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Cc:
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Subject: 薄扶林居民對於香港大學擬在沙宣道以東綠化帶興建大型實驗室的反對
From: Anita FM SIT/LEGCO - Monday 20/09/2021 09:38

立法會FC238/20-21(01)號文件
LC Paper No. FC238/20-21(01)

From: Richard Xu

Sent: Friday, September 17, 2021 5:59 PM

To: Chan Kin-Por <kp@kpchan.com>

Subject: 薄扶林居民對於香港大學擬在沙宣道以東綠化帶興建大型實驗室的反對

尊敬的陳建波議員，您好。

我是徐志剛，薄扶林道118號豪峰的居民。現在我們附近居民面臨一個重大的影響，就是香港大學擬在沙宣道東的綠化帶上，興建新的龐大的實驗室，並已正式向規劃署提出申請，具體如下：

1. 2021年5月底，香港大學在南區區議會的會議上，首次提出該規劃，並提交了規劃方案，見附件一。
2. 南區區議會立即將該規劃方案通知了可能會受到影響的附近居民(豪峰，豪峰二期，Radcliffs, the Northcotes, 以及沙宣道、碧荔道等居民)，引起的強烈的反響和不滿。為此，香港大學在6月3日召開居民大會進行溝通。近100位附近居民出席了當天的會議，提出了很多問題包括香港大學的選址有沒有可行性研究、香港大學現有的閒置設施是否可以重新利用而不是破壞綠化帶、實驗室的安全性等等問題。香港大學出席的5位人員，完全不能夠解答，敷衍了事，說聽取意見後，再回復。
3. 2021年6月8日，我們正式書面向香港大學提交了附近居民的問題明細(附件二)，要求香港大學書面回復。遺憾的是，香港大學完全不予理睬，不做任何書面回復，對我們附近居民完全沒有尊重。
4. 2021年7月底，香港大學正式向城市規劃署提交了申請，申請將該綠化帶更改為建築用地，興建大型實驗室。規劃署收到申請後，公開向公眾徵詢意見。我們附近居民聯合起來，向規劃署正式提交了我們的反對信，以及詳細的反對理由，請見附件三。
5. 近期，環保組織，新聞媒體，電視論壇，都從環保的角度，從安全的角度，從政府財力浪費的角度等對該專案提出了很多質疑。
6. 今日立法會工務委員會會議上，委員已經贊成衛生署/香港大學提出的關於興建該實驗室所需的前期費用5600萬港幣。整個工程造价預計高達30多億港幣，嚴重浪費公帑。
7. 10月份的財委會會議，將對以上撥款正式進行審議。

尊敬的陳建波議員，您是資深立法會議員，財委會主席，是香港重量級的政治人物，話語權很重。請您和您的團隊仔細研究一下附件中的文件，理解我們附近居民的擔憂，為民請命，向政府、立法會、城市規劃署等各相關部門反映我們的心聲，理解我們的擔憂，解決我們面臨的問題。

感謝您！！

徐志剛

手提電話：

2021年9月17日



附件三Revised Objection Statement.pdf



附件一EDPC_2020_6_TC_ppt.pdf



附件二Questions from Royalton & Royalton II.pdf

Update on Progress Report - HKU Development (Southern District) 發展項目進展 - 香港大學南區發展項目

New Academic Building on an Extension Site East of No. 3 Sassoon Road 沙宣道三號擴建地段新教學大樓

18 May 2021

DEVELOPMENT PARAMETERS 發展參數

Site Area 用地面積：17,431 sq.m.

GFA 計容面積：40,000 sq.m.

NOFA 淨作業樓面面積：26,000 sq.m.

Plot Ratio 地積比率：2.29

PROPOSED USE – NEW ACADEMIC BUILDING 建議用途 - 新教學大樓

- Classroom Facilities 教學設施
- Research Laboratories 研究實驗室
(Molecular Imaging, Stem cell and Animal Facilities)
(分子成像，幹細胞和動物科研設施)
- Teaching Laboratories 教學實驗室
- Laboratories Supporting Facility 實驗室支援設施
- Offices/ Storage 辦公室/儲存空間

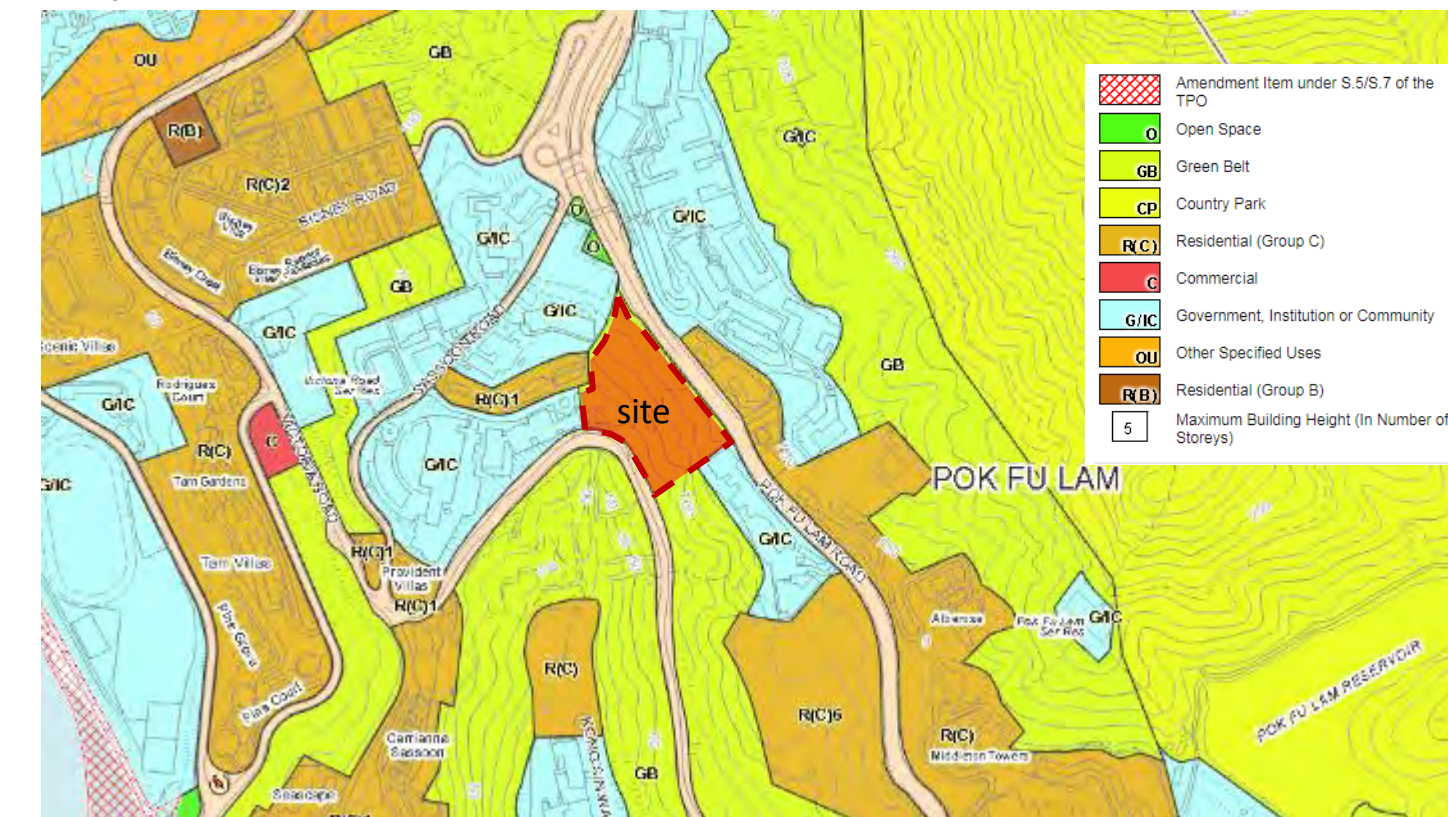


構建 城市綠洲 與 康健環境

To Create a GREEN and HEALTHY Building for students & staff of HKU and the public

建議提出修訂圖則申請更改原綠化地帶之土地用途

Propose to CHANGE the LAND USE from GREENBELT to GIC SITE



WELLNESS 康健環境

CONNECT 便捷通行

GREEN 城市綠洲





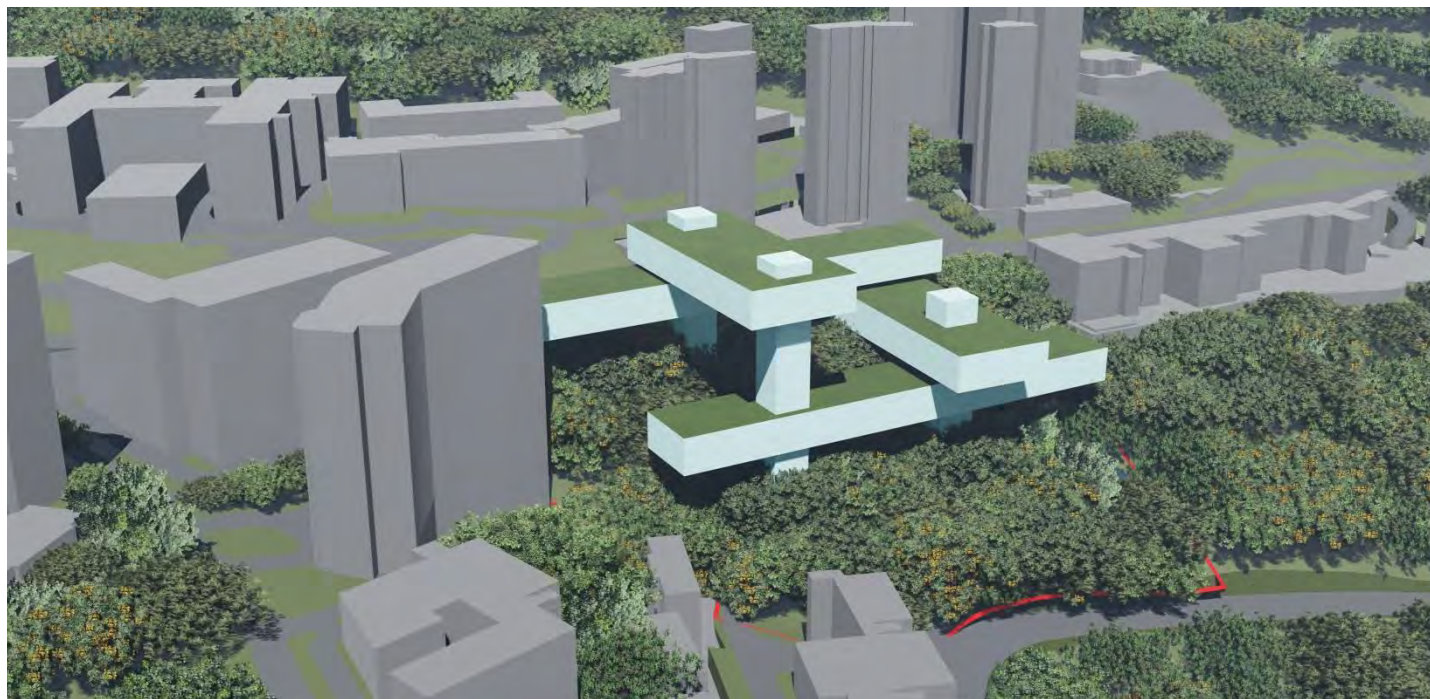
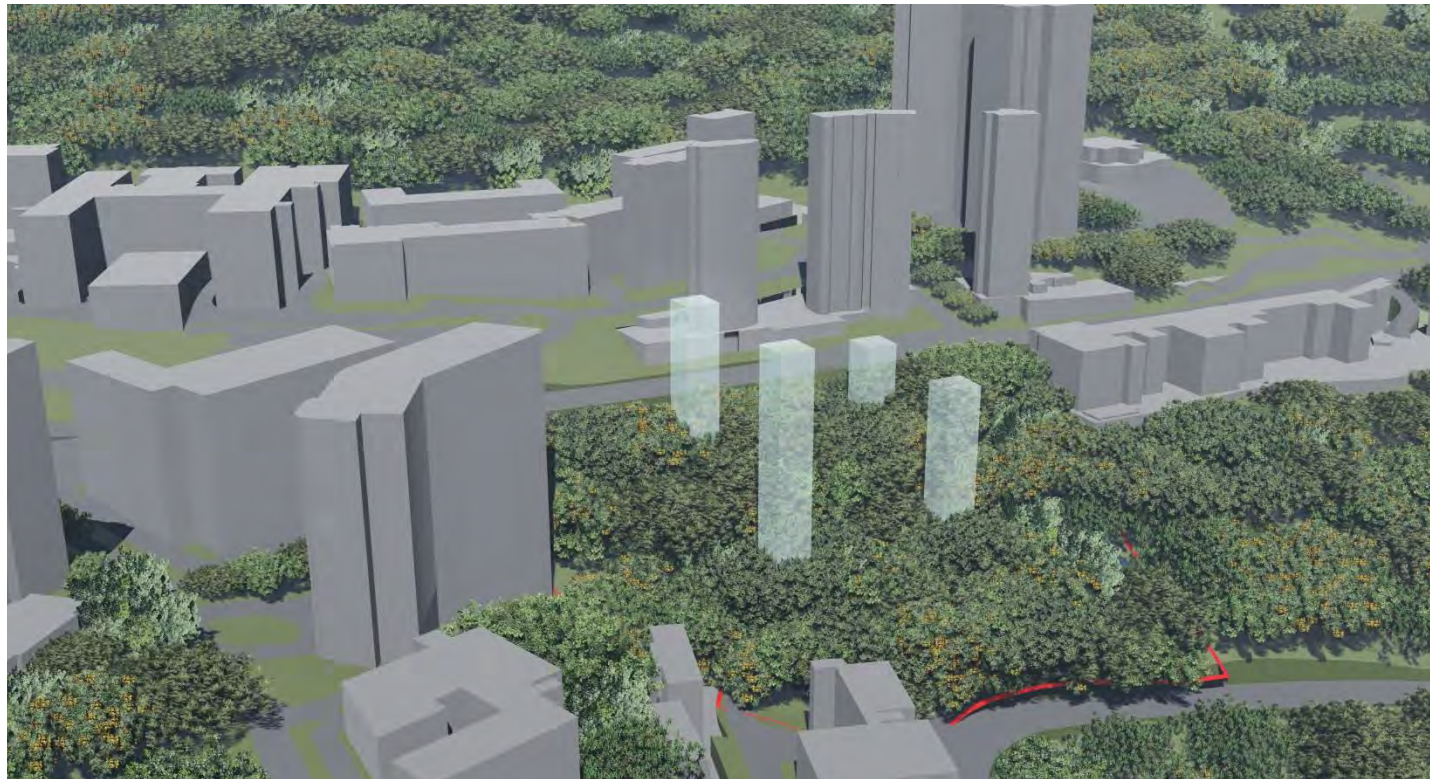
香港大學李嘉誠
醫學院蒙民偉樓
William M.W.
Mong Block

香港大學李嘉誠醫學院

Sassoon Rd

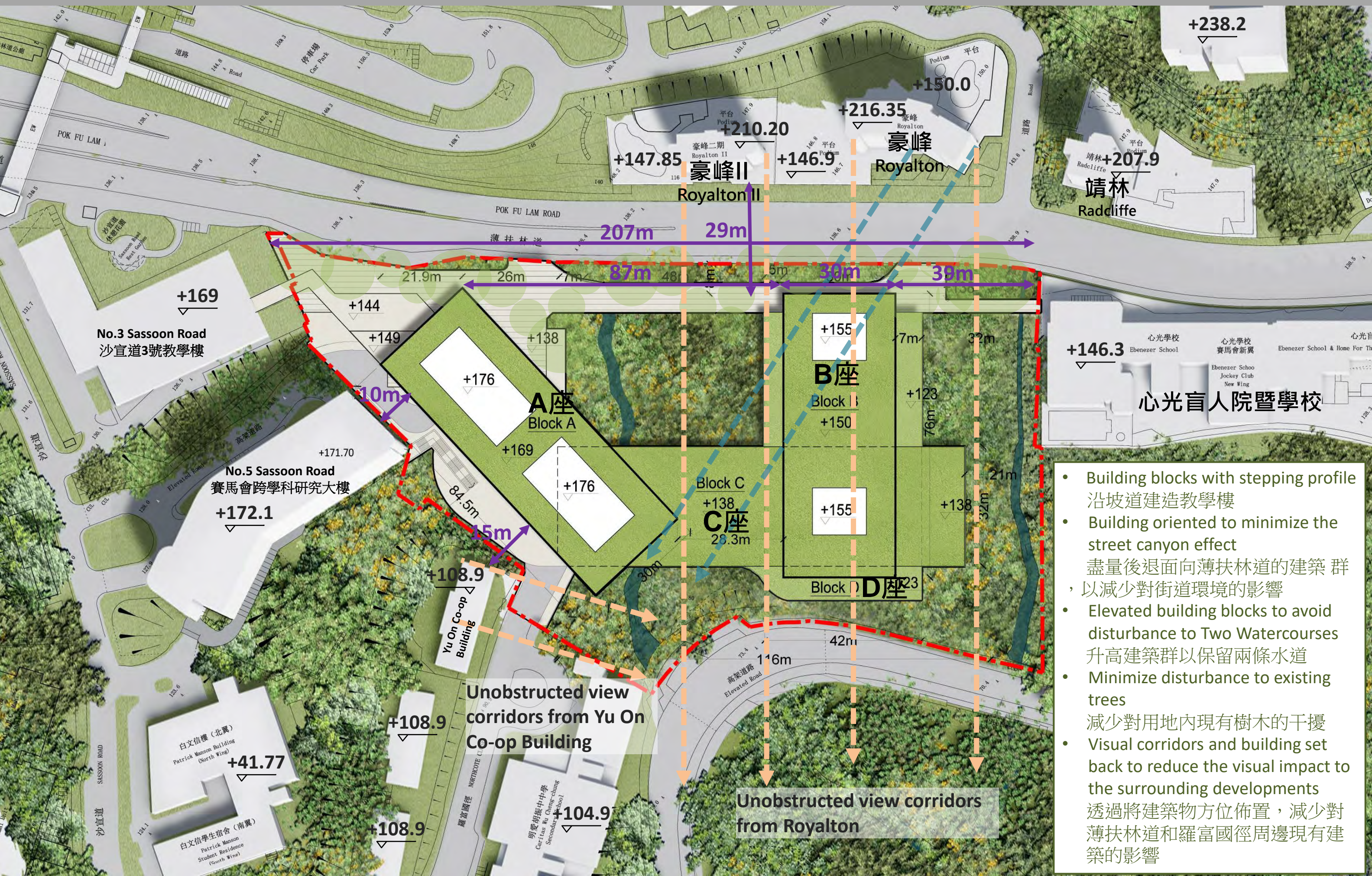


香港大學李嘉誠醫學院



- Building masses are elevated from the slope through 4 main structural cores, further minimize the disturbance of existing trees and the two existing watercourse.
建築體量透過四個核心筒從斜坡上抬起，從而進一步減少了對現有樹木和兩條現有水道的影響
- Building disposition overlapping each other and stepped down toward the south to Victoria Road reduce the visual impact to the neighboring residential towers.
建築物位置相互重疊，層層遞進向南延伸至域多利道，從而減少對周邊建築的影響

MASTER LAYOUT PLAN 總平面圖

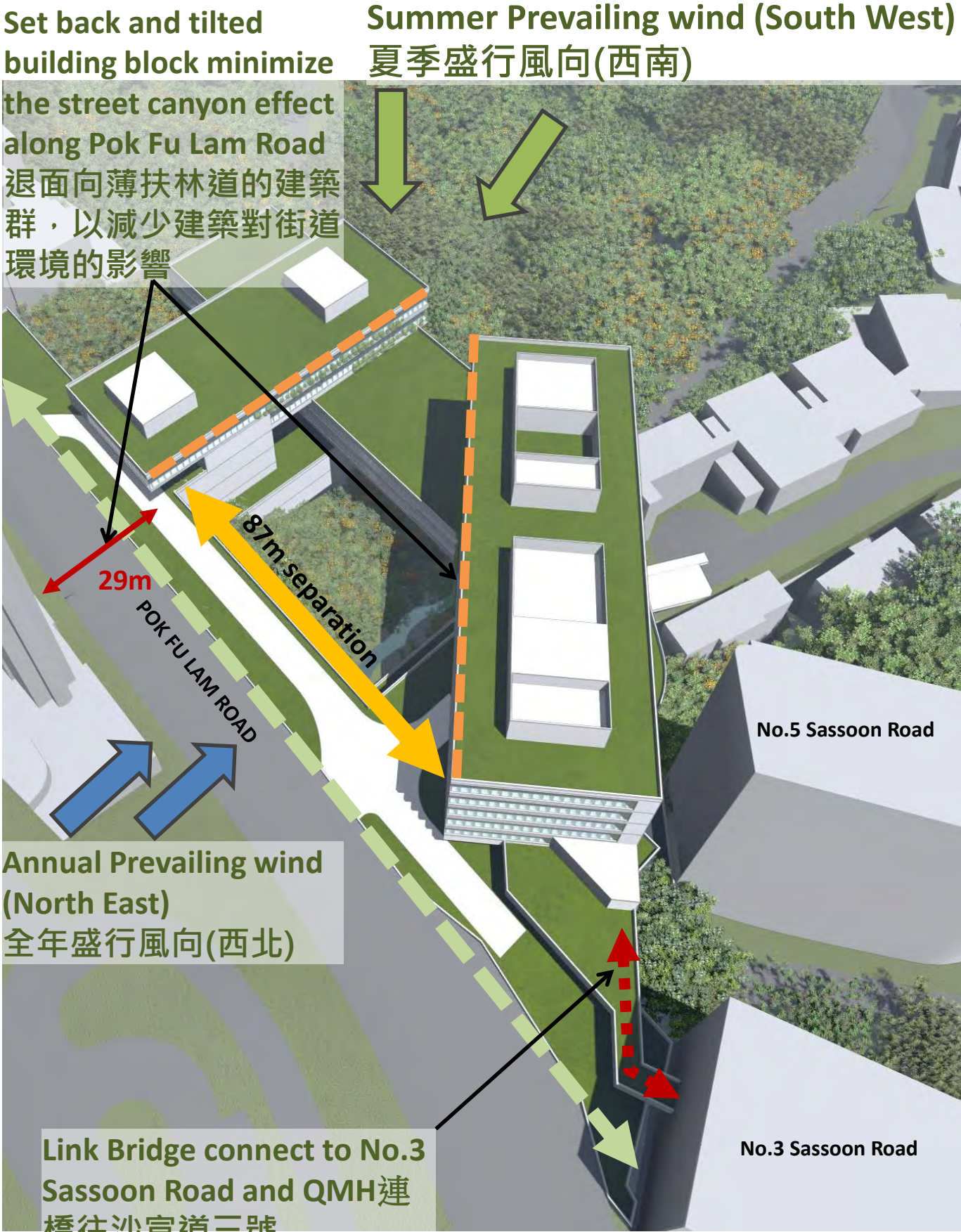


BUILDING ORIENTATION 建築概念



Vehicular service access from Northcote Close
車路入口(經羅富國徑)

Pedestrian access from Victoria Road connecting to the landscape deck and Pok Fu Lam Road 人行入口(連接域多利道、綠化平台、薄扶林道)



Set back and tilted building block minimize the street canyon effect along Pok Fu Lam Road
退面向薄扶林道的建築群，以減少建築對街道環境的影響

Summer Prevailing wind (South West)
夏季盛行風向(西南)

Annual Prevailing wind (North East)
全年盛行風向(西北)

Link Bridge connect to No.3 Sassoon Road and QMH
橋往沙宣道三號及瑪麗醫院

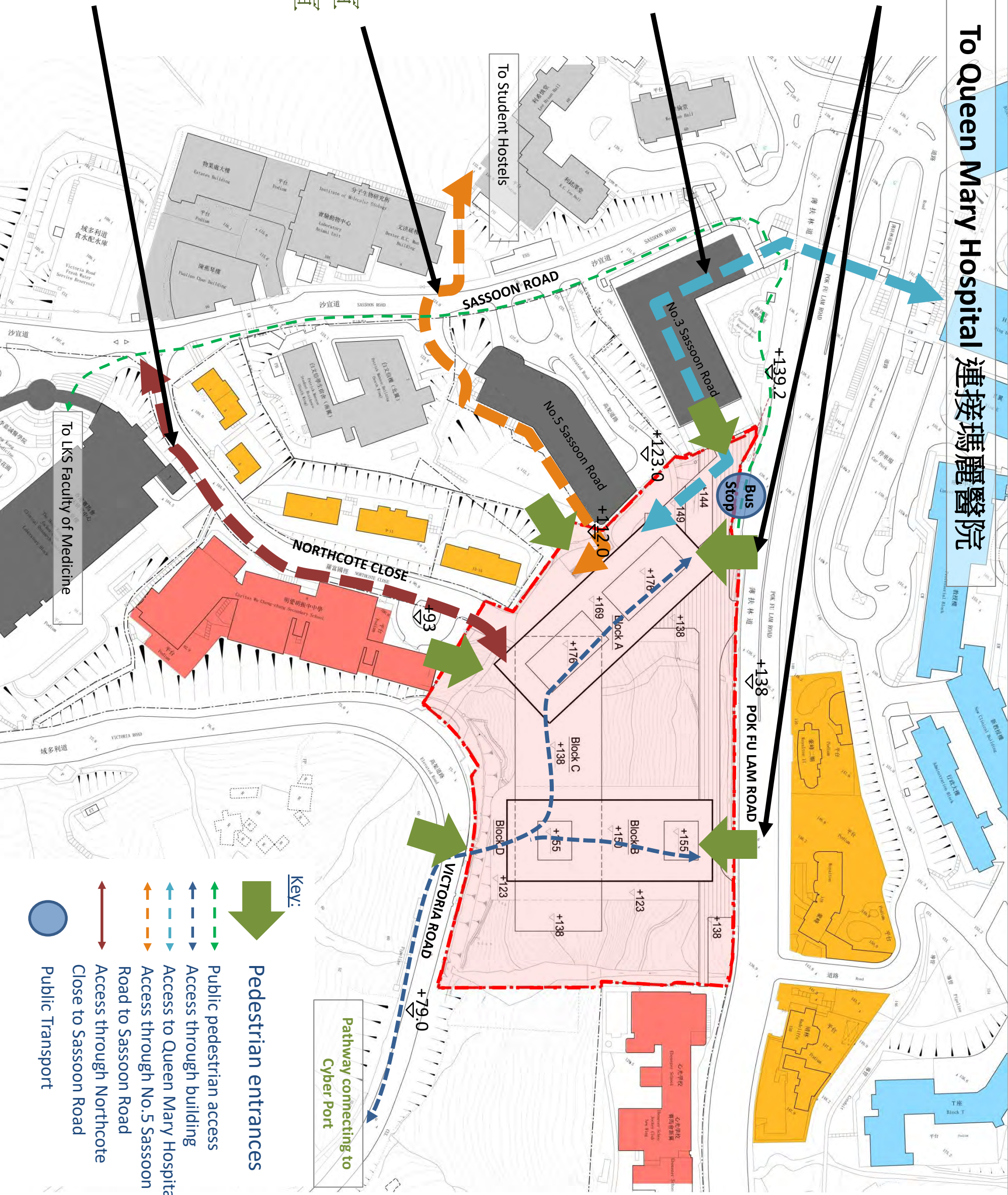
To Queen Mry Hospital 連接瑪麗醫院

Entrance from Pok Fu Lam Road 薄扶林道入口

Pedestrian linkage from QMH to the site through No.3 Sassoon Road and footbridges 經沙宣道三號及行人天橋連接瑪麗醫院

Pedestrian linkage to Sassoon Road through the external passage next to No.5 Sassoon Road 經沙宣道五號的走道連通至沙宣道

Pedestrian linkage from Sassoon Road through Northcote Close 人行走道連接沙宣道(經羅富國徑)

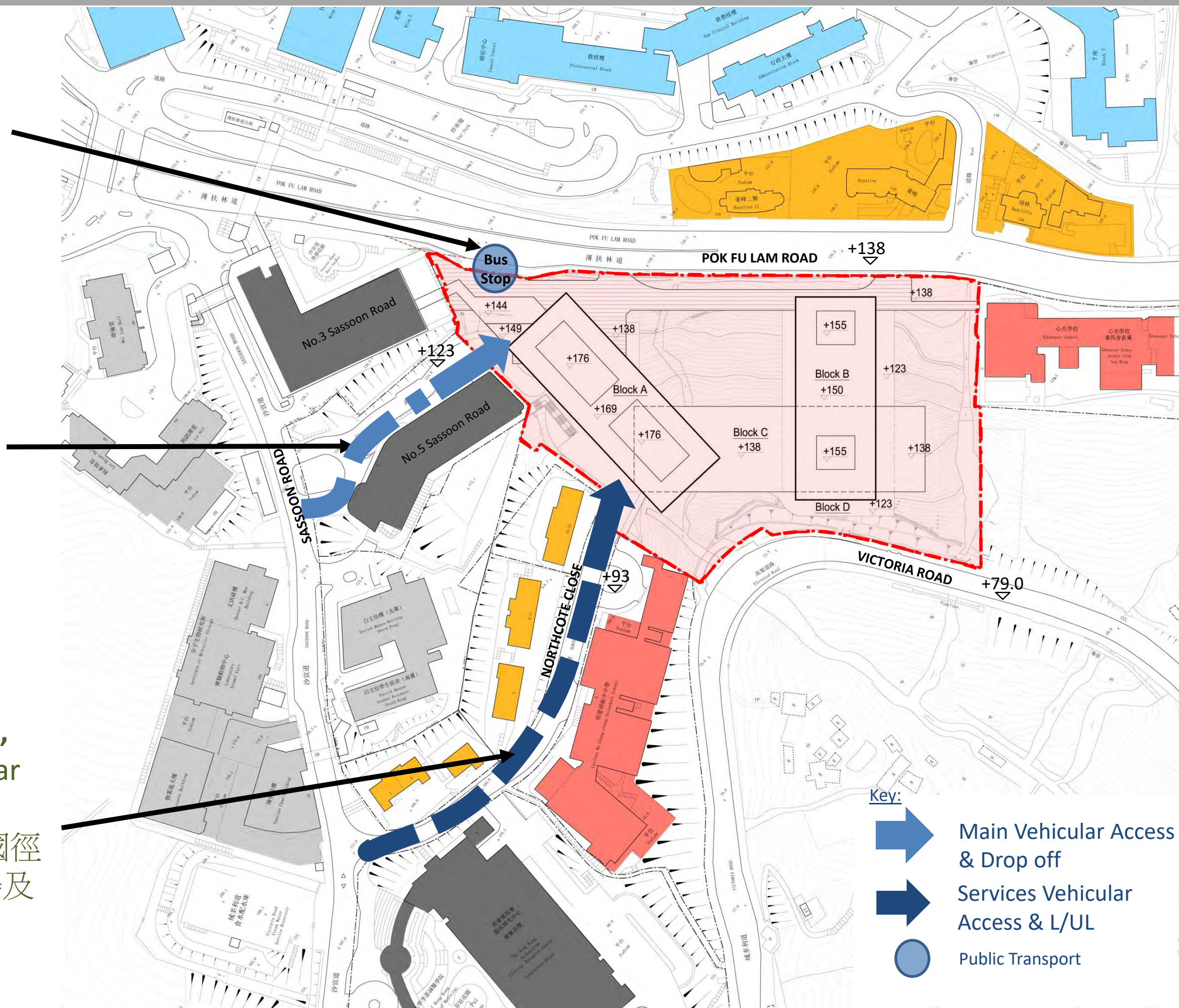


VEHICULAR ACCESS 車輛出入通道

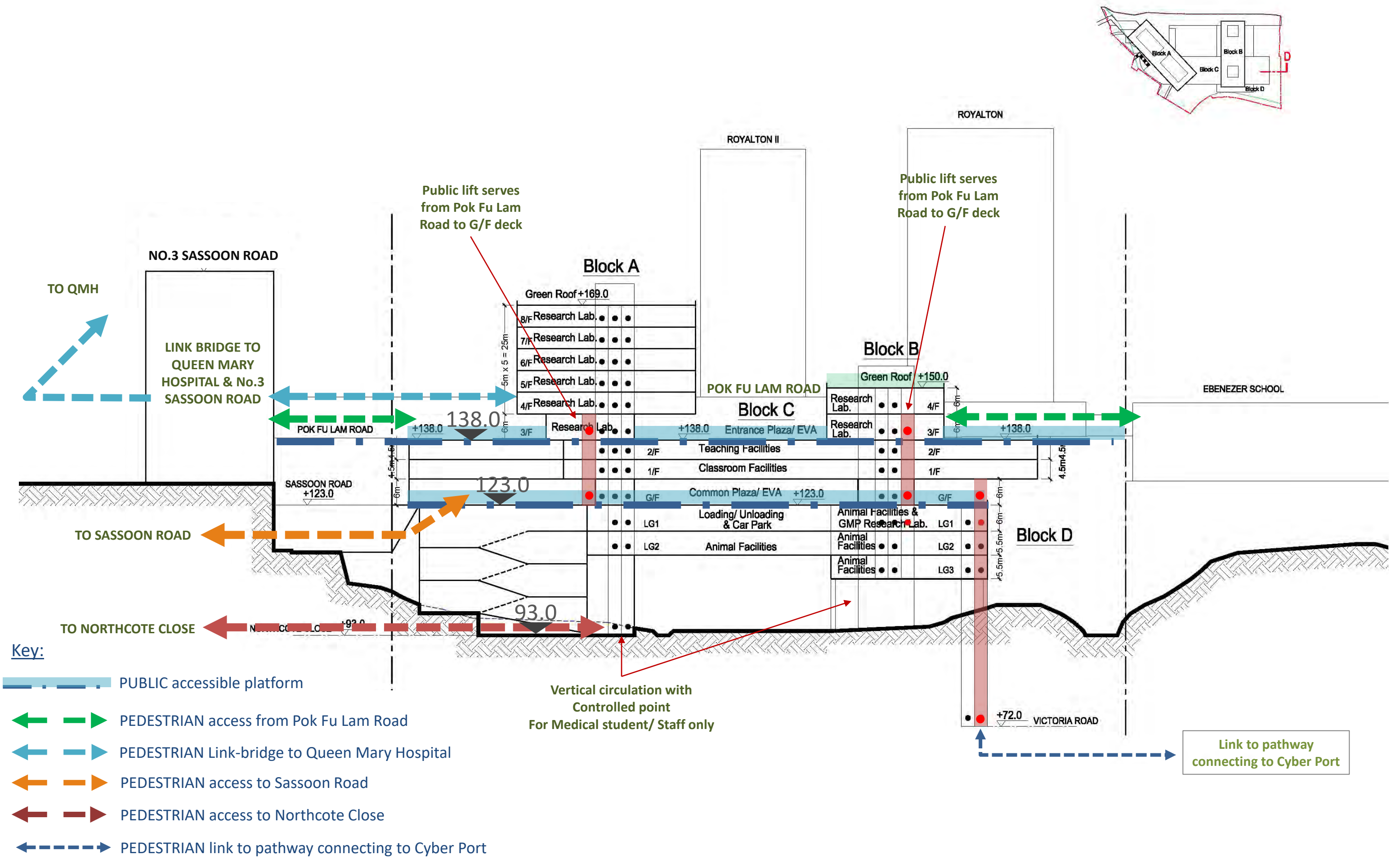
Expanded Bus layby
along Pok Fu Lam Road
巴士站沿薄扶林道

Main Drop-off of the site
accessing via No.5
Sassoon Road
經沙宣道5號上落客區

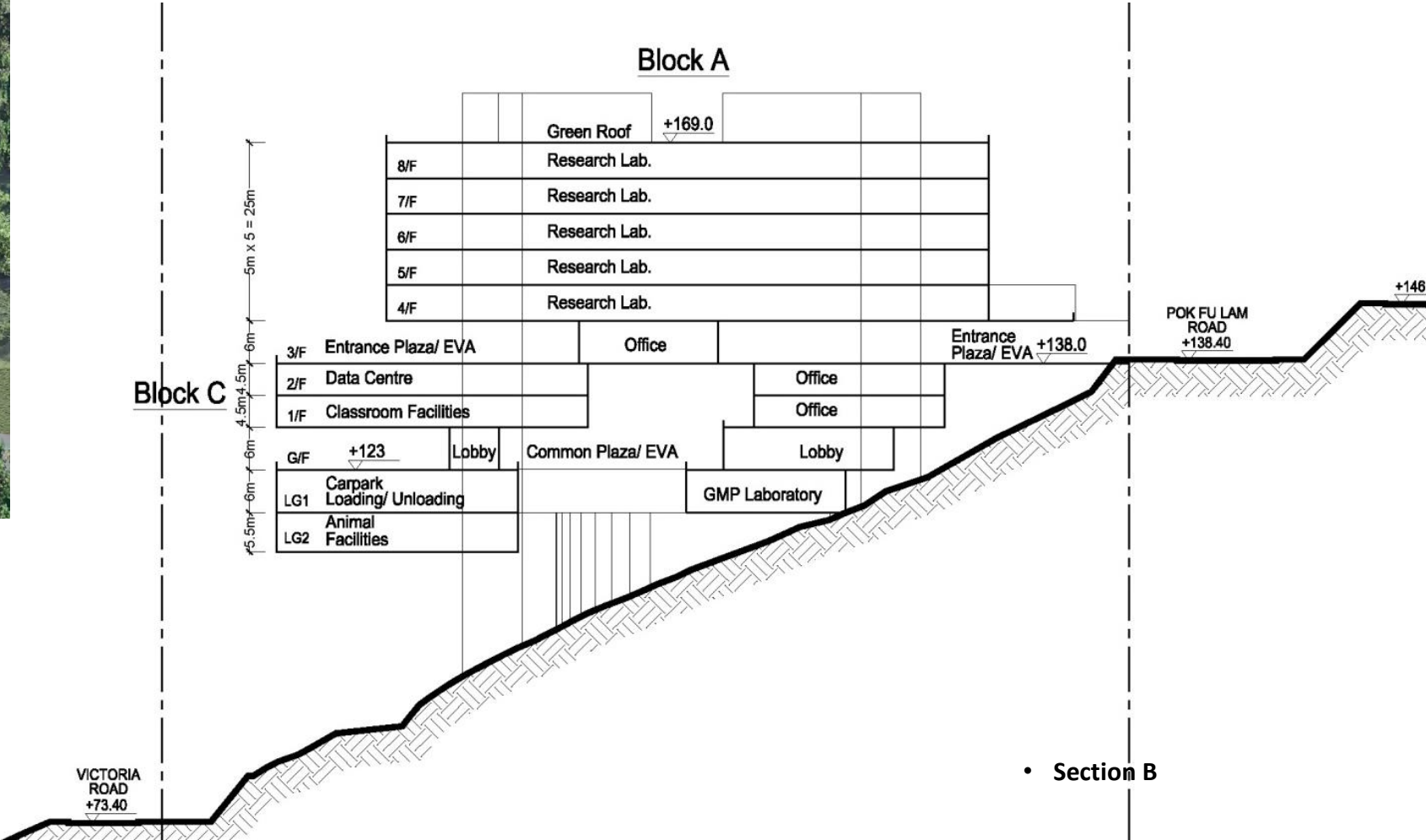
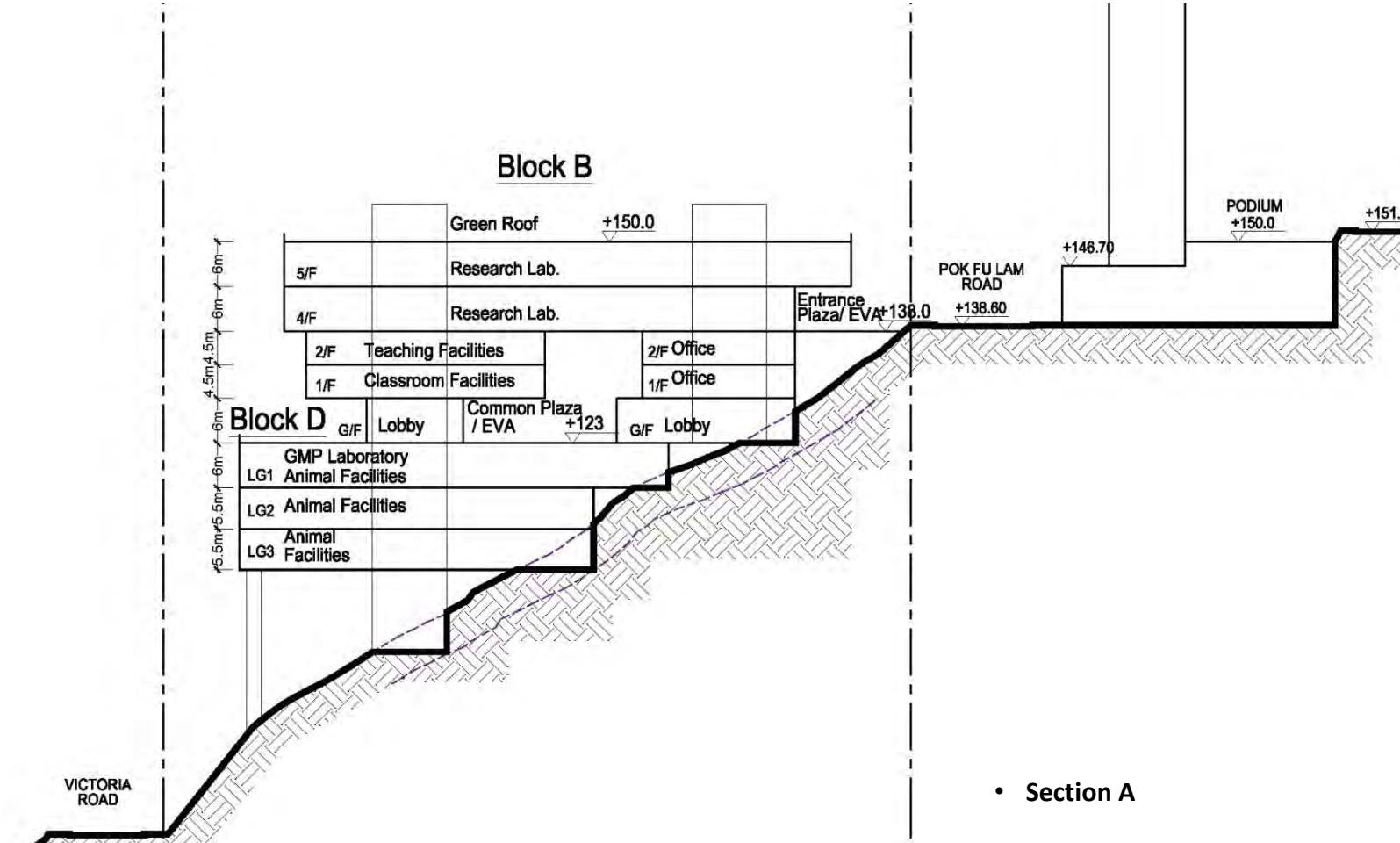
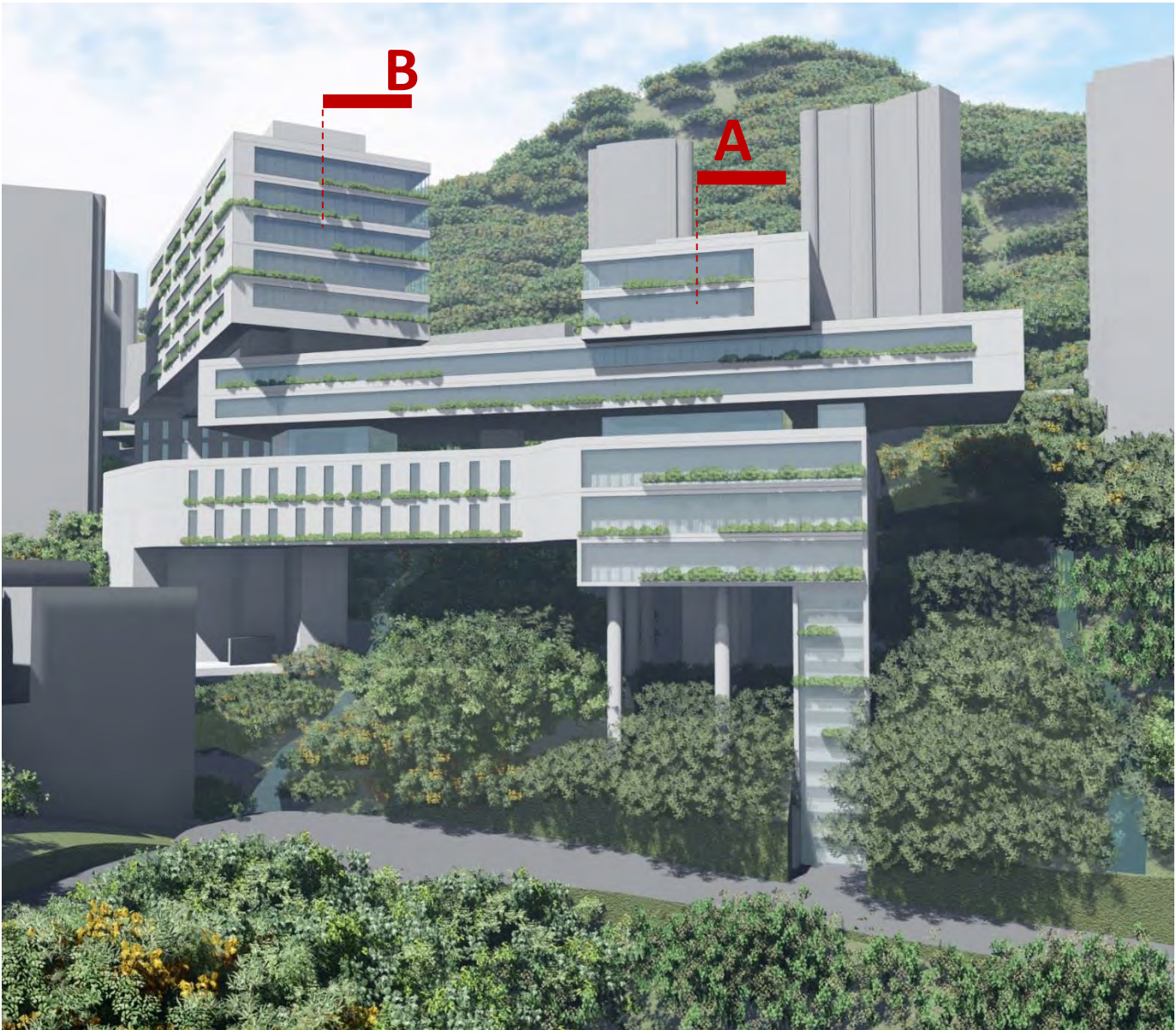
Services Vehicular Access,
Loading/Unloading and Car
Park Entrance from
Northcote Close 經羅富國徑
之車行入口 (前往停車場及
裝卸區)



SITE SECTION - PEDESTRIAN CONNECTION 行人連接網絡



SITE SECTION 用地剖面圖



VIA - VIEW POINTS 視覺影響評估 - 視點分析



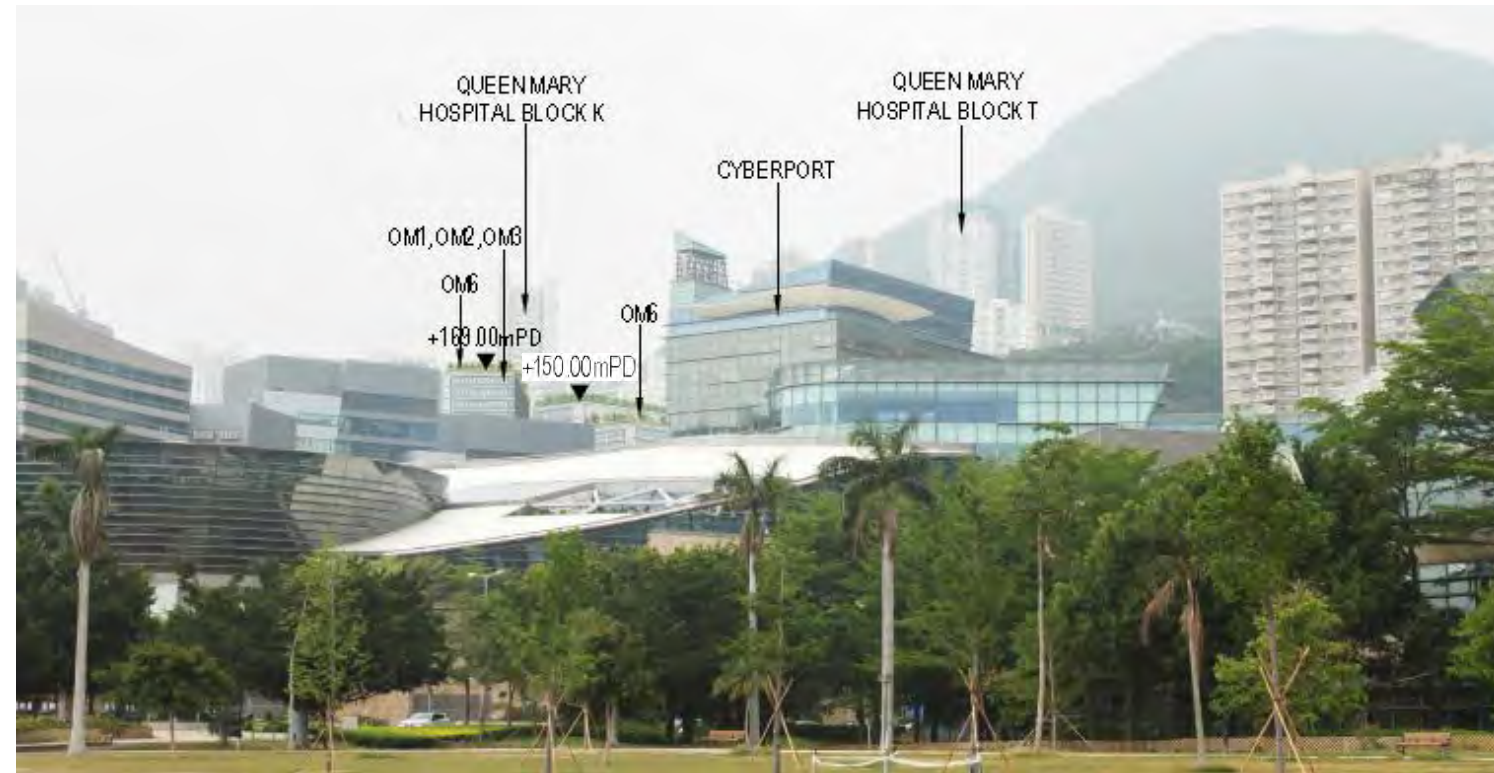
PHOTOMONTAGE VIEWPOINT VP1:
VIEW FROM QUEEN MARY HOSPITAL



PHOTOMONTAGE VIEWPOINT VP2:
VIEW FROM PEDESTRIAN PATH OF VICTORIA ROAD



PHOTOMONTAGE VIEWPOINT VP3:
VIEW FROM RESTING AREA NEXT TO BUS STOP AT VICTORIA ROAD

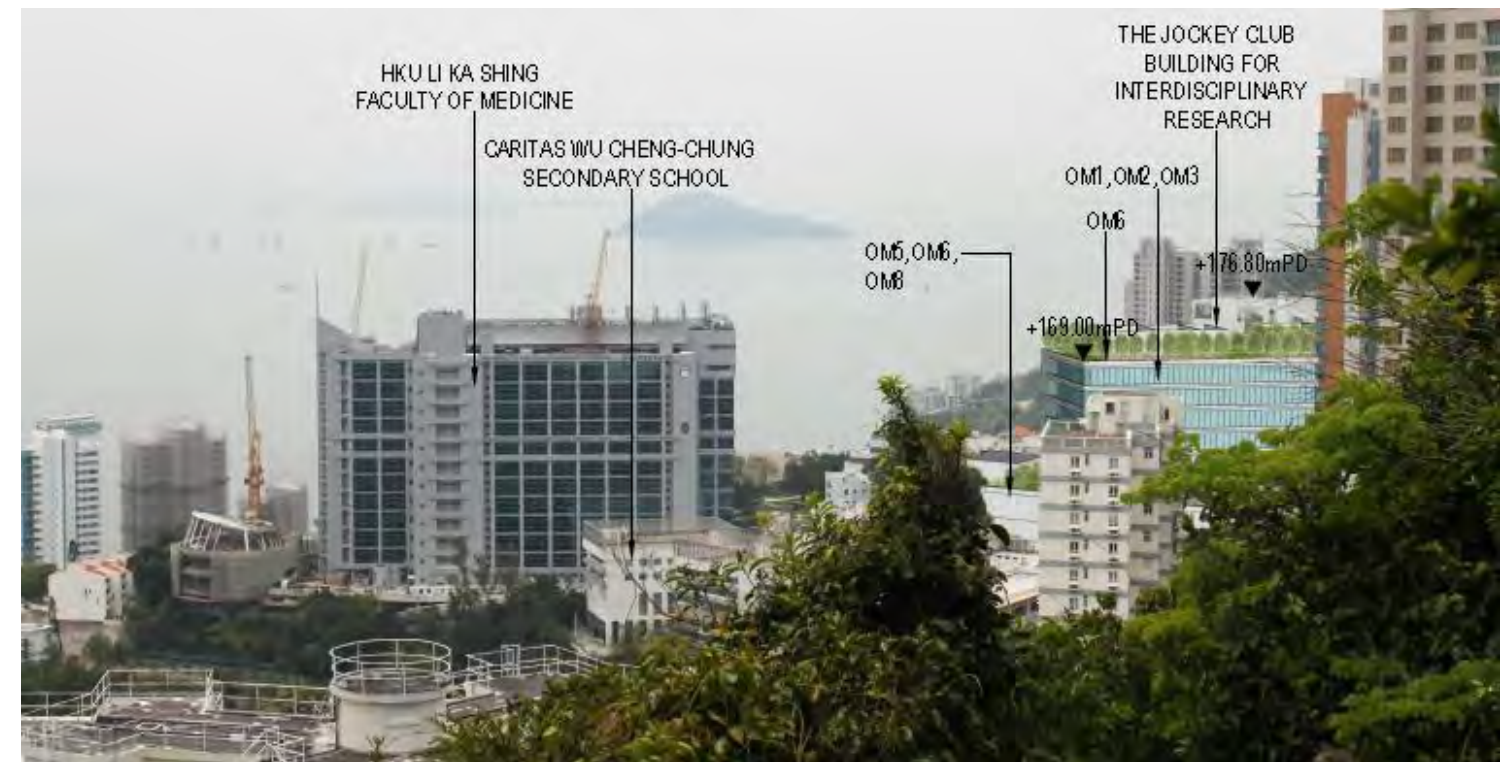


PHOTOMONTAGE VIEWPOINT VP4:
VIEW FROM CYBERPORT WATERFRONT PARK

VIA - VIEW POINTS 視覺影響評估 - 視點分析



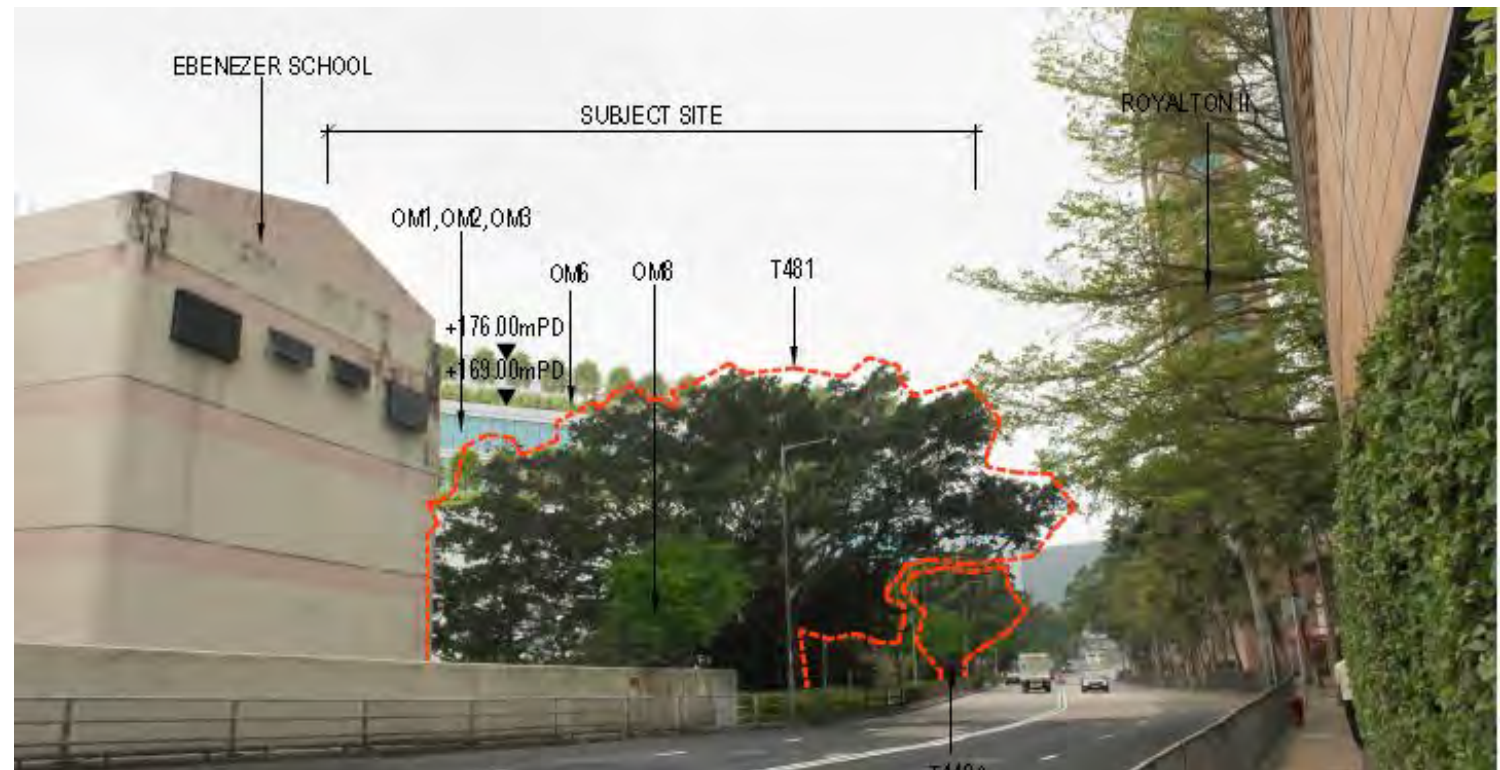
PHOTOMONTAGE VIEWPOINT VP5:
VIEW FROM THE HKU STANLEY HO SPORTS CENTER



PHOTOMONTAGE VIEWPOINT VP6:
VIEW FROM THE HONG KONG TRAIL SECTION 1

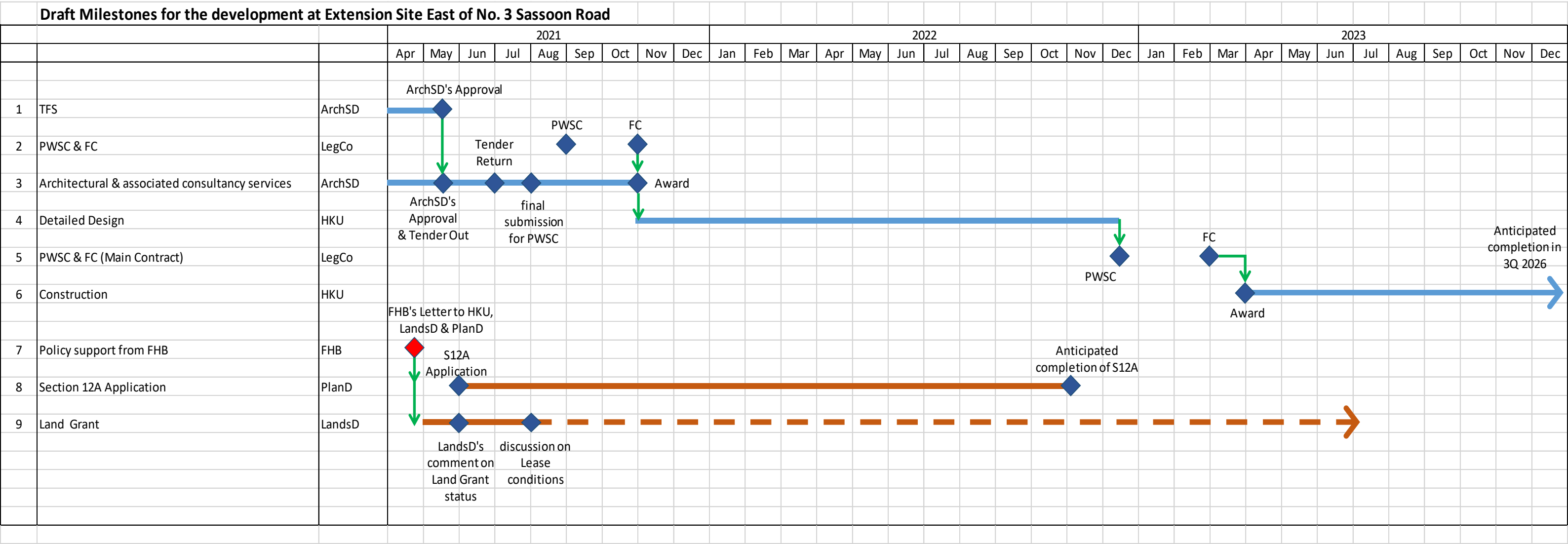


PHOTOMONTAGE VIEWPOINT VP7:
VIEW FROM THE HIGH WEST



PHOTOMONTAGE VIEWPOINT VP8:
VIEW FROM POK FU LAM ROAD

PROJECT MILESTONES 項目重大里程



THANK YOU
謝謝



Questions from Royalton & Royalton II

IMPORTANT: This document is submitted to HKU on behalf of all owners and residents of Royalton and Royalton II, who are very concerned about the proposed development by HKU at the green belt and are sincerely urging HKU to consider alternative sites with less negative impact on the environment as well as health and safety of the community living in the vicinity.

A. Space and Need

1. How much space (number of square meters) is currently owned by or available for use by HKU Medical Faculty? How many floors in Sassoon Road Campus are there already dedicated to medical studies and research respectively? Please provide the raw data to verify the utilization rate of the current HKU Medical Faculty facilities.
 - How many days per week are each of these facilities open for use by students and/or staff?
 - How many people can each existing classroom accommodate?
 - How many people can each existing research lab accommodate?
 - How many students can each existing lecture hall accommodate?
 - How many students in each existing small group discussion sessions?
2. According to HKU, the MBBS admission quota in 2021/2022 is 265 and the admission quota will increase to 295 in 2022/2023, 325 in 2024/2025, and 400 in 2028/2031 respectively. Can HKU explain how does an increase of 60 students by 2025 (around the time the proposed development will be completed) justify the proposed development which comprises of 4 blocks, 8 floors of research labs and 3 floors of animal facilities?
 - How many people can each new classroom accommodate?
 - How many people can each new research lab accommodate?
 - How many students can each new lecture hall accommodate?
 - How many students in each new small group discussion sessions?
3. Can you provide actual data on the increase in the number of medical students in the past 5 years and the increase in the number of space allocated to accommodate such increased medical students intake in the past 5 years?
4. According to the HKU website (<https://www.med.hku.hk/en/teaching-and-learning/undergraduate-studies/programmes/mbbs>), medical students are only on the

Questions from Royalton & Royalton II

Sassoon Road campus for 2 years. Even with the projected increase in the medical students intake, how would HKU justify the large increase in academic space intended for medical students?

5. In the briefing session, you mentioned that a reason for the close location of the new development was overcrowding of the laboratories in Block T of Queen Mary Hospital and that these were used by Year 3 and 4 students. This does not appear to be part of the curriculum as Year 3 appears to be a year when students are not having formal teaching and Year 4 appears to be a clinical year. Can you also share with us the monthly booking plan for the Block T teaching laboratories in Years 1 – 4 so a clearer understanding of how utilized they are can be provided?
6. When the medical students intake was increased in the past 5 years what was the documented increase in teaching staff and how much extra space was given to these students and staff?
7. In the publication titled "The University of Hong Kong Medical Faculty News Vol.22 Issue 2" published in November 2017 ([MFN--Volume-22-Issue-2--Bold-Stroke-Towards-a-Renewed-Sassoon-Road-Campus.ashx \(hku.hk\)](#)), the HKU Medical Faculty outlined its expansion plan. It was proclaimed that the "*vision is to transform Sassoon Road into one big contiguous state-of-the-science medical campus stretching all the way from Queen Mary Hospital on Pokfulam Road at the top to the Victoria Road roundabout at the bottom*".

Such grand expansion plan (see details below) has addressed the needs for new teaching and research space, a renovated LAU, new GMP laboratory at Grantham Hospital etc. Why is HKU Medical Faculty proposing further expansion in such a short time span, particularly as some of the expansion projects are still ongoing or near completion? Can the Faculty explain the justification for proposing another expansion so soon after a major expansion of academic facilities dedicated to medical functions at No. 3 Sassoon Road and in view of the upcoming long-term redevelopment of existing old buildings along Sassoon Road?

- The new buildings at 21 Sassoon Road opened in April 2012, and there have been other renovation and expansion projects to expand the Faculty's footprint at 21 Sassoon Road further, giving rise to a domino effect as space frees up stretching down to 21 Sassoon Road.
- The Medical Complex Extension at No. 21 Sassoon Road is the first major project of the comprehensive plan for the development of the Sassoon Road campus, including the annex at Tang Court (estimated net operational floor area of 1,967 square metres, 3-storey high new Annex Block) and extension at William M W Mong Block (estimated net operational floor area of 497 square metres).
- The Faculty has been undergoing a \$810.9 million project which will create a whole new building at 3 Sassoon Road, a 9-storey building which will provide more than 10,000 square meters of operational floor area that will be used for lecture theatres,

Questions from Royalton & Royalton II

seminars, classrooms, a learning common for students, clinical skills training centres, research laboratories, a Chinese medicine outpatient clinic, as well as offices for staff, administrators and research postgraduate students. This new building should be more than sufficient to accommodate more students (note that the Chinese Medicine Course only takes in 25 -30 students each year) and increased research needs.

- The Laboratory Animal Unit is undergoing a \$90 million revamp to increase its space by 35 percent and upgrade its equipment and infrastructure. The expansion involves taking over the entire Dexter HC Man Building, providing an additional 920 square metres of space and fulfilling the requirements for the next AAALAC accreditation. comprises of a whole new building to be completed in 2020.
 - There are also plans to redevelop the 50-year-old Patrick Manson Building and the Estates Building and Pauline Chan Building which will be re-developed together into one large block.
 - Apart from expansion at the Sassoon Road Campus, the Faculty has also enhanced collaborations with the partnership hospitals such as Queen Mary Hospital, Grantham Hospital, where more clinical research and investigations work can be conducted at the hospital facilities.
8. In the modern technology era and as proven in times of the pandemic, e-learnings and e-platforms have become integral to the curriculum. Can you explain how will the increased usage of e-learnings and e-platforms affect the utilization of existing and proposed teaching facilities? Even small group discussions can be conducted via teleconference and other interactive technological platforms.

B. Alternative Sites

9. Besides the teaching and research facilities at Sassoon Road, do medical students/researchers currently utilize other HKU facilities for medical teaching and research as well as the renovated Grantham Hospital?
10. What comprehensive studies have been conducted by HKU in respect of all possible sites? We asked this question at the briefing session and you were not able to answer.
11. Has HKU considered utilizing other research facilities currently available? For example, recently it was announced that HKU has established a Centre for Emerging Infections (<https://www.med.hku.hk/en/careers/inno-hub/c2i>). Rather than waste monetary and human resources and destroying the green belt, has HKU considered this site at Science Park as a location for the animal and research laboratories, and to what extent will the new development here overlap with the aims and purpose at c2i? Given this facility at Science Park is nowhere near residential facilities, do you accept that this would be a better site for animal research?

Questions from Royalton & Royalton II

12. Instead of destroying the green belt at the proposed site, has HKU considered alternative sites which have less adverse impact on the environment, ecosystem, and local population living nearby? For example:
- (i) There is a larger site beneath Victoria Road (adjacent to ISF school and opposite the Li Ka Shing Faculty of Medicine building) which has been rezoned from green belt to residential use and would have lesser environmental impact, tunnel effect and be more visually appealing assuming the height of the new buildings are no higher than Victoria Road. A larger site will also be more aligned with the long-term vision of the Faculty.
 - (ii) There are various low storey buildings along Sassoon Road which could be redeveloped to higher buildings to accommodate the projected needs. This is particularly relevant as the proposed Queen Mary MTR station will be located at Sassoon Road and there is already plan to redevelop some of old buildings along Sassoon Road. Rather than waste monetary and human resources and destroying the green belt, has HKU considered redeveloping these old buildings along Sassoon Road to accommodate the projected needs?
 - (iii) The land below and west of Sassoon's Road sitting out area is currently vacant and the slope there is much less steep. That area is also well connected with the other buildings along Sassoon Road.
 - (iv) The area adjacent to the Queen Mary extension construction site along Pok Fu Lam Road (eastbound) is currently vacant and this alternative location can include all the way up to and including the gas station site. This site is bigger than the green belt concerned and can be more easily rezoned to become teaching and research facilities for HKU with less environmental impact and no tunnel effect. The location is also more convenient and even closer to Queen Mary Hospital. Furthermore, the health and safety risk posed to the community living in the vicinity is much lower as there is no residential building nearby (opposite this site is the cemetery and the monastery). The relocation of the existing gas station should not be a concern as the government is promoting the green initiative towards increased usage of electric vehicles.
13. In the briefing session, you mentioned that the proposed site was selected primarily because of its proximity to Queen Mary Hospital and linkage with the other academic buildings along the Sassoon Road campus, and that this site was actually proposed by and agreed with the Food and Health Bureau of the HKSAR Government. In this respect, can you explain which aspects of the site on the floor plan justify the closeness to Queen Mary Hospital as HKU does not directly treat patients; staff of HKU Faculty of Medicine are given honorary appointments and the research facilities do not involve direct contact with patients. Which areas need patients and why it could not be done on other parts of Sassoon Road or research facilities within Queen Mary Hospital? For example, why does a LAU need to be so close to Queen Mary Hospital?

Questions from Royalton & Royalton II

14. In comparison, the main campus for the Faculty of Medicine of the Chinese University of Hong Kong is located far away from residential buildings and the Prince of Wales Hospital is the CUHK faculty's teaching facility and base of research. If CUHK can achieve the teaching and research excellence without having its main campus at walking distance with its affiliated teaching hospital, can HKU explain why proximity to the Queen Mary Hospital is such a critical factor in selecting suitable sites for expansion?

C. Environmental Impact

15. Has an environmental impact assessment been conducted? If yes, please share a copy of the report with us.
16. Has a tree assessment been conducted? If yes, please share a copy of the report with us.
17. In your current design, the elevated building blocks are said to avoid disturbance to the two watercourses and minimize disturbance to existing trees, do you accept that it is highly probable that all plant life beneath the elevated structure will die from lack of light? As such, do you accept that the design would be better by building down rather than up? As presented in the briefing session, you envisioned creating a green oasis at the proposed site whereas the reality is that the area will become a concrete jungle.
18. Concrete reinforcement is likely needed when structure is being constructed at the slope, meaning there will be no greenery under the proposed new buildings. How can HKU explain that plant life will still survive despite construction of the proposed new buildings?
19. In your current design, do you accept that if the proposed structure did not extend in height above Pok Fu Lam Road i.e. without the extra research blocks, that this would decrease the environmental impact, tunnel effect and be more visually appealing?
20. In your current design, the building orientation, visual corridors and building set are said to minimize the street canyon effect and to reduce the visual impact to the surrounding developments. Do you accept that the visual corridors are misleading as one just need to turn his/her head slightly from the center for the unobstructed visual corridors to disappear? Block A is particularly concerning given its height and the fact that it blocks the only airway between the existing building at No. 5 Sassoon Road and the Li Ka Shing Faculty of Medicine building, resulting in sunlight and air circulation being blocked and pollutants being trapped between the buildings. Furthermore, this blockage is without any mention of the rooftop infrastructure of HVAC which was not displayed in the presentation shared beforehand.
21. In the briefing session, you mentioned that Blocks B and C are designed to be at the level of the podium of Royalton and Royalton II but you were evasive when being asked about the height of Block A. Do you accept that if Block A were also at the level of the podium of Royalton and Royalton II, this would decrease the environmental impact, tunnel effect and be more visually appealing?

Questions from Royalton & Royalton II

22. HKU has taken the lead into studying the adverse effects of light pollution on health and environment. The residents of Northcote Close have been told the increased light pollution is because research laboratories operate out of hours and as you can see, lights are on continuously. If the proposed blocks are built above ground level on Pok Fu Lam Road, rather than building down towards Victoria Road, do you accept that this increased research laboratory space will worsen the adverse effects of light pollution on the environment and the residential areas?
23. In the briefing session, you mentioned that light screening can be adopted to address to light pollution problem. However, it is clear that the light pollution problem has persisted despite concerns raised in the preceding paragraph. How does HKU propose to address the light pollution problem when even more research facilities are built around the neighbourhood?
24. In the schematic which has been presented to District Council, why did you choose to omit any mention of the layout of the roof of the research buildings which will involve lift shafts, HVAC etc. If you look at the roof of the Research Block of the Medical Faculty, you can see the structures on this roof top. Will the proposed building have these structures, and if so to what extent will they impact the rooftop height, noise, heat generation, visual impact etc.? You also indicate that in summer the winds blow towards residential areas, so can you explain why that will not adversely affect the residential and school areas?
25. According to the HKU website (<https://www.estates.hku.hk/eo-general/sustainability/sustainability-management/capital-works-building-works>), HKU is committed to environmentally friendly buildings: "*Capital works and building works such as Alterations, Additions, Repairs and Improvements (AA&I) projects funded by the government through the University Grants Committee (UGC) are required to follow the government guidelines on green and sustainability requirements.*" In view of the fact that the rooftops will most likely be used for HVAC and the vegetation under the structure will die from lack of light, can you indicate how the structure will meet government guidelines for sustainability and decrease the impact on the environment?
26. Will the proposed animal facilities be built to international standards which require intensive facilities for housing, temperature control, and are you planning to conduct an environmental impact and safety plan for this facility?
27. As you may recall, prior to the construction of the Phase 1 extension of Queen Mary Hospital there was a period of about 4 years where extensive slope management work was performed on the mountain behind. Since the residents of Royalton and Radcliffe will be above this structure, can HKU provide the government lands and geotechnical assessment assurance that building this structure with the consequent loss of vegetation will not lead to an increased risk of landslide to Pok Fu Lam Road or our buildings, or an increased risk of flooding to the ISF below Victoria Road?
28. The horror and the upheaval in the aftermath of the Pokfulam landslip which killed two people in the Baguio Villa several years ago show the serious safety risk posed to the community if the slope is further weakened. The safety risk is aggravated by the fact that

Questions from Royalton & Royalton II

the proposed development is intended for not only teaching but research as well, including potentially research for infectious diseases and other high risk researches, giving rise to the risk of toxic substances being released and spread across the community in the event of a landslide. Can HKU provide assurance that such disasters will not happen?

D. Health & Safety Risk

29. What exactly are the kinds of research and testing contemplated under this proposal? Why is it not detailed in the submission form?
30. If the proposed facility is going to be used for infectious diseases researches, what types of infectious diseases will be under the scope of these researches? Has HKU taken into consideration that residents living in the vicinity will be exposed to health and safety risk in the event of improper waste disposal or accident? The health and safety risk is even more disastrous for the patients at Queen Mary Hospital whose immunity is compromised. Would you accept that such health and safety risk would be disastrous to the community?
31. Although there are already existing research facilities along Sassoon Road, they are at a good distance away from residential buildings and main road (i.e. Pok Fu Lam Road). In contrast, the proposed new building is only 29 meters from the residential buildings on the other side of Pok Fu Lam Road. Regardless of the precautionary measures in place, the risk of mishandling, accident and leakage is unavoidable, and this pose a serious risk to the health and safety to the local community, particularly when residential buildings, schools and hospital are nearby. How does HKU plan to address such health and safety risk? In the event of occurrence of such disasters, how would HKU take responsibilities for the damage caused to residents living in the vicinity?
32. In your submission, there are several floors used as animal facilities. What types of animals testing will be conducted? What types of animals will be housed in the building? Will these research facilities be used for any type of genetic modification testing?
33. Has there been any discussion in the Faculty about using the proposed animal laboratory for research using highly pathogenic agents, and if so, why is it not documented in the submission form? If the proposed facility is going to be used for highly pathogenic agents in a BSL-3 setting, has HKU assessed how will this affect the infrastructure of the submitted proposal?
34. There are a wide variety of toxic gases found within a medical laboratory. Many have no taste, colour or smell, which makes it difficult to tell if a gas leak is present. Has HKU considered the serious risk that a gas leak will pose and the potentially fatal incident or hazard which may result from a gas leak?
35. Has HKU assessed the adverse effects of light, air, and noise pollutions on the health of residents living in the vicinity?
36. According to a recent HKU bulletin titled [How Green Is Seen - The University of Hong Kong Bulletin \(hku.hk\)](#), urban green landscape is critical for promoting public health and

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well-being. Dr. Bin Jiang, Associate Professor in Landscape Architecture, opines that *"This study provides concrete evidence that urban green landscapes are not just pleasant 'visual candy' but can efficiently improve public health and well-being, and therefore... the government and society should regard urban green landscapes as critical and low-cost 'preventive medicine'."*

E. Traffic

37. Has a traffic impact assessment been conducted? Traffic along Pok Fu Lam Road is already very congested during rush hours. Traffic along Sassoon Road is also an issue given it is narrow, steep and winded. It is well recognized that the north-bound bus stop is far from adequate and it is not uncommon for 6 or more buses to be lined up along Pok Fu Lam Road and long queue of passengers waiting at the bus stop from 5pm-6:30pm. It is disappointing that in the current submission there is still no provision for additional lay by to allow at least 3 large buses to enter without holding up other north-bound traffic, and from the diagram it appears that only 1 large bus can be catered. This problem will not be alleviated by the proposed Queen Mary Hospital MTR station as a large number of QMH staff, students and patients utilize the cross harbour buses (970, 970x, 973) which go via the west harbor tunnel and directly to central Kowloon without going via Central. It is to be noted that the Pokfulam Moratorium restricts further development in the area unless and until the traffic infrastructure has been improved.
38. In the briefing session, you agreed that MTR forms a big part of the long-term redevelopment plan of the medical faculty campus at Sassoon Road. Has HKU taken into account the MTR extension plan and redevelopment of existing buildings at Sassoon Road in addressing its need for new academic facilities? A lot of the proposed development is dependent on a MTR station at Queen Mary Hospital. Would you accept that it is sensible not to progress with the proposed development until there is a concrete plan for the MTR extension plan and funding for the MTR extension has been approved by LegCo? For instance if an MTR facility is built near Sassoon Road why could not this be combined with your proposed educational/research structure? Many MTR developments have structures atop the station.
39. In the briefing session, you mentioned that the main pedestrian entrance is located at Pok Fu Lam Road and the pedestrian path will be widened towards the slope to accommodate the increased pedestrian flow. Can you provide further details of your plan to widen the pedestrian path and any impact assessment conducted? Also, has any survey of pedestrian flow been conducted to compare the pedestrian flow at Pok Fu Lam Road and Victoria Road to assess if it makes more sense to build down rather than up?
40. For a long time there has been a problem with large vehicle access to Northcote Close because of the narrow and winding entrance. This is of concern because in the submission Northcote Close is stated as being the main vehicular access to this new development. According to EU Regulations, an animal laboratory and research unit must have easy and rapid access to emergency services including fire services, especially a laboratory researching infectious agents. The existing laboratories on Sassoon Road can meet these requirements, but given the remote location of the proposed animal research

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and vivarium unit, has the submission been approved by the Fire Services Department? It should also be noted that already the residents of Royalton and Radcliffe are inconvenienced by the regular false fire alarms at Block T requiring FSD attendance, in which because of the inadequate access causes blockage because the vehicles are unable to turn around to exit.

F. Construction

41. The proposed site is currently a green belt at a very steep slope. How do you propose to construct the new building? Has any impact assessment been made regarding the stability of the slope?
42. During the years of construction period, there is likely a need for single lane working on Victoria Road and the loss of one lane on Pok Fu Lam Road right next to the main public hospital in Hong Kong. Many hundreds of patients visit the hospital each day, many with life threatening emergencies. Pok Fu Lam Road is already congested and your proposed construction project is bound to block at least one lane for a prolonged period. It should also be noted that road traffic is currently the only available transportation option in this area, and Pok Fu Lam Road is a main road frequently used by various emergency vehicles such as ambulances to access Queen Mary Hospital. How does HKU plan to address this? The Pok Fu Lam Moratorium on development in this area was enacted exactly for this reason. Given the risk to life of the community and the public generally, why haven't the alternative locations mentioned above been selected?

G. Others

43. In your submission, it is stated that this development is for staff students and the public. Since the residents of Royalton, Radcliffe and Northcote Close are members of the public, can you list the benefits that we will get in having the existing proposed structure built on this site rather than elsewhere? We asked this question at the briefing session and you were not able to answer.
44. Can you explain why there is no schematic on how the proposed structure will look from Pok Fu Lam Road at the site of Royalton and Royalton II?
45. Besides the Food and Health Bureau, has HKU consulted with other relevant government departments such as the Education Bureau, the Environment Bureau, Transport and Housing Bureau, Development Bureau etc.?
46. According to your original timeline, it appears that HKU has already obtained approval from the Architectural Services Department and HKU has already received letter from the Food and Health Bureau. Can you provide more information about the approval and letter received from the Architectural Services Department and the Food and Health Bureau respectively? Has HKU started engaging with the Lands Department and the Planning Department already?

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47. Can you confirm your latest timeline? In the briefing session, you mentioned that given feedback provided by the community, HKU will postpone its s.12A application. When will you submit the rezoning application to the Town Planning Board?

OBJECTION STATEMENT
S.12A Rezoning Application No. Y/H10/13
Proposed Rezoning of “Green Belt” (“GB”) Site to “Government, Institution or Community”
(“G/IC”) on the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/19 (OZP)
for the New Academic Building (the Proposal) of The University of Hong Kong (HKU)
Government Land to the East of No. 3 Sassoon Road, Pok Fu Lam (the Site)

Strong Objection to the Rezoning Proposal

Since becoming aware of the Proposal by HKU, the residents in the local community in close proximity to the Site, including the residents of Royalton and Royalton II (the Residents), are very concerned about the serious and adverse impacts the Proposal will have on the surrounding environment and community, including the irreversible loss of this only remaining breathing space in this part of Pok Fu Lam, the natural vegetation and visual amenity in the subject “GB” buffer, aggravated environmental, health and safety risks posed to the community living in the vicinity, and detrimental traffic impact on Pok Fu Lam Road, Victoria Road, Northcote Close and Queen Mary Hospital (QMH). Despite the pre-submission briefing by HKU and HKU’s undertaking to consider and address the concerns raised by the community, HKU has not properly responded to or addressed any of the questions, views, and concerns expressed by the Residents to HKU. The Residents are very disappointed at the false and misleading undertakings by HKU and the incomplete information provided. The Residents are formally submitting their ***strong opposition to the Proposal at the Site***.

The Residents respectfully submit that, despite the legitimate goal of increasing healthcare education in Hong Kong, the Proposal is not a suitable or necessary means to achieve the goal of increasing medical teaching facilities at the HKU Medical Campus (HKU’s Goal), as there are less intrusive but equally effective alternative sites available for achieving HKU’s Goal, which does not impose a disproportionate burden on the surrounding environment and community. Firstly, there is ***no rational connection*** between the selection of the Site for the Proposal and the achievement of HKU’s Goal – the Proposal, which comprises irreparable destruction of a precious “GB” buffer at the Site, is ***not a suitable means*** of achieving HKU’s Goal. Secondly, the Proposal is ***not necessary*** in that ***there are less intrusive but equally effective alternative sites*** available for achieving HKU’s Goal. Thirdly, the Proposal will impose a ***disproportionate burden*** on the surrounding environment and community, including the numerous negative impacts mentioned above.

The Residents also bring to your attention the ***misleading descriptions*** in the Proposal, as presented by the applicant to the TPB and the community. In particular, the applicant’s description of the Proposal as teaching facility or academic building creates a false narrative – the teaching facilities only comprises 10% (4,450m²) of the entire Proposal, which is essentially a ***30,000m² laboratory complex***. The justification cited by the applicant for the Proposal is the need to increase their healthcare-relevant teaching facilities; however, only 10% of the Proposal is directly related to teaching/training facilities whilst the remaining gross floor area (GFA) of the Proposal are laboratories and research facilities involving high biosafety risks, the latter of which is clearly not justified in the circumstances.

The details of the objections and reasoning are set out below.

Major Objection Grounds:

1. Unsuitable Site and Importance of this Green Belt Buffer
 2. Irreversible Devastating Disturbance and Loss of Natural and Visual Amenity
 3. Blockage of Important Wind Penetration, Air Circulation and Sunlight
 4. Environmental, Health & Safety Failures and Risks
 5. Not a Locational Requirement for Research Laboratories and Animal Facilities at the Site
 6. Poorly Justified Development Scheme
 7. Traffic Concerns
 8. Utilisation of Existing Facilities and Premises
 9. Site Search Exercise
-

1. Unsuitable Site and Importance of this Green Belt Buffer

- 1.1 The rezoning of the subject “GB” zone for the Proposal is not a suitable means to achieve HKU’s Goal. The Residents are not disputing the legitimate need for increasing healthcare education in Hong Kong; however, the justification of the Proposal as a means to achieve HKU’s Goal is subject to challenge, particularly the site selection. The Residents respectfully submit that the site selection and the proposed development is out of proportion for the asserted needs for increased teaching facilities, and will cause the permanent destruction of this natural woodland which is the only remaining breathing green space in this Pok Fu Lam area.
- 1.2 The Site falls within an area zoned “GB” on the Pok Fu Lam OZP. The planning intention of this “GB” zone is primarily for the ***conservation of the existing natural environment amid the built-up areas/at the urban fringe, to safeguard it from encroachment by urban type development***, and to provide additional outlets for passive recreational activities. There is a ***general presumption against development*** within this “GB” zone. The Site was zoned “GB” because of its value to serve as a “GB” buffer.
- 1.3 Where the Site is located, it is on a steep topography ranging from 80mPD to 130mPD and is heavily vegetated by matured trees that is serving as an important green buffer and breathing space in this built-up area of Pok Fu Lam. The difficult topography and geotechnical conditions render these areas unsuitable for development. The application has failed to justify that the Proposal at the Site is the best option in the interest of the public having regard to the likely high construction cost given the difficult topography of the Site and the disproportionate negative impacts on the surrounding environment and the local community in the vicinity, considering there are alternative sites available for achieving HKU’s Goal.
- 1.4 The proposed new buildings at the Site are totally defeating the purpose of the “GB” zone, which is intended to conserve existing landscape features and areas of scenic value. The “GB” zone is to define the outer limits of urbanised districts and to serve

as a buffer between and within urban areas. Without this “GB” buffer, the ***breathing space would disappear***, lowering the living environment to a degraded standard. With the pandemic in place, all countries are striving for a healthier place to live in. The applicant, as one of the leading institutions in Hong Kong, should take the lead in their campus development and planning with an aim of contributing to Hong Kong being a healthier city.

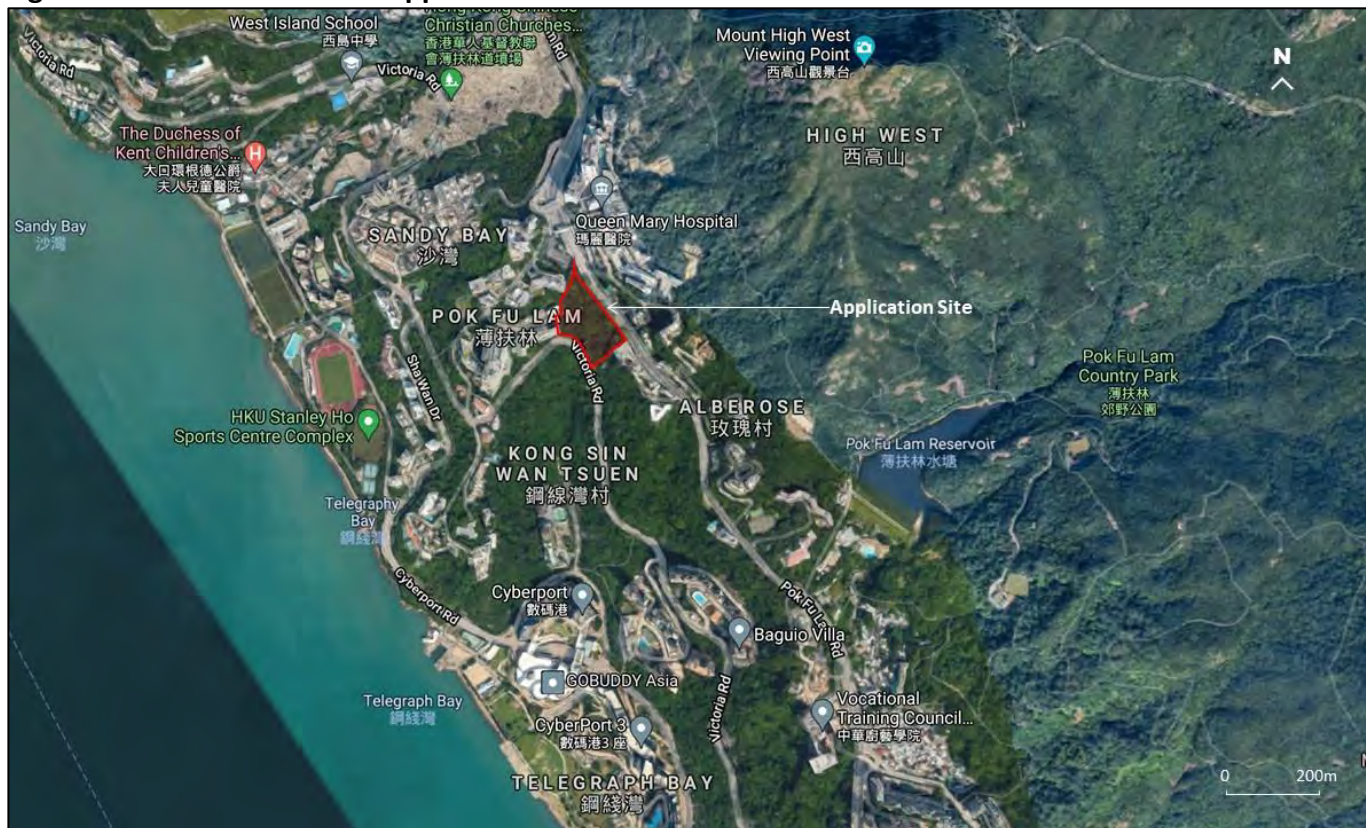
- 1.5 Reference is made to the extract of the OZP showing the location of the Site in **Figure 1** and the aerial photograph in **Figure 2** below. This “GB” buffer where the Site is located is the only remaining opening that was originally intended to serve as a breathing space with the natural assets in Pok Fu Lam. The government must have considered the “GB” zoning very carefully and the OZP has made it clear the “GB” zone is important to the whole area and the government must minimise the reduction of the “GB” zoning.

Figure 1 Location and Zonal Context of the Application Site (extract from the OZP)



(Source: Base map from the Planning Portal of the Town Planning Board website)

Figure 2 Aerial View of the Application Site at this Green Buffer



(Source: Base plan from Google Map)

- 1.6 This “GB” zone amidst Pok Fu Lam Road and Victoria Road is an important ***natural vegetation buffer*** and ***breathing space***, both environmentally and visually. The local community as well as the public in the area are taking this piece of natural terrain as a breathing space. Simply adopting the slightly adjusted building orientation or building separation at a slight angle, as proposed by the applicant, cannot offset the Proposal’s negative impacts on the surrounding environment and the local community.

- 1.7 While the current “GB” buffer is serving its function in this natural setting and the current vegetation is neither deserted nor unused land but is incubating various flora and fauna, the new laboratory building at the Site is taken for granted as an easy expansion of the existing campus. It is important for the applicant to demonstrate that it has thoroughly searched for other possible and appropriate new localities for their future expansion of academic activities before concluding the Site as the only option and ignoring the fact that other educational developments, including No. 3 Sassoon Road and potentially Patrick Manson Building will be available or proposed for development to cater to the increased number of health care students. In this respect, the Residents have asked the applicant repeatedly for information about the studies the applicant had conducted on all possible sites and alternatives (assuming such comprehensive studies have been conducted by the applicant), but the

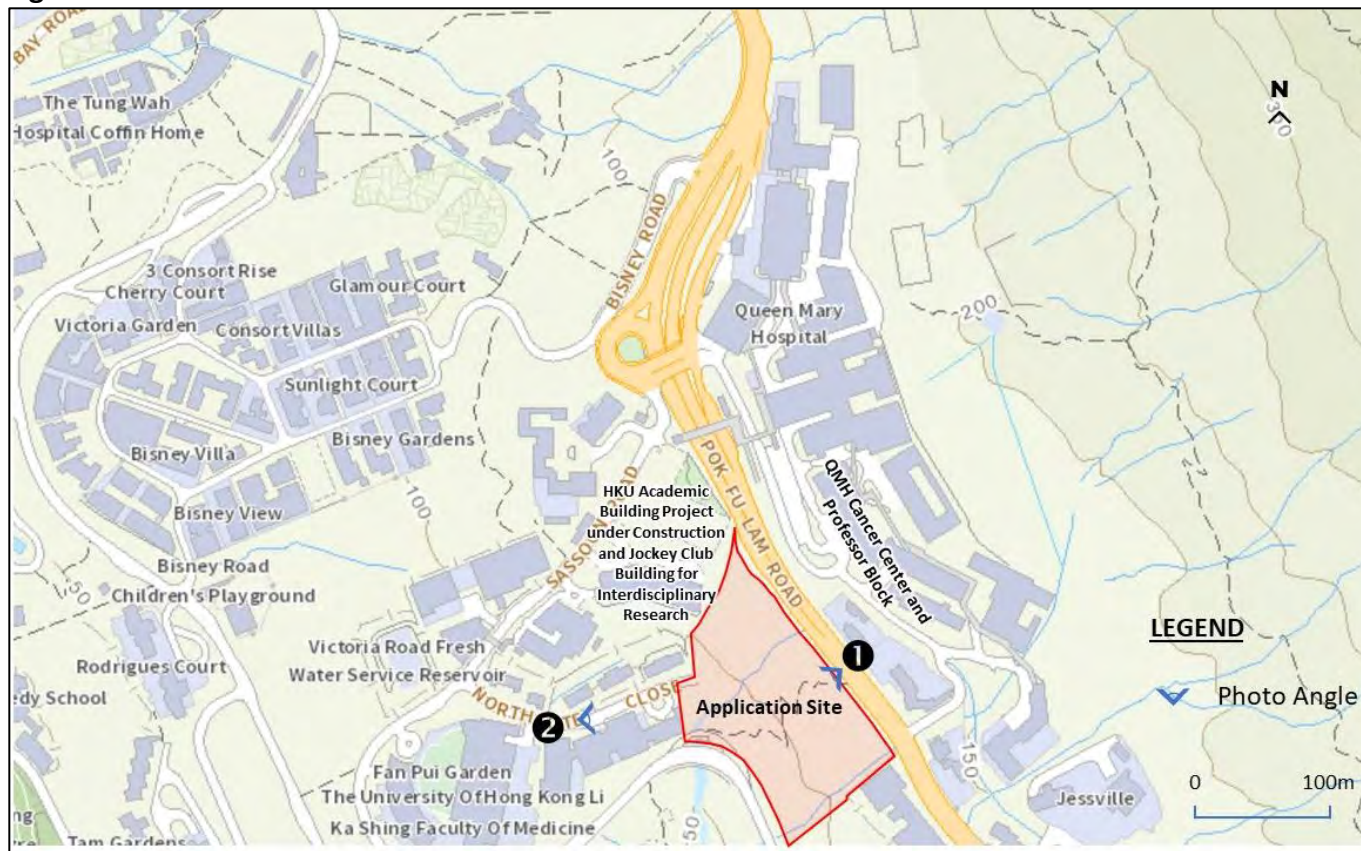
applicant has been evasive to the Residents and has yet to provide a meaningful response.

- 1.8 If the applicant had conducted comprehensive studies in respect of all possible sites, it would be impossible for the applicant to come to its current conclusion that this “GB” buffer is the only feasible solution and acceptable location for the Proposal. The applicant should submit the findings of their comprehensive studies as part of its responses to the Residents’ objection. If, on the other hand, the applicant had not conducted comprehensive studies in respect of all possible sites, then it has clearly failed to discharge its obligations to the public, it must now conduct detailed search and assessment of all alternative sites for the proposed expansion of their academic facilities.

2. Irreversible Devastating Disturbance and Loss of Natural and Visual Amenity

- 2.1 The applicant has conducted a tree survey for the proposed development. There are a total of 768 numbers of existing trees within the whole development site. Some of the existing trees in this natural woodland have crown spreading to 20m. Out of the total 768 existing trees, 553 existing trees will get affected by the site formation works, construction works of the new buildings and various related access and the construction of the campus landscape area. According to the tree survey in the submission, **91%** of these affected trees (i.e. 502 numbers) will be **felled**.
- 2.2 The subject “GB” buffer is not an unused piece of “GB” site; rather, it serves its vital purpose as a natural woodland nurturing various birds, reptiles and aquatic fauna species some of which have conservation interests, and containing over 180 vegetation species. Moreover, the natural stream in the middle part of the Site serves as an important breeding ground for frogs also with species of conservation interest. Although the natural stream will be retained, the construction and building works are posing adverse impact on the natural environment of this nurturing ground. Furthermore, 0.55ha of the natural woodland will be lost permanently due to the proposed development. The ecological system interlinks with each other, thus the loss of the natural woodland would result in a loss of the natural environment for survival of the remaining flora and fauna. Regardless of whether or not the species identified in this woodland area are of extinct value, their existence together with the value of the natural woodland have contributed significantly to the luxuriant natural ecosystem for the area. Given the above, this piece of natural woodland should not be easily given up unless the applicant can discharge its burden to prove that they have very strong justification for destroying the “GB” buffer and that the current Proposal is the best option in the interest of the public (including the community in the vicinity) considering all alternative locations.

Figure 3 Location of Photo 1 Taken at Pok Fu Lam Road and Photo 2 at Northcote Close

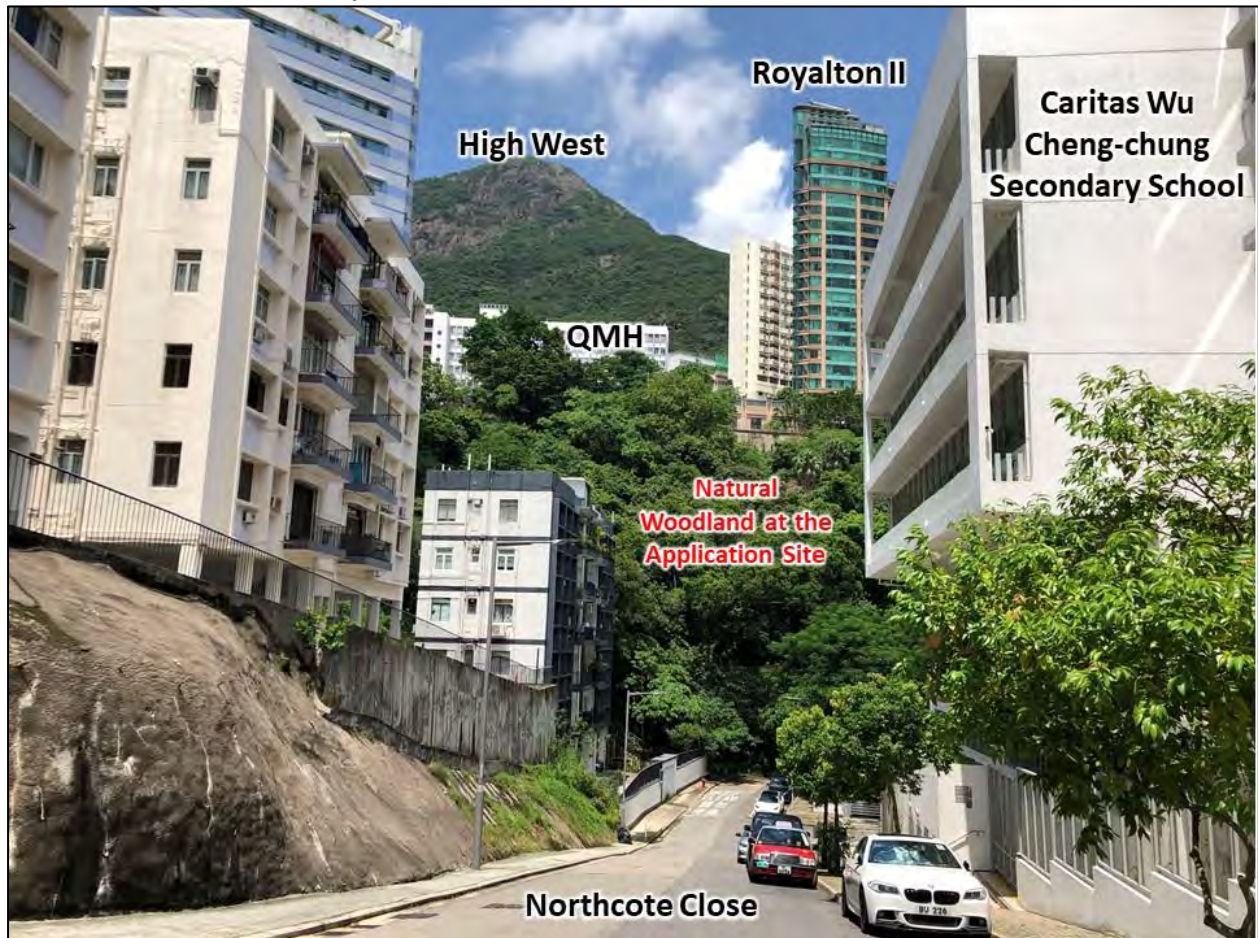


(Source: Base plan from the GeoInfo Map)

Figure 4 Photo 1 Showing the Natural Woodland at The Application Site



Figure 5 Photo 2 Showing the Natural Woodland at The Application Site (View from Northcote Close)



- 2.3 It has been clearly stated in the explanatory statement of the OZP that development within this zone is normally not permitted unless otherwise approved by the Board based on very strong planning grounds, the Residents respectfully requested the TPB to critically review the applicant's justifications for selecting this "GB" buffer for the proposed development, including in particular asking the essential question whether the applicant has truly detailed each alternative options they have tried to explore and requesting the applicant to produce details of the comprehensive studies that the applicant has conducted in respect of alternative sites.

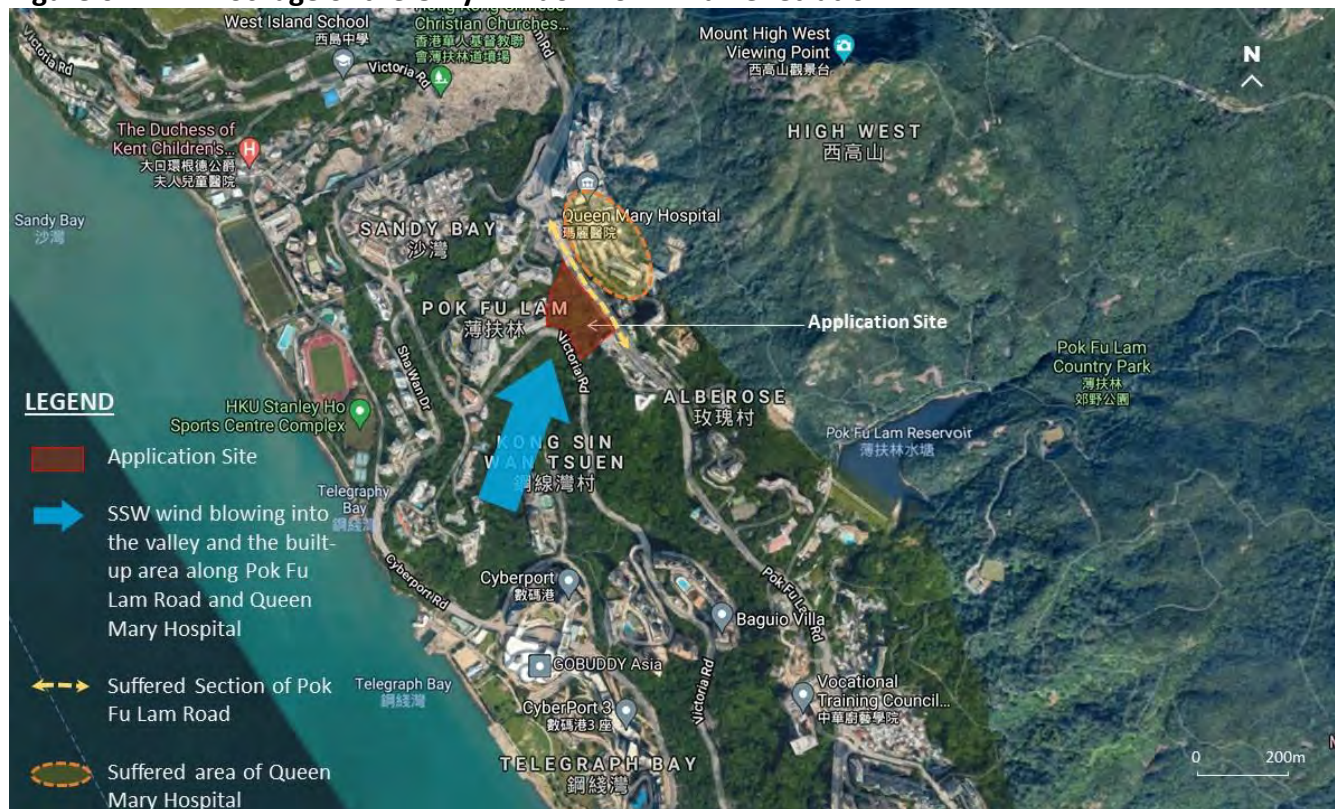
3. Blockage of Important Wind Penetration, Air Circulation and Sunlight

- 3.1 The Site is located in an opening between HKU's new academic building at No. 3 Sassoon Road that is under construction and the Ebenezer School (**Figure 1** on p.3 above refers). Filling up this breathing space would block the only remaining opening from the seaward side from the southwest (SW) and southwest-southerly (SSW) to the built-up cluster in the northeast (NE), diminishing the air ventilation into the built-up cluster, along Pok Fu Lam Road, and the surrounding environment including

QMH. It should be noted that the applicant has failed to provide any schematic design on what the elevated structures will look like when viewed from Pok Fu Lam Road, or provide any information on how the elevated structures on Pok Fu Lam Road will extend the tunnel effect that exists right now between Ebenezer School and Radcliffe, where there is already restricted air movement. The erection of the proposed blocks of new buildings on Pok Fu Lam Road are aggravating the tunnel effect.

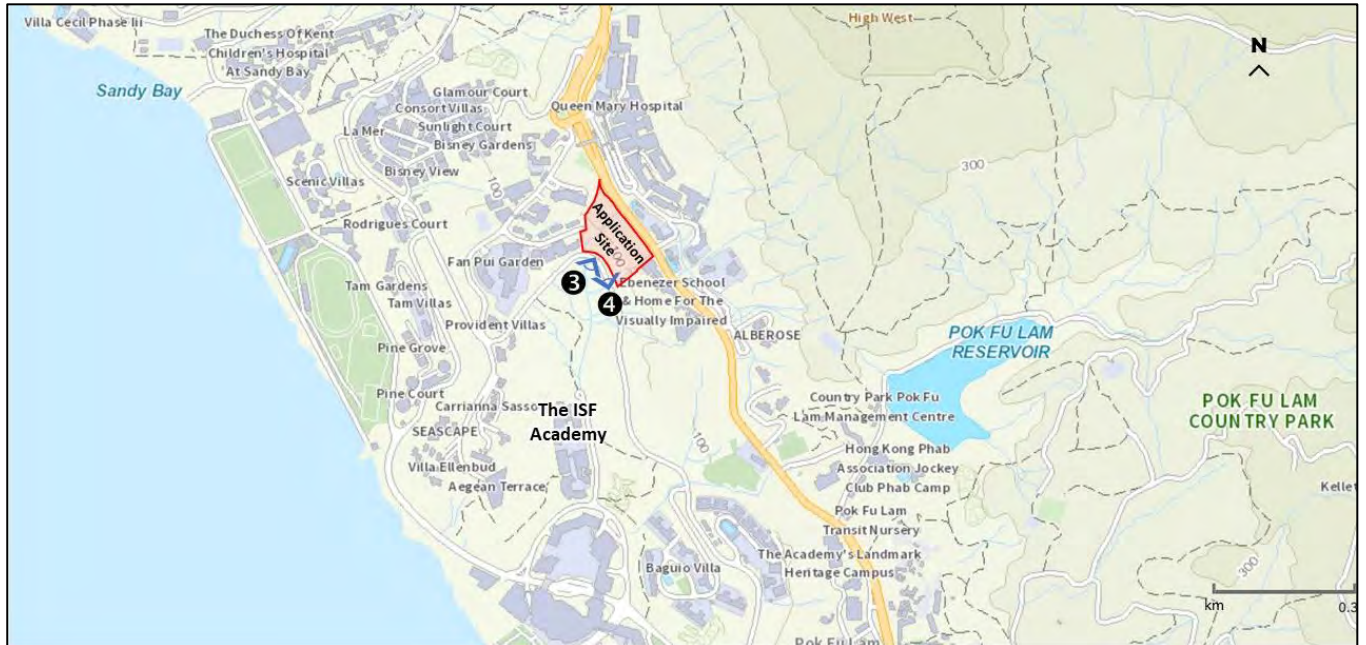
- 3.2 The Air Ventilation Evaluation (Expert Evaluation) (AVA EE) conducted by the applicant has focused on the obstruction on the proposed development. However, the AVA EE has not taken into account the impact caused by the proposed bulk of the building at the Site on the surrounding area.
- 3.3 Moreover, the AVA EE stated that the Site is anticipated to have a better wind environment without obstruction, and the incoming SSW and S winds from the sea would have no obstruction into the assessment area and the Project Site (para. 6.7.9 of the applicant's planning statement refers). The following plan shows the obstruction of the summer prevailing wind SSW by the proposed new academic building at the Site. The pedestrians on Pok Fu Lam Road and all the residents and visitors in the area including those in QMH are going to suffer from the blockage of air circulation by the proposed new academic building.

Figure 6 Blockage of the Only Window for Wind Penetration



(Source: Base plan from Google Map)

Figure 7 Location of Photos 3 and 4 Taken on Victoria Road



(Source: Base plan from the GeoInfo Map)

Figure 8 Photo 3 Taken on Victoria Road Facing Southwest



Valley Facilitating Summer Prevailing
Wind SSW to the Inland Built-up Area

Figure 9 Photo 4 Taken on Victoria Road Facing the Application Site



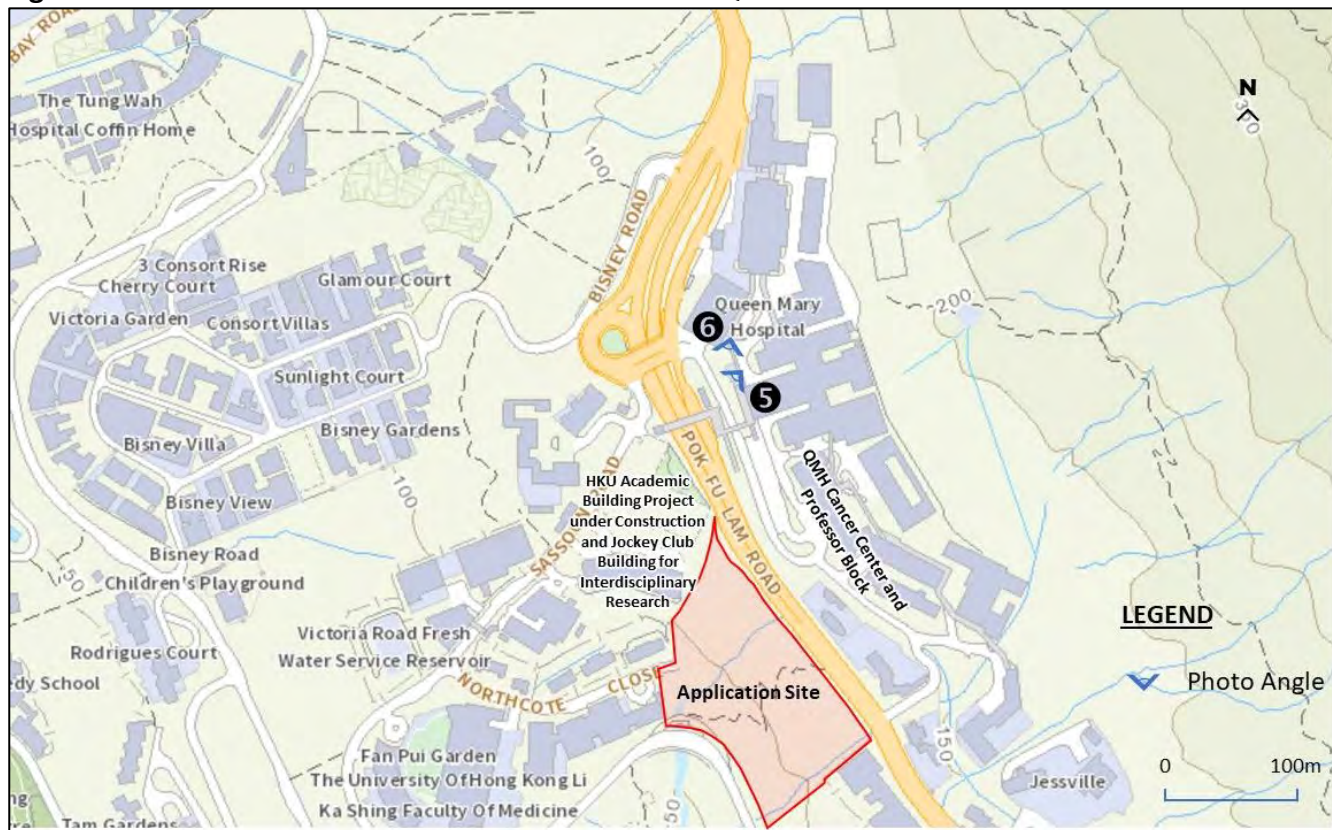
- 3.4 The valley serves to channel the wind from the sea into the built-up area of Pok Fu Lam. The photomontage below prepared by the applicant shows the bulk on the natural slope that would be a blockage of the summer prevailing wind SSW from the sea and from the lowland of the Cyberport.

Figure 10 Photomontage of the Proposed Building from Victoria Road



(Source: Extract from the Submission by the Applicant Under Y/H10/13)

Figure 11 Location of Photos 5 and 6 Taken from QMH



(Source: Base plan from the GeoInfo Map)

Figure 12 Photo 5 Taken from QMH Showing the Future SSW Wind Blockage

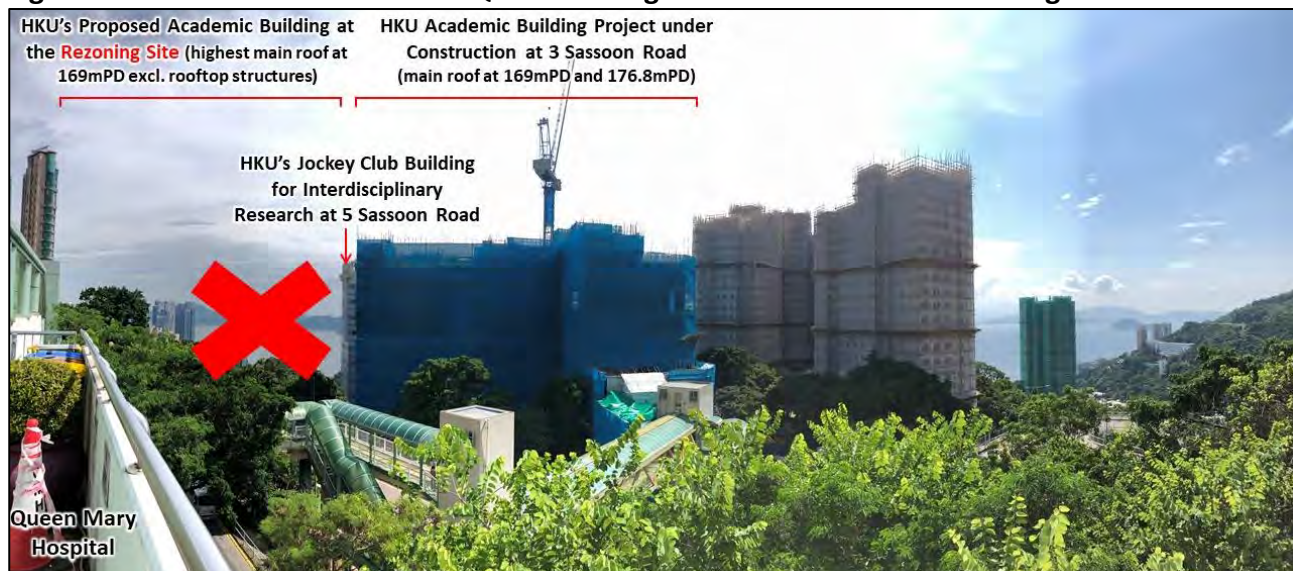


Figure 13 Photo 6 Showing the Future Suffered Area in QMH



- 3.5 If the applicant's rezoning request were approved, the proposed development together with HKU's adjacent No. 3 Sassoon Road project would block the only remaining opening of wind penetration from the sea and create the highly undesirable impermeable wall effect which would significantly degrade the environment in this area of Pok Fu Lam. According to the Hong Kong Planning Standards and Guidelines (HKPSG) (Chapter 11 on the Urban Design Guidelines), breezeway along major prevailing wind directions and air paths should be provided in order to allow effective air movements into the urban area to remove heat, gases and particulates, and to improve the micro-climate of the urban environment. The urban air ventilation is in particular vital for QMH and Pok Fu Lam Road. The current breezeway is facilitated by the "GB" buffer at the rezoning site and the valley amidst Pok Fu Lam Road and Victoria Road (**Figure 6 to Figure 13** above refer). However, the Proposal is in contrary to the above government's commitment in preventing the impermeable walled environment. The applicant's rezoning request should therefore be rejected.
- 3.6 We strongly disagree with the applicant's assertion that the building orientation, visual corridors and building set back are said to minimise the street canyon effect and to reduce the visual impact to the surrounding developments. The visual corridors presented in the pre-submission briefing by the applicant to the local community that is same as the s.12A submission were misleading. OM1, OM2 and OM3 are particularly concerning given their height and the fact that they block the only airway between the existing building at No. 5 Sassoon Road and the Li Ka Shing Faculty of Medicine building, resulting in sunlight and air circulation being blocked and pollutants being trapped between the buildings. Furthermore, the above visual analysis has not included the rooftop structures that would comprise the infrastructure of heating, ventilation, and air conditioning (HVAC) which was not indicated in the materials presented by the applicant. The impact arising from the above cannot simply be mitigated by the adjustment of the building mass, treatment of the building structure, or design and positioning of the building footprint. The main crux of the problem originates from the unsuitable location of the Site.

4. Environmental, Health & Safety Failures and Risks

- 4.1 The applicant has failed to assess biosafety and environmental contamination risks. The primary use of the proposed development is research laboratories (GFA of 30,000m²) working with biosafety risk group 3 microorganisms, macromolecular complexes, stem cells, wet chemicals, soft tissues, and animals. However, the applicant has not provided any information on its assessment of the risks of leakage via aerosols, drainage, sewerage, transport, and people movements, into the environment; and the health and safety risks of exposure for staff, students, patients, commuters, and local residents.

Research Laboratories

- 4.2 Based on the information currently provided by the applicant, the various types of research laboratories proposed in the building include **P3 laboratories** which carry out treatment that is **highly harmful to humans**, animals, plants and the environment. Serious and fatal diseases will result from **aerosols**. This type of special research and laboratories should be located at isolated, secure location away from residential area, to minimise the potentially disastrous consequences arising out of accidents and risks due to mechanical failures, human failures, or any critical events.
- 4.3 If the proposed research and testing facilities are going to be used for infectious diseases researches, residents living in the vicinity will be exposed to health and safety risk in the event of improper waste disposal, accidents, human or mechanical failures. The health and safety risk is even more disastrous for the patients at QMH whose immunity is compromised. With reference to the government approach in fighting against the COVID-19 virus, facilities relating to infectious diseases researches should similarly be located in an isolated area that is far away from residential population.
- 4.4 The Proposed Facilities will be Biosafety Level 3 (BSL-3) certified. It should be noted that a BSL-3 laboratory typically includes work on microbes that are either indigenous or exotic, and can cause serious or potentially lethal disease through inhalation. In a BSL-3 laboratory, the microbes are so serious that the work is often strictly controlled and registered with the appropriate government agencies. Laboratory personnel are also under medical surveillance and could receive immunizations for microbes they work with. While BSL-3 at the Proposed Facilities certainly helps ensure that a certain level of safety protocols are in place, it is submitted that such facilities should not, however, be built directly adjacent to residential communities for the sake of public health and safety.
- 4.5 Although there are already existing research facilities along Sassoon Road, they are at a good distance away from residential buildings and main road (i.e. Pok Fu Lam Road). In contrast, the proposed new structure is only 29m from the residential

buildings on the other side of Pok Fu Lam Road. Regardless of the precautionary measures in place, the risk of mishandling, accident and leakage is unavoidable, and this would pose a serious risk to the health and safety to the local community, particularly when residential buildings, schools and hospital are nearby.

Animal Facilities

- 4.6 Given the limited information provided by the applicant, the Residents are very concerned about the health and safety risks arising in connection with the research facilities and laboratories with animal facilities. If the proposed animal facilities will be used for research using highly pathogenic agents in a BSL-3 setting, the Residents have serious concerns about its impact on the infrastructure of the Proposal and how the applicant proposes to address this health and safety issue.
- 4.7 Despite repeated questions from the Residents, the applicant has not provided any concrete information on the specific types of researches that will be carried out in the proposed development (e.g. whether these research facilities will be used for any type of genetic modification testing) or the specific types of experimental animals used in the laboratories or housed in the animal facilities within the proposed building. It is imperative that the applicant provides more details about such animal facilities for research, testing and experiments, whether there are any current regulations on the experimental animals in the proposed laboratory, the type of animals to be housed and used in the building for experiment, any standards and regulations for animal transportation, any safety plan, to prevent any hazard to the public.

Possibility of Toxic Gases

- 4.8 There are a wide variety of toxic gases found within a medical laboratory. Many of such toxic gases have no taste, no colour or no smell, which makes it difficult to tell if a gas leak is present by accident. The serious risk that a gas leak will pose to the community and the potentially fatal incident or hazard that may result from a gas leak is aggravated by the fact that the proposed new structure is in close proximity to the residential buildings, schools and hospital, in which there are elderly, patients and visually impaired people who are particularly vulnerable to the above risks.
- 4.9 No contamination or risk assessment on the accidental leakage or any reports of track record of HKU's research laboratories has been provided in the submission or advised to the residents through HKU's briefing to the local community.

Environmental Risks

- 4.10 The applicant has failed to provide any information in the planning statement or the Preliminary Environmental Review on any proper treatments of the potential exhausted fume from the laboratories in the proposed development. The applicant

has also failed to provide any information on whether any gas boiler will be installed and whether assessment on this has been carried out. Moreover, the applicant has failed to provide any mitigation measure against the above environmental, health and safety risks, especially with the summer prevailing wind blowing from the SSW to the Pok Fu Lam area and QMH. In the absence of sufficient information to show that the proposed development would not pose adverse environmental impact to the surrounding environment, the applicant cannot in good faith conclude that the proposed development at the Site is acceptable from the environmental perspective and that this is an ideal site for the proposed development.

- 4.11 According to the HKPSG on the land uses with the potential for development in rock caverns, 'research/testing laboratories' are one of the uses that has potential to be placed in rock caverns minimising nuisance to the community. The Proposal erecting such uses in the "GB" buffer with sensitive receivers in the area is going against the good practice and Government's strategy. It should be noted that the proposed structure is very close to Ebenezer which is currently an educational institute for the visually impaired, and the safety and effect on which given the close proximity should be considered.

Light Pollution

- 4.12 The applicant has taken the lead into studying the adverse effects of light pollution on health and environment. At present, residents in the community are already suffering from the increased light nuisance due to the existing research laboratories operating out of hours and lights being turned on continuously. The increased research laboratory space under the Proposal will further worsen the adverse effects of light pollution on the environment and the residential areas in the vicinity.
- 4.13 It is clear that the light pollution problem is a persisting nuisance to the local community living in the vicinity, and the Residents have serious reservations over how the applicant can effectively address the light pollution problem when even more research facilities are built around the neighbourhood.

Landslide and Slope Instability

- 4.14 The construction under the Proposal will undoubtedly result in loss of vegetation at the Site, thereby increasing the risk of landslide to Pok Fu Lam Road or the residential buildings which locate above the proposed structure and/or the increased risk of flooding to the ISF School below Victoria Road. The Residents have asked repeatedly but the applicant has not been able to provide the government lands and geotechnical assessment assurance that constructing the proposed structure with the consequent loss of vegetation will not lead to an increased risk of landslide or flooding to the neighbourhood.

- 4.15 The steep, naturally vegetated slopes at the Site would likely require extensive slope management work if any construction were to be implemented at the Site. The expensive cost, devastating environmental impact and safety risk would render construction at the Site highly undesirable.

5. Not a Locational Requirement for Research Laboratories and Animal Facilities at the Site

- 5.1 Majority of the proposed use at the Site is for the provision of research, laboratories, and animal facilities. The applicant has not demonstrated such uses have a locational requirement that need to be located next to QMH and there is no special operational reason why the new building should be located at the Site in the expense of the “GB” buffer and the environment of the area.
- 5.2 In a new article on South China Morning Post on 28 July 2021, the applicant mentioned that the Site was needed for a Good Manufacturing Practice (GMP) laboratory. Yet, the applicant has omitted to mention that (i) a clinical GMP facility is already under development at Grantham Hospital; (ii) there are commercial GMP laboratories at the Hong Kong Science and Technology Parks (HKSTP) which have already offered HKU access; and (iii) there is no scientific need for a GMP facility to be directly next to QMH for the research laboratories for manufacturing pharmaceutical or cellular products, biomedical imaging, signal processing, as well as providing a work space for microorganisms with risk of aerosol spread. Furthermore, animal facilities accommodating for experimental animals is not a reason for placing the new building at the Site under the rezoning application, especially as the current Laboratory Animal Unit at Sassoon Road has already been recently refurbished.
- 5.3 The applicant claims that there needs to be proximity of the proposed new academic building to QMH to facilitate accessibility of fresh specimens. However, the applicant has yet to provide detailed evidence of how often this will be utilised and whether it is economical to spend this large amount of public money to provide under-utilised laboratories for infrequent use a couple of sessions weekly.
- 5.4 The applicant has failed to justify why the proposed new academic building needs to be located close to QMH given the reasons and questions stated above. Moreover, it should be noted that (i) HKU does not directly treat patients; (ii) staff of the Faculty are given honorary appointments; and (iii) the research facilities do not involve direct contact with patients.
- 5.5 A comparison with the teaching and research facilities of the Faculty of Medicine of the Chinese University of Hong Kong (CUHK) also shows the fallacy the applicant’s claim that the new academic building needs to be located close to QMH. The main campus for the Faculty of Medicine of CUHK is located far away from residential buildings and the Prince of Wales Hospital (which is the CUHK Faculty’s teaching facility and base of research). In view of fact that CUHK can achieve teaching and research excellence without having its main campus at walking distance with its

affiliated teaching hospital, there seems no valid reason why proximity to the QMH is a critical factor in HKU's selection of suitable sites for its expansion.

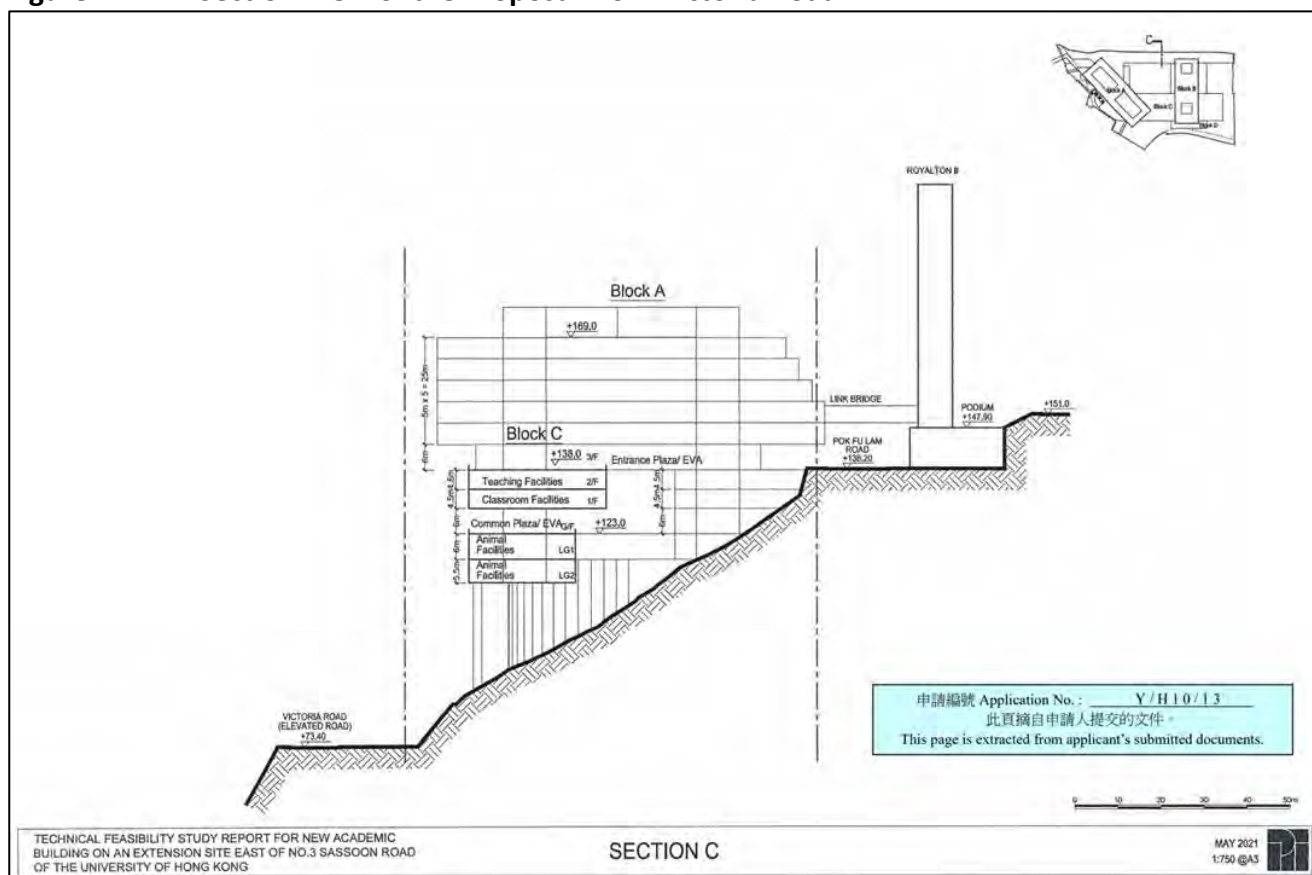
- 5.6 In a recent Legislative Council paper dated 5 March 2021 which discussed the enhancement of healthcare teaching facilities of universities, it was mentioned that CUHK is planning to construct a teaching-research complex in Tai Po Area 39 to provide CUHK's Faculty of Medicine with additional teaching and research facilities on campus for increasing enrolments of medical and nursing students (in addition to renovating existing facilities in the main campus). It is worth pointing out that CUHK's proposed new teaching-research complex in Tai Po is far away from the Prince of Wales Hospital. A valid reason from the applicant is absent to justify for the proposed development at the Site with a locational requirement for locating in close proximity to QMH, instead of exploring alternative sites with less difficult topography and less devastating environment impact and health and safety risks.
- 5.7 In the abovementioned Legislative Council paper, it was also mentioned that HKU is enhancing its existing facilities at its medical campus, including carrying out extensive renovation works of existing facilities, enabling virtual connection by a telepresence solution across different teaching venues at the Sassoon Road medical campus buildings and QMH. The increasing use of telepresence solution should further reduce the need for physical space and/or proximity with QMH.

6. Poorly Justified Development Scheme

6.1 Large in Scale and Height

- 6.1.1 It is evident that the proposed development, which has a maximum height of 169mPD and involving over 1.6 Ha of land filling up the "GB" buffer in between the HKU academic building under construction (No. 3 Sassoon Road) and the Ebenezer School to the south-east, would irrevocably change the existing green character and low density in this locality and create the highly undesirable wind blockage as detailed in paragraph 3 above. The Proposal is therefore contrary to the government's commitment in improving the wind environment in our city as set out in the HKPSG.
- 6.1.2 The proposed new building is large in scale involving the need of ***excavation into the vegetation 8,000m² down to 10m in depth***. This is irrevocably destroying the vegetation and ecosystem in this "GB" buffer. The difficult terrain has also proved the scheme on the Site undesirable. **Figure 14** below shows the bulk of the proposed buildings and the massive column structures at Victoria Road. The fundamental problem is due to the difficult topography. The TPB is requested to carry out a critical review of the applicant's rezoning request on the balance between the disturbance on this piece of natural vegetation and possible alternative sites that may involve lesser extent of destruction to the natural environment.

Figure 14 Section View of the Proposal from Victoria Road

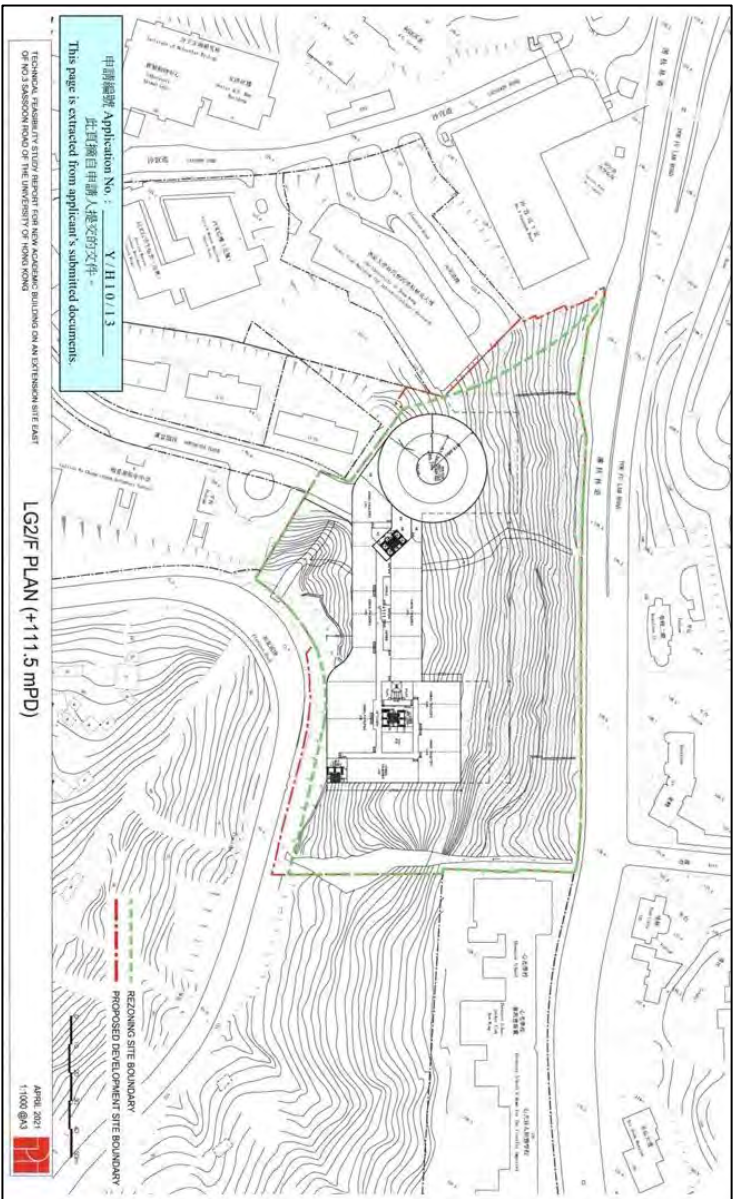


(Source: Extract from the Submission by the Applicant Under Y/H10/13)

6.2 Inefficient Layout and Unnecessary Building Works

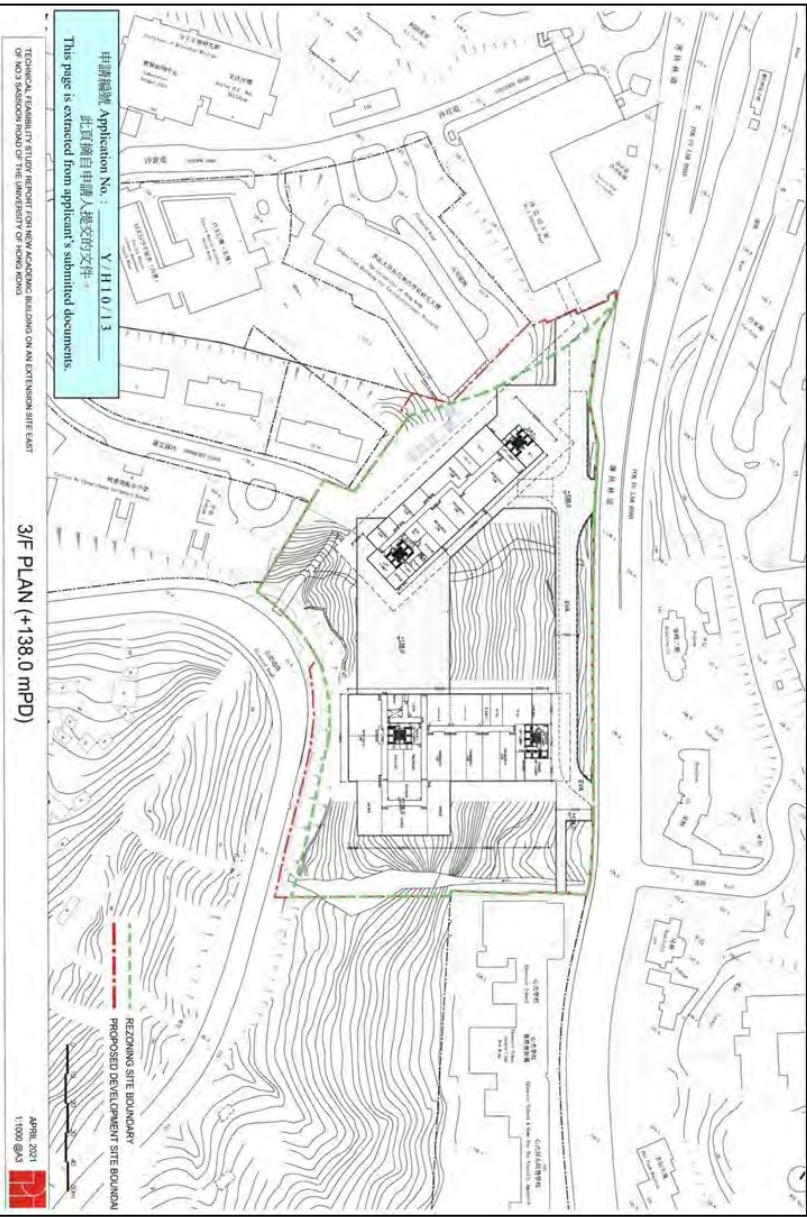
6.2.1 The proposed building layout on this piece of “GB” buffer of difficult terrain is inefficient and unnecessary. Instead of choosing an alternative site with much less steep/difficult topography or building down rather than up (i.e. constructing simple blocks of building at the level of Victoria Road instead of having elevating columns to support structures above Pok Fu Lam Road), such proposed building layout would require the construction of **intrusive elevated columns and unnecessary ramps** taking up extensive land area and destroying the natural vegetation. Only a component of the ramp is taking up an area of about 1,255m² and additional land would be required for other related accesses for the proposed development. A critical review on the efficiency of the applicant’s proposed building layout when compared to more appropriate and efficient construction plan at alternative location has to be carried out as part of the TPB’s review of the applicant’s rezoning request.

Figure 15 **Proposed Development Scheme Showing the Land-Take of the Ramp and the Building Structure at LG2/F**



(Source: Extract from the Submission by the Applicant Under Y/H10/13)

Figure 16 **Proposed Development Scheme Showing the Land-Take of the Building Structure at 3/F**



(Source: Extract from the Submission by the Applicant Under Y/H10/13)

- 6.2.2 It is not convincing that the vegetation beneath the elevated structure with concrete reinforcement would be able to survive. The construction of the elevated columns are undesirable and the design of the proposed building is unrealistic. The vegetation beneath the elevated structure will be deprived from sunlight and perish from insufficient light.

6.3 Unrealistic Building Layout

- 6.3.1 The Site is very steep and dissected by water courses and the underground Hong Kong West Drainage Tunnel. There are no details in the submission on how the applicant is going to tackle and proceed with the building construction works due to the steep topography, that would have ***implications on the surrounding environment and the problems caused to the local community and the neighbourhood.***

- 6.3.2 Insufficient flat land along Pok Fu Lam Road near the major bus stop area and the existing 2-lane single carriageway of Victoria Road would mean blockage of certain road areas and unnecessary cut and fill into the slope for the construction works. The elevated structures of the 4 proposed buildings with structural cores and massive beams across building blocks render preservation of the existing vegetation impossible and extensive slope works demanding. Given the above anticipated challenging and costly works, the Site is unsuitable and the building layout currently presented by the applicant is unrealistic. It is very likely that the final development scheme will vary dramatically from what has been presented for the purpose of the subject rezoning application.

- 6.3.3 The Site was one of the potential sites for the future QMH MTR Station for consideration. However, due to various challenges including the proximity to the Hong Kong West Drainage Tunnel; lack of land space for vent shafts; steep topography, this Site has been dropped for the station construction. The above warrants a critical review on the suitability of the Site for the applicant's proposed development.

6.4 Inappropriate Land Use Zoning

- 6.4.1 This rezoning request from "GB" to "G/IC" is not appropriate. If the applicant's rezoning request were approved, the Proposal would proceed as 'educational institution' under Column 1 of the Notes of the "G/IC" zone. Such a decision would unfortunately be based on the insufficient and misleading descriptions in the Proposal, particularly the core and primary use is for ***special research laboratories***, the use of which would involve high biosafety risks. The ***special nature and operation*** of the proposed ***research laboratories including P3 laboratories***, and the associated negative impact

and risks must be taken into account as part of the review of the applicant's rezoning request. On the above, this "GB" buffer is an **UNSUITABLE SITE** and "G/IC" is an unsuitable zoning. For such use this would require a **special land use zoning**, without putting the community at uncertainty and at risk, and different considerations would apply.

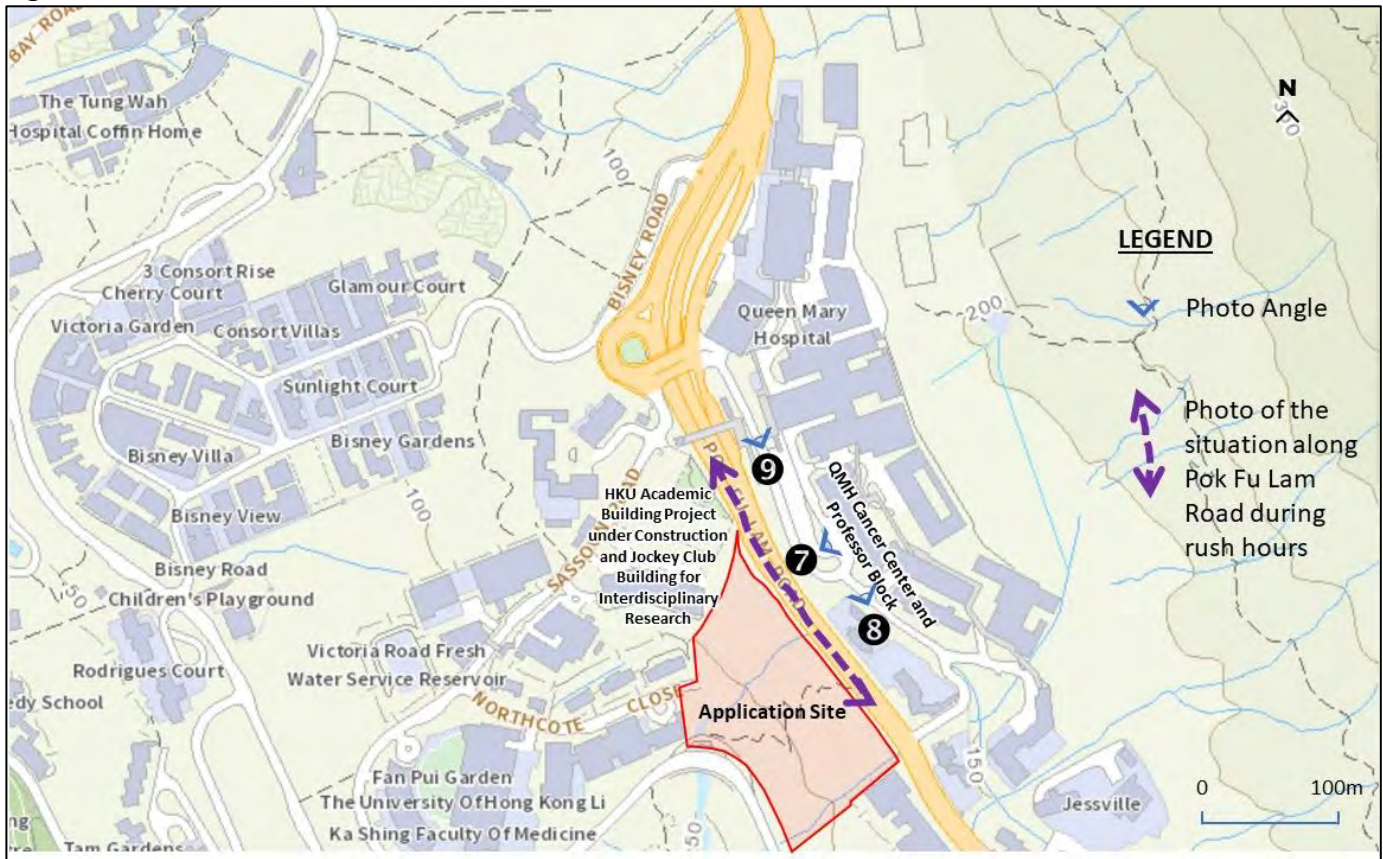
6.5 Omission of HVAC Structures

- 6.5.1 The applicant has omitted the importance of the roof layout of the research and laboratories buildings. There are roof structures including chimneys, vent shafts, lift shafts, HVAC, etc. that are the necessary structures for research laboratory structures. For the proposed P3 laboratories, the P3 chimneys are most alarming. All these will be imposing negative health & safety, air, noise, heat generation impacts on the surroundings. The summer prevailing winds would be blowing all these chemicals, heat and pollutants (including potentially infectious pathogens) from the HVAC systems into the Pok Fu Lam built-up areas adversely affecting the hospital, residential and school areas in the vicinity.

7. Traffic Concerns

- 7.1 Based on traffic/transport policy considerations, ***the Pokfulam Moratorium restricts lease modification and the sale of government land to control the amount of traffic generated within the Pokfulam area***. The Pokfulam Moratorium is still currently in force. Unless the traffic impacts are assessed to be acceptable and the proposed development is considered as necessary and proportionate to fulfilling overriding public needs, the applicant's rezoning request should be rejected.
- 7.2 Notwithstanding the findings of the Traffic Impact Assessment (TIA) presented by the applicant, the Residents highlight below the reality of the actual daily traffic situation of Pok Fu Lam Road and the area nearby, and the concerns about the detrimental traffic impact arising in connection with the Proposal.
- 7.3 Traffic along Pok Fu Lam Road is already very congested during rush hours. Traffic along Sassoon Road and within QMH is also an issue given it is narrow, steep and winded. **Photos 7 to 9** below show the traffic situation within QMH at different times of the day, and the traffic queue tailing back to the hospital at the junction with Pok Fu Lam Road. In emergency situations for ambulance and required attendance by the Fire Services Department, road blockage due to inadequate vehicular access is common.

Figure 17 Location of Photos 7 to 9 Taken from QMH



(Source: Base plan from the GeoInfo Map)

Figure 18 Photo 7 Showing the Traffic Situation in QMH in the Afternoon



Figure 19 Photo 8 Showing the Traffic Situation in QMH in the Afternoon



Figure 20 Photo 9 Showing the Traffic Queue Tailing Back in QMH in the Evening

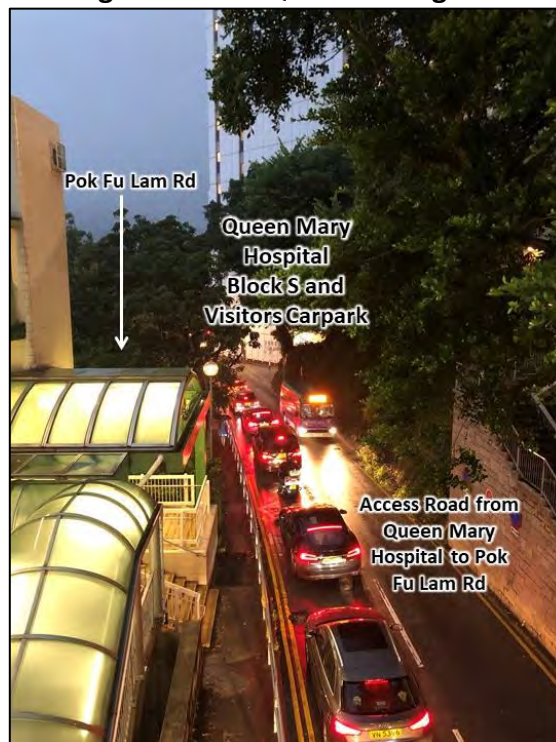


Figure 21

Photo Showing the Situation of the Bus Queue along Po Fu Lam Road During Rush Hours



- 7.4 Regardless of whether the pick-up/drop-off lay-by and intervals of the bus stops are standard design or not, it is recognised by the residents and the road users in the area that the northbound bus stop is far from adequate. Having six or more buses lining up along Pok Fu Lam Road holding up all northbound traffic along Pok Fu Lam Road, and long queue of passengers of hospital staff, patients, visitors, HKU students, residents nearby waiting at the bus stop during the rush hours are common. This situation is particularly acute from 5pm to 6:30pm.
- 7.5 In the context of the above poor current traffic situation, the residents and the road users will suffer to a worse extent from the negative traffic impact brought by the proposed development at the Site. Even though the TIA's conclusion is that the proposed development will be generating insignificant traffic impact, the traffic congestion problem along Pok Fu Lam Road and the area nearby is real and persisting. It is disappointing that the applicant has not made any genuine effort to address the traffic concerns associated with the Proposal. It is important for the applicant to explain how the proposed mitigation measure of a roundabout at J2 recommended in the submitted TIA report would effectively help improve the traffic queue that is caused by the existing traffic flow on Pok Fu Lam Road.

- 7.6 More, given the above existing poor traffic situations, significant traffic issues during the long construction period of 3.5 years (i.e. starting Feb/2023 and ending approximately 3Q/2026) would be detrimental to the nearby Residents, as well as alarming to the emergency vehicles such as ambulances sending emergency patients to QMH, during the construction period.
- 7.7 The applicant has conceded at the briefing session with the local community that the MTR will play a major role in the long-term redevelopment plan of the medical faculty campus at Sassoon Road. A lot more of HKU's proposed development projects will be dependent on the future station at QMH. However, the planning, funding approval, design, gazettal, development and construction of a new MTR station at QMH is still a long way before it can be realised. It is not in the best interest of the public or HKU to make a premature decision to rezone the GB buffer and irreversibly destroy the natural vegetation and ecosystem at the Site, particularly where there are alternative sites available as interim solution. We respectfully submit that it is much more sensible not to progress with the Proposal until there is a concrete plan for the new MTR station at QMH, so that the applicant can have a more holistic and long-term plan for the expansion of its medical faculty campus. For instance, if a new MTR station is to be built near Sassoon Road, the new MTR facility can be combined with new teaching/research structure proposed by HKU. It would be more aligned with HKU's long-term expansion vision and more cost-efficient for HKU to take into account the MTR extension plan and redevelopment of existing buildings at Sassoon Road in addressing its need for new academic facilities.
- 7.8 It is impractical and undesirable for the main pedestrian entrance of the proposed building to be located at Pok Fu Lam Road, given the narrowness of the pedestrian path and the lack of flat space at the top of the Site. Despite the questions from the Residents, the applicant has not provided further details of a feasible plan to widen the pedestrian path and it is uncertain whether any impact assessment has been conducted for the proposed widening of the pedestrian path on such a steep slope.
- 7.9 There has also been a persisting problem with large vehicle access to Northcote Close because of the narrow and winding entrance. This is a serious concern because Northcote Close is stated in the Proposal to be the main vehicular access to this proposed development. According to EU Regulations, an animal laboratory and research unit must have easy and rapid access to emergency services including fire services, especially a laboratory researching infectious agents. The existing laboratories on Sassoon Road can meet these requirements, but given the remote location of the proposed animal research and vivarium unit and the narrow entrance of Northcote Close, it is highly doubtful whether the Proposal can meet the relevant requirements.

8. Utilisation of Existing Facilities and Premises

- 8.1 Whilst we understand from HKU that the Proposal is aimed at addressing the need for more medical students in the coming years, expansion and constructing new buildings is not the only solution in meeting the needs. Before expending public money on new construction, it is crucial for the applicant to objectively evaluate the actual need for such further expansion of the medical faculty campus and determine the extent of expansion. A detailed assessment must be conducted regarding the utilisation rate of the existing HKU Medical Faculty facilities with the support of the actual raw data to the TPB.
- 8.2 Without the above information and gathering from the following, there is insufficient information in the submission to demonstrate why the existing facilities or other sites and premises cannot be utilised before spending public money at the Site. Moreover, the applicant has not provided sufficient justification for the proposed new academic building so soon after a major expansion of academic facilities dedicated to medical functions at No. 3 Sassoon Road and in view of the upcoming long-term redevelopment of existing old buildings along Sassoon Road.
- (a) the MBBS admission quota in 2021/2022 is 265 and the admission quota will increase to 295 in 2022/2023, 325 in 2024/2025, and 400 in 2028/2031. Based on this projection, there is serious reservation over how an increase of 60 students (who will only be in the Sassoon Road campus for 2 years) by 2025 (i.e. estimated completion time of the proposed academic building comprising 4 building blocks, 8 storeys of research laboratories and 3 storeys of animal facilities) would justify the use of large amount of public money and at the expense of the natural terrain, the loss of which is permanent and irreversible;
 - (b) the applicant indicated that the proposed new building at the Site would be to ease the overcrowding utilisation of the laboratories in Block T of QMH, and for the use of Year 3 and Year 4 medical students. However, it appears that Year 3 curriculum is not designed to receive formal teaching and Year 4 appears to be a clinical year (i.e. the above is not part of the curriculum), and the applicant has yet to provide the necessary information on the current utilisation rate of the teaching laboratories in Block T;
 - (c) the Medical Complex Extension at No. 21 Sassoon Road (The HKU Li Ka Shing Faculty of Medicine) was opened in April 2012. There have been other renovation and expansion projects to expand the Faculty's footprint at No. 21 Sassoon Road further, giving rise to a domino effect as space frees up stretching down to No. 21 Sassoon Road;
 - (d) the \$810.9 million Faculty project at No. 3 Sassoon Road will provide over 10,000m² of operational floor area for lecture theatres, seminars, classrooms, a learning common for students, clinical skills training centers, research

laboratories, a Chinese medicine outpatient clinic, as well as offices for staff, administrators and research postgraduate students. The applicant has not provided sufficient information in the submission on the need for another such similar building so soon after the No. 3 Sassoon Road expansion project;

- (e) the Laboratory Animal Unit at Sassoon Road is undergoing a \$90 million revamp to increase its space by 35% and upgrade its equipment and infrastructure. The expansion involves taking over the adjacent entire Dexter HC Man Building, providing additional space and fulfilling the requirements for the next AAALAC accreditation;
- (f) there are plans to redevelop the 50-year-old Patrick Manson Building and the Estates Building and Pauline Chan Building, which will be re-developed into one large block providing additional space for the Faculty; and
- (g) apart from the expansion at the Sassoon Road Campus, the Faculty has also enhanced collaborations with the partnership hospitals such as QMH, and Grantham Hospital, where more clinical research and investigations work can be conducted at the hospital facilities.

8.3 In a recent Legislative Council paper dated 5 March 2021 which discussed the enhancement of healthcare teaching facilities of universities, it was mentioned that HKU is enhancing its existing facilities at its medical campus, including carrying out extensive renovation works of existing facilities, enabling virtual connection by a telepresence solution across different teaching venues at the Sassoon Road medical campus buildings and QMH. HKU also plans to redevelop a catering facility and the Madam S.H. Ho Residence for Medical Students for medical students (both at No. 6 Sassoon Road) into two new blocks of a Clinical Training Amenities Centre, and to redevelop Patrick Manson Building at No. 7 Sassoon Road. HKU further explores construction of an elevated pedestrian network connecting different buildings at the Sassoon Road medical campus and QMH, with a view to forming a safe and effective pedestrian access for a university corridor linked with QMH.

8.4 In the modern technology era and as proven in times of the pandemic, e-learning and e-platforms have become integral to the curriculum. Even small group discussions can be effectively conducted via teleconference and other interactive technological platforms. The increasing use of technology-enabled measures would likely reduce the utilization of existing and proposed teaching facilities, and alongside with the redevelopment of existing facilities, would alleviate the need for more physical space.

9. Site Search Exercise

9.1 Given the devastating environmental impact, health and safety risk, traffic impact, high construction cost and technical difficulties, and all the concerns and questions

yet to be addressed by the applicant, it is necessary for the applicant to undertake a proper and thorough site search exercise to identify a more appropriate site that can meet its need whilst minimising the negative impact on the environment and community. Such a mutually beneficial solution would be in the interests of all stakeholders.

- 9.2 At the briefing session with the local community, the Residents asked HKU if they had conducted comprehensive studies in respect of all possible sites and HKU was not able to answer this question. It appears that HKU has chosen the Site for convenience and disappointingly without comprehensive studies in respect of alternative sites. This is an unjustified use of public resources if HKU chooses to build the new academic facilities at the Site without (i) fully utilising existing facilities currently available for medical teaching and research; and (ii) conducting comprehensive studies in respect of all possible alternative sites to identify the most cost-effective and least intrusive option.

Tier 1 – Existing Facilities and Premises

- 9.3 The existing facilities and premises should be critically reviewed for any opportunities for better utilisation.
- 9.4 The Medical Complex Extension at No. 21 Sassoon Road (The HKU Li Ka Shing Faculty of Medicine) was opened in April 2012. There have been other renovation and expansion projects to expand the Faculty's footprint at No. 21 Sassoon Road further, giving rise to a domino effect as space frees up stretching down to No. 21 Sassoon Road.
- 9.5 The adjacent Faculty project at No. 3 Sassoon Road under construction is providing over 10,000m² of operational floor area also for lecture theatres, seminars, classrooms, training centers, research laboratories, as well as offices. There is insufficient information in the submission on the need for another such similar building at the Site.
- 9.6 The Laboratory Animal Unit at No. 10A Sassoon Road is undergoing a revamp to increase its space by 35% and upgrade its equipment and infrastructure. The expansion will involve taking over the entire Dexter HC Man Building, which would provide additional space for the animal facilities purposes.
- 9.7 The redevelopment of the 50-year-old Patrick Manson Building at No. 7 Sassoon Road and the Estates Building and Pauline Chan Building, into one large block would also provide additional space for the Faculty.

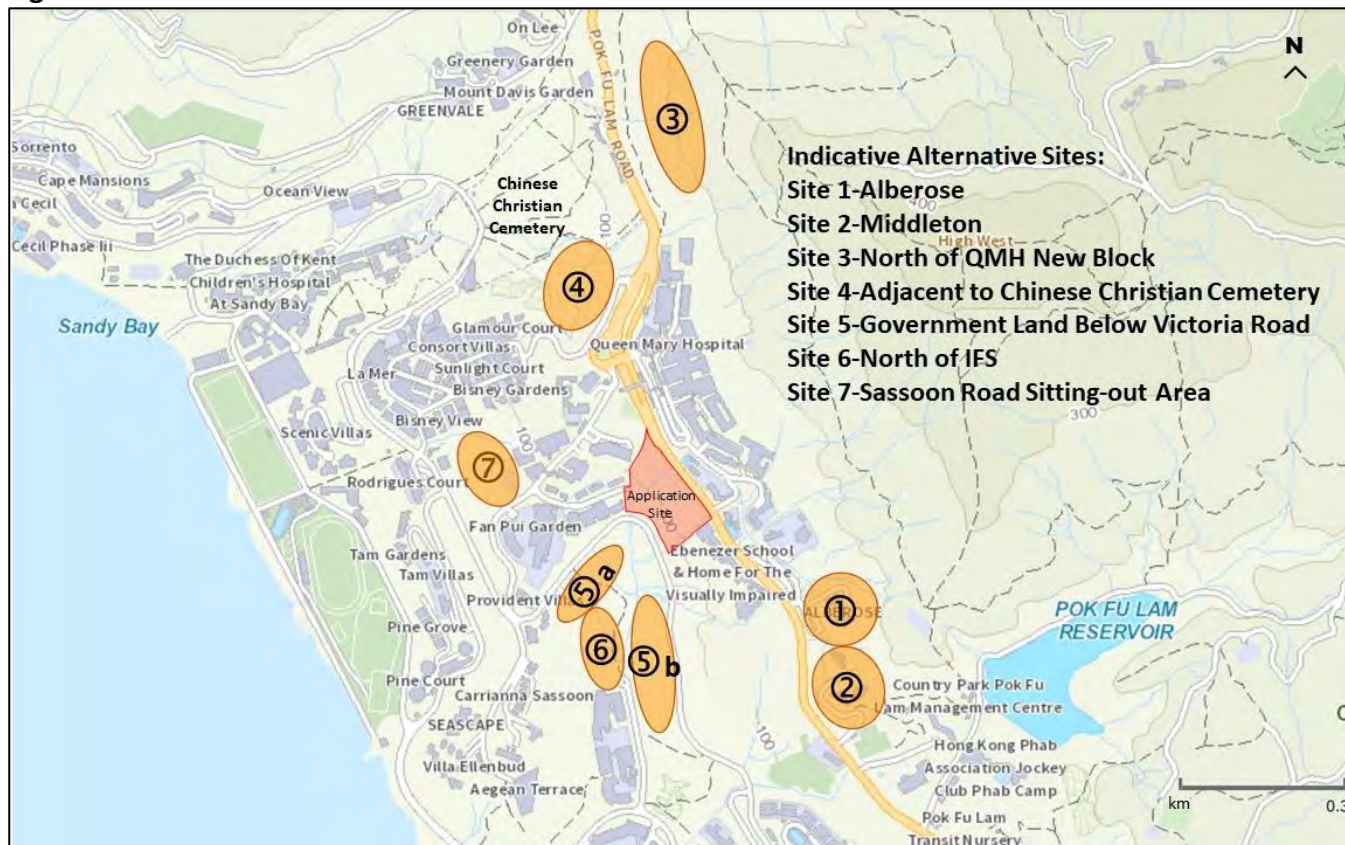
Tier 2 – Wider Context

- 9.8 For the research laboratories and animal facilities, it is in the public interest for the applicant to consider selection of sites in a wider context that is more appropriate and aligned with the government's initiative to create research hub in designated areas. The **HKSTP** with well-planned and intact infrastructure is the **home of laboratories** offering a comprehensive environment for various R&D including biotech in Hong Kong. **Biomedical** is also one of their edges in recently years. The HKSTP in Pak Shing Kok has a good accessibility of public transport network and would offer a conglomerate effect in research laboratories. It is also more appropriate for this special research laboratories to be located in this research-oriented district instead of a populated area.
- 9.9 It was recently announced that HKU has established the Centre for Immunology & Infection (C2i). Rather than spending additional monetary and human resources and destroying the "GB" site, HKU should consider the existing facility at HKSTP as a location for the research laboratories and animal facilities. As this facility at HKSTP is located in an area designated for research and not in close proximity with residential population, it would be a more suitable site for special researches such as infectious diseases research and animal research.
- 9.10 The **Lok Ma Chau Loop** (LMC Loop) located near to the border area with a strategic locational advantage of being near to Futian across the Shenzhen River demonstrated potential for the proposed research laboratory development. LMC Loop will provide development space for various research and development uses. It will create a good synergy in supporting and accommodating the research facilities proposed by HKU.

Tier 3 – Alternative Sites in Pok Fu Lam

- 9.11 There is insufficient information in the submission to demonstrate the locational criteria for the provision of the research laboratories at the Site in proximity to QMH. Even if the applicant were able to justify the need for the proposed development to be in proximity to QMH, there are alternative and more appropriate sites in this area of Pok Fu Lam which can serve HKU's needs.
- 9.12 Despite the repeated requests to HKU from the Residents to provide information on the alternative sites that have been studied, there is no such information in the s.12A submission. In the absence of the above, the Residents have provided assistance in identifying possible sites in Pok Fu Lam that would also meet the HKU's Goals. Seven alternative sites have been identified and are indicated in the following figure.

Figure 22 Indicative Location of the Possible Alternative Sites in Pok Fu Lam



(Source: Base plan from the GeoInfo Map)

Site 1 – Alberose at No. 132-136 Pok Fu Lam Road

- 9.13 This alternative site is a readily available site served with existing infrastructure and is zoned “Residential (Group C)” (“R(C)”) on the OZP. ‘Educational Institution’ falls under Column 2 of the Notes of the OZP. S.12A rezoning request and subsequent OZP amendment is not required from the TPB. Planning application under Section 16 (s.16) of the Town Planning Ordinance would be able to materialise the project.
- 9.14 The apartment blocks in the Alberose were built in the 1960s and are currently in the rental market. The apartment blocks are nearly 60 years of age and demonstrate potential for redevelopment to accommodate the proposed development. The location at Alberose is accessible by an existing road and various public transport within the Pok Fu Lam area, and infrastructure is also in place that is serving the Alberose. It is located by the hillside of Pok Fu Lam. The erection of the proposed research laboratories buildings would not serve as wind blockage into the built-up area. There will not be incompatibility issue to the surrounding area as compared with the “GB” site in the current application that is close to the populated area.

Site 2 – Middleton Towers at No. 140 Pok Fu Lam Road

- 9.15 Middleton Towers is another property of the applicant that is also readily available and zoned “R(C)” on the OZP. S.12A rezoning request is not required and planning application under s.16 for the proposed ‘educational institution’ use from the TPB would realise the proposed development. The apartment blocks are over 50 years and may serve as another potential site for the proposed development. The location at Middleton Towers is accessible by an existing road and various public transport within the Pok Fu Lam area, and infrastructure is also in place. Its hillside location would not cause wind blockage problem. There will not be incompatibility issue to the surrounding area as compared with the “GB” site in the current application that is close to the populated area.

Site 3 – North of QMH Block K and the New Block

- 9.16 While the new block replacing the existing Pathology Building, Clinical Pathology Building and the Housemen’s Quarters adjacent to Block K is in the pipeline, the site to its further north would be a logical extension for the proposed research laboratory buildings. The site is zoned “GB” on the OZP. The proposed use at this location next to QMH is compatible in land use term. The health and safety risk posed to the community living in the vicinity is much lower as there is no residential building nearby. More, the erection of the proposed research laboratory buildings would not cause blockage to the wind penetration at this hillside location. It has a close proximity to QMH, the locational need of which as claimed by the applicant (if considered valid) would be an ideal site location.

Site 4 – Adjacent to Chinese Christian Cemetery

- 9.17 Another alternative site that demonstrated potential for the proposed development is the site next to the Chinese Christian Cemetery to the north of Bisney Road. It is zoned “GB” on the OZP but the terrain is more convincing than the Site under the current rezoning application. This also has a close proximity to QMH. More, the erection of the proposed research laboratory buildings would not cause blockage to the summer prevailing wind penetration; as for the winter prevailing wind from the NE, the cemetery would serve as the breezeway.

Sites 5a & 5b – Government Land Below Victoria Road

- 9.18 These two sites are Government land zoned “GB” on the OZP. They are located at lower topography. Site 5a is between 20-40mPD, whilst Site 5b is between the terrain of 20-50mPD. Both of which have smaller level difference and on lower terrain as compared with the Site under the current application. Kong Sin Wan Road is the nearest road accessible to these two sites subject to further study by the applicant. The erection of the proposed research laboratory buildings on this lower

terrain would not block the wind penetration into the built-up area above Pok Fu Lam Road.

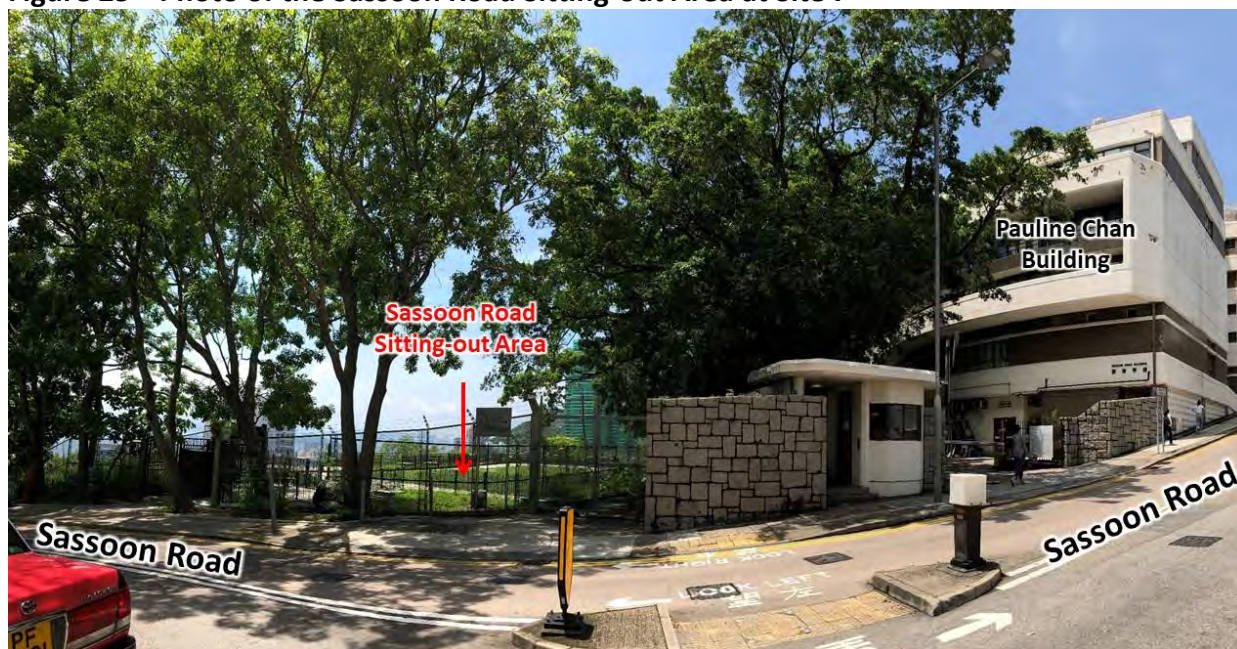
Site 6 – Government Land to the North of IFS

9.19 This is another piece of Government land to the north of IFS, that has been zoned “R(C)” on the OZP. This piece of flat land demonstrated the potential for the proposed development from the geographical and land use perspectives. It has an easier topography than the Site under the current application. Given its lower and flat topography, the erection of the proposed research laboratory buildings would not block the wind penetration into the built-up area above Pok Fu Lam Road. The proposed use is compatible with the ISF Academy to the south. Kong Sin Wan Road is the existing that serves the locality.

Site 7 – Sassoon Road Sitting-out Area and Victoria Road Fresh Water Service Reservoir

9.20 The Sassoon Road Sitting-out Area atop the Victoria Road Fresh Water Service Reservoir (**Figure 23** below) is currently zoned “G/IC” and its adjacent land area is zoned “GB” on the OZP. The sitting-out area has a low utilisation since its construction. To make better use of the land, this site and its adjacent land area demonstrates potential for the proposed development. This has a better advantage of the flat topography and the area is well connected and compatible with the other campus buildings along Sassoon Road in land use term. This site has been opened up by the Water Supplies Department for recreational use as this site is accessible and not in the vicinity of water treatment works. Given this locational advantage, this site warrants potential for further study of the feasibility for the proposed development.

Figure 23 Photo of the Sassoon Road Sitting-out Area at Site 7



Pointers for Further Study by the Applicant

- 9.21 The above alternative sites are identified based on the public information available. They serve as the pointers for the applicant to study further. In addition to the above possibilities, the applicant should explore other possibilities utilising their existing properties and premises, and in other locations. Increase in the plot ratio of the existing premises and sites may also be the other means to achieve HKU's Goals when these are redeveloped.

10. Conclusion

- 10.1 In view of the above, the Residents of Royalton and Royalton II express their **STRONG OBJECTION** to the applicant's rezoning request for the proposed development at the "GB" buffer.
- 10.2 The proposed development **felling 91% of the existing trees** at the Site and **irrevocably disturbing the natural woodland** nurturing birds, reptiles and aquatic fauna species some of which have conservation interests, and containing over 180 vegetation species, and replaced them by concrete columns and structures is **defeating the purpose of the "GB" zone**, which is intended to conserve existing landscape features and areas of scenic value.
- 10.3 The erection of the building structures at the Site which is an important breathing space would **block the summer prevailing wind** from the seaward side, diminishing the air ventilation into the built-up cluster along Pok Fu Lam Road, and the surrounding environment including the hospital and schools. There is also absence of the information and impact arising from the HVAC and light pollution. The impact arising from the above cannot simply be mitigated by the adjustment of the building mass, treatment of the building structures, or design and positioning of the building footprint. The main crux of the problem originates from the **unsuitable location of the Site**. The **locational requirement** of the research laboratories and animal facilities next to QMH **cannot be justified**.
- 10.4 The proposed development on the difficult site terrain filling up 1.6 ha of "GB" buffer is large in scale involving the need of **excavation into the natural vegetation 8,000m² down to 10m in depth**. The land take for the construction of the ramps and structure columns are **unnecessary making the layout inefficient**.
- 10.5 The **biosafety and environmental contamination risks, risks of leakage** via aerosols, drainage, sewerage, transport, into the environment; and the health and safety risks of exposure for staff, students, patients, commuters, and local residents arising from the proposed **P3 laboratories** are absent in the submission.

- 10.6 While the Residents are suffering from the existing **poor traffic situation** along Pok Fu Lam Road with 6 or more buses holding up the traffic during rush hours, and despite that the Pokfulam Moratorium is still in force, the applicant has failed to explain why the TIA presented insignificant impact. The traffic impact during construction is in particular alarming to the Residents.
- 10.7 Before acquiring public funding for new research and laboratory buildings, the applicant has failed to set out that the existing facilities have been fully utilised; nor comprehensive studies in respect of all possible **alternative sites** to identify the most cost-effective and least intrusive option. There is currently insufficient information provided by the applicant to demonstrate the above, and it would be an unjustified use of public resources if the applicant were to proceed with the Proposal in such circumstances.
- 10.8 In sum, the value of this “GB” buffer, the applicant’s devastating disturbance to the natural and visual amenity, blockage of the important breezeway, environmental, health & safety risks brought by the proposed research laboratories, its poorly justified development scheme, **inappropriate zoning** for the special nature of the research laboratories, the existence of the current traffic problems and anticipated aggravation of the poor traffic situation especially during construction, lack of the applicant’s endeavours to utilise the existing facilities and absence of the study on alternative sites should warrant **REJECTION of this rezoning request**.