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Hong Kong Institute of Architectural Conservationists
香港建築文物保護師學會

By email: enquiry@amo.gov.hk

Dear Antiquities and Monuments Office,

14th May 2026

Best Practices for Assessment of the Maykong Warehouse Industrial Heritage Complex and Holistic Protection

On behalf of the Hong Kong Institute of Architectural Conservationists, our organization is writing to formally express our deep disappointment by the recent decision to assign a "no grading" status to the N446 and N447 ("Maykong warehouse complex") in Tsuen Wan.

In response to the invitation for public views on the proposed grading of four items dated 15 April 2026, we have carefully reviewed the assessment and supporting materials. Upon review of the current findings, we observed significant research gaps and misalignment with established national and international conservation standards. We urge the board to reconsider this evaluation based on a more comprehensive and holistic understanding of industrial heritage, and assessment methodology; or make information as such available for further review. In any case, we would like to take this opportunity to outline what we strongly believe to be appropriate from the perspective of a professional heritage conservation approach.

1. Holistic Understanding of Industrial Process and Historical Witness

According to the *ICOMOS-TICCIH Principles*, industrial heritage must be understood holistically, encompassing the entire process of production, storage, and distribution. A crucial point of contention in the current assessment is the lack of recognition that buildings N446 and N447 constitute a single, integrated industrial system. Specifically, the architectural and functional importance of the godown (N447) appeared to be largely overlooked. As a specialized storage component of the textile production chain, N447 is architecturally inseparable from the complex's operational narrative. Without such evaluation of these structures as a unified whole, the assessment does not address the essential "spirit of place" and the physical manifestation of the industrial process. Therefore, we strongly advocate for the holistic protection of both structures to preserve the integrity of this industrial site.

We also contend that the current assessment is too overly focused on the physical building and its basic operation. On the other hand, the broader role of silk and textile production in Hong Kong's history has not been taken into account at all. As a unique structure representative of its era, the Maykong warehouse complex serves as an essential witness to the evolution and eventual decline of the once-flourishing silk and textile industry in Tsuen Wan. Evaluating the building in isolation from the textile production lifecycle strips it of its primary historical significance. Therefore, we

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strongly advocate for the holistic protection of the complex as a unified entity that manifests these industrial connections.

2. Redefining Social Value and Accessibility

Our review suggests that the assessment of social value was unreasonably limited to factory workers, at the expense of the site's impact on local residents. Furthermore, we wish to highlight that the site's historical lack of public accessibility was a direct result of its specialized industrial function. In the context of industrial heritage, restricted access is an inherent characteristic of the site's operation and should not be a factor that diminishes its heritage value.

The complex remains a landmark for the Tsuen Wan community; its nickname, “貨倉 (The Warehouse) is so deeply embedded in local identity that it serves as an official reference for the local minibus stop. To bridge this research gap, we highly recommend a wider public consultation at the residential level to accurately capture the site's true social and collective value.

3. Requirement for Specialized Re-assessment

The *ICOMOS-TICCIH Principles* explicitly state that evaluation should be undertaken by appropriate specialists. A standard architectural assessment is insufficient for a site of this industrial complexity. Current assessment outcomes suggest an opportunity to enhance local capacity and contextual understanding, ensuring that the inherent values of these sites are fully recognized. This highlights the importance of integrating contemporary conservation frameworks and refining internal review processes to support a more holistic and equitable evaluation. Acknowledging that local expertise specifically focused on the textile industrial heritage may be limited, we strongly urge the board to invite external national or international expertise with deep understanding of global textile production and industrial heritage landscape to participate directly in a re-assessment to ensure a more comprehensive understanding and evaluation of the site's heritage significance can be established.

4. Alignment with Strategic Conservation Frameworks

Additionally, we urge the Board to review the scope and capacity of relevant department to align with the strategic direction outlined in the 《國務院關於加強文化遺產保護的通知》 (*Notice on Strengthening the Protection of Industrial Heritage*). This document mandates that authorities fully recognize the value and urgency of industrial heritage, balancing economic construction with cultural preservation through a scientific approach. The Maykong warehouse complex is a vital physical record of Hong Kong's industrial identity, and we trust you will address these gaps in research to ensure a specialized, holistic re-evaluation that aligns with these national and international standards.

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5. Additional Information on Godown Architecture and wider social connections

Finally, the godown possesses clear architectural merit as a rare surviving example of Hong Kong's former port-related warehouse typology. Additional comments and images shared on social media, together with other publicly available sources, provide useful supporting evidence of the site's former use and historical associations, including silk storage, film production, and international trade. Consideration of the architectural merit of godowns and public interest should be included in the assessment. Please refer to Annex for further details.

We see this as an ideal opportunity not only to explore the adoption of a more holistic approach to assessment for the benefit of this particular building(s)/site of heritage significance but also for capacity building and empowerment of stakeholders involved in other heritage conservation projects in Hong Kong in the future.

Thank you for your time and attention to this matter. We look forward to your response.

Yours Sincerely,



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CC.

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Annex

The term “godown” refers to a warehouse or storage building, a typology that was once common in Hong Kong when the city functioned as a major trading port. Many godowns, especially those located near piers, have since been demolished, making this surviving example a rare one, particularly as a facility used by a single company.

The building also displays clear architectural and functional merit. Its red-brick structure includes a lifting platform, and a fair-faced concrete chute designed for transferring goods from upper floors directly to the loading and unloading area on the ground floor. The numbering marked on the ceiling appears to have been a practical pre-digital system for locating goods efficiently, while the smaller windows suggest intentional design for controlling temperature and light. If the smoke lobbies are regarded as character-defining elements, the original compartmental layout remains intact, and the doors could be restored relatively easily.

The historical significance of godowns is also underscored by the decline of this building type after the introduction of containerization in the 1970s. Godowns have been recognized as heritage buildings and preserved as special architectural examples in overseas countries.

Additional publicly available information, including comments and images shared on social media, provides further evidence of the site’s former use and history, including its connections to film production, international trade, and prominent historical figures associated with the silk industry.

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