royal Park at Greenwich form an exceptional ensemble that bears witness to human artistic and creative endeavour of the highest quality.

Criterion (vi): Greenwich is associated with outstanding architectural and artistic achievements as well as with scientific endeavour of the highest quality through the development of navigation and astronomy at the Royal Observatory, leading to the establishment of the Greenwich Meridian and Greenwich Mean Time as world standards.

It may be argued that the Meridian Marks in Hong Kong, being the only known meridian marks in China and also rather unique in East Asia, when grouped together

with the Hong Kong Observatory Headquarters, which is already a declared monument based on its heritage value in architecture, meet the above criteria on the regional and national levels.

4.3 As for individual meridian marks, it should also be noted that the Mire du Nord² (North Meridian Mark) of Paris, France has been designated as a historic monument at the national level (Classé Monument Historique) since 1993 (Figure 11). In France, historic monuments are protected by law. For any alterations to the protected building, the owner must make a request to the authority concerned before the start of the work, indicating the details of the work to be carried out. In return, maintenance is partially funded by the State, and tax exemption is possible for owners²⁴.

4.4 Another example is a meridian stone²⁵ at Falmouth Hospital, England (Figure 12), which has been a Grade II Listed Building since 2008²⁶. In England, listed buildings are protected by law to a certain extent. A listed building consent must be applied for in order to make any changes to that building which might affect its special interest. The local authority uses listed building consent to make decisions that balance the site's historic significance against other issues, such as its function, condition or viability²⁷.



Figure 11: Mire du Nord, Paris. (Source: Wikipedia)



Figure 12: Meridian stone at Falmouth Hospital, England. (Source: Facebook²⁸)

4.5 Even though a new set of criteria will need to be devised for assessing the “unusual items” (see 3.9 above), a mock assessment using the current criteria for assessing List (a) “buildings / structures” (see 3.2 above) has been attempted by the author for the OSM using the Historic Building Assessment Form of AMO²⁹, an overall 59 out of 68 marks (equivalent to 87%) may be obtained (Appendix I). While the importance for certain criteria such as “Architectural Merit” and “Group Value” may

have different perspectives for items not falling into the category of “buildings / structures”, this exercise shows that with suitable adjustments of the assessment form, the heritage value of items such as the Meridian Marks could be assessed. Furthermore, this mock assessment shows that the OSM would have high heritage value due to its Victorian architectural style, its uniqueness in China and rarity in East Asia, and its historical significance in time service provision through astronomical observation since 1885. Should a similar mock assessment be also attempted for the NNM, the overall mark would be lower due to its belonging to the second generation (since 1913), its relative basic design, and the fact that it has partially collapsed.

5. PROPOSAL FOR CONSERVATION OF THE MERIDIAN MARKS

5.1 In view of the discussion on the heritage value of the Meridian Marks in Section 4 above, in particular considering the examples of similar meridian marks being designated as monuments or graded buildings in France and the UK respectively, one would ask the question whether the Meridian Marks could be graded or even be declared monuments? What was the original intent or spirit in heritage conservation when the A&M Ordinance, AAB and AMO was set up back in 1976?

5.2 To answer the latter question, it is fortunate that Dr Solomon Bard, the first Executive Secretary of the AMO (1976-83), wrote an article in 1999 on “Preserving Hong Kong’s Heritage: The First Steps”³⁰. Dr Bard revealed that, based on an extensive search, identification and recording of a wide range of items deemed to be of historical or archaeological interest during the late 1970s, the AMO came up with an “inventory” of the types of heritage items to be recorded. They included historic buildings, archaeological sites, ancestral halls, Chinese temples, ancient tombs and graves, Chinese traditional villages, **stones (boundary, foundation, and other historic)**, ancient rock engraving and inscriptions, forts, tablets with inscriptions, bridges, Chinese study-libraries, pagodas, military barracks, street furniture (e.g. lamp posts, letter pillar-boxes), old cannon, and miscellaneous items such as ancient kilns, stone circles, and others. It is therefore crystal clear that the original intent when the whole heritage conservation mechanism came into place in 1976 was to include historic stones such as boundary stones, foundation stones and naturally also meridian marks (under “other historic” stones). Another compelling evidence is that street furniture (e.g. lamp posts) with similar sizes was also intended to be conserved and indeed the declaration of the Duddell Street steps and gas lamps was among the first monuments declared in 1979³¹.

5.3 If one digs deeper into the legislation, viz the A&M Ordinance, the following would quickly come into sight:

“2. Interpretation

***monument** (古蹟) means a place, building, site or structure which is declared to be a monument, historical building or archaeological or palaeontological site or structure under section 3”*

This definition clearly implies that apart from a “building” or a “structure”, a “place” or a “site” could also be a monument, despite there are no further definitions of “place”, “building”, “site” or “structure” in the A&M Ordinance.

5.4 Further definitions and meanings of terms could however be found from the following international conventions and charters:

(1) Convention Concerning the Protection of the World Cultural and Natural Heritage, UNESCO (1972) (the “UNESCO Convention”)

“Article 1

For the purpose of this Convention, the following shall be considered as “cultural heritage”:

*monuments: **architectural works**, works of monumental sculpture and painting, elements or structures of an archaeological nature, inscriptions, cave dwellings and combinations of features, which are of outstanding universal value from the point of view of history, art or science;*

groups of buildings:

sites:”

(2) International Charter for the Conservation and Restoration of Monuments and Sites (The Venice Charter 1964)

“Article 1.

*The concept of a historic monument embraces not only the single **architectural work** but also the urban or rural **setting** in which is found the evidence of a particular civilization, a significant development or a historic event. This applies not only to great works of art but also to **more modest works of the past** which have acquired cultural significance with the passing of time.”*

(3) The Burra Charter (The Australia ICOMOS³² Charter for Places of Cultural Significance, 2013)

“Article 1. Definitions

For the purposes of this Charter:

*1.1 **Place** means a geographically defined area. It may include elements, objects, spaces and views. Place may have tangible and intangible dimensions.*

*(Explanatory Notes: **Place** has a broad scope and includes natural and cultural features. Place can be large or small: for example, a memorial, a tree, an individual building or group of buildings, the location of an historical event, an urban area or town, a cultural landscape, a garden, an industrial plant, a shipwreck, a site with in situ remains, a **stone arrangement**, a road or travel route, a community meeting place, a site with spiritual or religious connections.)*

5.5 It therefore becomes apparent from 5.4 above that while the UNESCO Convention specifies that “monuments” should include “architectural works”, the Venice Charter extends the meaning of “monuments” to embrace not only a single “architectural work” but also its “setting”, and this applies also to more “modest works of the past”. The Burra Charter further extends the scope from “monuments” to “places of cultural significance” where “place” has a broad scope – it can be large or small, and could specifically include “stone arrangement”.

5.6 In the light of the above definitions and meanings of terms in the international convention and charters, the practices in the UK and France to designate meridian marks and stones as graded buildings (UK – see 4.4 above) or even monuments (France – see 4.3 above) are obviously in line with the prevailing international best practices. For practical reference, the UK lists out the 20 themes of building and structures that could be selected for protection under The Planning (Listed Buildings and Conservation Areas) Act 1990³³ (Appendix 2) and provides guidelines for selection – relatively small items such as “commemorative structures” and “street furniture” are part of the themes. It is apparent that the decision of AAB in 2017 to split the list of new items into List (a) and List (b), thereby preventing the “unusual items” like the Meridian Marks from being graded or declared monuments, was only an ad-hoc decision based on expediency, and not based on the original intent in 1976 nor international best practices. The Meridian Marks, especially the OSM, should be graded considering their heritage value.

5.7 Nevertheless, given the current heritage conservation policy and practice, and to be pragmatic, the following two options for conservation of the Meridian Marks, with pros and cons, have been drawn up for discussion.

Option 1 (Protect the OSM and NNM in One Go)

Step (1) Apply for funding to restore the NNM.

Step (2) Include the OSM and NNM in the list of GHSIAs, thereby achieving some protection (see 3.8 above).

Step (3) Grade and/or declare the OSM and NNM as monuments when conditions are right.

Pros • The OSM and NNM are integral parts of the Hong Kong Meridian, and so they should be protected together.

Cons • Access to the NNM is not available, rendering the restoration of the NNM difficult and expensive.

• Difficult to arrange guided tours to the NNM and difficult to impress the public on its heritage value.

• Value for money of the restoration works is low.

• Success in funding application for restoration of the NNM is very slim.

Option 2 (Protect the OSM First, then the NNM)

Step (1) Include the OSM in the list of GHSIAs first, thereby achieving some protection (see 3.8 above).

Step (2) Grade and/or declare the OSM as monument when conditions are right

Step (3) Apply for funding to restore the NNM after promotion of the OSM proves effective, followed by Steps (1) and (2) again for the NNM.

Pros • The OSM was built in 1884, thus it has a higher heritage value than the NNM which was built in 1913.

- Access to the OSM is available; basic maintenance works and plate with explanatory information for the OSM has been completed.
 - Guided tours to the OSM and other educational and promotion activities can be arranged (COVID-19 permitting) and stand a good chance to be effective.
 - Effective promotion of the OSM to the public could win support for funding application to restore the NNM.
- Cons
- As the OSM and NNM are integral parts of the Hong Kong Meridian, separating their protection may attract criticisms from the public.
 - Delaying the restoration works for the NNM may lead to eventual complete collapse of the NNM.

5.8 The above two options were presented by the author to the Working Group on Heritage Conservation of HKO in its meeting held on 22 November 2021. The meeting agreed with Option 2. The author therefore **recommends that, as a first step, the OSM should be included in the list of GHSIAs. (Recommendation 1)**

6. POSSIBLE IMPROVEMENTS OF HERITAGE CONSERVATION POLICY

6.1 Proceeding with Option 2 to achieve some protection of the OSM is a compromised pragmatic approach. In view of the best practices of other countries and cities, it will be highly desirable for the OSM to be graded for eventual consideration to be declared as a monument. Declaration of the OSM as a monument may also be considered as an extension of the existing declared monument of the HKO Headquarters to the OSM through the Hong Kong Meridian. In order to achieve this, a new process in the government will be required, including devising a new set of criteria for assessing the “unusual items” in the list of GHSIAs. This work may be carried out in-house by the AMO, or if workload is a problem, external support such as a consultancy study could be considered.

6.2 Even though the current list of GHSIAs only consists of 30 items, as the scope of monuments and places with cultural significance could be quite large in view of the international best practices (e.g. see the scope in the UK in Appendix 2), it may turn out that thousands of such new items may eventually need to be assessed. This is not unachievable as the AMO had conducted a territory-wide survey of historic buildings from 1996 to 2000, during which some 8,000 buildings built before 1950 and those with historic significance were recorded and eventually shortlisted into the 1,444 buildings for detailed assessment (see 3.3 and 3.4 above). The assessment of some 94% of the 1,444 buildings has been finalized as at May 2021 and the assessment of some 200 items of remaining buildings on the list of 1,444 buildings and additional new items has yet to be finalized²⁰. Of course, it should also be noted that the AMO has been tasked by the AAB in 2019 to consider assessment of post-1950 buildings and this new task may involve assessment of some 20,000 buildings²⁰. Therefore there will be a need for prioritization and/or consideration of additional staff resources to take forward the grading assessment of GHSIAs and post-1950 buildings.

6.3 Regarding the prioritization issue, one should note that the GHSIAs do include items with significant heritage value, such as the City of Victoria Boundary Stones (Figure 13), the Sung Wong Toi Inscription Rock (Figure 14), the Boundary Stones at Chung Ying Street (Figure 15) and the Stone Tablet Bearing an Inscription “九龍關” (Figure 16). Failing to protect them adequately could potentially jeopardize the reputation of the AMO, AAB and the Government, especially that most of them are probably situated on UGL or land allocated to Government departments, e.g. HyD³⁴.

The Mission Hill Service Reservoir, which might have been initially recognized only as an underground water tank, i.e. an “unusual item” that did not receive the necessary attention, and subsequently demolished in December 2020 by the Water Supplies Department until being stopped by enthusiastic public, is a vivid case in point which should be avoided in the future. This case also reveals the increasing public interests in conserving historic architectural works that are not usually considered as buildings. The author therefore **recommends that: (a) a plan should be drawn up to conduct a territory-wide survey to identify the “unusual items” with significant heritage value, (b) a set of new assessment criteria suitable for such items should be devised, and (c) a grading assessment of the identified “unusual items” with significant heritage value should be carried out in order to protect them. (Recommendation 2)**



Figure 13: Boundary Stone of City of Victoria, Hatton Road. (Source: AMO)



Figure 14: Sung Wong Toi Inscription Rock, Sung Wong Toi Garden. (Source: Wikipedia)



Figure 15: Boundary Stone No.1 at Chung Ying Street. (Source: Wikiwand)



Figure 16: Stone Tablet Bearing an Inscription “九龍關”, Ma Wan. (Source: HK01)

6.4 If the two tasks of grading assessment of GHSIAs and post-1950 buildings³⁵ are to be carried out at the same time, it is apparently that additional human and financial resources will be required for the assessment work as well as the subsequent maintenance, restoration and re-vitalizing works. As regards the human resource issue, it is noted that back in March 2013, Director of Audit has already recognized in his

report that, due to **resources availability**, the AMO was not able to carry out its tasks adequately, e.g. regular inspection of monuments¹¹. This human resource issue is to be expected to intensify as the number of declared monuments has further increased from 101 in February 2013¹¹ to 129 in July 2021¹⁸, a 28% increase in 8 years. Adding to this, Director of Audit also expressed dissatisfaction¹¹ on the progress in the grading of the 1,444 historic buildings, specifically, “the grading of 175 of the 1,444 historic buildings were not confirmed after a long period of time” and “other than the 1,444 historic buildings, the AMO had received public referrals for historic-value assessment of 202 buildings”. As at March 2021, eight years after the Director of Audit’s Report, grading of 83 of the 1,444 historic buildings, and 137 of some 340 new items, were still not confirmed²⁰. If this rate of work progress in grading persists (about 20 items per year), another 11 years will be needed to complete the outstanding grading assessment of the 220 items, not to mention that the number of new items referred by the public for assessment will continue to increase with time. The author therefore **recommends that a review the staff establishment of the AMO should be carried out with a view to enhancing the staff support to complete the outstanding assessment work as soon as possible and to take forward the grading assessment of the GHSIAs. (Recommendation 3)**

6.5 In the course of looking into the human resource issue of the AMO, it is also noted that after the re-organization of the AMO to come under the Development Bureau in 2019, one Chief Curator and two Senior Architects at the same rank on the Master Pay Scale (MPS) report to the CHO (Figure 17). This hierarchy issue appears undesirable as there is no longer a Head of AMO at the Chief Curator level, with the expertise in heritage conservation to lead and to take the responsibility of issues related to antiquities and monument. This used to be the case before the re-organization. Instead such issues will now have to be handled at the level of the Commissioner for Heritage (C for H), who is an Administrative Officer at Directorate Pay Scale Point 2 (D2) level with little experience in heritage conservation.

Organisation Chart for Commissioner for Heritage's Office

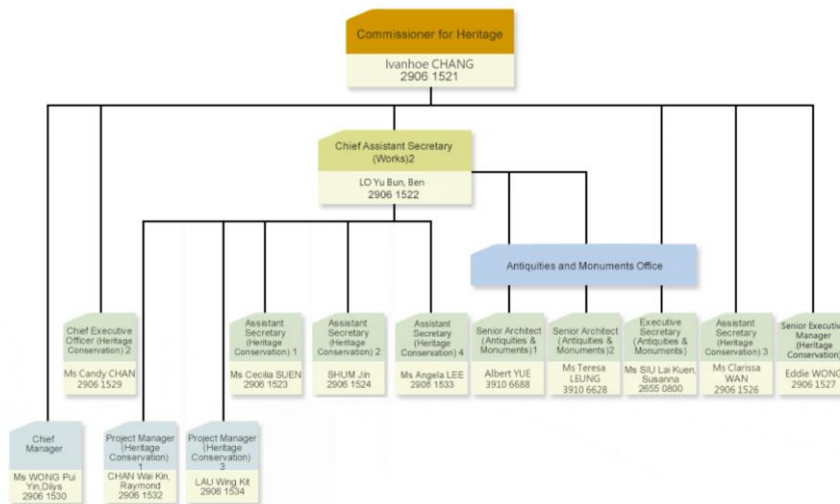


Figure 17: Organization chart for the CHO³⁶.

6.6 Incidentally, in a report written by Civic Exchange on “Saving Hong Kong’s Cultural Heritage” back in February 2002³⁷, issues on the structure, resource, expertise and leadership were already highlighted:

(1) Structure and Resource

“2.2.3 Deficiencies in the Administrative Framework

AMO Structure: *In order to be assured of the efficient allocation of available resources, **an audit of the structure and existing resource use of the AMO / AAB is necessary.** This need will be enhanced once the Antiquities and Monuments Ordinance is revised to reflect necessary changes.”*

(2) Expertise

C. CO-ORDINATION AND INTEGRATION OF EXISTING GOVERNMENT DEPARTMENTS

Inability to co-ordinate and integrate existing government departments and legislation, which is also illustrated by:

*... the **lack of expertise.** Apart from within the AMO, there are very few persons with any heritage conservation experience, or indeed expertise, within Government.”*

(3) Leadership

“2.2.3 Deficiencies in the Administrative Framework

Inter-Departmental Cooperation: ... the AMO is a relatively low level body within the organization of the Government. As a result, the AMO lacks the power to lead and the ability to influence other departments in the government bureaucracy.”

6.7 It therefore transpires that issues on structure, resource, expertise and leadership in the organization of the AMO has been long-standing. The situation in the lack of resource for enhancing the grading assessment work progress (see 6.4 above), and the issues experienced for conservation of graded buildings on UGL (see 2.1 above) have not been improved after the re-organization of the AMO to come under the Development Bureau in 2019. The re-organization has also brought some issues in the hierarchy and dilution in the expertise in the leadership. Now, with the present term of the Government drawing to a close and in view of the possibility of setting up a new Culture, Sports and Tourism Bureau (CSTB) in the new term, one would ask the question: Would it be more beneficial to heritage conservation for the AMO and CHO to come under the new CSTB, if established? The author therefore **recommends that the organization and structure of the CHO an AMO should be reviewed for the new term of the Government. (Recommendation 4)**

6.8 Apart from human resource issues, there is also a need to consider enhancing the financial resource for maintenance, restoration and re-vitalizing works for “unusual items” with heritage value. As pointed out in 2.2 above, the chance of obtaining resources for restoration of the NNM, no matter from inside or outside the Government, is very slim. Even if the NNM is included in the list of GHSIAs or graded, there is still no provision for its restoration as items on UGL fall outside the maintenance responsibility of the Architectural Services Department (Arch SD)¹¹. If **Recommendation 2** above is accepted and taken forward, the issue of maintenance of graded “unusual items”, especially those located on UGL, has to be dealt with. Noting that most of these “unusual items” are probably situated on UGL or land allocated to Government departments (see 6.3 above), the responsibility of their protection (or the failure of) should ultimately fall within the Government. The author therefore **recommends that financial resource for maintenance, restoration and re-**

vitalizing works for future graded “unusual items” should be made available to protect them. (Recommendation 5)

6.9 In the light of the above discussion, especially the international best practices highlighted in 5.4 - 5.6 above, one might also ask the question: does Hong Kong need an overhaul of the A&M Ordinance and other related legislation? The answer is “Yes” according to the above-mentioned report of Civic Exchange³⁷. Without going too much into the details, as regards the A&M Ordinance, Civic Exchange proposed “*extension of protection of heritage to incorporate all building types, areas and districts, intangible assets and the surrounding environment*” and “*revision of current grading system to ensure a consistent understanding of the grading system and to include more than just monumental quality heritage assets*”. They are consistent with the above discussion, especially **Recommendation 2**.

6.10 Another “Yes” to the above question can also be found in an article written in 2012 by Professor David Ping-yeung Lung³⁸, an internationally recognized scholar in the field of heritage conservation and past Chairman of the AAB. Apart from stating upfront that “the current heritage law is in dire need of review and amendment”, he mentioned several issues in the A&M Ordinance, of which the following is most relevant to this study:

*“The single layer for declaring buildings and sites of monumental status is hardly convincing and sufficient to meet the societal aspiration; especially as **the definition of monuments is no longer acceptable to the community at large**. There is a need to recognise the multi-faceted nature of cultural heritage, including cultural landscapes, **streetscapes**, historic precincts or districts, vernacular buildings, cemeteries and intangible cultural heritage such as ancestor worship practices, which are all subsets of an integrated whole and should receive different degrees of intervention and protection. **A more comprehensive heritage law is needed to address this burning issue.**”*

Again, Professor Lung’s loud and clear message highlights issues similar to those discussed above, in particular the need to extend the definition of “monument” to encompass a wider scope of heritage items so as to meet public expectation and aspiration, and to provide the necessary protection. He also called for a more transparent and statutorily protected grading system. He proposed strongly to

upgrade the heritage law, viz the A&M Ordinance, as well as the other legislation related to heritage conservation. Nevertheless, one would also recognize that in the past several years, the political environment in Hong Kong was not conducive to taking forward significant amendments to the legislation. It is hoped that with the stabilization of the political situation and proper functioning of the Legislative Council, such legislative amendments could be taken forward by the Government. The author therefore **recommends that the A&M Ordinance and related legislation should be reviewed with a view to upgrade the definitions, scope of coverage, and to give the grading mechanism a statutory basis tallied with appropriate conservation measures. (Recommendation 6)**

6.11 While a detailed proposal on possible improvements of the heritage conservation legislation is beyond the scope of this study, any such proposal should be guided by principles, vision and values. Here the author would like to refer to the Heritage Conservation Policy Statement which was an order given by the Chief Executive in 2007 (see 3.5 above). This Policy Statement essentially consists of two parts: the first part *“To protect, conserve and revitalize... for the benefit and enjoyment of present and future generations”* resembles a vision and mission statement which perhaps could be strengthened in the following ways:

- (1) to widen the scope beyond “historical and heritage sites and buildings” to “historic environment” and “cultural heritage” (reflecting the above discussions and recommendations);
- (2) to make the statement more visionary and forward-looking, using stronger and more passionate wording like “celebrate” our past, “build” our future, “be a model of excellence” etc; and
- (3) “relevant and sustainable approaches” should be further developed, perhaps building around the core values that cultural heritage conservation should have.

6.12 As regards the second part of the Policy Statement, while there are a couple of core values that could be used for 6.11(3) above, e.g. “collaboration”, “engagement”, the author feels that the constraints and limiting factors like “development needs” and “budgetary considerations” should not be included. These constraints and limiting factors should be viewed as given in any society. Including

“development needs” and “budgetary considerations” explicitly in the Policy Statement could even be viewed to reflect a lack of vision, political will and commitment of the leadership in heritage conservation. The author therefore **recommends that the Heritage Conservation Policy Statement should be reviewed and amended with a view to reflecting the vision, political will and commitment in heritage conservation. (Recommendation 7)**

7. CONCLUDING REMARKS

7.1 This study started with presenting the background and the issues of conservation of the recently discovered Meridian Marks which testify the history of time service provision through astronomical observation in Hong Kong from 1885 to 1941. The relevant heritage conservation policy is then reviewed with a view to explore feasible ways to conserve the Meridian Marks. Noting that there are currently limitations in the legislative and administrative instruments for heritage conservation of such “unusual items”, the study formulated a proposal with a specific recommendation based on a pragmatic approach, despite being a compromised one, for conserving the Meridian Marks.

7.2 In drawing up the proposal for conserving the Meridian Marks, the study also referred to the international convention, charters and best practices in other countries and found that the prevailing legislation and best practices in advanced countries and cities are based on a **more comprehensive approach on heritage conservation of places with cultural significance** rather than just monuments of buildings or sites. With this as the underlying principle, the study explored possible ways to improve the current heritage conservation policy with reference to views expressed by a number of stakeholders, and came up with six additional recommendations. These recommendations cover planning for grading assessment of the “unusual items” with a view to protecting them, review of staff resource of the AMO, review of the organization and structure of the CHO and the AMO, financial resource for maintenance of future graded “unusual items”, review and upgrade of the legislation (viz the A&M Ordinance), and review of the Heritage Conservation Policy Statement laid down in 2017. Hopefully, the stabilization of the political environment and a new term of the Government next year will allow some fundamental improvements to the heritage conservation to be made in Hong Kong – a step forward in building cultural identity for the present and future generations.

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APPENDIX 1

MOCK ASSESSMENT OF THE OLD SOUTH MARK NEAR BOWEN ROAD, WANCHAI

Criterion	Range of Score				Score Awarded
	4	3	2	0 or 1	
1. Historical Interest					
(a) Associated with historical event(s), phase(s) or activity(ies)	Associated with extremely significant event(s) at territory/ national level	Only associated with very significant event(s) at district/ regional level	Only associated with significant event(s) of local community	Little or no association	4
(b) Associated with historic figure(s)	Associated with historic figure(s) at territory/ national level	Associated with historic figure(s) at district/ regional level	Associated with historic figure(s) of local community	Little or no association	4
(c) Importance in the historical development of Hong Kong	Important at territory level	Only important at district/ regional level	Only important to local community	Little importance	4
(d) Age of the building	1899 or earlier	1900-1919	1920-1939	1940-1970	4

2. **Architectural Merit**

(a) Style - as an example of an architectural style	Excellent example	Very good example	Good example	Ordinary example	2
(b) Function - as an example of a building type	Excellent example	Very good example	Good example	Ordinary example	3

Criterion	Range of Score				Score Awarded
	4	3	2	0 or 1	
(c) Construction - design, decoration, construction materials, technology and craftsmanship	Excellent construction	Very good construction	Good construction	Ordinary construction	3
(d) Aesthetic Value - The building's external appearance contributes to visual quality of its vicinity	Very high aesthetic value	High aesthetic value	Ordinary aesthetic value	Little aesthetic value	3

3. <i>Group Value</i>	4	3	2	0 or 1	
(a) Importance in a building cluster of harmonious architectural design and style of Hong Kong or an integral component of an historical complex	Very Important	Important	Some importance	Little or no importance	2
(b) Importance in a building cluster showing common cultural value(s) or historical development of Hong Kong	Important to a region	Only important to a district	Only important to a place	Little or no importance to an area	4

Criterion	Range of Score				Score Awarded
	4	3	2	0 or 1	
4. <i>Social Value and Local Interest</i>					
(a) Importance as a symbolic or visual landmark recognized by the community	Important at territory level	Important at district/ regional level	Only important to the people of a place	Only important at individual's level	4
(b) Importance in depicting "cultural identity" and/ or perpetuating "collective memory" of the community	Important at territory level	Important at district/ regional level	Only important to the people of a place	Only important at individual's level	4

5.	Authenticity				
(a) Alterations to the building that adversely affect/enhance its historical significance and architectural integrity	No notable alterations OR Alteration(s)/change(s) associated with a historic figure/ event that enhanced its heritage/cultural significance or/ and architectural value	Only superficially altered, little impact on overall integrity	Moderately altered, but the original design still discernible	Considerably altered to detract greatly from its integrity	4
(b) Modification to the cultural setting and the associated cultural landscapes	Its cultural setting well preserved OR Compatible modification that enhanced the overall ambience/ environment	Only superficially modified, little impact on overall environment	Moderately modified, but the original environment still discernible	Considerably modified to detract greatly from its environment	4

6. <i>Rarity</i>	Range of Score				Score Awarded
	10-12	7-9	4-6	0-3	
Being rare due to the a) historical interest; and/or b) architectural merit; and/or c) group value; and/or d) social value & local interest; and/or e) authenticity of the building (refer to Explanatory Notes, section 3.6)	Very rare	Rare	Moderately rare	Least or not rare	10

APPENDIX 2

THEMES OF BUILDINGS AND STRUCTURES THAT COULD BE SELECTED FOR PROTECTION UNDER THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 OF THE UNITED KINGDOM

1. Agricultural Buildings
2. Commemorative Structures
3. Commerce and Exchange Buildings
4. Culture and Entertainment Buildings
5. Domestic 1: Vernacular Houses
6. Domestic 2: Town Houses
7. Domestic 3: Suburban and Country Houses
8. Domestic 4: The Modern House and Housing
9. Education Buildings
10. Garden and Park Structures
11. Health and Welfare Buildings
12. Industrial Buildings
13. Law and Government Buildings
14. Maritime and Naval Buildings
15. Military Structures
16. Places of Worship
17. Sports and Recreation Buildings
18. Street Furniture
19. Infrastructure: Transport
20. Infrastructure: Utilities and Communication

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- ¹ <http://www.thegreenwichmeridian.org/tgm/>
- ² <https://www.pop.culture.gouv.fr/notice/merimee/PA00086754>
- ³ https://www.nps.gov/parkhistory/online_books/butowsky5/astro4g.htm
- ⁴ <https://www.historicplaces.ca/en/rep-reg/place-lieu.aspx?id=4377>
- ⁵ <https://www3.astronomicalheritage.net/index.php/show-identity?identity=52&idsubentity=1>
- ⁶ <https://www.nao.ac.jp/news/topics/2013/20131115-cultural-property.html>
- ⁷ Stephen Davies, Shun Chi-Ming & Yip Tsan-Pong (2021): Hong Kong's Meridian Marks – traces of time past, *Journal of the Royal Asiatic Society Hong Kong*, Vol. 61, 2021.
- ⁸ The other known meridian marks in East Asia were only built in 1925 in Japan and do not have the Victorian British Colonial design.
- ⁹ https://www.amo.gov.hk/en/monuments_24.php
- ¹⁰ <https://www.elegislation.gov.hk/hk/cap53>
- ¹¹ Director of Audit Report No. 60, March 2013, Chapter 1, Conservation of monuments and historic buildings (https://www.aud.gov.hk/pdf_e/e60ch01.pdf)
- ¹² The risk of slope problem is evidenced by a major landslide in 2005 located just about 10 m north of the OSM.
- ¹³ GEO (2021): The New North Meridian Mark at Beacon Hill: Preliminary Geotechnical Appraisal. (It is an internal report.)
- ¹⁴ Based on previous experience, the cost of such works may be in the order of at least several millions HK dollar.
- ¹⁵ Based on discussion at the Working Group on Heritage Conservation of HKO. Members of the Working Group include Professor Joseph Ting Sun-pao, Mr Cheng Po-hung, the author, and other colleagues of the HKO.
- ¹⁶ The Antiquities Authority is currently the Secretary for Development of HKSAR.
- ¹⁷ Such unlawful acts include excavation, building or other works, planting or felling trees or depositing earth or refuse on or in a proposed monument or monument, or demolition, removal, obstruction, defacing or interfering with a proposed monument or monument.
- ¹⁸ <https://www.amo.gov.hk/en/monuments.php>
- ¹⁹ <https://www.aab.gov.hk/en/built3.php>

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- ²⁰ Report on Implementation Progress of Heritage Conservation Initiatives by the Development Bureau to LegCo Panel on Development dated 10 May 2021 (https://www.heritage.gov.hk/en/doc/LegCo_Panel_Paper_2021_E_Main_Paper_Annexes_A-E_final.pdf)
- ²¹ LegCo Brief on Heritage Conservation Policy dated 10 October 2007 (https://www.heritage.gov.hk/en/doc/LC_Brief_Heritage_Conservation.pdf)
- ²² https://www.amo.gov.hk/form/build_hia_government_historic_sites.pdf
- ²³ UNESCO (2019): Operational Guidelines for the Implementation of the World Heritage Convention (<https://whc.unesco.org/en/guidelines/>)
- ²⁴ <https://www.culture.gouv.fr/en/Thematiques/Monuments-Sites/Monuments-historiques-sites-patrimoniaux/Les-monuments-historiques>
- ²⁵ The purpose of the meridian stone was to provide a reference for compass calibration. Even though its purpose is not exactly the same as the meridian marks, it served comparable scientific and navigation purposes.
- ²⁶ <https://historicengland.org.uk/listing/the-list/list-entry/1392642>
- ²⁷ <https://historicengland.org.uk/listing/what-is-designation/listed-buildings/>
- ²⁸ <https://www.facebook.com/The-Cornish-Curiosities-115388916524612/>
- ²⁹ https://www.aab.gov.hk/form/AAB_brief_faq_en.pdf
- ³⁰ Bard, Solomon (1999): "Preserving Hong Kong's Heritage: The First Steps." *Proceedings of the International Conference: Heritage and Tourism*, December 13 to 15, 1999, the Antiquities Advisory Board, Lord Wilson Heritage Trust, and Antiquities and Monuments Office, Hong Kong, pp.2-26.
- ³¹ https://www.amo.gov.hk/en/monuments_08.php
- ³² ICOMOS stands for International Council on Monuments and Sites.
- ³³ <https://www.legislation.gov.uk/ukpga/1990/9/contents>
- ³⁴ Looking through the current list of the GHSIAs (https://www.amo.gov.hk/form/build_hia_government_historic_sites.pdf), except for a couple of items which have some uncertainties (e.g. items No. 12 and 27), most of the items should be located on UGL or land allocation to Government departments.
- ³⁵ The author understands from the AMO that 7 permanent staff (1 Curator, 2 Assistant Curator I and 4 Assistant Curator II) have been established for carrying out the preparatory work for grading assessment of the post-1950 buildings. This has increased the curator grade staff strength of the AMO to 58 (1 Chief Curator, 5 Curator, 20 Assistant Curator I and 32 Assistant Curator II).
- ³⁶ <https://www.heritage.gov.hk/en/about/commissioner.htm>
- ³⁷ Chu, Cecilia and Kylie Uebegang (2002): *Saving Hong Kong's Cultural Heritage*, Civil Exchange, February 2002.

³⁸ Lung, David (2012): Built heritage in transition: a critique on Hong Kong's conservation Movement and the Antiquities and Monuments Ordinance, *Hong Kong Law Journal*, 2012, v. 42 n. 1, p. 121-141.