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**Submission Number:**

**TPB/R/S/NE-MKT/6- S1**

**From:** mm1947 [REDACTED]  
**Sent:** 2025-07-30 星期三 03:19:20  
**To:** tpbpd/PLAND <tpbpd@pland.gov.hk>  
**Subject:** AMENDMENT TO THE DRAFT MAN KAM TO OZP NO. S/NE-MKT/5

**Representation Number:**

**TPB/R/S/NE-MKT/6- R1**

**Attachment:** Hong Kong COVID - Coronavirus Statistics - Worldometer.pdf;  
Mortuary.docx

## **AMENDMENT TO THE DRAFT MAN KAM TO OZP NO. S/NE-MKT/5**

Dear TPB Members,

**Item A** – about 9,400m<sup>2</sup>. Rezoning of three land parcels at Sandy Ridge from “Other Specified Uses” (“OU”) annotated “Cemetery, Columbarium, Crematorium and Funeral Related Uses” to “OU” annotated “Innovation and Technology”.

Two of them (including one (about 1,800m<sup>2</sup>) near MacIntosh Fort (Nam Hang) and another (about 5,900m<sup>2</sup>) near the adjacent “Green Belt” (“GB”) zone) are located at the northern fringe of the “OU(I&T)” zone while the remaining one (about 1,700m<sup>2</sup>) is at the southern fringe. **The Site is mainly natural slope area with vegetation.**

### **Strong Objections.**

First of all to the sneaky manner in which the site approved in March is being extended. While many rights of participation in the planning process on the part of the community have been curtailed under the excuse of a more efficient system, the administration itself by not revealing its true intentions in the previous exercise has generated much time wasting on the part of government staff, TPB members and the public via the generation of a further OZP.

In the previous OZP the paper underlined that the intention was effectively nothing more than a change of land use on an already formed site:

*“The Site with a total area of about 10.59ha comprises a formed flat platform (about 2ha) at site formation level of approximately 50mPD and adjoining man-made slopes (about 8.59ha)”*

But now it is clear that all along the intention was to extend the site onto the surrounding slopes. The previous OZP was an obvious **MISREPRESENTATION** of the true intention.

And this may be just the first of a number of steps to gradually encroach further onto the designated burial grounds and green belt that will create a considerable negative impact from both a visual and functional perspective.

Also of concern is the statement:

*“Considering the industry feedback collected from the RFI exercise, the proposed minor boundary expansion would provide flexibility to cater for more development options initiated by future developer(s), including the development of a single building with a larger floor area”*



This would effectively create a long wall effect with strong negative visual impact on the verdant landscape.

### **NOTE THAT NO PLANS NOR VISUAL IMPACT IMAGES HAVE BEEN PROVIDED**

The references to 'larger floor area' and 'no additional traffic is anticipated' are in contradiction to the statement that there would be no increase in GFA or the number of employees to be accommodated at the site.

The issue of the single road access was of considerable concern during the OZP meeting in March.

While there is no mention of tree felling, it is clear from the images that in fact a considerable number of trees would be cleared.

### **MEMBERS MUST QUESTION HOW MANY TREES WOULD BE REMOVED**

Of concern also is the considerable extension of man-made slopes. The further cutting into the slopes surrounding the platform erodes the drainage function of the land surrounding the proposed development.

On the news today were multiple images of water cascading down man made slopes "Heavy downpour cascades down hillside during Hong Kong's first Black Rainstorm" "A temporary waterfall formed in Shau Kei Wan when rainwater poured down a slope on Yiu Hing Road, the site of a large landslide in 2023."

At the March OZP when question about evacuation if the single access was blocked the solution was to use helicopters! The news clips of the conditions during the black rainstorm underline that this would not be a viable option.

That the issue of access was not properly addressed in the March OZP is evident. This exercise provides the members with the opportunity to do their duty and consider the issue with regard to the impact of climate change on the terrain.

That the planned use has deprived the community of essential services, in particular with regard to mortuary capacity was also not adequately addressed.

Attached is correspondence on the matter that shows that no lessons were learned from Covid and that facilities are manifestly inadequate should there be another outbreak of a deadly virus. Much of the presentation in March remains relevant.

Mary Mulvihill

**MAN KAM TO OZP NO. S/NE-MKT/5**

**21 Mar 2025**

**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 196,000m<sup>2</sup> / Office use 54,000m<sup>2</sup> / Total GFA of 250,000m<sup>2</sup> 115mPD



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## **STRONGEST OBJECTIONS**

It is an indication of the extent to which public opinion has been stifled when an absurd plan like this 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 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>

Hopefully members have read this report and the attached outline of the original plan that underlined the urgent need for additional burial facilities in Hong Kong.

**NOTE THAT THE NUMBER OF DEATHS PROJECTED IS ACTUALLY GREATER THAN THOSE QUOTED IN THIS DOCUMENT**

Even if the number of residents opting for Green burial increases to one third from the current 18%, by 2046 the demand for facilities would be around 60,000.

**Tuen Mun Tsang Tsui Columbarium and Wo Hop Shek Columbarium Phase VI** came into operation in **2020** providing about **200,000 public niches**.

**Cape Collinson-San Ha Columbarium** In **2023** provided about **25,000 public niches**

**Shek Mun Columbarium** mid-2025 would provide additional some **40,000 public niches**

**265,000 IN TOTAL. TAKING THE CURRENT NUMBER OF ESTIMATED DEATHS 2025 – 54,600, THIS WOULD TRANSLATE INTO AROUND 40,000pa. SO THE SUPPLY IS SUFFICIENT ONLY UNTIL AROUND 2032.**

**ACCORDING TO THE PAPER 450,000 NICHES IN TOTAL BUT NO DATA PROVIDED ON THE NUMBER ALREADY TAKEN UP. EVEN IF ALL ARE FREE, TAKING INTO ACCOUNT THE INCREMENTAL INCREASE IN PREDICTED DEATHS, THE SUPPLY IS SUFFICIENT FOR AROUND 10 YEARS ONLY.**

**AND WHAT IF WE HAVE ANOTHER COVID OR SIMILAR SCENARIO? THE PROVISION OF THE PROPOSED FACILITIES LIKE THE MORTUARY (at least 80 dead bodies) IN A REMOTE LOCATION SHOULD CERTAINLY BE CONSIDERED NOT ONLY PRUDENT BUT NECESSARY. IT APPEARS THAT THE DISTRESSING SCENES OF BODIES PILED UP IN HOSPITAL CORRIDORS AND STORAGE AREAS ARE FORGOTTEN AND LESSONS THAT SHOULD HAVE BEEN LEARNED WITH REGARD TO PREPARATION FOR THE INEVITABLE COMING DISASTERS ARE NOW IGNORED IN THE FRENZY TO JUMP ON THE NEXT BANDWAGON**



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.**

"Whilst some members of the NDC and TKLRC raised concerns on road capacity of the existing Man Kam To Road to accommodate additional traffic as well as the lack of public transport services serving the area arising from the proposed development"

**REGRETABLELY NONE OF THEM HAVE BOTHERED TO PARTICIPATE IN THE OZP**

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 onsite 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 land.**



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**MANY TAX PAYERS WERE LEFT GOBSMACKED BY PAUL CHAN'S RECENT PLEDGE TO 'GRANT A PIECE OF LAND' TO SUCH DESERVING OPERATORS AS BIG PHARMA THAT HAVE BEEN GOUGING COMMUNITIES FOR DECADES, AND IN SOME CASES PROMOTING DRUG ADDICTION THAT HAS COST BILLIONS IN HEALTHCARE AND OTHER EXPENSES (See SCMP article)**

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.

So instead of making provision for a clear and unavoidable increase in the number of deaths due to our ageing society, the administration is punting on development that has no guaranteed outcome.

**Note:** "Site shows potential for development of a cluster of data facilities, **which could serve as an enabler in the I&T industry**"

As for "market demand for data centers", sure if land is cheap. But he ignores the current decline in demand for Commercial zoning that will free up equally 'spade ready' sites in far more convivial and easily accessible districts:

**26 Feb 2025: Commercial current oversupply – expected to reach 3 million square feet in the coming months – would take between seven and 10 years to fully digest, said Hannah Jeong, head of valuation and advisory services at CBRE Hong Kong.**

The OZP 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 isolated 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.

**The Response that the site "has no direct visual to the existing graves scattered across the other side of the hill" is risible as ingress and egress is through burial grounds.**

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

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

**NOTE:** As of April 13, 2024, the **Coronavirus Tracker is no longer being updated** due to the unfeasibility of providing statistically valid global totals, as **the majority of countries have now stopped reporting**. However, historical data remain accessible. Worldometer delivered the **most accurate and timely global statistics** (/coronavirus/most-accurate-and-timely/) to users and institutions around the world at a time when this was extremely challenging. **We thank everyone** who participated in this extraordinary collaborative effort.

[WORLD \(/CORONAVIRUS/\)](#) / [COUNTRIES \(/CORONAVIRUS/#COUNTRIES\)](#) / CHINA,

HONG KONG SAR

Last updated: April 13, 2024, 01:00 GMT



China, Hong Kong SAR

Coronavirus Cases:

**2,937,609**

Deaths:

**14,924**

Recovered:  
**2,872,188**

[Daily Cases Graph](#) - [Daily Deaths Graph](#)

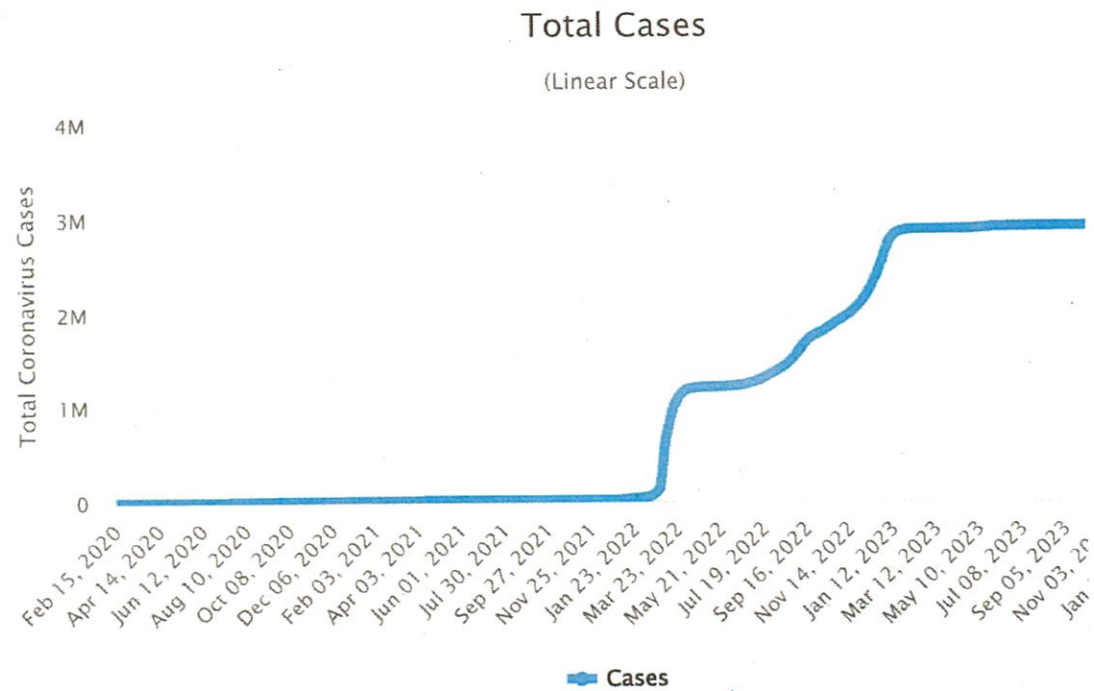
**Learn more about Worldometer's COVID-19 data** (</coronavirus/about/>)

Total Coronavirus Cases in China, Hong Kong SAR

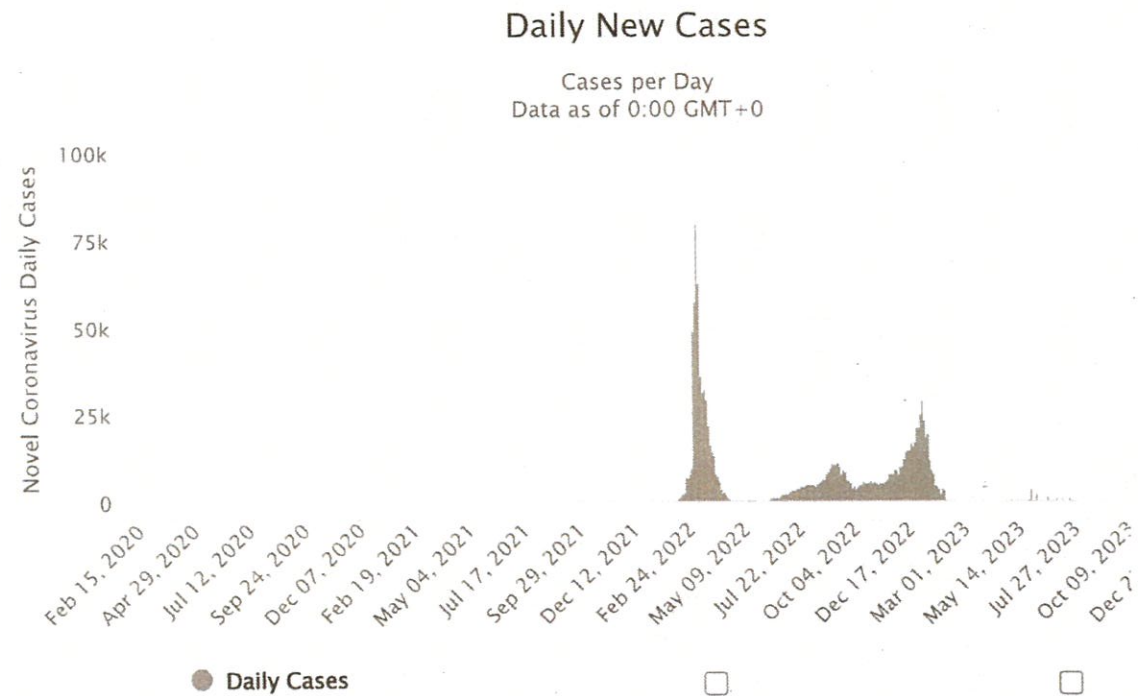
linear

logarithmic





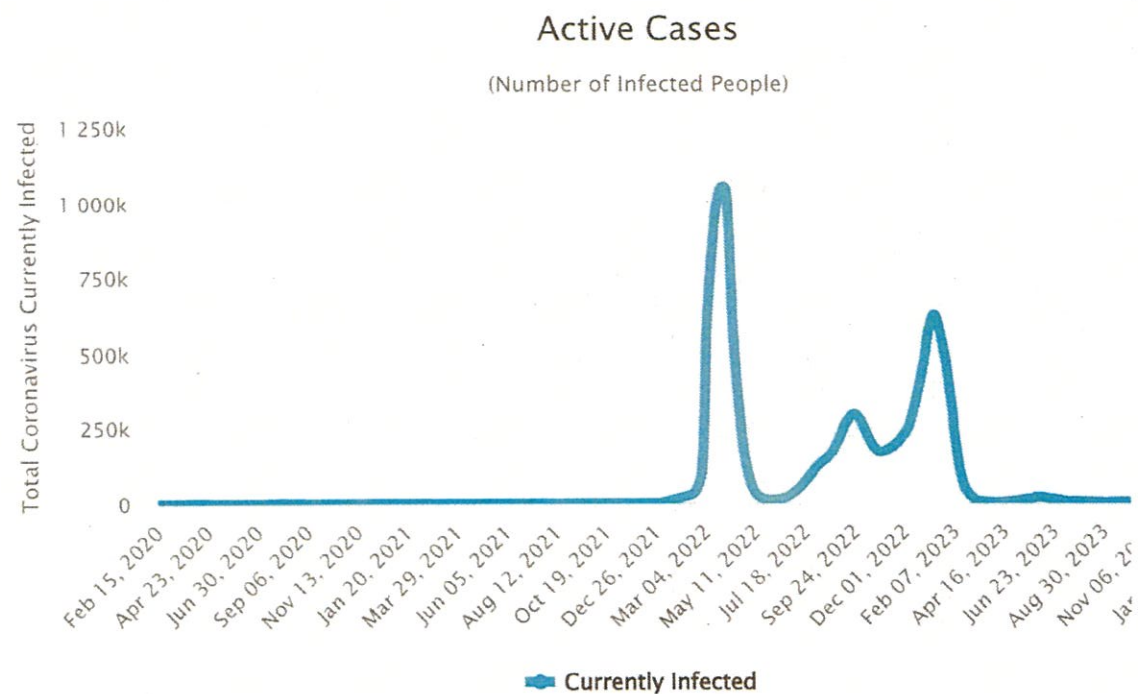
## Daily New Cases in China, Hong Kong SAR



See also: [Daily Deaths Graph](#)



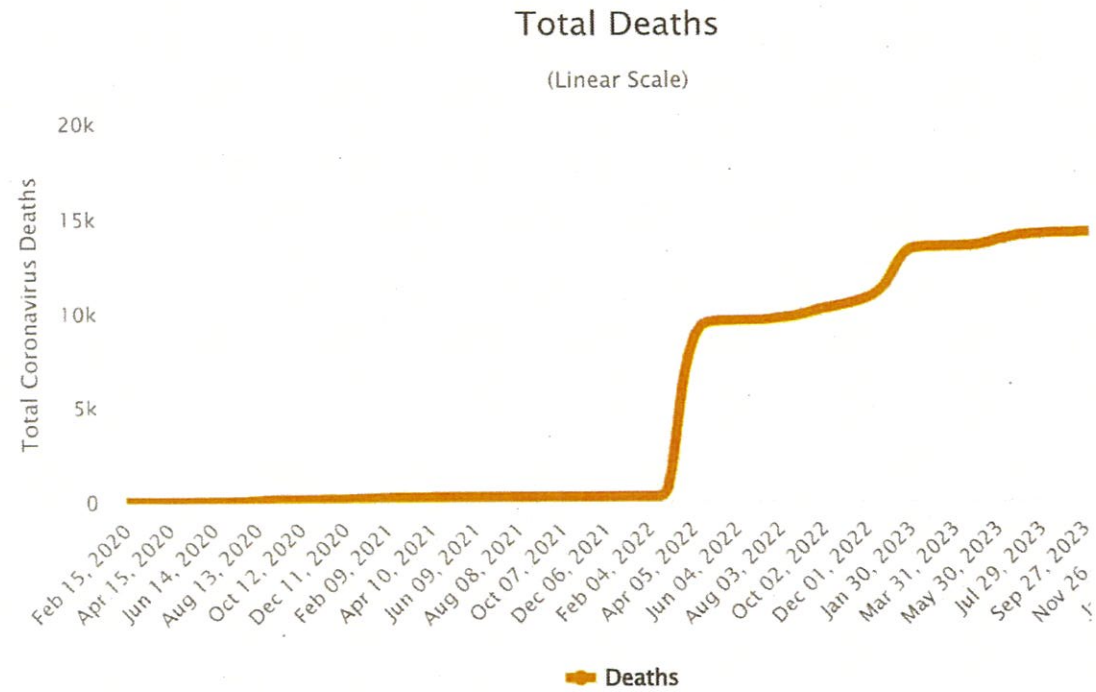
## Active Cases in China, Hong Kong SAR



## Total Coronavirus Deaths in China, Hong Kong SAR

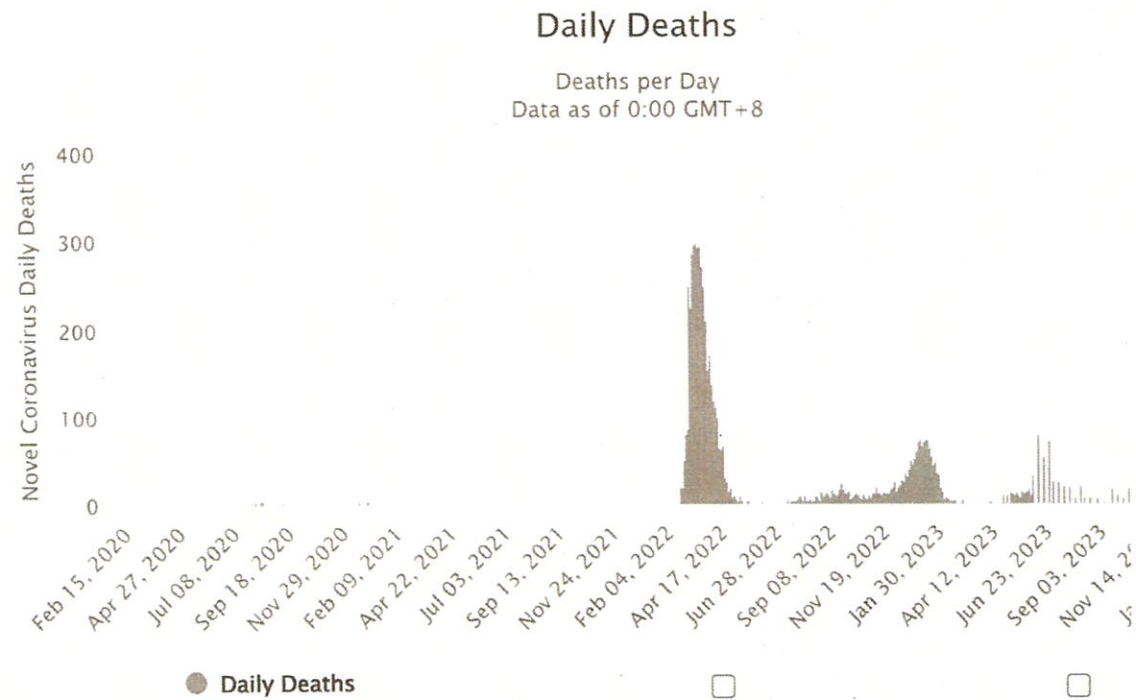
linear

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## Daily New Deaths in China, Hong Kong SAR



See also: [Daily Cases Graph](#)

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**From:** Enquiry [REDACTED]  
**To:** mm1947 [REDACTED]  
**Date:** Friday, 23 May 2025 9:57 AM HKT  
**Subject:** Re: No Mortuary Facilities to address Covid era conditions

Dear Ms Mulvihill,

Further to our reply on 17 April 2025, in consultation with the Department of Health (DH) and the Hospital Authority (HA), please find our consolidated reply in the ensuing paragraphs.

#### **Public mortuaries**

At present, there are four public mortuaries in Hong Kong (including the Victoria Public Mortuary (VPM) in Hong Kong Island, the Fu Shan Public Mortuary (FSPM) in Sha Tin, New Territories East, the Kwai Chung Public Mortuary (KCPM) in New Territories West, and the Kowloon Public Mortuary (KPM) in Hung Hom, Kowloon) of the Forensic Pathology Service of the DH for conducting medicolegal investigation of deaths that are reportable to the Coroner. The VPM, FSPM and KCPM are currently under operation whereas the KPM is reserved for emergency use where necessary.

The Government regularly monitors the utilisation situation and storage capacity of public mortuaries. Currently, the regular body storage capacity of the VPM, the FSPM, the KCPM and the KPM is about 1 280 in total, and is able to accommodate the demand up to 2031.

To meet the overall projected caseload (1 800) of public mortuaries by 2046, and to enable flexible coordination of body storage capacities in public mortuaries in various districts amid epidemics, the Government proposed to re-provision the VPM to further increase the overall body storage capacity of Hong Kong to over 2 000. On 21 March 2025, the Legislative Council Finance Committee has approved the project (<https://www.legco.gov.hk/en/legco-business/committees/financial-proposals-results.html?20250321>).

#### **Mortuaries in public hospitals**

Meanwhile, the HA mortuaries provide temporary safe storage of deceased HA patients before identification or collection for respectful burial, cremation or other means by the bereaved families. The HA has established a Mortuary Task Force to oversee mortuary services. This task force is responsible for coordinating and aligning operations across clusters, as well as making recommendations for service improvement. A contingency plan is in place and is reviewed regularly for internal communication to cope with surges in demand for storage at hospital mortuaries. Moreover, the HA has established a designated communication channel with the Health Bureau and the DH for emergency response.

As of December 2024, there were about 3 300 body compartments in 38 mortuaries under the HA, with 28 providing farewell facilities. During the peak of the pandemic from 2020 to 2022, the overall utilisation rate of HA mortuaries exceeded 100%, with all physical body compartments fully occupied. This necessitated the use of temporary storage units to manage the surge in demand. Since 2023, the overall utilisation rate of HA mortuaries has averaged around 75%. The HA will continue to regularly review the demand for storage facilities, while exploring administrative measures to consistently improve turnover rates and reduce the number of long-staying cases, including the potential for setting limits on storage

duration. Consideration will be given to hospital operations, compassionate needs, and public expectations during these reviews.

In planning hospital development projects, the HA will consider providing relevant facilities in appropriate hospitals, taking into account design and environmental factors. These may include farewell facilities and small viewing rooms to meet the needs of the deceased's families.

The DH and HA will regularly review the demand for storage facilities from time to time to meet service demands.

Yours sincerely,  
(Miss Sharon LAU)  
Health Bureau

<https://www.legco.gov.hk/yr2025/english/fc/pwsc/papers/P24-22-e.pdf>

Currently, the regular body storage capacity of the VPM, the FSPM, the KCPM and the KPM is about 1 280 in total. The public mortuaries would usually reach their critical storage limits after long holidays and during winter.

It is estimated that a body storage capacity in public mortuaries of no less than 1 800 is required by 2046 to meet the anticipated demand

Fu Shan Public Mortuary (FSPM) in Sha Tin 830  
Kowloon Public Mortuary (KPM) in Hung Hom, Kowloon) 132 (for emergencies)  
Kwai Chung Public Mortuary (KCPM) 220  
Victoria Public Mortuary in Kennedy Town (VPM) 1005 when redeveloped in 2034.  
Currently 76  
**Total: 1258**

HKU – MAY 29 2023 – 13,825 cumulative deaths from Covid

<https://www.worldometers.info/coronavirus/country/china-hong-kong-sar/>

THIS PUTS THE NUMBER OF DEATHS AT ALMOST 15,000