

By email: enquiry@aab.gov.hk

Dear AAB Chairman and Members,

10th September 2025

HKICON's views on the Discovery of Ming's Dynasty Graveyard in San Tin

On behalf of the Hong Kong Institute of Architectural Conservationists (HKICON), we would like to express our views towards the recently discovered Tangs' Graveyard of the Ming Dynasty in San Tin, New Territories (The Graveyard).

Regarding the recent discovery, HKICON urged the relevant government bodies to examine the cultural significance of the graveyards in detail and establish appropriate conservation strategies and mitigation measures in a value-based and landscape-based approach in response to the potential impact caused by the upcoming development in San Tin area. The guiding conservation process within local ordinance and international conservation charters, including but not limited to the *Burra Charter*, the *Principles for the Conservation of Heritage Sites in China* and *ICOMOS International Charter and Guidance on Sites with Intangible Cultural Heritage*, shall be adhered to minimize adverse impact on heritage fabric as well as associated cultural space, customary and traditional practices, and sustainably manage changes under development agenda.

HKICON observes that the subject graveyard is in the vicinity of the Ngau Tam Mei Site of Archaeological Interest. Acknowledging that the physical location of heritage places contribute to its significance, in-situ conservation is always prioritized, and relocation of heritage elements will only be acceptable with supporting evidence. Any conservation interventions and decisions that may impact the concerned heritage fabric and values shall only be made with thorough understanding of the heritage, prior and informed consent of owners, and mitigated with appropriate measures.

Adhering to the aforementioned international practices, HKICON wants to emphasize the importance of landscape approaches that respect the historical settings of heritage sites. Based on thorough assessment of cultural significance, the possibility of boundary extension of the Ngau Tam Mei Site of Archaeological Interest shall be considered. Enlargement or extension of conservation areas could ensure proper conservation interventions to heritage settings, which is common practices worldwide such as enlarging the buffer zone of World Heritage Properties. It is hoped that multi-pronged measures would be taken for the sake of long-term heritage protection and conservation through education and social engagement activities, as well as to avoid reoccurrence of similar miss-out of heritage assets in future development in the area of San Tin.

HKICON also wish to bring attention to the emerging right-based approach in conservation advocated by the United Nations Educational Scientific and Cultural Organization (UNESCO), which promotes heritage sites as exemplary locations for upholding and realizing the highest standard of human rights, including rights of Indigenous people, allowing continuation of long-lasting living traditions and cultural practice.

HKICON

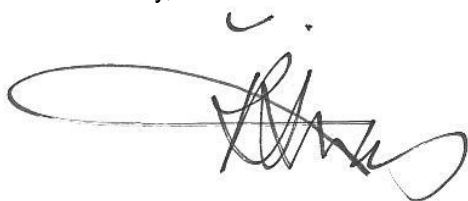
Hong Kong Institute of Architectural Conservationists

香港建築文物保護師學會

HKICON appreciates the civil efforts in heritage assets identification and awareness towards the Graveyard. Such efforts from community members involved in the advocacy of heritage conservation and civil society should be publicly acknowledged to encourage community participation and awareness-raising, which are of utmost importance in conservation practice.

Thank you very much for considering our views on this matter. HKICON is committed to supporting initiatives that uphold the cultural heritage of Hong Kong, and we trust that the Antiquities Advisory Board shares our dedication to safeguarding our heritage for future generations to appreciate and cherish.

Your Sincerely,

A handwritten signature in black ink, appearing to be 'Roger Wu', with a large, sweeping horizontal stroke at the end.

Roger Wu
President, Hong Kong Institute of Architectural Conservationists

Cc:

Members of the Antiquities Advisory Board, Email: enquiry@aab.gov.hk

Ms. LINN Hon Ho, Bernadette, JP, Secretary for Development, Email: sdev@devb.gov.hk

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