

**Review Report of the Incident of the
Ex-Sham Shui Po Service Reservoir**

Executive Summary

**Development Bureau
April 2022**

Introduction

1. In December 2020, the Water Supplies Department (“WSD”) commenced demolition of the Ex-Sham Shui Po Service Reservoir¹ (“Ex-SR”) due to possible collapse of its roof structure. Upon proper reinstatement of the Ex-SR site, the site would be returned to the Lands Department for other public use. In end December 2020, the interior underground architectural features of Ex-SR were exposed, which led to public concern about its preservation value. The demolition works were halted immediately.
2. In January 2021, the Permanent Secretary for Development (Works) set up and led an independent Working Group (“Working Group”) to (a) study the facts and circumstances surrounding the above incident of Ex-SR (“Incident”) and the relevant communications and considerations of the Government departments / offices concerned (including WSD and the Antiquities and Monuments Office (“AMO”²)) under the relevant prevailing policies and procedures for the conservation of built heritage; and (b) make recommendations on measures to prevent recurrence of similar incidents in the future.
3. The Working Group examined the relevant existing policies and procedures for handling public works, which include the Antiquities and Monuments Ordinances (Cap. 53), the administrative grading system adopted by the Antiquities Advisory Board (“AAB”) in assessing the heritage value of historic buildings, and the heritage impact assessment (“HIA”) mechanism for capital works projects. The Working Group also looked into the actions taken by WSD and AMO in the Incident through conducting document reviews and interviews with staff concerned as well as paying a site visit to Ex-SR.

¹ The service reservoir is located atop the Mission Hill and was decommissioned in 1970.

² To achieve synergy in implementing policy initiatives on heritage conservation and streamlining day-to-day operations, AMO, previously under the Leisure and Cultural Services Department, had been amalgamated with the Commissioner for Heritage’s Office of the Development Bureau on an interim basis since 27 August 2018. The official amalgamation subsequently took effect on 1 April 2019.

Comments

The HIA Mechanism and its Compliance by WSD and AMO

4. The prevailing HIA mechanism and related procedures are set out in the Development Bureau Technical Circular (Works) (“TC(W)”) No. 6/2009. The mechanism aims to address any potential or material impact of capital works projects on items that have identified heritage values (“heritage sites”) as well as items that may have heritage values but not yet ascertained before.
5. The Working Group opines that, in the Incident, both WSD and AMO complied with the consultation requirement as per TC(W) No. 6/2009. However, the Working Group notes that there lack specific guidelines in TC(W) No. 6/2009 on the types of information and level of details that need to be submitted by works agents to AMO. This resulted in inadequate / inappropriate information being submitted by WSD to AMO. The Working Group also notes that while the information submitted by WSD could not show much architectural features inside Ex-SR, WSD possessed another working drawing showing, inter alia, the cross-section of Ex-SR and its roof arches, which had not been passed to AMO. Nevertheless, the Working Group reckons that the interior features of Ex-SR had all along been “buried” inside a dark, confined space. It would not only be difficult for one to take good quality photos of such features without prior special arrangement of installing high power lighting or digital scanning devices inside the confined space, but also hard for one to appreciate the architectural features in the dark.

Communication between WSD and AMO

6. The Working Group observes that there is room for improvement in respect of the communication between WSD and AMO in the Incident. During the consultation with AMO under the HIA mechanism in April 2017, WSD used the term “water tank” to describe Ex-SR as it had been WSD’s tradition to name such facilities as “water tanks”, which led to AMO treating Ex-SR as an ordinary “water tank”. AMO, having regard to AAB’s consensus reached at its meeting in March 2017 (i.e. grading assessment for items including water tanks, amongst

other items, that did not fall under the usual category of “buildings / structures”, would not be conducted for the time being³) and noting the poor structural condition of the roof of Ex-SR as conveyed by WSD, did not request WSD to provide additional information nor arrange a site visit. Subsequently, WSD proceeded with the proposed works. The Working Group considers that had both AMO and WSD walked an extra mile in seeking clarification / confirmation from each other in their communications, the decision to demolish Ex-SR could have been revisited in a timely manner.

Insufficient Staff Awareness

7. The Working Group notes that although staff members of AMO were not aware that many structures being maintained by WSD, irrespective of the size, are commonly named by WSD as “water tanks”, AMO, being the office in the Government with expertise to offer advice to works agents of public works on heritage matters, should have exercised extra vigilance in seeking further information from WSD so as not to omit inadvertently potential items of heritage value that might look “ordinary” and should have provided clear advice to WSD on the appropriate follow-up actions that should be taken. On the other hand, staff members of WSD might not be familiar with conservation of heritage, resulting in the submission of insufficient information of Ex-SR that was not conducive to AMO’s assessment.

Other Comments

8. The investigation and design as well as the reinstatement works of the Ex-SR site were funded by Category D items of the Public Works Programme. The Working Group notes that there is currently no explicit requirement for works departments to consult AMO on the “Heritage Implications” paragraph of the funding paper for creation of Category D works items. Such consultation could be useful as a reminder to AMO on revisiting the case with the benefit of the availability of more information.

³ This would enable AAB to focus its work on other new items involving usual buildings / related structures and kick start the preparatory work for assessment and grading of historic buildings / structures built after 1950.

9. The Working Group also notes that a number of underground facilities with possible heritage value being maintained by WSD and the Drainage Services Department (“DSD”) have not yet been identified by any earlier research or studies. Also, AAB acknowledged in its meeting in March 2017 that the Government had set up the Advisory Committee on Built Heritage Conservation which would fund academic researches on built heritage, and might also provide financial assistance to studies on different forms of heritage items such as those not falling under the usual category of “buildings / structures”.

Recommendations and Implementations

10. To prevent recurrence of similar incidents, the Working Group recommends the adoption of the following two short-term and three medium-term measures.
11. The short-term measures include (a) revising TC(W) No. 6/2009 to elaborate on the detailed requirements for works agents and AMO to handle items that have potential heritage value but not on the list of “heritage sites” including setting out clearly the types of information to be submitted by works agents to AMO and making arrangement for site visits where circumstance warrants, and issuing guidelines to assist work agents in handling works projects involving underground structures with potential heritage value in consultation with AMO; and (b) stipulating the need for works departments to seek AMO’s clearance of the “Heritage Implications” paragraph of the funding paper for creation of Category D works items if such items involve modification and / or demolition of facilities with possible heritage value (including aged underground structures⁴) maintained by works departments, especially WSD and DSD.
12. The medium-term measures include (a) enhancing communication and staff awareness of AMO and works departments through organising joint seminars on a regular basis so that their staff can fathom the duties / role of departments / offices under the HIA mechanism, the features and assessment of facilities with heritage value, the critical issues in

⁴ Aged underground structures generally refer to those structures that were built over half a century ago.

handling items of possible heritage value under the HIA mechanism, etc.; (b) enhancing the preparedness of WSD and DSD through taking stock of the aged underground structures under their maintenance, so that if there are works in the future that would involve modification and / or demolition of such structures, AMO would be duly consulted under the HIA mechanism; and (c) conducting studies, through the Built Heritage Conservation Fund, on items that do not fall under the usual category of “buildings / structures” so as to explore appropriate approaches to handle such items.

Conclusion

13. Upon completion of the review, the Working Group considers that though WSD and AMO complied with the requirement of the prevailing HIA mechanism in the Incident, there exist areas of shortcomings. The Working Group suggests follow-up actions be taken by relevant parties in respect of the recommended measures identified above. With the full implementation of the recommended measures, the Working Group believes that recurrence of similar incidents could be avoided in the future.