

DRAF AKHIR RANCANGAN KAWASAN KHAS TAPAK WARISAN DUNIA UNESCO (GEORGE TOWN) PENGANTIAN

OBSERVATIONS AND COMMENTS FOLLOWING THE GEORGE TOWN WORLD HERITAGE SITE DRAFT SAP FOCUS GROUP  
DISCUSSION 2 HELD ON ZOOM - 17TH JUNE 2021

**ICOMOS MALAYSIA**

*June 2021*



Prepared by

**ICOMOS MALAYSIA Georgetown Special Area Plan (Replacement) Review Group**

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## BACKGROUNDS

The Focus Group Discussion 2 (FDG2) held via Zoom on 17<sup>th</sup> June 2021 was the second FDG organised by Pulau Pinang Town and Country Planning Department (PLANMalaysia@Pulau Pinang). ICOMOS MALAYSIA participated in this session, represented by Ar. Ahmad Najib Ariffin and Shaiful Shahidan. ICOMOS MALAYSIA forms part of the ICOMOS international network of multi-disciplinary professionals involved in conserving tangible and intangible heritage. It is an independent organisation that acts as a national and international link between public authorities, institutions, and individuals involved in studying and conserving all places of cultural heritage significance. Given its objective, ICOMOS MALAYSIA made a formal request to be part of FGD2, to offer suggestions and share experience on managing a World Heritage Site. At the end of the session, a summary of action was compiled by PLANMalaysia@Pulau Pinang, and this document is feedback based on that summary.

Our following comments are based on the “PERINCIAN TINDAKAN A-L (SEMUA)” document released to FGD2 participants prior to the session. Comparison with GT SAP 2016 was also made. Two documents referred to throughout the discussion were not made available, which would have helped the reviewers understand where the proposals came from and where misconceptions had occurred:



- George Town UNESCO World Heritage Site Special Area Plan Study (Replacement), 2020
- Volume II: Development Control Part 3.0: Category I and Category II Heritage Building Conservation Guidelines).

Upon reviewing the documents, we find certain sections of the Draft GTSAP2021, which were in the gazetted 2016 GTSAP, were either missing in total or had their contents 'picked' and partially presented; these are:

- 2016 Part D Guidelines for Conservation Area & Heritage Buildings in GT WHS;
- 2016 Annexure A - Heritage Building Forms and Styles in GT WHS; &
- 2016 Annexure B – Planning and Design Guidelines for the Public Realm.

Therefore, the documents issued and discussed during the FGD2 were only a portion of the overall SAP. Our intention is to enhance and to complete the content of Draft GTSAP2021.

## Understanding the Relevance of the Outstanding Universal Values

What became apparent in the reading of the issued documents was that the Outstanding Universal Value of the World Heritage Site had not been properly understood. The gazetted GTSAP 2016, which was approved as a draft by UNESCO 2011, was not appreciated for its strong relevance to the protection of the OUV.

Therefore, these comments are by way of bringing the OUVs back into the centre of focus of the George Town Special Area Plan. Due to limited time, they might not be complete, but enough to say that there is need to seriously rethink the safeguarding of the WHS and its OUVs through the GTSAP. Most of the current proposals would be detrimental to the safeguarding efforts required and potentially put the site in the UNESCO category of Heritage in Danger.

It should also be noted that the period in which these documents were presented and likely studied and written was during the many COVID-19 MCO/lockdowns that prevented or even prohibited site visits.

## SUMMARY

### The Great Opportunities Missed – But It's Not Too Late

**Climate Change, Action** – George Town WHS was a low-carbon settlement (Jenkins, 2007) which, through careful management, can return. Throughout our observation, the current description of the built forms in Draft GTSAP2021 fails to understand this.

**Sustainable Development Goals** – This can be achieved better once the historic low-carbon settlement is understood and action taken.

**Liveable City** – This should be supporting host and local communities and considering ways to repopulate, which have not been mentioned or if so, not with clear strategies, hence, efforts should also be made to look at properties built as housing but were converted into commercial use and now stand empty due to oversupply and pandemic issues.

**Reducing Car Dependency** – Unfortunately, the opposite is proposed, e.g., stacking car parks. We should instead be thinking about how to reduce cars and offer good alternative transport options.

**Post COVID-19** – This challenging period offers economic realignment. The tourism proposals in these documents are in the pre-Covid-19 mindset, focusing on bulk

numbers. There is an opportunity to rethink tourism management, encourage domestic tourism, smaller numbers of tourists but more on quality, less invasive, spending more over a longer period, and wider area – these would benefit both tourists and host communities.

**Building the Knowledge Bank** – There seems to be a great love of inventories, which in itself is fine. However, if the data collected is incorrect or misunderstood, then it can present issues during analysis. There are already examples of this over the last few years. There appears to have been little to no continued investment in a public knowledge bank for the last five or so years, instead the existing, well-researched knowledge is toyed with (often incorrectly), leaving the public with a weak understanding of the WHS and its unique significance. A weak knowledge bank leads to weak management.

**New investment into the knowledge bank is vital** – This should be the primary source of data to assist in the writing of Heritage Management Plans (HMP) and Heritage Impact Assessments (HIA) and ensure a better quality of information presented. Equally important is the knowledge and experience of those who would be involved in the rebuilding of the knowledge bank. Knowledge sharing capacity between experts and GTWHI emerging professionals may be a way to assist in quality and knowledge control.

**The Technical Review Panel (TRP)** – An integral component in the debate over new developments in the WHS would also benefit from a more substantial, more inclusive knowledge bank. Continuity is critical as we move through the generations of stakeholders, managers, consultants and key players collectively responsible for the WHS management.

**The building identification map gazetted in the 2016 SAP** – Its misplaced realignment in the Draft GTSAP2021 is a case in point, hinting that the original intent may not have been clearly understood; depreciating the value of the gazetted document.

## Rethinking the Way the Site is Managed – Just Too Much to Do.

There is clearly and without a doubt, much work to do to get back on track, tackle the new climate change issues, – the post-Covid-19 economy etc. Therefore, it is an opportune time to consider if the current management arrangement can cope. Is a pyramidal hierarchy management method the right one, or would a more horizontal management team be the way forward? Are there too many cooks, or bottlenecks?

- Did the Consultative Panel in GTWHI add a dimension that is now missing?
- Would the board of GTWHI benefit from a heritage expert in their midst?
- How, When and Where can a multi-faceted education programme for built heritage be realised?
- Should the Technical Review Panel be strengthened? If so, how?
- What role does George Town Conservation and Development Corporation (GTCDC) have? Furthermore, who/ what is it answerable to/for in the overall scheme of things?
- Should Jabatan Warisan Negara (JWN), representing the State Party, play a more significant advisory role?

If these topics are taken on board and debated to produce a clear and positive way forward, the result will support the OUV and help manage unprecedented issues of modern life.

## We are all in this Together – and Together, we will Achieve

One of the plus points of the Draft GTSAP2021 is the inclusion of the Muslim endowment properties (*wakaf*) managed by Majlis Agama Islam Pulau Pinang (MAIPP). It is crucial to bring all landowners into the WHS protection dialogue so that the safeguarding of the OUV can be discussed and be of value to all.


Equally, therefore, properties owned by MBPP, PDC and Penang State, even Penang Port and other federal authorities should all be brought into the WHS dialogue.

The WHS is a special and unique site in both local and world history, and it may be necessary to rethink the current or conventional MBPP/State SOP's for repairs. For example, just in this area, supporting G1 contractors usually engaged in simple repair work, with more knowledgeable supervision for work on heritage buildings.

Education is a critical factor at all levels. Many people throughout the country have had years of experience in conservation and seen how their solutions have fared over decades, benefitting from the great teacher "hindsight". Some may be teaching in our universities, and some may be in practice. Continuous engagement with these experts will ensure that the current and future SAPs are better researched, analysed and written with in-depth knowledge, becoming truly valuable documents for professional and public records.

## COMMENTS

### Bahagian A - Penggunaan Tanah dan Bangunan

No	Section/page	Subject	Comments
1	<b>Tindakan A1.2</b> <b>Page 7.1-7</b>		<ul style="list-style-type: none"> <li>• Excellent to have included a tertiary buffer zone.</li> <li>• Propose a thorough site visit and land lot review to determine the actual lines of impact.</li> <li>• The current edge of the buffer zone offers little protection to the WHS. More to be done to soften the contrast along especially Prangin Canal.</li> <li>• No strategy mentioned on protecting the coastal area (buffer zone) within the gazetted area. Emphasis should be on the protection, prevention and development control of the water body.</li> </ul>





Tall buildings (left) just outside the buffer, opposite two storey shophouses (right) within the buffer.



Opportunity to green and screen the area in front of the mall with a buffer/pocket park.



## Bahagian B - Lalu Lintas dan Pengangkutan Awam

No	Section/page	Subject	Comments
1	<b>Tindakan B2.1</b> <b>Page 7.2- 16</b>	<p>Congestion and public transport</p> 	<ul style="list-style-type: none"> <li>Public transport provided by Rapid Penang is often unable to move due to congestion with illegally parked tour buses.</li> </ul>  <ul style="list-style-type: none"> <li>This image shows legally parked private cars, illegally parked tour buses, including parking in the Kampong Kolam bus stop.</li> </ul>



- This image shows Rapid Penang public buses unable to move due to illegally parked tour buses.
- 
- **Provide out of WHS parking for tour buses – this will free up congested areas for public transport –creating a real liveable city.**
-

2      **Tindakan**  
**B2.1**  
**Page 7.2- 16**

BAHAGIAN B: LALU LINTAS DAN PENGANGKUTAN AWAM	
STRATEGI <b>B2</b>	MENINGKATKAN PERKHIDMATAN DAN KEMUDAHAN PENGANGKUTAN AWAM
TINDAKAN B2.1	Menambahbaik perkhidmatan pengangkutan bas
<b>JUSTIFIKASI</b> Terdapat hanya dua jenis perkhidmatan bas yang disediakan dalam kawasan kajian iaitu perkhidmatan bas henti-henti dan antara bandar dengan kekerapan yang berbeza. Kajian mendapati kelewatan perkhidmatan pengangkutan bas yang tidak dapat mengikut seperti di dalam jadual yang telah ditetapkan adalah kerana kesesakan lalu lintas terutamanya di waktu puncak. Selain itu, spesifikasi bas sedia ada yang panjang menyukarkan pergerakan kenderaan dan seterusnya memberi kesan negatif kepada tahap perkhidmatan pengangkutan bas disebabkan: 1. Lalan yang sempit dan sesak terutamanya di waktu puncak. 2. Terdapat kenderaan persendirian meletak kenderaan secara haram di petak hentian bas. 3. Ruang menurunkan penumpang yang sempit. 4. Terdapat aktiviti perniagaan yang tidak formal di hentian bas sedia ada.	
<b>PERINCIAN DAN KOMPONEN</b> Menyediakan perkhidmatan bas mini atau <i>coaster bus</i> yang dapat beroperasi di laluan atau jalan – jalan yang sempit. Perkhidmatan bas jenis ini akan beroperasi pada luar waktu puncak dengan kekerapa setiap 10 minit.	
Spesifikasi <i>coaster bus</i> : 1. Panjang bas: 7 meter 2. Lebar bas: 2 meter 3. Jumlah tempat duduk yang disediakan: 22 tempat duduk. 4. Kelajuan maksimum: 100 km/jam	<b>KATEGORI PELAKSANAAN</b> QUICK WIN <input type="radio"/> IMPAK TINGGI <input type="radio"/> SOKONGAN <input checked="" type="radio"/>
	<b>LOKASI</b> • Zon Teras • Zon Penampian
Sumber: <a href="https://www.toyota.com.au/">https://www.toyota.com.au/</a> Perkhidmatan bas ini disediakan dalam kawasan kajian bagi memudahkan pergerakan penumpang ke kawasan tumpuan orang ramai seperti Kompleks Tunku Abdul Rahman (KOMTAR), Masjid Kapitan Keling, Lebuhr Armenian, Padang Kota Lama dan lain-lain. Perkhidmatan bas ini melibatkan Terminal Bas A dan B yang terletak di Pengkalan Weld dan Terminal Bas KOMTAR.	<b>AGENSI PELAKSANA</b> • Kementerian Pengangkutan • Agensi Pengangkutan Awam Darat (APAD) • Rapid Penang Sdn Bhd • Majlis Bandaraya Pulau Pinang (MBPP)
Antara laluan yang disediakan adalah seperti Rajah 7.2.7 iaitu: 1. Terminal Bas Pengkalan Raja Tun Uda – Lebuhr Pantai – Lebuhr Chulia – Jalan Penang – KOMTAR 2. Terminal Bas Pengkalan Raja Tun Uda – Lebuhr Downing – Lebuhr Pantai – Lebuhr Light – Jalan Sultan Ahmad Shah – Lebuhr Chulia – Pengkalan Weld 3. Terminal Bas Pengkalan Raja Tun Uda – Pengkalan Weld – Lebuhr Light – Jalan Masjid Kapitan Keling – Lebuhr Carmarvon – KOMTAR	<b>SUMBER PERUNTUKAN</b> • Kementerian Pengangkutan • Majlis Bandaraya Pulau Pinang (MBPP) • Pihak Swasta

- Tour buses need to be kept out of the WHS – and have specific delivery and pickup areas off the local transport routes.



- This image shows a tour bus entering narrow Armenian Street despite the warning sign.



- A different bus, but same problem - jammed at a T junction in the WHS with residents and tourists inconvenienced by this behaviour. Not a liveable city.
- Consider road pinching rather than visually polluting signage to curtail poor tour bus behaviour. **More signage in a WHS is not the answer.**

No	Section/page	Subject	Comments
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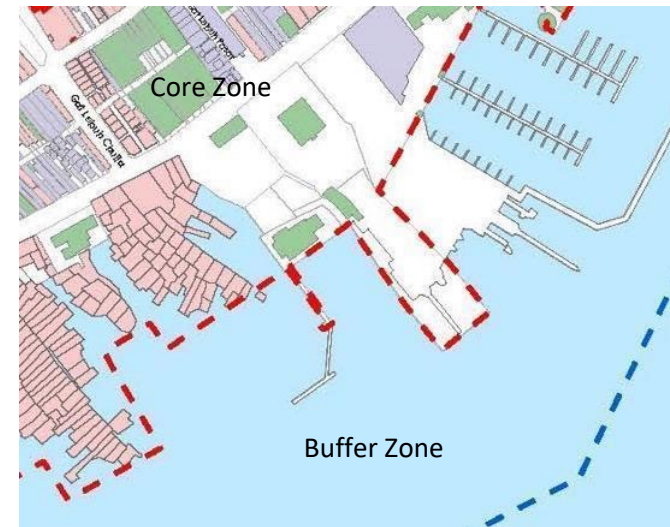
**3 Tindakan  
B2.3  
Page 7.20-21**



- The Bus Station on Weld Quay needs an upgrade – a good idea.
- Currently, the adjacent Ferry Terminal is planning an upgrade.
- Both sites must be fully aware that they are in the Core Zone of the WHS.
- Any development proposal should prepare a Heritage Impact Assessment (HIA) before work is approved.
- Better still, prepare a Heritage Management Plan (HMP) before anything is designed.
- The Historic Weld Quay seawall has been found in parts along Weld Quay; every opportunity should be found to show the original boundary in some way as part of the development plan.







This is a challenging area with many pedestrians, buses, cyclists, e-hailers, ferry users etc., all in one space. Some remain in the station for their next journey, others moving into the city. Please keep it simple.

#### 4 Tindakan B3.1 Page 7.2-24

BAHAGIAN B:  
LALU LINTAS DAN PENGANGKUTAN AWAM

STRATEGI  
B3 MENINGKATKAN PERKHIDMATAN DAN KEMUDAHAN PENGANGKUTAN AWAM

TINDAKAN  
B3.1 Menaik taraf dan menambahbaik laluan pejalan kaki

**JUSTIFIKASI**

Kawasan kajian merupakan kawasan berintensiti pembangunan yang padat. Selain itu, kawasan kajian ini juga merupakan kawasan tumpuan bagi aktiviti perniagaan, pelancongan, pentadbiran dan aktiviti harian penduduk setempat. Pengurusan lalu lintas yang lebih efektif amat diperlukan bagi mengurangkan masalah konflik antara kenderaan bermotor dengan pejalan kaki. Oleh yang demikian, dengan menaik taraf dan menambah baik laluan pejalan kaki sedia ada perlu dilakukan untuk menyelesaikan pejalan kaki bergerak dalam kawasan kajian.

**PERINCIAN DAN KOMPONEN**

Menyediakan rangkaian laluan pejalan kaki yang komprehensif dan lebih menyeluruh dalam kawasan kajian yang merangkumi lorong belakang, lorong sisi dan pembinaan laluan pejalan kaki yang baru.

Beberapa laluan pejalan kaki yang dicadangkan untuk menyokong pembangunan mobiliti aktif adalah seperti berikut:

- Pesara King Edward – Pengkalan Weld
- Lebuh King – Lebuh Queen
- Lebuh Armenian
- Jalan Pintal Tali – Pesara Claimant
- Jalan Sungai Ujong – Jalan Pintal Tali
- Jalan Transfer
- Jalan Sri Bahari
- Lorong Cheapside – Lorong Seckchuan
- Lorong Steward
- Lorong Che Em
- Lorong Pitt – Lebuh Ah Quee

Penyediaan laluan khusus ini akan melibatkan perubahan anjakan lokasi petak TLK sedia ada dalam kawasan kajian seperti di Jalan Transfer.

Antara penyediaan kemudahan untuk berjalan kaki adalah seperti berikut:

- Meletak papan tanda:
  - Zon mesra mobiliti aktif di jalan utama zon teras sebagai maklumat untuk galakan kepada orang awam atau pelancong untuk berjalan kaki.
  - Penyediaan papan tanda had laju kenderaan bermotor supaya mengurangkan kelajuan di zon mobiliti aktif.
- Mengaktifkan lorong belakang dan lorong sisi rumah – rumah kedai sebagai ruang sokongan atau tambahan untuk kegunaan laluan pejalan kaki untuk mengelakkan konflik antara pejalan kaki dengan kenderaan bermotor.

**KATEGORI PELAKSANAAN**

QUICK WIN ☐

IMPAK TINGGI ☐

SOKONGAN ☒

**LOKASI**

- Zon Teras
- Zon Penempatan

**AGensi PELAKSANA**

- PelanMalaysia@Pulau Pinang (PMPP)
- Majlis Bandaraya Pulau Pinang (MBPP)
- George Town World Heritage Incorporated (GTWHI)

**SUMBER PERUNTUKAN**

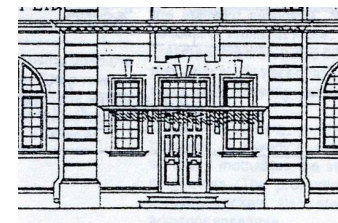
- Kerajaan Negeri Pulau Pinang
- Majlis Bandaraya Pulau Pinang (MBPP)
- Pinak Swasta

7.2-24

- Traffic Management – by creating pavements?
- Will they enhance and safeguard the OUV and the HUL?

The traditional Historic Urban Landscape (HUL) was one of the open drains lined with bullnose bricks running parallel to the raised five footways of the shophouses.

The architecture was designed to suit this format. When pavements are introduced without the road being lowered, architectural features are destroyed, and truncating the historic building design.



Designed to have three steps – two are below the new pavement level.





As this file picture shows, modern services, PBA/TNB, and shoddy road surfacing work have eroded the historic street edges. Pavements would only hide this but not solve

the problem and would not support the OUV of HUL of the WHS.

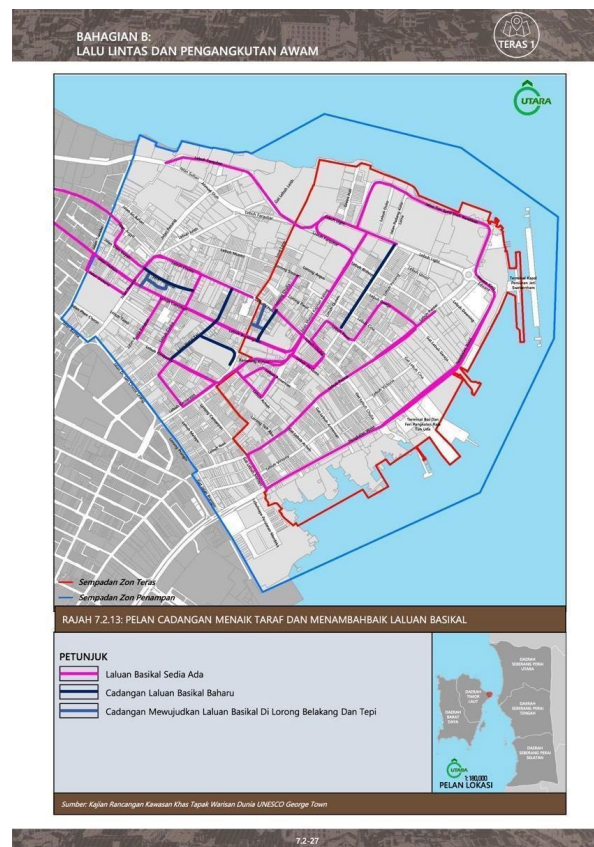
Good implementation works/manangement are key  
– training and monitoring of contractors are essential.

Upgrading rough street edges is welcome. The design must consider the Historic Urban Landscape  
– traditional drains are to be kept open and cleaned, and constant resurfacing of roads to be milled down to avoid the pavement level encroaching on the base of the buildings.



No	Section/page	Subject	Comments
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**5 Tindakan  
B3.2  
Page 7.2-27**



- The OUV of George Town WHS relates to the working / liveable city. Tourism was not part of the OUV and so must respect the liveability of the space, or else tourism could destroy it.
- Pedestrians and bikes should not share the same space – it creates a hostile and unfriendly environment for those who think themselves safe when walking. Tourists behave as if they are in shopping malls, forgetting to look as they step into roads, and locals try and use the same space to complete their daily tasks.
- Reducing cars in the WHS to avoid conflict of space would also enhance the HUL / OUV and the WHS

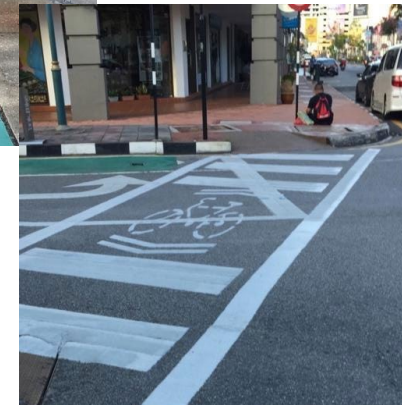
The green-painted bike lane project on pavements was halted halfway – to avoid this in future – all designs must consider the HUL of the WHS, and no design should make the walkways unsafe for pedestrians.

The image shows when a bike lane takes over a narrow pavement, then turns to cross creating an



uneven walkway to accommodate a ramp. Examples like these litter the WHS.

A crossing at a road junction where cars halt before moving out into the main road is also a bike lane.



Conflicting sites like this need to be discussed with all parties before work .

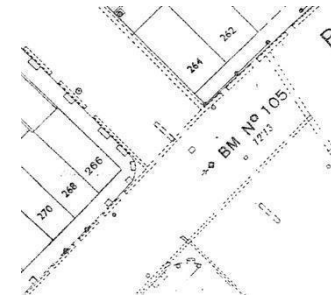
Reducing cars in the WHS to avoid conflict of space would also enhance the HUL / OUV and the WHS.

**6 Tindakan  
B3.2  
Page 7.2-26  
until 29**



The concept of traffic reduced areas is welcome – in the design process, the HUL of the site must be thoroughly understood in order to safeguard the OUV and to avoid creating a jumble of signs and bollards that make the experience unsightly and unpleasant. There is already too much pole and signage pollution in the area.

Proposed bollards at road entrances– not part of the HUL, the automatic will fail over time, block Bomba, delivery and OKU access, and also conflict with the historic drain layout below the road surface. See map – the dotted line is the below surface drain under the roads.



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(Continued)

Proposed bollards along the pavement –  
pavement too narrow – cars are not known to park  
along here

Signage detracts from the unique shophouse  
street experience, and is usually made from cheap  
materials, poorly installed and seldom maintained  
– the fewer we have, the better the environment.

It would be advantageous to revisit the **urban  
landscape and infrastructure survey suggested  
in the GTSAP2016** so that future design  
proposals understand their limits in the WHS.

No	Section/page	Subject	Comments
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7      **Tindakan**  
**B3.2**  
**Page 7.2-32**



**Open drains are part of the Historic Urban Landscape (HUL) that reflect the site's history and support the OUV. The gazetted GTSAP 2016 notes that they should be retained and returned wherever possible.**

The open drains are part of an intelligent building system that manages the groundwater beneath the historic buildings built on a drained swamp.

Open drains are easy to clean and ensure they do not clog with litter and become an incubation site for Aedes mosquitoes that cause Dengue fever and the daytime mosquito that causes Chikungunya – both of which regularly occur in areas of the WHS, not to mention rats.

The implementation of covered drains can damage the historic private property next to which they are being installed.



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The solid concrete box culvert prohibits the traditional groundwater management below the historic properties, leading to excessive rising damp and slow but steady structural degradation through salt-carrying groundwater.



The new box culvert is about to cover the internal air well rainwater outlet from inside the shophouse. Seen in the wall – Traditional open drains accommodated these outlets – managing the rain and groundwater.




Traditional hand-carved curved granite slabs to a corner shophouse were removed by contractors when a new box culvert covered drain was installed – the granite was lost and replaced with straight slabs – and the steps were also removed. To avoid all this, it is better to keep the drains open.



No	Section/page	Subject	Comments
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**8 Tindakan B3.2**  
**Page 7.2-39**

PERINCIAN DAN KOMPONEN											
<p>A. Usaha Sama Kemudahan TLK Persendirian Dengan Pihak Berkuasa Tempatan</p> <p>Menaiktaraf TLK berpusat persendirian yang strategik sedia ada dengan menggalakkan pembangunan <i>mechanical parking</i> dan meluaskan liputan aplikasi <i>Penang Parking</i> bagi memudahkan orang ramai mendapatkan petak TLK dalam masa yang singkat dan mudah. Pemberian peruntukan oleh Pihak Berkuasa Tempatan kepada pengusaha TLK persendirian yang terpilih untuk membina TLK mekanikal. Diskaun pembayaran lesen perniagaan akan diberikan kepada pengusaha-pengusaha ini yang dapat menyediakan TLK mekanikal. Antara TLK yang terlibat bagi cadangan ini adalah seperti berikut:</p> <ol style="list-style-type: none"> <li>1. TLK berpusat Jalan Tun Syed Sheh Barakbah</li> <li>2. TLK Kampung Malabar (Line Clear)</li> <li>3. TLK Genius, Lebuhraya Pantai</li> <li>4. TLK Wilson, Jalan Dr Lim Chwee Leong</li> <li>5. TLK Lebuhraya Downing</li> </ol> <p>Selain itu menaik taraf liputan aplikasi <i>Penang Parking</i> bagi memudahkan orang ramai mendapatkan petak TLK dalam masa yang singkat dan mudah di TLK bangunan MBPP sedia ada. Antara TLK yang terlibat bagi cadangan ini adalah seperti berikut:</p> <ol style="list-style-type: none"> <li>1. TLK berpusat bangunan MBPP Lebuhraya Pantai</li> <li>2. TLK berpusat bangunan MBPP Pasar Chowrasta</li> <li>3. TLK berpusat bangunan MBPP Lebuhraya Union</li> </ol> <p>Rajah 7.2.33: TLK mekanikal di Kuala Teregganu</p>  <p>Sumber: <a href="http://zaliyatt.blogspot.com/">http://zaliyatt.blogspot.com/</a></p>	<table border="1"> <thead> <tr> <th>KATEGORI PELAKSANAAN</th> </tr> </thead> <tbody> <tr> <td>QUICK WIN <input type="radio"/></td> </tr> <tr> <td>IMPAK TINGGI <input type="radio"/></td> </tr> <tr> <td>SOKONGAN <input checked="" type="radio"/></td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>LOKASI</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>• Zon Teras</li> <li>• Zon Penampakan</li> </ul> </td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>AGENSI PELAKSANA</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>• Majlis Bandaraya Pulau Pinang (MBPP)</li> <li>• Pihak Swasta</li> </ul> </td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>SUMBER PERUNTUKAN</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>• Kerajaan Negeri Pulau Pinang</li> <li>• Majlis Bandaraya Pulau Pinang (MBPP)</li> <li>• Pihak Swasta</li> </ul> </td> </tr> </tbody> </table>	KATEGORI PELAKSANAAN	QUICK WIN <input type="radio"/>	IMPAK TINGGI <input type="radio"/>	SOKONGAN <input checked="" type="radio"/>	LOKASI	<ul style="list-style-type: none"> <li>• Zon Teras</li> <li>• Zon Penampakan</li> </ul>	AGENSI PELAKSANA	<ul style="list-style-type: none"> <li>• Majlis Bandaraya Pulau Pinang (MBPP)</li> <li>• Pihak Swasta</li> </ul>	SUMBER PERUNTUKAN	<ul style="list-style-type: none"> <li>• Kerajaan Negeri Pulau Pinang</li> <li>• Majlis Bandaraya Pulau Pinang (MBPP)</li> <li>• Pihak Swasta</li> </ul>
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LOKASI											
<ul style="list-style-type: none"> <li>• Zon Teras</li> <li>• Zon Penampakan</li> </ul>											
AGENSI PELAKSANA											
<ul style="list-style-type: none"> <li>• Majlis Bandaraya Pulau Pinang (MBPP)</li> <li>• Pihak Swasta</li> </ul>											
SUMBER PERUNTUKAN											
<ul style="list-style-type: none"> <li>• Kerajaan Negeri Pulau Pinang</li> <li>• Majlis Bandaraya Pulau Pinang (MBPP)</li> <li>• Pihak Swasta</li> </ul>											

In line with the Climate Action, SDGs and the liveable city concept – the encouragement of cars, carparks and tour buses should be rethought, taking them out of the city – except for deliveries and OKU - and finding another solution.



For tour buses – see **Tindakan B2.1 Page 7.2- 16**  
Pre-Covid-19, up to 40 tour buses would park on this congested stretch – Kampong Kolam – with up to 10 at any one time – this congestion was regular.

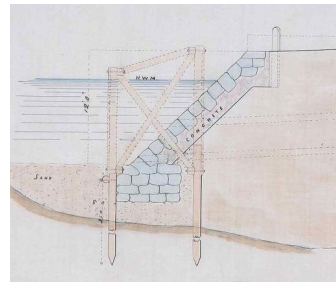


Thinking out of the box – limited access to cars (except OKU), and tour buses, maybe timed slots for drop off and pick-up? This should be a protected WHS – yet how to help the movability of people and goods around the site? Free Grab, shuttle?



## Bahagian C - Alam Sekitar dan Pengurusan Risiko

No	Section/page	Subject	Comments
1	<b>Tindakan C1.1 &amp; C1.2 Page 7.3-2 &amp; 7.3-5</b>		<p>Suggestion to add one (1) more station for marine water quality sample site (nearby Shorefront) and two (2) more stations for air quality sample site (near Pengkalan Weld and KOMTAR)</p>
2	<b>Tindakan C2.1 Page 7.3-6</b>		<p><b>Drainage – learning from the original:</b></p> <p>George Town's traditional Historic Urban Landscape street drainage and water runoff system has significantly been compromised over the years. The gazetted GTSAP2016 recommended a survey of such infrastructure take place in order to understand and record the system and balance new and old when creating improvements - thinking away from the norm</p>



and out of the box in order to protect the WHS and support SDGs.

Along the East waterfront, the outfalls were designed to pierce the Weld Quay granite block wall – which is now likely buried in the jetty and other reclamation. The quay edge granite can still be seen in many places.

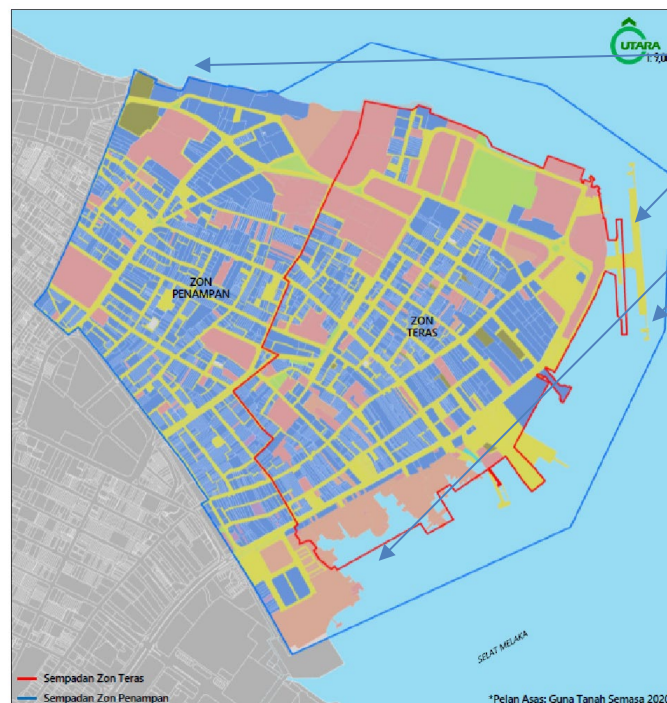
A few original large open, brick-lined drains can be seen in the Ghauts leading to Weld Quay. These should remain open and repaired/conserved as part of the remaining element of the HUL.

The raised roads, due to inappropriate resurfacing works, covered drains and pavements, need to be reviewed for the role they play in compromising the original system before recovery design begins.



No	Section/page	Subject	Comments
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**3 Tindakan  
C2.1 – C2.4  
Page 7.3-5  
to 14**



- To include Coastal Erosion Mitigation Plan (in C.25)
- To include Soil Deposition Mitigation Plan – (especially for Clan Jetty area) (in C.26)
- To prepare a Disaster Risk Management Plan (in C.26)

No	Section/page	Subject	Comments
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**4 Tindakan  
C2.1  
Page 7.3-6  
to 9**



The low, older shophouse on the left gets drenched whilst the higher, younger shophouse on the right stay dry. Removing and reducing the road premix bitumen layers is vital.

**Flooding and issues for shophouses.**

There are several areas in George Town where the new road surfaces have piled one on top of the other each time, building up the premix surface that would have been occupied by rainwater in the past.

Now the flood gets so high; it backs up into the shophouse to the air-well sink, which is already used as a reservoir for rain from the internal roofs.

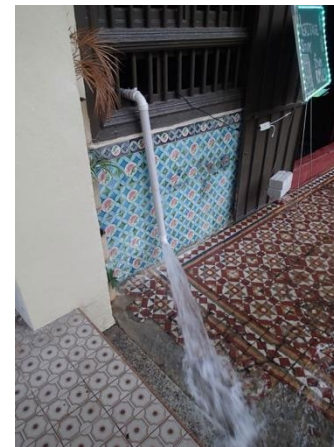
The internal air-well sink acts as a reservoir and discharges into the street drain. When that is full, the road is used as a drain – when curb-side drains were open, there was a large area for the water to disperse. Furthermore, when the roads were lower and milled to the bullnose bricks, there was plenty of 'space' for rainwater to gather and disperse quickly.

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Currently, the method of removal of old premix bitumen is by huge machines suitable for highway maintenance – they take barely more than 50mm off the surface, which is not sufficient in the WHS. The method and machinery used for removal must be in alignment with protecting the WHS.



Build up of premix, bitumen road surface that has not been lowered/milled for possibly 30 years.



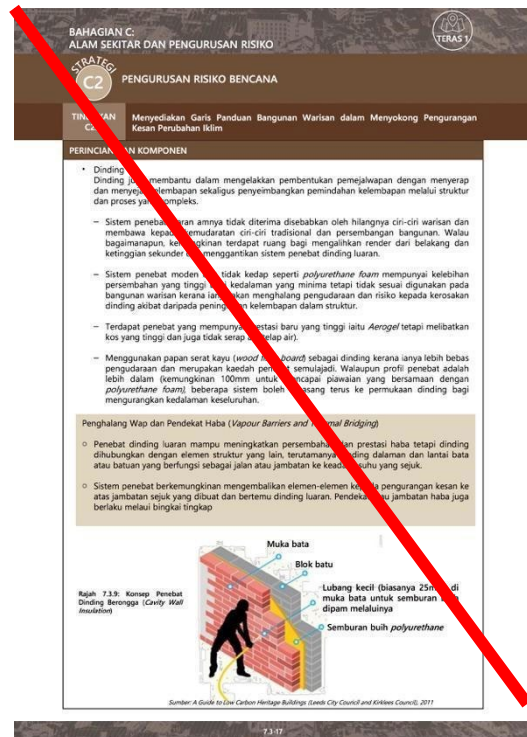
Some owners have taken to pumping out the air-well sink water into the street drain – but it just flows right back in.

The holistic system needs to be understood and analysed as part of an infrastructure study before new design ideas are put forward.



No	Section/page	Subject	Comments
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5 Tindakan  
C2.4  
Page 7.3-14  
to 18



This section is not relevant to the WHS.  
A new section needs to be written.

## Climate Change Impact Reduction.

**A HUGE OPPORTUNITY LOST due to a MAJOR ERROR OF UNDERSTANDING** - The whole section has been written for temperate climate architecture. It has no similarities with the historic tropical architecture of the Gt WHS. It needs a total rewrite.



The accurate picture is as follows - George Town was **and could return to being a low carbon city**. The building materials used, and the buildings' design means that they were built with the climate and nature, not against them.

Even in today's hot climate, the shophouses remain cool, but if only the central air-well remains open as built, the timber louvres, shutters, etc., have not been replaced with solid glass windows and the walls are not cement rendered.

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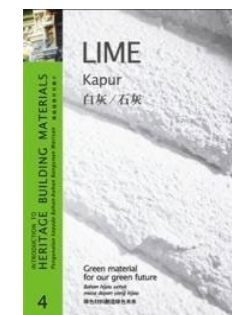
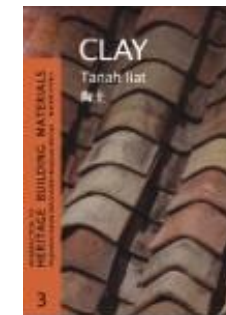
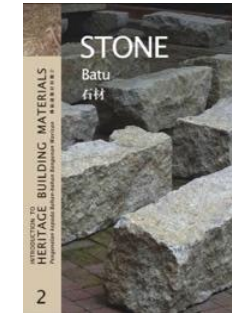
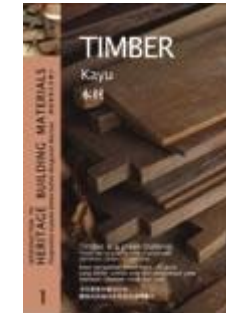
The shophouse walls are solid brick – there are no cavity walls as shown in the report shown.

The historic built environment is an example of what we should return to and consider for new modern design buildings – work with the climate and not against it for a sustainable future. Learning from and using ideas from this valuable resource is part of the **Climate Change Impact Reduction.**

Heritage Conservation Consultants who understand the shophouse typology well must be engaged to help the consultants write this section.



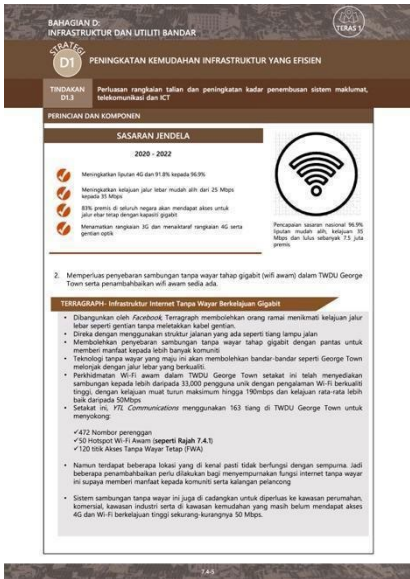

Suggested reference: A booklet sponsored by Think City on clay illustrates the structural brick walls with no cavity.



Earlier Heritage Building Materials booklets such as these which are part of the existing Knowledge Bank should be published online and extended.



## Bahagian D – Infrastruktur dan Utiliti Bandar

No	Section/page	Subject	Comments
1	Tindakan D1.3 Page 7.4-5		<p>We all love good <b>internet</b>, mainly during Covid-19 lockdowns, BUT in WHS, the utility poles are a BIG problem.</p> <p>Laying a fibre optic cables also has its problems, as the land beneath our feet is already filled with sewers, TNB, PBA, landlines and drains etc.</p> <p>When designing any new infrastructure to be installed in a WHS, the HUL must be understood, and some smart thinking done to avoid the mess we are already in. Poles should double up for more than one use, including signage, to reduce the number.</p> 

---

## 2 Tindakan

### D1.4

#### Page 7.4-5




Not all of George Town is covered in a sewerage system, and new areas to be covered would indeed be welcomed.

Missing from this map is the area along Muntri Street, Leith Street and Love Lane– which currently rely on a septic tank system.

The area shown on the map indicating a new installation between Beach Street, Victoria Street and Weld Quay – there are large areas with no connecting back lanes. How would the line be installed through private properties?

Again, consultation should take place, and care to be taken that the new lines do not destroy some of the more 'random' areas where communities still live and work and add to the richness of the WHS.

## Bahagian E- Ekonomi Berdaya Maju

No	Section,page	Subject	Comments
1	<b>Tindakan E2.1 Page 7.5-2</b>		<p><b>Using the city and its unique architecture representing the communities living and working there as a canvas for the arts has proved problematic.</b></p> <p>The WHS was listed before any of the murals were painted; thus, they are not part of the OUV and can often be detrimental to the OUV, causing damage to the historic fabric and the HUL.</p> <p>Materials used are often damaging to the building fabric, while some of the images fail to connect with the site's history.</p> <p>When the wire sculptures were introduced, they were deliberately designed to allow the walls to breathe, thus avoiding outright damage.</p>



This mural used paints that sealed the plaster, causing groundwater to burst through instead of evaporating through the wall/paint.



Request for lighting added an unnecessary detritus of wires etc. soon, the lights failed, and a mess of dead equipment is left entangled with the sculptures.

Any management of such creative work should first clear up the mess, repair the damage and build up a knowledge base of suitable materials and characteristics before further work is commissioned.


2 **Tindakan**  
**E2.1**  
**Page 7.5-3**



**We recognize the growing shortage of the craftsmen, artisans and builders qualified to carry out conservation work.**

While GTHWI is the lead implementation body supported by the state government, It has already taken steps to involve CIDB as the right lead organization to train and regulate all construction companies for conservation, not only at state level by at national level.

## Bahagian F - Pelancongan Warisan

No	Section/page	Subject	Comments
1	Tindakan F1.1 Page 7.6-2		<p><b>Disseminate information through websites, exhibitions and site visits.</b></p> <p>An excellent idea.</p> <p>The initial website set up by GTWHI – was less fun in appearance but carried a lot more helpful information regarding all the activities.</p> <p>The current website, set up circa 2019, is stronger in the intangible visual elements and carries more regarding past festivals and heritage celebrations. However, it struggles to provide accurate content for its tangible section. It currently displays shop house style panels, for example, which have changed or been updated many times since; even the GTSAP2016 has more up to date and accurate data.</p>

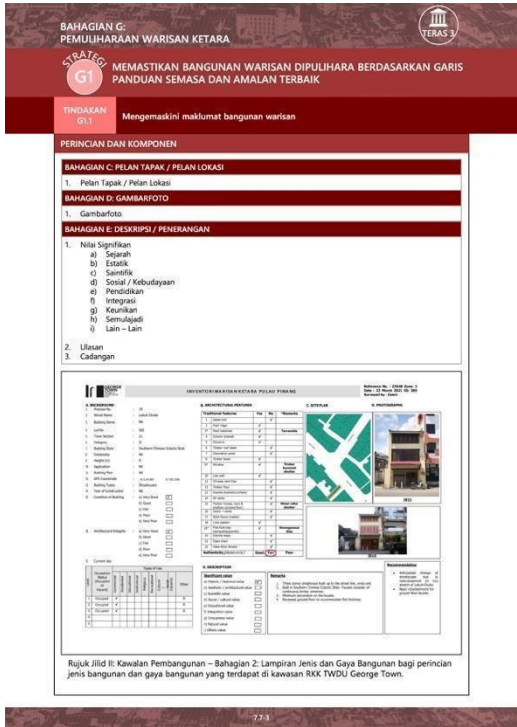
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More time, knowledge and investment are needed to help this essential tool develop.

Workshops, site visits and conservation programmes are critical to the conservation movement, and should be online, visible and open to everyone.

Again, knowledgeable practitioners, historians, conservators who have much experience should be brought in to plan and design website content and online teaching material that is accurate. In the process, images such as the one on the left showing car parks will be screened out and more appropriate images put in.

## Bahagian G - Pemuliharaan Warisan Ketara

No	Section/page	Subject	Comments
1	Tindakan G1.1 Page 7.7-2 to 4		<p><b>Periodic updating of the Inventory.</b> Excellent in concept, potentially poor in implementation, digital or otherwise.</p> <ol style="list-style-type: none"> <li>1) The items listed and their assessment are dependent on heritage architecture surveyors with sound knowledge of the traditional building types, styles and building methods.</li> <li>2) A periodical round table discussions/consultative dialogue to agree upon categorisation recommended with input from Pertubuhan Akitek Malaysia.</li> <li>3) All surveyors in the team must do their assessments on the same accepted basis.</li> <li>4) The Inventory should be fewer tick boxes and larger, clearer images showing the detail.</li> <li>5) A pool of experts to assist with the areas of 'missing' or 'weak' architectural knowledge, and establish the knowledge sharing capacity with GTWHI emerging professionals to ensure the quality of the Inventory is as originally intended and fitting for a WHS.</li> </ol>



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This section refers to:

*“Rujuk Jilid II: Kawalan Pembangunan – Bahagian 2: Lampiran Jenis dan Gaya Bangunan bagi perincian jenis bangunan dan gaya bangunan yang terdapat di kawasan RKK TWDU George Town. ”*

The above guidelines **must be part of this review** especially when earlier entries in this document show clearly that the architectural form, materials and building methods are not known by the author(s).

GTWHI website's on the description of the shophouses and the use of a since-updated set of shophouse style descriptions indicates there is much work to be done in enriching the knowledge and understanding of the team and the public. Note that the GTSAP 2016 has a more up-to-date description than the GTWHI website. JWN as the State party representative to UNESCO to be referred to.

No	Section/page	Subject	Comments
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**2 Tindakan  
G1.2  
Page 7.7-5**



**Monitoring improvement**

Excellent idea and very much needed.

The knowledge of the WHS and its architecture increases year by year, project by project – it is vital that this knowledge is shared so that a greater number of people can appreciate the significance and help to alert when things 'do not seem right'.

During some periods of the Covid-19 pandemic, works have been carried out on properties that have not displayed repair permits or other relevant signboards. This has also been an issue pre-pandemic and should be systematically addressed.

GTWHI's monitoring role is vital; therefore, it is paramount that they keep up to date with historical architectural analysis to fulfil this role well.

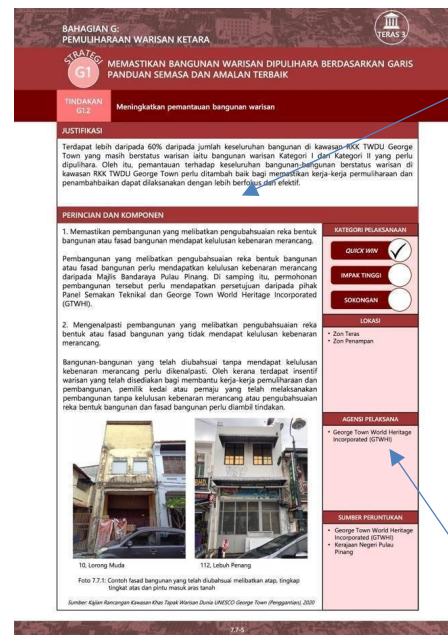


For this reason, the **Visions of Penang** website was set up in 2010, providing historical image material of the WHS. Since 2016 no new material has been entered onto the site, although there is much ready to be added. Instead, money is being spent moving the contents of the VOP site onto the GTWHI official website, without the knowledge of the collection owners.

It is recommended that the **VOP** website be independent, improved and performs its function not just as an archive site. Further investment should be made for the entry of new material and that the site is upscaled to be more 'fun' and appeal to a new generation. The site should have a gallery section and a monthly update learning section to encourage more than the current academic audience.

This will be of immense help and support to the GTWHI team.

The Visions of Penang website is an education tool that is part of the knowledge bank.



On the “Perincian dan Komponen”, the text should include “Kebenaran Merancang bawah Jabatan Warisan Negara” as well for Category I buildings, which are also listed as National Heritage and Heritage building under National Heritage Act 2005 (Act 645).

For examples:

### **National Heritage:**

Mahkamah Tinggi Pulau Pinang

St. George’s Church

Fort Cornwallis

Leong San Tong Khoo Kongsi

Masjid Kapitan Keling

Acheen Street Mosque

### **Heritage:**

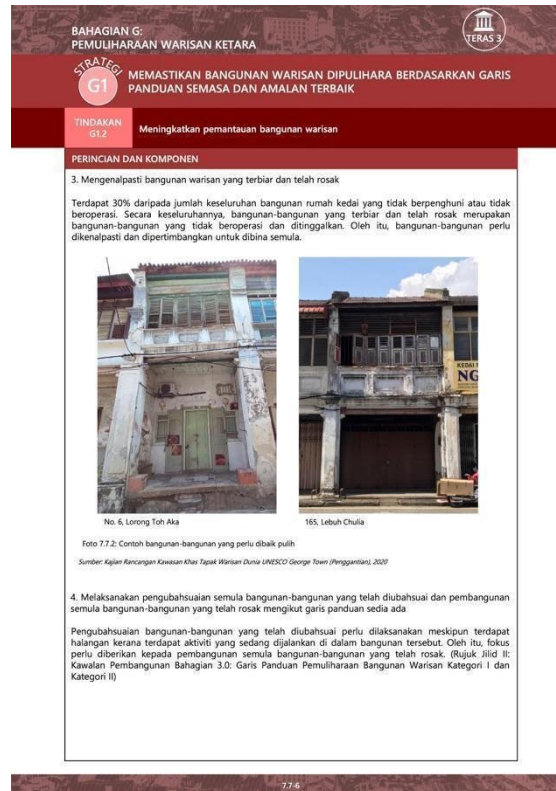
Penang City Hall

Muzium Negeri Pulau Pinang, Lebuh Farquhar

Queen Victoria Memorial Clock Tower

It should also include include “MBPP” and “Jabatan Warisan Negara” as some Category I buildings in George Town WHS are also listed as National Heritage and Heritage Buildings under National Heritage Act 2005 (Act 645).

### 3 Tindakan G1.2 Page 7.7-6



### Abandoned and Damaged Heritage Buildings, particularly Category II

Scars on the landscape come in many forms:



- 1) Rows of shophouses that appear part-way through the restoration process but have not been occupied.

- 
- 2) Highly visible projects which have been part-way abandoned and neglected causing danger to the public - mosquito breeding and site deterioration.



Buffer Zone



Buffer Zone

NOTE: individual shophouses, as shown in the document, are often closer to the original building method and materials and should be carefully documented and measured before any restoration work occurs.

**Buildings can be restored even from a dilapidated state – but if they are allowed to be demolished and rebuilt, then that will encourage total neglect and loss, which may well be happening - this is an urgent area to review.**

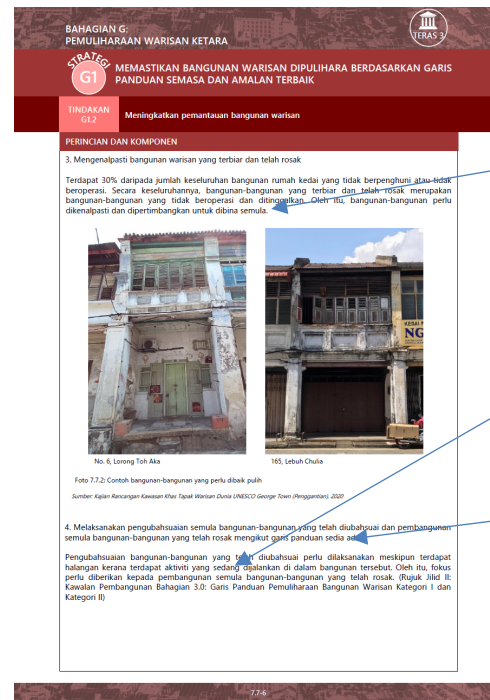


Core Zone



Buffer Zone

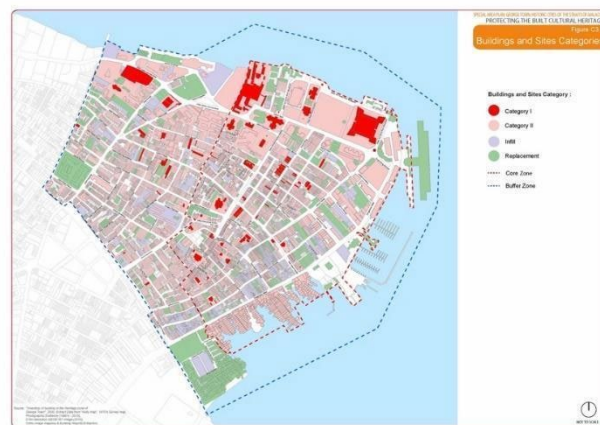




- To be re-built according to related conservation guidelines to safeguard the OUV of George Town WHS.
- To correct "Pembangunan Semula (Re-development)" to "Pembinaan Semula (Re-building)".
- To list out which guidelines, in which it should also include "Garis Panduan Pemuliharaan Bangunan Warisan 2017" by Jabatan Warisan Negara and guidelines stated in SAP 2016.

No	Section/page	Subject	Comments
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**4 Tindakan G1.3**  
**Page 7.7-7**

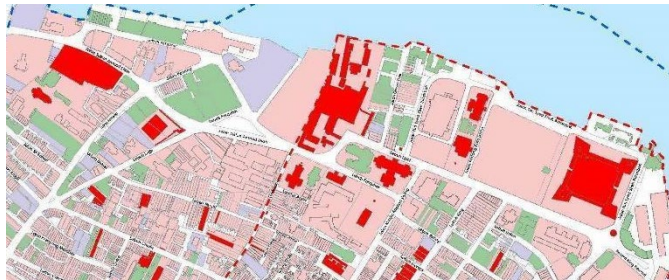


This plan (above) has been gazetted in the 2016 SAP and other than updates may not be altered without due discussion with JWN and ultimately UNESCO.

- **Before any building identification can be discussed – there must be a map showing all four categories together side by side. This has been removed from the current draft documents and must be reinstated.**
- Propose minor change in **the order that the 4 categories** are presented.
- Category I : best building
- Category II : next best buildings
- Replacement : not-too-sure buildings
- Infill : empty site or temporary structures
- This makes the layering of categories easier to follow.
- **One map shows all – why so?**
- So that everyone can see what category of property is next to the one they want to develop, and therefore they develop accordingly, and would require HMP and HIA.

---

The detail from the 2016 gazetted plan shows the Category I buildings in Category II compounds – the 2021 map should be an update of this map only, adding new buildings as replacement on former infill sites and adding new Category II buildings where more significant information has been found.



- For example – Cold Storage on Penang Road is next to the Category I East India Company Cemetery – one of the most intact in the region and tells the story of the early founding inhabitants. Very much part of the multicultural criterion that supports the OUV.
- **Category I buildings & the protection of their compounds**
- In the gazetted 2016 SAP Category I, buildings are shown as red and their compounds in pink – Category II – this ensures that archaeology can take place – such as the discovery of the moat and cannons at Fort Cornwallis etc.
- The updated map of 2021 has **taken this away** – this must now **be reinstated** back to the gazetted 2016 map, and better still, both the building and the compound become Category I – red!

---

- **Only Reasons for Change**

- When an 'Infill' site has been built on, the new building becomes 'replacement'
- When an existing building has been discovered as having historic value.
- When there has been a genuine error in classification – this must be accompanied by a reasoned argument to the advisory experts.

BAHAGIAN G:  
PEMULIHARAAN WARISAN KETARA

STRATEGI  
G1 MEMASTIKAN BANGUNAN WARISAN DIPULIHARA BERDASARKAN GARIS  
PANDUAN SEMASA DAN AMALAN TERBAIK

TINDAKAN  
G1.5 Memastikan pelan pengurusan pemuliharaan dan panduan bangunan warisan  
dipatuhi

JUSTIFIKASI

Setiap pembangunan yang dirancang perlu mematuhi Pelan Pengurusan Pemuliharaan dan Garis Panduan sedia ada bagi memastikan Nilai Keunggulan Sejagat (NKS) tidak terjejas lebih-lebih lagi bagi pembangunan semula yang melibatkan bangunan warisan Kategori I dan Kategori II. Pengubahsuaian bangunan warisan yang menyebabkan hilangnya ciri-ciri reka bentuk warisan akan menjejaskan Nilai Keunggulan Sejagat (NKS) kawasan RKK TWDU George Town dan status sebagai Tapak Warisan Dunia UNESCO.

PERINCIAN DAN KOMPONEN

1. Memperketatkan pematuhan kepada garis panduan pembangunan bangunan warisan Kategori I dan Kategori II

Terdapat perbezaan bagi garis panduan pemuliharaan bergantung kepada kategori bangunan iaitu bangunan warisan Kategori I dan bangunan warisan Kategori II.

Jadual 7.7.1: Pembangunan Baharu dan Pembangunan Semula yang dibenarkan bagi setiap Kategori Bangunan

KATEGORI BANGUNAN	PEMBANGUNAN BAHARU ATAU PEMBANGUNAN SEMULA YANG DIBENARKAN
KATEGORI I	<ul style="list-style-type: none"> <li>Hanya kerja pemuliharaan sahaja yang dibenarkan dalam usaha untuk mengembalikan karakter asli dan mengekalkan fabrik asal menggunakan kaedah pembinaan dan bahan-bahan yang serupa.</li> <li>Kaedah pembinaan baharu hanya akan dibenarkan untuk mengukuhkan semula struktur bangunan asal tanpa mengganggu atau mengubah struktur asal atau menghapuskan apa-apa fabriknya yang asal.</li> <li>Pengubahsuaian memerlukan pendaklan yang lebih teliti dengan meminimalkan kerosakan ke atas bangunan.</li> </ul>
KATEGORI II	<ul style="list-style-type: none"> <li>Profil asal bangunan seperti ciri-ciri ruang pendaklan, pekarangan laman, pekarangan dalaman, pekarangan belakang dan lain-lain hendaklah dikekalkan dan dipulihkan kepada keadaan asal.</li> <li>Menggantikan bahan-bahan sedia ada perlu mencapai profil yang sama atau setara, dari segi prestasi, reka bentuk, warna dan tekstur.</li> <li>Pemasangan baru perlu disepadankan dengan yang lama untuk memastikan kelangsungan hidup fabrik bersejarah.</li> <li>Penambahan ke atas reka bentuk asal bangunan warisan, termasuk pertambahan kecil seperti serambi, balkoni, beranda, hasan pintu, tidak seharusnya menjejaskan kualiti bangunan.</li> <li>Sambungan baharu pada bangunan tidak boleh mengukuhkan bangunan warisan sedia ada sama ada dalam skala, bahan atau keadaan.</li> </ul>

Sumber: Kajian Inventori Bangunan Warisan dalam Zon Teras dan Zon Penampian, Tapak Warisan Dunia George Town, 2015-2017.  
Kajian Rancangan Kawasan Khas Tapak Warisan Dunia UNESCO George Town (Pengantian), 2020

(Rujuk Jilid II: Kawalan Pembangunan Bahagian 3.0: Garis Panduan Pemuliharaan Bangunan Warisan Kategori I dan Kategori II)

KATEGORI PELAKSANAAN

QUICK WIN ☒

IMPAK TINGGI ☐

SOKONGAN ☐

LOKASI

• Zon Teras  
• Zon Penampian

AGensi PELAKSANA

• George Town World Heritage Incorporated (GTWHI)

SUMBER PERUNTUKAN

• George Town World Heritage Incorporated (GTWHI)  
• Kerajaan Negeri Pulau Pinang

- Kategori I  
Building diagnostics with application of scientific tests should be conducted to identify actual building defects, to study the building material's composition and to avoid further damage.
- Kategori II  
Suggestion: To replace.... "kualiti bangunan" with "nilai seni bina dan teknologi pembinaan asal" (original architectural value and building technology)
- Should include MBPP and Jabatan Warisan Negara (for listed National Heritage & Heritage buildings in George Town WHS).

## 5 Tindakan

### G1.3

#### Page 7.7-7



This does not support the OUV.

## Category I and II buildings

This section refers to the guidelines which were **not** supplied for this review.

The 2016 gazetted SAP has an unambiguous definition for Category I and II, which is not included in these descriptions.

These definitions were in the Nomination Dossier, 2011 draft SAP approved by UNESCO and the 2016 gazetted SAP – they should appear here. **This CANNOT change.**

All Category I sites should prepare a Heritage Management Plan, which should be submitted to JWN.

No physical changes may take place in addition to conservation that cannot be reversed.

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These documents that have not been issued yet are referred to:

- George Town UNESCO World Heritage Site Special Area Plan Study (Replacement), 2020
- Volume II: Development Control Part 3.0: Category I and Category II Heritage Building Conservation Guidelines).

They need to be checked thru too.


Category II also warrants every effort being made to preserve them.

In the light of climate change, again every effort should be made to return to the original low-carbon form, natural ventilation, breathable materials etc.

New build, if permitted, should learn and follow from the traditional methods.

GTWHI to work with the suggested pool of experts to ensure the low-carbon city is thoroughly understood and how it can be translated into contemporary living.



No	Section/page	Subject	Comments
6	<p><b>Tindakan G1.3</b></p> <p><b>Page 7.7-8 &amp; 7.7-20</b></p>		<p><b>Separation of Category I into two maps is not advantageous.</b></p> <p>This only adds to the confusion and potential errors when creating the maps and should be grouped as in the gazetted 2016 SAP.</p> <p>Note that the 2016 SAP and the nomination dossier description of Category I cover "buildings, monuments, objects and sites of exceptional interest."</p> <div data-bbox="1218 900 1626 1289"> <p><b>Protection, conservation &amp; adaptation:</b></p> <p>● <u>Category I:</u></p> <ul style="list-style-type: none"> <li>(a) Buildings, monuments, objects and sites of exceptional interest;</li> <li>(b) Buildings and monuments declared as ancient and gazetted formerly under the Antiquities Act 1976 now under the National Heritage Act (2005); and</li> <li>(c) Buildings and monuments Registered as National Heritage under the National Heritage Act (2005) (Table C3.1).</li> </ul> </div> <p>Detail from the 2016 SAP C 3-1.</p>

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As mentioned, the compound identification should be put back to avoid potential loss – for example, see Cheong Fatt Tze wall & gate below.



The 2016 map has identified it as category 1.



However, 2021 has not. The 2021 Category I map does not protect the overall authenticity, integrity and significance of the WHS.

**7 Tindakan  
G1.4  
Page 7.7-11  
to 14**



Garis Panduan Perancangan dan Pembangunan Taman Tema (Theme Park) JPBD 14/97

This section, as written, will not support the OUV and has little relevance to the authenticity of the place.

**The Clan Jetties** are unique to Penang Island and the World Heritage Site. They are a living community that has been at the centre of many ambitious attempts to commodify what is seen as a tourism asset.

Commodification from both local and visitor communities has threatened the wellbeing of the host community and the environment they live in.

Tourism must be secondary to the liveability of the site, with the needs of the host communities being a priority. Covid-19 has proved how vulnerable communities can be if their entire economy is based on the highly volatile tourism industry.

Clearly, 'Theme Park' style management is not appropriate. They are not a zoo.

Community consultation and a bottom up approach from the true host community – not those who move in to make a profit - should be a top priority.

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As a water village, they will be extremely vulnerable to climate change and rising sea levels. Thus 'challenges and changes' to their way of life should only be about this risk and only following consultation, analysis and design of protective measures.

Any physical change to their environment next to Weld Quay must consider that the former quay wall is likely to be buried below the early reclamation and must be part of an archaeological project because the area is to be disturbed for enhancement. That includes any development (such as housing development, coastal reclamation covering an area of 50 ha or more, or construction of coastal resort facilities or hotels with more than 80 rooms) which are unsuitable for the core or buffer zone.

George Town's old drain outlets also pierce the quay wall – these should not be blocked or covered.

## 8 Tindakan G2.1 Page 7.7-15

2. Ulasan  
3. Cadangan

**INVENTORI WARISAN KETARA PULAU PINANG**

Survei No. 123456789 Page 1  
Date: 2 November 2020 14  
Surveyor: Mr. Tan

**A. IDENTIFICATION**

1. Name of the site  
2. Address  
3. Locality  
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**B. HISTORICAL FEATURES**

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100. Historical Features

**C. SITE PLAN**

**D. PHOTOGRAPHY**

**E. DESCRIPTION**

**F. RECOMMENDATION**


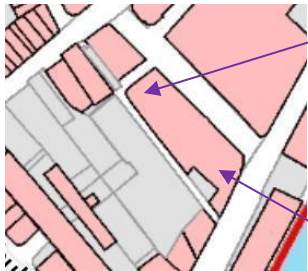


Rujuk Jilid II: Kawalan Pembangunan – Bahagian 2: Lampiran Jenis dan Gaya Bangunan bagi perincian jenis bangunan dan gaya bangunan yang terdapat di kawasan RKK TWDU George Town.

## Monuments

Inventories are only as good as the knowledge of the people who write them. Large well-annotated images are more valuable than lists and ticks.

Great opportunity here to work with experts in the field of history/crafts/architecture/engineering / archaeological sectors etc.

The current knowledge bank is weak and has not been invested in for several years – there is an excellent opportunity for a boost from local experts.

No	Section,page	Subject	Comments
9	<b>Tindakan G3.1 Page 7.7-24</b>	<p>These maps are taken from the documents discussed on 17<sup>th</sup> June 2021;</p>  <p>The Rice Miller apartments are a new build. They should not be Category II</p>  <p>The back area of the former Boustead godown, 1 Weld Quay is a totally new build, so it should show on the maps as a green, replacement – only the front should be pink – the Category II building.</p>	<p><b>Other errors that need to be corrected, and there may be many more.</b></p>   <p>Rice Miller project – this is a new build that cannot be coloured as Category II.</p>



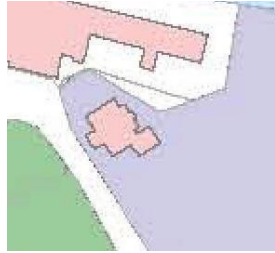
The back area of Chowrasta market should now be coloured green – replacement.



Only the Weld Quay building can be categorised as Category II – the back of Category II modernist market building at Chowrasta was being demolished to build a car park.



No	Section,page	Subject	Comments
10	<b>Tindakan G3.1 Page 7.7-24 and others</b>	<p>These maps show the mistaken reclassification between the 2016 gazetted maps and the newly presented one on the 17th June 2021.</p> <div data-bbox="555 624 788 855" data-label="Image"> </div> <div data-bbox="853 624 1084 852" data-label="Image"> </div> <p>Leith Street, Waldorf Hotel, from the 2016 SAP. Two categories reflect the situation.</p> <p>The 2021 map has shown both as replacement, and this should return to 2016 arrangement.</p>	<p><b>Other errors need to be corrected, and there may be many more.</b></p> <div data-bbox="1261 510 1603 767" data-label="Image"> </div> <p>The front of the Waldorf Hotel is a modern building which is classed as a replacement.</p> <p>Part of the original mansion is still there at the back of the hotel – this is, therefore, Category II.</p> <p>St George's Girls School, Farquhar Street, was part of the Shorefront project and was reviewed in the HIA. It is and should remain a Category II building.</p> <div data-bbox="1693 1031 2033 1286" data-label="Image"> </div>



Farquhar St. 2016 –  
St George's Girl's  
School.

Shown as Category  
II in the gazetted  
document.



Current map issue  
in fill – as the  
buidling exists that  
is not the correct  
category. However  
it should remain  
Category II.

One of the few remaining single storey godowns along Weld Quay, in 2016 was Category II, but in 2021, it has been changed to Infill – this needs to be corrected back to Category II.



Weld Quay godown Cat II in 2016 – Infill  
today?





## Bahagian L – Pengurusan TWDU George Town

No Section/page

Subject

Comments

### 1 Tindakan L1.1 Page 7.11-2

**STRATEGI L1** MEMPERKUKUKAN PENGURUSAN TWD UNTUK MEMASTIKAN PELAKSANAAN DISELARASKAN DENGAN TINDAKAN DAN PROGRAM PERINGKAT TEMPATAN

**TINDAKAN L1.1** Mengukuhkan keupayaan agensi kerajaan dalam menjaga Nilai Keunggulan Sejagat (NKS)

**JUSTIFIKASI**

Setiap agensi kerajaan yang berkaitan perlu memainkan peranan dan tanggungjawab dalam menjaga Nilai Keunggulan Sejagat (NKS) TWDU George Town. Pengurusan dan kawalan terhadap pembangunan di TWDU George Town adalah menjadi tanggungjawab pihak Majlis Bandaraya Pulau Pinang (MBPP). Namun begitu, agensi-agensi kerajaan yang lain juga mempunyai peranan yang penting dalam membantu pihak Majlis Bandaraya Pulau Pinang (MBPP) dalam memastikan perancangan dan pembangunan tidak menjejaskan Nilai Keunggulan Sejagat (NKS) TWDU George Town.

**PERINCIAN DAN KOMPONEN**

1. Memastikan agensi-agensi kerajaan mempunyai peranan dan tanggungjawab yang khusus dalam pengurusan TWDU George Town

**KATEGORI PELAKSANAAN**

QUICK WIN ☐

IMPAK TINGGI ☐

SOKONGAN ☒

**LOKASI**

Jadual 7.11.1: Peranan dan Fungsi Institusi dan Agensi Kerajaan yang berkaitan

PERINGKAT	INSTITUSI / JABATAN	FUNGSI
PERSEKUTUAN / NEGARA	JABATAN WARISAN NEGARA	i. Penjaga Pelan Pengurusan Pemuliharaan (PPP) sebagai <i>state party</i> yang mewakili Malaysia di Konvensyen Warisan Sedunia. ii. Mengekalkan Daftar Warisan Kebangsaan ( <i>National Heritage List</i> ). iii. Penyebaran maklumat mengenai warisan. iv. Meningkatkan kepakaran dalam pelbagai bidang warisan. v. Menyelia pemuliharaan, pemeliharaan, pembalutihan, penyelenggaraan warisan. vi. Menasihati dan menyelaras kan Pihak Berkuasa Perancangan Tempatan, Majlis Warisan Kebangsaan dan badan serta organisasi di semua peringkat. vii. Menasihati menteri mengenai apa perkara berkaitan pemuliharaan dan pemeliharaan warisan. viii. Mewujudkan Pejabat Pesuruhjaya Warisan di peringkat Negeri.
	JABATAN PERANCANGAN BANDAR DAN DESA SEMENARAUNG MALAYSIA	i. Merancang pembangunan, penggunaan tanah dan merangka dasar di peringkat persekutuan. ii. Melaksanakan projek-projek berskala besar dan berimpak tinggi. iii. Memantau pembangunan peringkat tempatan.

**AGENSI PELAKSANA**

- PihakMelayang@Pulau Pinang (PMPP)
- Majlis Bandaraya Pulau Pinang (MBPP)
- Jabatan Warisan Negeri
- George Town World Heritage Incorporated (GTWHI)
- Jabatan Konservasi Warisan (MBPP)
- Institusi dan agensi kerajaan berkaitan

**SUMBER PERUNTUKAN**

Sumber: Kajian Rancangan Kawasan Khat Tapak Warisan Dunia UNESCO George Town (Pengantar), 2020

- Should add university as one of the 'Agensi Pelaksana' with other implementing agencies.

## 2 Tindakan

### L1.1

#### Page 7.11-5

BAHAGIAN L: PENGURUSAN TAPAK WARISAN DUNIA UNESCO GEORGE TOWN

**STRATEGI L1** MEMPERKUKUKAN PENGURUSAN TWD UNTUK MEMASTIKAN PELAKSANAAN DISELARASKAN DENGAN TINDAKAN DAN PROGRAM PERINGKAT TEMPATAN

**TINDAKAN L1.1** Mengukuhkan keupayaan agensi kerajaan dalam menjaga Nilai Keunggulan Sejahtera (NKS)

**PERINCIAN DAN KOMPONEN**

Jadual 7.11.1: Peranan dan Fungsi Institusi dan Agensi Kerajaan yang berkaitan (sambungan)

PERINGKAT	INSTITUSI / JABATAN	FUNGSI
TEMPATAN	PEJABAT WARISAN DUNIA (GEORGE TOWN WORLD HERITAGE INCORPORATED)	i. Menyelia tapak warisan selaras dengan keperluan PPP. ii. Membangunkan dan mengurus pangkalan data warisan dan pemantauan yang berkesan. iii. Menyokong penyelidikan dan pembangunan berkaitan warisan. iv. Menggalakkan pembangunan mampan pelancongan kebudayaan dan menguruskan perkhidmatan pelancong dan kemudahan. v. Menyokong penglibatan masyarakat tempatan dalam pemuliharaan warisan budaya mereka. vi. Menggalakkan pembangunan socio-ekonomi penduduk tempatan. vii. Meningkatkan tahap kesedaran mengenai warisan dengan pelaksanaan pelbagai program. viii. Mengesyorkan, melaksanakan dan membiayai projek-projek dan program-program yang berkaitan dengan pemuliharaan warisan. ix. Menyediakan, mengurus dan mengawal kewangan organisasi. x. Mendapatkan pembiayaan. xi. Menyediakan dan membangunkan laporan mengenai pelaksanaan PPP. xii. Berfungsi sebagai setiausaha kepada Jawatankuasa Pemandu Warisan Negeri, dan menyelaras mesyuarat ke arah pengurusan berkesan PPP. xiii. Perlaksanaan bukan berlandaskan seperti: a) Pendidikan dan kesedaran b) Memantau pelaksanaan PPP c) Pemantauan premis warisan d) Penyelenggaraan pendaftaran e) Menyediakan inisiatif f) Melaksanakan projek-projek (peningkatan, budaya, penyelenggaraan dan landskap) g) Mengumpul data h) Melaporkan prestasi dan aktiviti i) Melihat semula pelan j) Publikiti k) Melakukan kajian dan penyelidikan l) Mengurutan Kumpulan Wang Amanah Warisan m) Pemuliharaan ekowisata

Sumber: Kajian Rancangan Kemas Khat Tapak Warisan Dunia UNESCO George Town (Pengantar), 2020

7.11.5

- For effective heritage management strategies, list of type of cultural heritage, process of inscription and the criteria for National, State and Local Heritage Listing should be included in this section. Please refer to Helena Aman Hashim (2017) of UM's, PhD thesis.
- GTWHI should provide training and necessary skills for tangible and intangible heritage courses for multiple stakeholders involved in managing the heritage site.

### 3 Tindakan

#### L1.1

Page 7.11-6



- Technical know-how courses are needed for preserving the tangible and intangible heritage to nurture expertise in conservation. In this regard, university and authority should offer qualified programme to educate technical experts or contractors in order to issue licenses.
- Local authority staff should be equipped with technical courses on heritage so that they can become effective development controllers. A Continuing Professional Development (CPD) for contractors, architects, and technical agencies on vernacular architecture, heritage property renovation, and adaptive reuse should be regulated and imposed.

#### 4 Tindakan

##### L1.1

Page 7.11-7

BAHAGIAN L: PENGURUSAN TAPAK WARISAN DUNIA UNESCO GEORGE TOWN	
STRATEGI L2	MENGUATKUASA PELAN PENGURUSAN PEMULIHARAAN DALAM RKK UNTUK MEMASTIKAN PERLINDUNGAN BERKANUN YANG SESUAI UNTUK TWD
TINDAKAN L2.1	Memastikan Pelan Pengurusan Pemuliharaan dan RKK Tapak Warisan Dunia UNESCO George Town dipatuhi oleh semua pihak berkepentingan dan pemegang taruh
JUSTIFIKASI	
<p>Pelan Pengurusan Pemuliharaan bagi TWDU George Town dan Melaka telah disediakan seiring dengan pengisytiharan kedua-dua bandar sebagai Tapak Warisan Dunia UNESCO. Penyediaan RKK TWDU George Town (Penggantian) pula adalah khusus bagi TWDU George Town sahaja. Namun begitu, kedua-dua dokumen ini perlu dijadikan sebagai asas kawalan pembangunan dan pengurusan warisan supaya perancangan pembangunan dapat dilakukan tanpa menjejaskan Nilai Keunggulan Sejagat (NKS) di TWDU George Town.</p>	
PERINCIAN DAN KOMPONEN	
<ol style="list-style-type: none"> <li>1. Institusi dan agensi kerajaan serta pihak berkepentingan dan pemegang taruh mestilah menggunakan dokumen RKK TWDU George Town (Penggantian) ini sebagai panduan dalam melaksanakan perancangan pembangunan di tapak.</li> <li>2. Mengadakan kawalan pembangunan seperti Zon Guna Tanah dan Guna Bangunan, Kelas Kegunaan Tanah, Kawalan Intensiti Pembangunan dan Garis Panduan Perancangan dan Pengurusan Warisan bagi memastikan pengurusan dan pemuliharaan warisan dapat dilaksanakan dengan menyeluruh. (Rujuk Jilid II: Kawalan Pembangunan)</li> <li>3. Mengajukan bengkel, program dan ceramah berkaitan kepentingan pematuhan kepada RKK TWDU George Town (Penggantian) bersama pihak berkepentingan dan pemegang taruh.</li> </ol>	<p>KATEGORI PELAKSANAAN</p> <p>QUICK WIN <input type="radio"/></p> <p>IMPAK TINGGI <input type="radio"/></p> <p>SOKONGAN <input checked="" type="radio"/></p> <p>LOKASI</p> <p>AGENSI PELAKSANA</p> <ul style="list-style-type: none"> <li>• PlanMalaysia@Pulau Pinang (PMPP)</li> <li>• Majlis Bandaraya Pulau Pinang (MBPP)</li> </ul> <p>SUMBER PERUNTUKAN</p> <p>-</p>

Sumber: Kajian Rancangan Kawasan Khas Tapak Warisan Dunia UNESCO George Town (Penggantian), 2020

- To design an education programme for George Town residents to nurture capability of the residents to conserve cultural heritage on their own. The course covers the need for cultural tours programmes, heritage planning and tourism business know-how.



## REFERENCES

Jenkins, G. (2007) Cool Architecture- Cool Cities- Karbon 0, *Architecture Malaysia (AM)*, Vol. April 2007, Pertubuhan Akitek Malaysia, Kuala Lumpur.

Helena, Aman Hashim (2017) *Interpretation of criteria for assessment of national heritage listing in Malaysia*. PhD thesis, University of Malaya, Kuala Lumpur.



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