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To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: PROPOSED AMENDMENTS TO THE MAN KAM TO OZP NO. S/NE-MKT/4
Attachment: Sandy Ridge expansion plan.pdf

PROPOSED AMENDMENTS TO THE MAN KAM TO OZP NO. S/NE-MKT/4

Dear TPB Members,

Item A – About 10.59ha. Rezoning of a site in Sandy Ridge from “Other Specified Uses” (“OU”) annotated “Cemetery, Columbarium, Crematorium and Funeral Related Uses” to “OU” annotated “Innovation and Technology” (“OU(I&T)”)

Data centre use 196,000m² / Office use 54,000m² / Total GFA of 250,000m² 115mPD

STRONGEST OBJECTIONS

It is an indication of the extent to which public opinion has been stifled when an absurd plan like this that will exacerbate an existing problem has not been met with strong protests from the community.

For over a decade consultations, impact assessments, millions of dollars in consultant fees and incalculable time expended on the part of government departments went into the preparation of plans for the Development of Columbarium, Crematorium and Related Facilities at Sandy Ridge Cemetery. The initial site formation has already been carried out to provide a formed flat platform (about 2 ha) and adjoining formed man-made slopes.

The facility was intended to resolve long standing issues re the urgent need to provide cremation and niche facilities to address the shortfall. The community was advised that the “super cemetery” at Sandy Ridge would be capable of performing up to 178,000 cremations a year and provide 200,000 niches for urns and stage 17,800 cremations per annum.

<https://www.epd.gov.hk/eia/register/profile/latest/esb314/esb314.pdf>

Members must read the above report and the attached outline of the original plan and the urgent need for additional burial facilities in Hong Kong.

Now suddenly because some residents of Lo Wu have complained that the plans would lower the value of their homes, impact their views and adversely affect their mental wellbeing, the administration has caved in and come up with the ridiculous plan to develop a data center node in the middle of a very large cemetery complex, Sandy Ridge Cemetery is 90ha.

However here in Hong Kong thousands of residents live comfortably with full views of cemeteries, some of our most prestigious residential locations like Pok Fu Lam and Happy Valley are located adjacent to large burial grounds.

As for the right to views, this has been discussed many times at TPB. The only views that have protection are those of the ridgelines from the harbour front.

It was shocking to note that during the TPB meeting in Nov **there was no mention of any proposal for an alternative site to provide the many planned facilities**. The interests of the community were completely ignored.

The paper states that “the Government would continue to develop Hong Kong into an international innovation and technology (I&T) centre”. Indeed, and a large amount of land has already been set aside for this purpose.

While President Xi has mandated that Hong Kong develop its IT sector, this was intended to be in the form of large integrated developments like those planned for San Tin Technopole. HSITP and the existing Science Park, not an isolated facility in the middle of a burial ground. He has stressed better respecting public opinion and following the aspirations of the people, in this instance a solution to the need for more and better facilities to remember the departed.

The location is a long distance from any existing or planned MTR stations.

One access road only. Isolated location, the paper, probably deliberately, avoids any mention of the fact that there would be need for a considerable supply of catering and convenience store options. These would require staff, but the location is far from public transport options. This indicates that the amount of accommodation required to ensure adequate on site assistance has also been brushed aside.

While “in addition to the data centres and related purposes that are always permitted within the proposed “OU(I&T)” zone, other complementary non I&T uses, such as ‘Flat (Staff Quarters only)’, ‘Office’, ‘Eating Place’ and ‘Shop and Services’, etc., which provide business and living support uses, are always permitted in this zone.” A site at such an out of the way location would require considerably more supporting facilities than the usual facilities where one can pop out to the shops and restaurants.

While the paper boasts that there is considerable interest in the development, this is more likely to be on the expectation of cheap rents. No lessons have been learned from Cyberport where much was promised but little delivered because of the remote location. The outcome was that the premises were leased out at very low rates and used for storage, back up facilities, etc.

The statement that “The land would be sold in phases, taking into account the market responses” underlines this possibility. But we are talking about a limited number of buildings, see Drawing 1, two data centres and two offices towers.

Also of concern is “While an overall management of the Site was not planned, the Government would explore setting out requirements to encourage coordinated development of the Site.” Again most undesirable for what is essentially a compact site surrounded by slopes.

Amendments to the Notes of the Plan

(b) Incorporation of 'Government Refuse Collection Point' and 'Public Convenience' under Column 1 of the Notes for "Village Type Development" ("V") zone; and corresponding deletion of 'Government Refuse Collection Point' and 'Public Convenience' under Column 2 of the Notes for the "V" zone.

OBJECT – DEPRIVES THE COMMUNITY OF HAVING A SAY IN BOTH THE LOCATION AND DESIGN OF THESE FACILITIES

(c) Incorporation of 'Field Study/Education/Visitor Centre' under Column 2 of the Notes for "V" zone.

OBJECT – THE INTENTION OF V ZONE IS TO PROVIDE HOUSING. THE PROPOSED USES CAN BE EXPLOITED TO PROVIDE A FRONT FOR COMMERCIAL OPERATIONS

(f) Revision to the Remarks of the Notes for "Conservation Area" zone on filling of land/pond or excavation of land.

STRONGEST OBJECTIONS. THIS GIVES THE GOVERNMENT UNFETTERED AND UNACCOUNTABLE POWER TO BASICALLY DO WHATEVER IT WANTS AND MAKES A MOCKERY OF THE ENTIRE PLANNING PROCESS AS THERE IS NO POINT IN PROPOSING CONSERVATION PROJECTS WHEN THE LOTS CONCERNED CAN BE FILLED IN BY HKSAR WHENEVER IT PLEASES WITHOUT BEING SUBJECT TO EVEN MINIMAL SUPERVISION. THE INTERESTS OF THE COMMUNITY WILL BE ENTIRELY ELIMINATED FROM THE PROCESS.

The Plan should be rejected. The location is inappropriate for the proposed development. Such facilities should be located within or adjacent to the planned IT parks.

The change of use from cemetery is not justified when there is urgent need in the community for community facilities. It displays significant disrespect to the intended land use of the district.

It is quite likely that because of the isolate location, long distance from services, and the issues of Fung Shui and working in close proximity to a large number of deceased would impact the attraction of the facilities and we would end up with yet another white elephant like Cyberport.

TPB members have a duty to see beyond the hyperbole. This is a jump on the bandwagon proposition similar to the current panda mania.

The need for rational assessment of the wider interests of the community has been abandoned.

Mary Mulvihill

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1 Basic Information

1.1 Project Title

- 1.1.1 The title of the proposed project is “Provision of Crematorium, Funeral Parlour and Visitor Centre at Sandy Ridge Cemetery” (hereafter named as the Project).

1.2 Purpose and Nature of the Project

- 1.2.1 Food and Environmental Hygiene Department (FEHD) currently manages 32 body cremators (ten in Cape Collinson, six in Diamond Hill, six in Wo Hop Shek, four in Fu Shan, four in Kwai Chung, and two in Cheung Chau). About 52 840 cremation sessions are available each year under general operation of FEHD facilities.
- 1.2.2 With the growth in overall population and changes in demographic profile, the projected demand for cremation service in Hong Kong is expected to continue to increase steadily in the next 20 years. The annual average number of deaths and cremations is estimated to be around 60 000 and 57 000 respectively in the future 20 years (from 2019 to 2038).
- 1.2.3 On the supply side, the serviceable life span of cremators is generally 15 to 20 years, or about 30 000 to 40 000 cremation cycles. The cremators in Wo Hop Shek Crematorium and the Cape Collinson Crematorium were reprovisioned in 2013 and 2015 respectively. The cremators in the four crematoria in Cheung Chau, Kwai Chung, Fu Shan and Diamond Hill have been in use since 1991, 2003, 2004 and 2007 respectively. In the normal course, reprovisioning projects for crematoria need to be kicked off at suitable junctures. Between the decommissioning of an old facility and completion of a new one (typically three to four years), there will be a reduction in the total number of cremation sessions available. As an overall picture, it is anticipated that there will be a shortage in the number of available sessions from 2023 to 2026 and from 2033 to 2038.
- 1.2.4 Given the increasing demand for cremation service and the reprovisioning of crematoria, planning is in place to implement crematorium projects to ensure no service gaps. The Project is the next in the pipeline to provide ten new cremators at Sandy Ridge Cemetery for commissioning in 2027, adding about 17 800 cremation sessions per annum.

1.2.5 In addition to the new crematorium, to cope with the anticipated demand for funeral related services in tandem with the increasing number of deaths, the Project is also proposed to develop new funeral parlour and visitor centre. The crematorium, funeral parlour and visitor centre proposed in the Project are integral parts of the planned infrastructure for providing a one-stop funeral service cluster at Sandy Ridge Cemetery.

1.2.6 The Project comprises the following key components:

- Construction of crematorium, funeral parlour and visitor centre at Sandy Ridge Cemetery; and
- Operation of crematorium, funeral parlour and visitor centre at Sandy Ridge Cemetery.

1.2.7 The proposed crematorium, funeral parlour and visitor centre, whose location and tentative block plans are shown in **Figure 1.1** and **Figure 1.2** respectively, comprise the following elements:

Crematorium

- (a) Provision of ten new coffin cremators using town gas as burning fuel (comprising eight standard cremators with a capacity of 170kg each and two large cremators with a capacity of 250kg each);
- (b) Provision of a full range of ancillary facilities including:
 - four multi-purpose service halls;
 - office accommodation for FEHD staff and reception area;
 - four joss paper burners;
 - a farewell gallery with two designated coffin routings from funeral parlour to cremator room;
 - mortuary with storage capacity of at least 80 dead bodies;
 - one ash storage room inside the office for FEHD staff;
 - one pulverization room with bone cremulators;
 - office accommodation for Electrical and Mechanical Services Department (EMSD) staff;
 - EMSD maintenance workshop and spare part store;
 - store rooms;
 - refuse storage chamber;
 - toilets for visitors and staff;
 - layby for hearses;

- loading and unloading area for coaches, private cars, refuse collection vehicle and emergency vehicles, etc.
- (c) Control room for CCTV system and Public Address (PA) System, and CCTV system with cameras at suitable locations both within the crematorium and the surrounding areas for monitoring and security purposes;
- (d) Separate control room for CCTV system inside cremation room; and
- (e) Landscaping.

Funeral Parlour

- (a) Provision of a funeral parlour with 30 funeral halls;
- (b) Provision of a full range of ancillary facilities including a small joss paper burner in each funeral hall, paper artifacts furnaces, separated toilets for visitors and staff, refuse storage chamber, parking spaces for hearses, coaches and private cars, loading and unloading area for refuse collection vehicle and emergency vehicles, etc;
- (c) Provision of control room for a CCTV system with cameras and a PA system at suitable locations for monitoring and security purposes; and
- (d) Landscaping.

Visitor Centre

- (a) Provision of a visitor centre incorporated with seating area and exhibition room;
- (b) Provision of a catering facility with a seating capacity for accommodating about 120 people;
- (c) Provision of ancillary facilities to support the operation of the visitor centre; and
- (d) Landscaping.

1.3 Name of Project Proponent

- 1.3.1** FEHD of the Government of the Hong Kong Special Administrative Region (HKSAR) is the Project Proponent whereas Architectural Services Department (ArchSD) of the Government of the HKSAR is the works agent of FEHD to implement the Project.