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The Conservancy Association

會址：香港九龍吳松街 191-197 號突破中心 9 樓

Add.: 9/F., Breakthrough Centre, Woosung Street, Kowloon, Hong Kong

電話 Tel.: (852)2728 6781 傳真 Fax.: (852) 2728 5538

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Town Planning Board  
15/F North Point Government Offices  
333 Java Road  
North Point  
Hong Kong

Re: Comments on the Section 16 Application No. A/YL-NSW/204

On behalf of the Conservancy Association (CA), I am writing to comment on the captioned planning application.

As mentioned by Antiquities and Monument Office (AMO) that Pun Uk is of extremely high built heritage value<sup>1</sup>, the application should be accompanied by a heritage impact assessment and a conservation management plan to establish a real model on adaptive re-use of historical building. It is quite common to have a pond in front of Hakka traditional house. AMO should advise whether the pond and the house should have certain group value and they be conserved in an integral manner. Therefore, conserving the pond should also be given due consideration in the heritage impact assessment, rather than simply filling up and then giving way to driveway and drop-off area. The current proposal by the project proponent to compensate this existing pond by providing a lily pond of 183.5m<sup>2</sup> in the middle of the columbarium area is not appropriate and cannot mitigate the heritage loss.

The proposed columbarium attempts to incorporate various Chinese traditional concepts and metaphor, but whether these elements were appropriate and would not obstruct authenticity of Pun Uk should be subject to proper heritage impact assessment. It is important that the “remodeling” or addition and alteration to the details of the heritage should be fully justified and approved before obtaining planning approval. There are too many cases where the entire character of heritage of Chinese traditional courtyards are ruined due to unnecessary and inappropriate additions and alterations.

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<sup>1</sup> AMO (2009). Brief Information on the Proposed Graded I Items.  
[http://www.amo.gov.hk/form/brief\\_information\\_grade1.pdf](http://www.amo.gov.hk/form/brief_information_grade1.pdf)