



Hong Kong, 10 September 2021

立法會PWSC177/20-21(02)號文件  
LC Paper No. PWSC177/20-21(02)

Honorable Tony Tse Wai-chuen, BBS, JP  
Chairman  
Public Works Subcommittee  
Finance Committee  
Legislative Council  
Legislative Council Complex  
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**Public Works Subcommittee meeting on 15 and 17 September 2021**  
**“Construction of a new academic building on an extension site**  
**east of No. 3 Sassoon Road – Consultancy Study” (Ref: [PWSC\(2021-22\)34](#))**

Honorable Members of the Public Works Subcommittee,

It is noted that you are invited to recommend to the Finance Committee the upgrading of part of 67EG to Category A as 68EG at an estimated cost of \$56.0 million.

The budget is for investigation of a **green belt site** adjacent to No. 3 Sassoon Road and a quantity survey **for the development of a 43,000 sq.m. laboratory complex** primarily for research including animal testing. Note the Key Development Parameters submitted to the Town Planning Board by The University of Hong Kong (Table 4.1. in application Y/H10/13).

**We urge Members to request a study comparing the benefits, costs and risks of alternative sites, not only the extension site east of 3 Sassoon Road, for the following reasons:**

- 1. Development adjacent to 3 Sassoon Road is technically challenging and costly.** The proposed site is steep, dissected by water courses and the underground Hong Kong West Drainage Tunnel, and has no flat space at the top (Pok Fu Lam Road, major bus stop area) and the foot (elevated road section of Victoria Road). **It is likely that alternative sites are more economical to develop.**
- 2. Agreement on using this green belt site for development has yet to be considered by the Town Planning Board.** The tentative meeting is 15 October 2021. The Town Planning Board received 2,672 comments.



**3. Residents including HKU and Queen Mary staff have the identified alternative sites:**

- a) Teaching laboratories in Queen Mary Block T may suffice for teaching.
- b) Medical Complex Extension at 21 Sassoon Road, the faculty project at 3 Sassoon Road and the Laboratory Animal Unit at Sassoon Road provide sufficient new space for research.
- c) The planned redevelopment of the Patrick Manson Building, the Estates Building and the Pauline Chan Building provide adequate opportunities for expansion.
- d) HKU properties including Alberose and Middleton Towers, both rented out in the open residential market, can be redeveloped with little delay.
- e) The slopes along Pok Fu Lam Road north of Queen Mary Hospital can be considered to expand the Queen Mary Hospital complex.
- f) Science Park or Lok Ma Chau Loop where Government is considering creating a biotechnology cluster.

**4. Many adverse comments and questions have been received from the community and HKU staff**

Paragraph 16. of the PWSC(2021-22)34 paper is misleading. More than 800 submissions with numerous adverse comments and questions have been submitted to the Town Planning Board. This information is mysteriously absent from the papers submitted to the Public Works Subcommittee of the Finance Committee of the Legislative Council. Note annex 2: Community concerns regarding HKU laboratory complex East of 3 Sassoon Road extension.

We call on the Legislative Council to arrange a public hearing on the proposal soonest prior to funding approvals. In the meantime, we urge LegCo to request for a study comparing alternative sites, not only the extension site east of 3 Sassoon Road.

Yours sincerely

Paul Zimmerman  
Vice-Chairman, Southern District Council  
District Councillor, Pok Fu Lam

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Annex 1 - Table. 4.1. Submission by The Hong Kong University to the Town Planning Board (Y/H10/13)  
Annex 2 - Community concerns regarding HKU laboratory complex East of 3 Sassoon Road extension

Cc Town Planning Board  
Pok Fu Lam Residents  
Southern District Councillors



Annex 1 - Table 4.1. Submission by The Hong Kong University to the Town Planning Board (Y/H10/13)

**Table 4.1 Key Development Parameters**

<b>Overall Development</b>	
<b>Site Area</b>	
▪ Development Site Boundary	About 17,431 sq.m
▪ Rezoning Site Boundary	About 16,401 sq.m
<b>Total Plot Ratio</b>	About 2.63 <sup>(1)</sup> About 2.47 <sup>(2)</sup>
<b>Total GFA</b>	<b>About 43,000 sq.m</b>
▪ Classroom Facilities	About 4,450 sq.m
▪ Office and Storage	About 8,270 sq.m
▪ Research Laboratories	About 18,190 sq.m
▪ Teaching Laboratories	About 2,990 sq.m
▪ Animal Facilities	About 8,270 sq.m
▪ Data Centre	About 830 sq.m
<b>No. of Blocks</b>	4
<b>No. of Storey</b>	Block A: Not more than 9 storeys Block B: Not more than 5 storeys Block C: Not more than 3 storeys Block D: Not more than 3 storeys
<b>Building Height</b>	Block A: Not more than 169mPD Block B: Not more than 150mPD Block C: Not more than 139mPD Block D: Not more than 123mPD
<b>Site Coverage<sup>(1)</sup></b>	Not more than 65%
<b>Communal Open Space</b>	Not less than 4,000 sq.m
<b>Estimated Population</b>	About 4,150

**Community concerns regarding HKU laboratory complex East of 3 Sassoon Road extension**  
**(Y/H10/13)**

1. Scheme presented can't be relied on for approval of any rezoning or development. Town Planning Board should withhold approvals until community has had a chance to consider all alternative site options, and realistic designs.
2. Unlikely the final scheme can be achieved as presented.
3. The development of the buildings, as proposed, defy the laws of physics.
4. Unsuitable construction access.
5. Costs of slope works and widening of Victoria Road ignored.
6. MTR deemed the Site too difficult.
7. Failure to assess biosafety hazards and contamination risks.
8. Development as proposed will impact air ventilation.
9. Significant visual impact of proposed development for public.
10. Green belt area will be destroyed.
11. High risk that the environmental impact will be greater than suggested.
12. There is no locational requirement for laboratories at this site.
13. Failure to offer a comparison of alternative sites.
14. Government policy makers consider Lok Ma Chau Loop for biotechnology.
15. In case the Town Planning Board supports the Application: Master Layout Plan requirement.

**1. Scheme presented can't be relied on for approval of any rezoning or development.**

The Faculty of Medicine of the University of Hong Kong proposes to build a 43,000 sq.m. laboratory complex on giant legs floating above a green belt site near Queen Mary Hospital.

Renderings published to gather community support; to convince the Town Planning Board to rezone the green belt site; and to convince LegCo to approve funding; are deemed "misleading". Engineers who surveyed the site concluded that "*It can't be built as presented.*" HKU admits that "*building layouts shown in the presentation materials are conceptual design only*".

The development site is steep, and dissected by water courses and the Hong Kong West Drainage Tunnel. The MTR rejected the site as unsuitable for a Queen Mary Station. Development here defies the laws of physics. Besides structural needs, access via Pok Fu Lam Road is not advisable. There is a major bus stop and there is no other flat space. Access would require a diversion of Victoria Road onto a new viaduct to cross the Kong Sin Wan valley. This would significantly impact cost, time, and the environment.

Besides the loss of green belt and 500 trees, residents have other concerns. The primary use is for laboratories working with biosafety risk group 3 microorganisms, macromolecular complexes, stem cells, wet chemicals, soft tissues, and animals. Residents are deeply concerned over biosafety hazards. No assessment has been provided of contamination risks including leakage via aerosols, drainage, sewerage, transport, and people movements. Risks of exposure for staff, students, patients, commuters, and local residents, is unknown.

A clear overriding need before areas reserved for conservation can be rezoned for development. There are no apparent requirements for laboratories to be at THIS site. Government is considering the Lok Ma Chau Loop for a biotechnology cluster (*"Hong Kong scientists urge closer collaboration with Shenzhen in bid to develop both cities into a hi-tech hub,"* SCMP 26 July 2021). Over 800 concerned citizens signed a petition urging HKU to consider alternatives, including Science Park, existing sites under HKU, and unallocated land near Queen Mary Hospital.

While proud of HKU's contribution to the fights against SARS and COVID, a rethink of the location is required. Current drawings can't be relied upon. The Legislative Council and Town Planning Board should withhold approvals until the community has had a chance to consider all site options, and realistic designs.

## **2. Unlikely the final scheme can be achieved as presented**

- a. In *"HKU's response to the local community"* it is stated that the Applicant does not expect the buildings to be constructed to comply with what is presented. A working group of resident experts deemed the renderings *"misleading"*.
- b. *"The building layouts shown in the presentation materials are conceptual design only as part of the TFS study. In the ensuing stage of building design, the University will work closely with the Architect to optimize the design to address the visual concerns raised by the community. The building blocks and height will be revisited in order to mitigate the visual impact from Pok Fu Lam Road and Northcote Close. The feasibility of further sunken the development, softening of building edges with greenery and building disposition will be actively explored and adopted where suitable"*.
- c. The green roofs are unlikely as suggested in the renderings as normal rooftop facilities such as chillers, cooling towers, lift rooms, pump rooms, and water tanks, are absent from the drawings.
- d. Importantly, HKU does not acknowledge the extent of the changes which will be required to their proposals. They do not appear to have had the benefit of any structural engineering review, nor any advice on how the building might be constructed on what can only be described as a *"Difficult and Demanding Site"*.

## **3. The development of the buildings, as proposed, defy the laws of physics.**

- a. The site is steep and dissected by water courses and the underground Hong Kong West Drainage Tunnel. There is no flat space at the top (Pok Fu Lam Road, major bus stop area) and the foot (Elevated road section of Victoria Road). Development at this site is technically challenging and costly. It is very likely that the final development scheme will vary dramatically from what has been shown to the Public and the Town

Planning Board.

- b. Development of the buildings, as proposed, defy the laws of physics. Little thought has been given to the structural needs. The presentation to the local community stated that the *“Building masses are elevated from the slope through four main structural cores, further minimizing the disturbance of existing trees and the two existing watercourse”*. Two cores (50 metres apart) support block A, two cores (45 metres apart) support block B and two cores (70 metres apart) support block C. However, the building form makes no allowance for massive beams which would be necessary between the cores. Such designs are not normally approved due to inefficiency and high cost. Even if provided, they would impose significant limitations on the layout on the various floors.

#### **4. Unsuitable construction access**

- a. Construction access via Pok Fu Lam Road is not advisable. There is no flat space at the top of the site. This section of Pok Fu Lam Road is a major bus stop. There is no flat space at the foot. Victoria Road is an elevated road (viaduct) and makes a sharp bend at the foot of the Site. Northcote Close is a steep and narrow road along a school site. None of the three access points are suitable for construction access.

#### **5. Costs of slope works and widening of Victoria Road ignored**

- a. Construction of major buildings on this steep hillside will require significant excavations if only for the building’s foundations. The “Geotechnical Review” has many provisos thus gives no real indication of how the work might be undertaken or the difficulties which will be involved.
- b. It is likely that the development would require a large excavation of the lower portion of the slope to form a platform on which, at least, the lower portions of the building would be constructed.
- c. The only area of flat land which might be suitable is Victoria Road at the bottom of the slope. Construction from the top of the slope, and occupying one lane of Pok Fu Lam Road, is clearly not a practical option, nor is the steep and narrow Northcote Close.
- d. To make space on Victoria Road would require a diversion of Victoria Road onto a new viaduct inside the existing bend to cross the valley. This then frees the existing road to enable construction on the hillside. This is a significant change to the scope of HKU’s project in terms of procedures, cost, time, and impact on the environment.

#### **6. MTR deemed the Site too difficult**

- a. While traffic demand is expected to be light, the anticipation of a MTR station nearby may well be misplaced. The Site was considered unsuitable for development by the MTR and abandoned as an option for the Queen Mary Station.
- b. Recently completed feasibility studies of the South Island Line (West) will have identified the limited patronage and lack of development opportunities except for Wah Fu. It is yet to be learned whether government is committed to implement a full MTR line between HKU station and Wong Chuk Hang.

#### **7. Failure to assess biosafety hazards and contamination risks**

- a. The applicant failed to assess biosafety and environmental contamination risks. The

primary use (30,000 sq.m.) is for laboratories working with biosafety risk group 3 (P3) microorganisms, macromolecular complexes, stem cells, wet chemicals, soft tissues, and animals.

- b. The Town Planning Board is advised to require an assessment of the risks of leakage via aerosols, drainage, sewerage, transport, and people movements, into the environment; and the risks of exposure for staff, students, patients, commuters, and local residents.

**8. Development as proposed will impact air ventilation**

- a. Development at the Site will block wind and negatively impact air ventilation at Queen Mary Hospital.

**9. Significant visual impact of proposed development for public**

- a. Development at the Site will block the views of Kong Sin Wan valley and East Lamma Channel for the public along Pok Fu Lam Road and at Queen Mary Hospital.

**10. Green belt area will be destroyed**

- a. The Site falls within an area zoned “Green Belt” (GB). The planning intention of this zone is primarily for the conservation of the existing natural environment amid the built-up areas/at the urban fringe. There is a general presumption against development within this zone.
- b. The Site is a steep vegetated area with nearly 800 trees some of which have a crown of over 20 meters. The area nurtures birds, reptiles, wild boars, and aquatic fauna. This eco-system will be destroyed as 553 trees are expected to be affected of which 502 will be felled.

**11. High risk that the environmental impact will be greater than suggested**

- a. It is not possible to construct these massive structures on this steep hillside without a major disturbance to the hillside and existing vegetation.
- b. It is likely that more trees will need to be removed to facilitate construction, slope stabilization and mitigation. The ‘floating’ design of the building in this notional scheme is unrealistic. Even if this design could be achieved on this Site, vegetation will be deprived from sunlight and perish below the building.

**12. There is no locational requirement for laboratories at this site**

- a. The Green Belt presumption requires an overriding need for any development to proceed. However, no information has been provided showing why a laboratory complex should be provided at this Site. There are no locational requirements for research laboratories and animal facilities at this Site.

**13. Failure to offer a comparison of alternative sites**

- a. Missing is a detailed search and assessment of alternative sites – whether within HKU or unallocated Government land - with a comparison of benefits, costs and risks.
- b. Residents have identified sites within HKU and on unallocated government land. HKU

staff have identified opportunities for use of under-utilized HKU properties:

- i. Teaching laboratories in Queen Mary Block T may suffice for teaching.
- ii. Developments including the Medical Complex Extension at 21 Sassoon Road, the faculty project at 3 Sassoon Road and the Laboratory Animal Unit at Sassoon Road provide sufficient new space for research.
- iii. The planned redevelopment of the Patrick Manson Building, the Estates Building and the Pauline Chan Building provide adequate opportunities for expansion.
- iv. There are alternative sites which can be considered, including Alberose and Middleton Towers, both rented out in the open residential market.
- v. Alternatively, increases in Plot Ratio on selected existing HKU sites may provide the GFA required. Or, existing HKU facilities, which are not essential to be located in this area, be relocated elsewhere to free space.
- vi. The slopes north of Queen Mary Hospital.
- vii. Science Park or Lok Ma Chau Loop.

#### **14. Government policy makers consider Lok Ma Chau Loop for biotechnology**

- a. Science Park and Lok Ma Chau Loop offer flat sites and lower development costs, as well as locational advantages for bioscience laboratories. None of these sites appear to have been considered.
- b. Government is considering the Lok Ma Chau Loop for a biotechnology cluster (*"Hong Kong scientists urge closer collaboration with Shenzhen in bid to develop both cities into a hi-tech hub," SCMP 26 July 2021*).
- c. With government tightened following the Covid – led downturn, there is a need for Government to decide wisely on investments in biotechnology and medical research laboratories.

#### **15. In case the Town Planning Board supports the Application: Master Layout Plan requirement**

- a. The zoning from Green Belt to "G/IC" is not appropriate. The main use of the proposed development is a "laboratory complex" rather than what is commonly understood as an "educational institution". Less than 10% of the laboratory space is for teaching. The dominant use and nature of the development must be recognized otherwise the wrong assessments criteria and approvals are considered.
- b. We urge the Board to reduce the maximum building height to the level of Pok Fu Lam Road and certainly not higher than that permitted for the Ebenezer School site.
- c. As explained above, the designs presented are unrealistic. A final scheme meeting the Site conditions is likely to be very different. For that reason, we urge the Town Planning Board to require a Master Layout Plan to ensure the Board retains control over the final design and development plans, and for the community to give their input.

Hong Kong, 20 August 2021