A Conservation Statement on Pudu Jail, Kuala Lumpur
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Conservation Statement for Pudu Jail, Kuala Lumpur

1.0 Summary

Pudu Jail, once Malaysia’s grand dame of penitentiary, currently faces possible redundancy and demolition. This conservation statement is the first step in addressing these issues and will be used to support and initiate further listing application and consultation. It sets out Pudu Jail’s heritage attributes and looks into its protection while allowing appropriate development.

The walled prison, located in the heart of Kuala Lumpur, has witnessed the city’s growth since 1895. Its integral role was when it was used as a P.O.W camp centre during the Japanese Occupation. Pudu Jail is of value for its colonial architectural design and its survival into modern Kuala Lumpur’s cityscape.

Threats to Pudu Jail’s further existence includes Malaysia’s present statutory and legislation, disputes on suitable use, pressures of high real estate value, lack of public awareness, surrounding development and poor maintenance and upgrading works.

The suggested conservation principles identifies the need for cooperation between public and private bodies, better informed management, raising awareness, public participation, monitoring of potential threats and market research for potential use.

A successful transformation of Pudu Jail from a building synonym with incarceration and punishment into a new exciting quarter of national importance for Kuala Lumpur will mark a significant chapter in Malaysia’s heritage conservation history.
2.0 Background of Pudu Jail

Pudu Jail is Malaysia’s second oldest prison located in the commercial Pudu District of central Kuala Lumpur. Built in 1895 by the British administration of Malaya, this historical landmark sprawls over 7.8 hectares at the junction of Hang Tuah Road and Pudu Road. Its surrounding development includes integrated train services, shopping complexes, apartments, hotels and high rise offices.

Figure 1: Pudu Jail’s Front Gate.

Figure 2: Pudu Jail’s location in Kuala Lumpur.
Currently, Pudu Jail serves as Hang Tuah Police Station, a temporary drug addict hold up centre. In 2006, the Federal Territory Administration will return the land to its owner, Uda Holdings Berhad. The company plans to develop the site into series of hotels, retails, offices and apartments known as the Bukit Bintang City Centre 1.

Kuala Lumpur’s Structure Plan 2020 (paragraph 811) recommends Pudu Jail to be developed as a high density residential development incorporating service apartments and a neighbourhood park. It is noted that no intentions to conserve the prison are mentioned.

This paper covers the evolvement of Pudu Jail’s main buildings, its compound and prison walls. Unfortunately, specific records on the prison prior to Independence are almost non-existent. Most documents were brought to England by the British or disappeared during the Japanese Occupation2. Information on the prison’s recent upgrade in 2004 is inaccessible due to the tight security of it being a new police station.

There are no existing management plans or policies associated to Pudu Jail known to the author. Measured drawings of the prison have been carried out by architectural students of Malaya University (1990) and International Islamic University Malaysia (2004). At present, The Malaysian Antiquity Department is analyzing the prison’s heritage value3.
3.0 Brief History of Pudu Jail

Pudu Jail’s construction began in 1891 and was completed in 1895. It was designed by Charles Edwin Spooner, the state engineer and director of Public Works Department to fit 950 inmates. At the cost of RM 138 000 ($320 000), the prison was built in six phases using steel, brick and cement, all imported from British colonies\(^4\). Built in a jungle clearance named Pudu Village (south east of old Kuala Lumpur), the prison’s location seemed ideal during that period, being conveniently close to the city but not close enough to be a threat. Surrounding the prison walls were rows of shop-houses and residential of police and prison officers.

Figure 4: Pudu Jail’s front gate in 1896.

Figure 5: Author’s sketch of Pudu Jail’s location in 1900.
The main prison structure is the Cell Block. Built to the shape of St. Andrew’s cross, it is a massive three storey stone and concrete building housing cells and gallows. The Cell Block has a narrow open courtyard in the centre where whippings took place\(^5\). The courtyard was a gathering space that served lighting and ventilation purposes.

The front gate depicts Moorish architecture in its two domed towers\(^6\). It led to a two-storied building known as the Administrative Block with a separate female prison and prison kitchen on each side. A prison hospital was to the east, separated from the main building\(^7\).

\(^5\)\text{Figure 6: Pudu Jail in early 20th century.}

\(^6\)\text{Figure 7: A sketch of Pudu Jail’s early layout.}
During its early years, Pudu Jail was used by the British as an army command centre. Those who fought against the British were executed, either by a firing squad or by hanging, and buried on prison grounds to prevent news about the executions from going beyond Pudu Prison walls\(^8\).

The prison became the central prisoners of war (P.O.W) camp in Malaya during the Japanese Occupation (1942-1945). Many members of the Allied Forces and locals were tortured and beheaded on prison grounds, some heads stuck to polls for all to see. They were believed to be buried around the hospital and behind the laundry workshop area\(^9\). Sweet potatoes were planted by the P.O.Ws on the prison grounds for food. There was also a chapel created from a cell by a prisoner named Padre Noel Duckworth to hold Sunday services\(^10\).

\(\text{Figure 8: Pudu Jail’s Administrative Block (1946).}\)

\(\text{Figure 9: Sweet potatoes planted on the prison grounds (1946).}\)
The post war period saw the formation of local organizations fighting for an Independent Malaya such as the The Young Malay Union (KMM) and Malay Nationalist Party. A large number of nationalists were imprisoned in Pudu Jail by the British Administration, among them Idris Hakim and Mustapha Hussain\textsuperscript{11}.

Kuala Lumpur expanded rapidly after the formation of Malaysia. Pudu Jail suddenly found itself in the heart of a bustling city centre. Perceived as being too grim for the cityscape, an inmate named Khong Yen Chong painted the outer prison walls with an impressive mural of tropical scenes as community service. The 860ft x 14ft mural took a year to complete using up to 2000 liters of paint. It was recorded in the Guinness Records as the longest mural in the world\textsuperscript{12}. In 1970s, watch towers were built to a vernacular style with jagged edges and pointed roofs called the Minangkabau on the east and west prison walls.

\textbf{Figure 10: Layout of detained P.O.W’s cells during World War 2.}
Figure 11: Aerial view of Pudu Jail in modern day Kuala Lumpur (2006).
From 1960, Pudu Jail only housed remand and pre-released prisoners. Until 1993, about 180 criminals were hanged there, among them the notorious armed robber Wong Swee Chin a.k.a Botak Chin (1981) and Australian drug traffickers Brian Chambers and Kevin Barlow (1986). There was a serious overcrowding problem in 1980s when it housed more than 1,300 prisoners. The worst happened in 1985 where 6,550 prisoners accommodated in the 950 cells had to take turn to sleep\textsuperscript{13}.

The problem of space and its increased real estate value forced the prison to be evacuated on the 1\textsuperscript{st} November 1996 to give way for development. Pudu Jail was opened as Pudu Prison Temporary Museum in May 1997, attracting around 500,000 visitors a year. Initial development proposals were called off due to the Asian 1997 economic crisis\textsuperscript{14}. Since 2004, the prison has been a temporary round up centre for drug addicts known as Hang Tuah Police Station.

\textbf{Figure 12:} Pudu Jail’s mural walls (1997).  \textbf{Figure 13: Minangkabau watch tower addition.}

\textbf{Figure 14:} Whipping demonstration carried out to the visitors (1997). Pudu Prison was the first Malaysian prison to be opened to the public, attracting huge crowds.
4.0 **Significance of Pudu Jail**

In general, the building is still reasonably intact and is of particular interest for its particular location. The form of Pudu Jail’s core parts dating from 1895 remains unaltered. Past exterior and interior renovations have not detracted its original architectural appearance. A reasonable amount of original fittings (stairs, windows, doors) appear to survive and their durable qualities are of note. Archaeological surveys have not been carried out on site but interesting discoveries of graves are expected.

![Figure 15: The present condition of the Cell Block’s interior. Original design and fittings appear to have survived.](image)

4.1 **Historical Significance**

Pudu Jail is one of the few remaining symbols of old Kuala Lumpur’s Innovation Period (1880-1930), when the city’s built environment transformation took place and lawlessness was rampant\(^{15}\). The prison represented order amidst all these.

Its enclosed nature means that Pudu Jail has been more important in its role as a symbol to the city than as an integral part. Even after its closure, Malaysians continue to perceive it as a centre for incarceration and punishment.

It is important to realize that within 100 years of serving as a prison, Pudu Jail’s inmates were not solely convicts but also servicemen and nationalists who fought against the Japanese and British for Malaya’s liberation. The prison’s key significance is the role it played towards the emergence of Malaysia’s nationhood.
Pudu Jail’s long relationship with Kuala Lumpur has been important in its evolution. Regardless of its past operations, it remains as a historical landmark. The closure of the prison, its use as a museum and later as a drug addict hold up centre also contributes to the story of Kuala Lumpur. The prison is of local and national interest because it is one of the few examples of a 19th century prison in the region.

4.2 Architectural Significance

A relic of the Victorian period, Pudu Jail’s architecture is strongly influenced by British colonial prison structure and design which emphasizes security and manual operation. The butterfly form of the Cell Block is the key architectural asset, hidden from the view of polite society for a century. The building’s bare design and minimal details strengthens its architectural impact as a prison. Its grim character adds an awkward charm to the place.

Figure 16: A crowd gathers to watch the bodies of executed prisoners carried into lorries (1946).

Figure 17: Aerial view of Pudu Jail’s X-shaped Cell Block.
Spooner has produced a prison design that was suitable to the local climate and culture. These are apparent in the use of courtyards, jack-roofs, large overhangs and the Moorish front gate.

![Figure 18a: Courtyard of Pudu Jail’s Cell Block](image)

![Figure 18b: Sketch of Cell Block’s section.](image)

The watch towers of 1970s sits rather awkwardly in the colonial prison. Nevertheless, they mark the early presence of Malaysia’s modern regional architecture. Wood carvings on the Minangkabau roofs are rare ornamentations for a prison, showing that the main intention was to contribute to the townscape’s character. The mural paintings on the prison walls smoothens the relation of the prison with the cityscape. It is noted that the absent of sentient beings on the murals are influenced by the Islamic religion. Pudu Jail is a good example of colonial prison architecture in Malaysia.

![Figure 19: Visible wood carvings on the Minangkabau watch tower.](image)
The historical and architectural significance of Pudu Jail are too obvious for the prison to be disregarded as a national heritage. After losing so many buildings from the colonial era to modern development, the preservation of Pudu Jail is essential. Malaysians need Pudu Jail to remain not solely for its historic and architectural importance, but for the need to retain a sense of identity. This is only possible with stories from their past and Pudu Jail has much stories to tell about crime and punishment, war and survival, freedom and honour. Without visual proof, these stories will only be legends that will disappear through time.

5.0 Issues and Vulnerability

5.1 Malaysia’s Present Statutory and Legislation
Malaysia’s present legislation on historic buildings is the main threat to Pudu Jail’s existence. It is not sufficient and suitable to protect such buildings from being demolished. There are presently 4 acts and enactments (stated below) showing aspects of building conservation, but none addresses heritage conservation extensively.

- Antiquities Act 1976
- Johore Enactment 1988
- Malacca Enactment 1988
- Rent Control Act 1966 (Revised 1988)

The Antiquities Act 1976 states that a historic building or monument aged at least 100 years old can be listed or gazetted through the Museum Department. At the age of 107, there have been no attempts to list Pudu Jail as a protected building. The City Council is not pro of its survival, making the future of Pudu Jail rather bleak unless this matter is addressed right away.
5.2 Dispute on Suitable Use
The City Council spent RM3 million to facilitate Pudu Jail’s current use as a temporary drug addict hold up centre. The Federal Police views this measure as a solution to the overcrowding in police lock ups and increasing crime rate. Furthermore, it relates to its former use as a prison and avoids it from being obsolete. However, this view is not shared by many as drug addicts are sick patients, not criminals\textsuperscript{18}.

On the other side, the City Council has proposed to consider the prison as the new Kuala Lumpur City Museum\textsuperscript{19}. However, the major stakeholder and developer, UDA Holdings Berhad, feels that a mix-development project is more practical.

5.3 Pressure of High Real Estate Value
The real estate value of Pudu Jail is estimated to be RM 300 million. This amount pressures the stakeholders for commercial development to gain profit. UDA Holdings Berhad proposal to develop the RM 2 billion Bukit Bintang City Centre is due in 2006 and will be completed within 5 years\textsuperscript{20}. Hopefully, Pudu Jail’s listing for protection takes place before demolition begins.

\textit{Figure 20: Pudu Jail faces possible demolishment to give way for mega commercial development similar to Berjaya Times Square (background).}
5.4 **Lack of Public Awareness**

Mixed reactions are received from the public concerning Pudu Jail’s future. Many seem to agree for its demolition for new development. Understandably, these perceptions are due to poor conservation awareness and understanding of Pudu Jail’s role in Kuala Lumpur’s history.

Since its closure, campaigns to save Pudu Jail have been carried out by members of the public. However, the focus has been on the front gate and prison walls rather than the Cell Block because these are more familiar landmarks. These campaigns are positive signs but they lack historical information. Knowledge of nationalists who served time in the prison could change the nation’s perception towards the prison.

5.5 **Surrounding Development**

The continuous construction and heavy traffic around Pudu Jail have created a negative environment for the building. Air pollution and acid rain caused the building to experience thick layers of dust, peeling of paint, fungal stains and defective plastered rendering. There could be foundation or structural movements due to vibrations from the nearby trains and construction works.

*Figure 21a: New developments around the prison.  Figure 21b: Heavy traffic along Hang Tuah and Pudu Road.*
5.6 Poor Maintenance and Upgrading Work

Poor maintenance and supervision has aged the building even more. The beautiful mural wall is peeling off badly. Recent repainting on certain portions has extracted the artistic value of the whole mural composition. Poor supervision enabled quality steel bars from the prison to be stolen by thieving scrap metal trades. This is a huge loss as the steel bars are important features of the prison’s character.

![Figure 22: Present mural walls of Pudu Jail. Paint condition is poor. New overcoat deemed unsuitable.](image)

6.0 Conservation Policies for Pudu Jail

The future development of Pudu Jail should seek to conserve the key historical and architectural aspects without detracting the setting and appearance of the prison. Suggested conservation polices for Pudu Jail are as follows:

6.1 Cooperation between Public and Private Bodies

Seek to develop partnership and consensus among all the public and private bodies involved in Pudu Jail’s management and heritage conservation.

This will involve:

- Effective communication between the management (UDA Holdings Berhad, Kuala Lumpur Local Council) and conservation bodies (Ministry of Culture, Arts and Heritage, Badan Warisan Malaysia).
- Organized consultation relating to Pudu Jail’s development proposals.
- A clear definition and agreement of Pudu Jail’s principles and objectives of development.
6.2 Better Informed Management
Facilitate a more informed management for Pudu Jail through better archaeological and historical understanding of the building.

This will involve:

- Ongoing research into Pudu Jail detainees and role before Independence.
- Collaboration with British Archives and interviews with former prison officers and ex-P.O.W’s.
- Establishing important local events which may be associated with Pudu Jail.
- Archaeological studies on the building’s phase of construction.
- Preparation of a publicly accessible archive on Pudu Jail.

6.3 Raising Awareness
Promote public awareness and appreciation of Pudu Jail as a feature of historic and ongoing contemporary importance.

This will involve:

- Raising the profile of Pudu Jail as a major national importance.
- Developing an accessible story and image of Pudu Jail, and undertaking education and interpretation work to publicize this story.
- Collaboration with Badan Warisan (Heritage Trust of) Malaysia to include Pudu Jail in Kuala Lumpur’s Heritage Trail.
- Linking with existing tourism networks to coordinate and facilitate the process of publicizing and organizing visitor’s experience and awareness of the prison.
- Disseminating Pudu Jail’s information via the internet.

6.4 Public Participation
Encourage public participation in Pudu Jail’s conservation:

This will involve:

- Developing key involvement of interested parties in Pudu Jail’s management or promotion developments.
- Cooperation with existing public information networks.
- Organizing workshops and lecture series to obtain feedbacks and ideas from the public.
6.5 Monitoring of Potential Threats
Potential threats are to be monitored from time to time to ensure the structural stability of the prison building and its walls.

This will involve:
- An ongoing survey of its structural condition.
- Continuous monitoring on the vibration effects from the trains (monorail) and surrounding construction works.
- Conservation of the mural paintings on the prison walls.

6.6 Market Research for Potential Use.
Propose suitable developments (commercial and public) for Pudu Jail’s reuse with consideration of its potential and constraints.

This will involve:
- Research of market potential for uses such as hotels, museums, restaurant, market stalls and other public spaces.
- Bringing forward the proposal for the prison to be the new Kuala Lumpur’s City Museum, using data of its successful past as a museum to convince the authority.
- Study examples of similar projects that have proved to be successful regeneration such as the Oxford Prison Hotel in United Kingdom.
- Assessment of the prison’s interpretive and tourist potential of this history of the site.
- Determining an access route into the site for future construction works.
The Future of Pudu Jail

Pudu Jail is a unique and nationally important historic building with interconnected historical, architectural and social significance. Being subjected to increasing pressures for commercial development, the prison is likely to suffer demolition unless a well focused, integrated and sustained conservation programme is implemented.

There is hope to protect Pudu Jail from being destroyed if the right measures are taken immediately. The Malaysian government has recently recognized the importance of heritage conservation by allocating RM 100 million for historical heritage preservation in its 9th Malaysia Economic Plan (2005). A new Malaysian Heritage Act is to be established in the near future involving a National Heritage Register and a National Heritage Fund\(^2\).
Pudu Jail Conservation Statement

However, the only statutory protection at present is through the Antiquity Act 1976. An application to list Pudu Jail under protection must be submitted as soon as possible. A study on how Pudu Jail could benefit from the new Heritage Act and National Heritage Fund could possibly save the building.

Involvement of the stakeholder in the consultation process would be beneficial in ensuring that the management would take account of Pudu Jail’s historical significance into their proposed development scheme.

This conservation statement only identifies and explains the key heritage values possessed by Pudu Jail using easily accessible information. A Conservation Plan and a Management Plan are to be commissioned, using inputs from workshops with consultants, heritage bodies and the public.
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Appendix A - Extraction of the Antiquities Act 1976 (Government of Malaysia)

Ancient Monument and Historical Sites

The Act provides for the control and preservation of, and research into ancient and historical monuments.

An "ancient monument" is defined as any monument which is or is reasonably believed to be at least one hundred years old or which is declared as one. Such monument may be a house, temple, church, building, cave, grave or a standing stone which has historical, religious or cultural significance.

A "historical site" means a site declared as such by a Minister who is responsible for the museums.

The Director-General of Museums may publish in the Gazette a schedule of ancient monuments and historical sites together with limits thereof. With regard to ancient monuments and historical sites, permission in writing from the Director-general is required for the following actions:

- digging, excavation, building works, tree planting, quarrying, irrigation, burning of lime or deposition of earth or refuse on or in the immediate.
- demolition, disturbance, obstruction, modification, marking, pulling down or removal of any such monuments or part thereof.
- alterations, additions or repairs.
- erect buildings or walls abutting upon an ancient monument.

Care of Private Properties

The Director-general may take the following actions with regard to the ancient monuments and historical sites under private ownership:

- make contributions towards the cost of carrying out any works of repair or conservation.
- purchase or lease the site by private treaty or compulsory acquisition.
- remove the whole or part of an ancient monument with payment of compensation (fixed by agreement or submitted to the Minister for decision in case of disputes).

Penalties for Demolishing and Damaging

Any person who demolishes or damages any ancient monument without permission commits an offence and is liable to imprisonment not exceeding three months or to a fine not exceeding RM 500 (Malaysian Ringgit) or both.
Appendix B - Extraction of the Johore Enactment No 7. of 1988

Purpose and Interpretations

An Enactment to establish a body corporate by the name of Yayasan Warisan Negeri (YWN) for the preservation of the cultural and historical heritage of the Johore state; and to provide for matters connected therewith.

An "ancient monument" means any monument in the State which is or is reasonably believed to be at least one hundred years old or which is declared by the State Authority to be one.

A "monument" includes any building, structure, erection or other work whether above or below the surface of the land, any memorial, place of interment and any part of a monument that is considered to be worthy of preservation historically, traditionally, archaeologically or architecturally.

A "historical site" means a site which has been declared by the State Authority to be preserved.

A "curator" is the Chief Executive Officer appointed by the YWN to be responsible for carrying out any decisions and directions made by the body and exercising general control over its officers and servants.

Establishment and Functions of the YWN

As an establishment body corporate, the YWN may involve in suing and be sued in its name, in entering into contracts; and in acquiring, purchasing, taking, holding movable or immovable property incidental or appertaining to the body. members of the YWN include a Chairman who is the Chief Minister of State, Deputy Chairman, Treasurer, Secretary and a representative from the National Museum and national Art Gallery.

The YWN has the authority to do research and inspection on monuments, advise and control on any alterations, repairs and renovations of any kind to ensure the better preservation. In addition, it can receive donations, grants from any source and contribute the grant or loan towards any repair and maintenance of monuments or articles of historic values.

The functions of the YWN shall be:

- to stimulate public interest and support in the preservation and dissemination of knowledge of the cultural and historical heritage of the State.
- to preserve monuments and articles of historic, traditional, archaeological or architectural interest.
- to protect the amenities relating to the monuments.
- to take appropriate measures to preserve all records, documents and data relating to those monuments and articles.
- to provide for libraries as reference and research work.
- to manage and administer the fund.

Penalty

Any person who wilfully defaces, damages or interferes with any monument shall be guilty of an offence and shall be liable upon conviction to a maximum fine of MR 10,000 (Malaysian Ringgit) or to a term of two years imprisonment or both.
Appendix C - Extraction of the Malacca Enactment No. 6 of 1988

Purpose and Interpretations

An Enactment to make provisions for the preservation, conservation and enhancement of cultural heritage and matters incidental thereto. It may be also called as the Preservation and Conservation of Cultural Heritage Enactment 1988.

A committee, known as the Preservation and Conservation Committee, shall be established by the State Authority in order to advise on matters of policy, administration and management of cultural heritage and conservation areas. This Committee is chaired by the Chief Minister of State.

The Enactment requires clarification of common terminologies used in preservation and conservation of cultural heritage.

"Adaptation" means a process of modifying a cultural heritage or a conservation area to suit a proposed compatible use.

"Conservation" defines a process of looking after a cultural heritage or a conservation area so as to retain its significance; and this includes maintenance, preservation, restoration, reconstruction, adaptation or a combination of two or more of these.

"Cultural heritage" includes any antiquity, historical object, historical site, fabric, building, structure, work of art, manuscript, coin, vehicle, ship or tree which has a significant and special architectural, aesthetic, historical, cultural, scientific, economic interest or value.

"Maintenance" means a continuous protection and care of a cultural heritage or a conservation area as distinguished from repair which may involve restoration or construction.

"Preservation" is a process of maintaining a cultural heritage or a conservation area in its existing state or form.

"Reconstruction" means a process of returning a cultural heritage or a conservation area as nearly as possible to an earlier known state by the introduction of old or new materials.

"Restoration" means a process of returning the existing cultural heritage or a conservation area to an earlier known state by removing accretion or by reassembling the existing repairs without the introduction of new materials.

Declaration of Cultural Heritage

The State Authority may on the recommendation of the Local Authority and advise of the Committee declare any cultural heritage which is desirable to be preserved or conserved, and also may designate an area within such heritage is located as a conservation area.

Any person who owns any cultural heritage which has not been declared may apply in a prescribed form to the Local Authority within which the heritage is located for such declaration. Upon processing the application, the Local Authority, however, shall notify the owner that his heritage or area is subjected to preservation or conservation.
Any cultural heritage which has been declared to be preserved or conserved shall be inspected at all reasonable times by an officer authorized by the Local Authority.

Restriction of Planning Permission

Planning permission shall be obtained from the Local Authority prior to any demolition, alteration, reconstruction, renovation, modification and repair of any required for erecting any building or structure, destroying any trees, digging, quarrying, irrigating or disturbing the landscaping in such area.

The Local Authority may impose conditions with respect to the reconstruction of a building or any part of it with the use of original material so far as practicable. Any alteration to the interior of the building may also be specified in the permission.

Repair of Historic Building

Whenever a building is declared to be preserved or conserved and is in need of urgent repair, the Local Authority may make arrangement with the owner or occupier for the repair to be executed and also for making contribution towards the cost. This also implies to any building of which has not been declared but is located in a conservation area (so as to maintain the harmonious character or appearance of the area).

A fund known as Preservation and Conservation Fund shall be established by the State Authority to maintain, preserve, conserve, acquire any cultural heritage or conservation area. The Fund shall also be expended for carrying out activities including publication, exhibition and campaign for the protection of the cultural heritage.

Financial Incentives and Tax Relief

Any person who owns a cultural heritage or conservation area declared for preservation or conservation may apply to the State Authority for financial assistance which includes grant, aid, loan, reduction of rates and rent; also a tax relief in respect to the revenue earned.

Penalty

Any person who contravenes any provision of this Enactment shall be guilty and be liable on conviction to a maximum fine of MR 10,000 (Malaysian Ringgit) or five years imprisonment or both.