



香港建築師學會
The Hong Kong Institute of Architects

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By Fax and By Post
Fax No. : 2577 3075

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Director of Planning
Planning Department
16/F North Point Government Offices
333 Java Road North Point
Hong Kong

Dear Mr. Ling

**Stage 1 Community Engagement
Planning and Engineering Study on Future Land Use at Ex-Lamma Quarry
Area at Sok Kwu Wan, Lamma Island – Feasibility Study**

Thank you for your letter dated 21 December 2012 informing the commencement of the captioned community engagement exercise and inviting the Institute to participate in various public engagement activities.

We are pleased to deliver our views regarding the subject. Please find enclosed our written submission for your consideration.

Yours sincerely

Ada Y S Fung JP FHKIA RA
President

Encl



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**The Hong Kong Institute of Architects
Professional Views on the Future Land Use at Ex-Lamma Quarry Area at
Sok Kwu Wan, Lamma Island Stage 1 Community Engagement**

The Hong Kong Institute of Architects (HKIA) supports in principle the Government's effort in strengthening the current housing and land supply in Hong Kong. Nevertheless, the HKIA would also caution that in seeking ways to improve the territory-wide quantitative output, the qualitative urban characters and living standards are equally important which must be upheld, especially for our out-laying islands as their existing tranquil qualities should not be compromised by over-urbanization. Notwithstanding this, we would like to offer our specific views regarding the captioned Consultation as follows:-

A. General Comments on the Approach

1. The Consultation presumes "Resort Use" to be the development direction without much explanation on the rationale behind. While HKIA does not object to the proposed "Resort Use" in principle, it is questionable if such would be the best option for development in an out-laying island, considering the current land and housing pressure in the Hong Kong urban areas. Does the proposed leisure use in the ex-quarry site fall within a more macroscopic tourism and leisure grand vision for Hong Kong? The Government should clarify with more information.
2. On the other hand, if strengthening housing supply is the very objective for developing the ex-quarry site at Lamma, the fundamental issues should have included the potential and possible roles of Lamma as a whole and in the wider context of Hong Kong. In this regard one would expect the study team to have examined these issues more fully by conducting a comprehensive planning analysis and supporting it with reliable statistical data to cover pertinent aspects such as the Island's tourism potential, ecological/ conservation values and opportunities (as well as constraints) of a larger-scale housing development at this location. Rather disappointingly, there appears to be no such efforts invested in these important aspects so as to provide a starting point or base reference for consideration/ constructive debates by the community at large. Instead, the public have been given 2 (or 3) predetermined options (with so little justifications) – with population varying from 2,800 to 7,000 – plus a large man-made lake and notional supporting facilities.
3. The lack of clarity in the conceptual basis is illustrious in the suggestion to locate a sewage treatment plant next to the proposed resort development. It diminishes, if not contradicts, the conceptual validity of the resort proposal.
4. As an observation, while the Government is trying hard to re-zone existing G/IC sites in the urban areas for residential developments, the ex-quarry site offers a good location for plot ratio transfer or site-swapping for certain kind of existing down town G/IC premises to free up land to meet the current residential demands (e.g. Police College in Wong Chuk Hang). Opportunities have not been fully explored in this regard.



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5. Most importantly, as first priority, there must be sufficient land dedicated to meet the needs of the local residents on Lamma Island, such as schools and other G/IC facilities, which are insufficient to meet the demands at present. Any imposed new uses should be considered if and when the local needs are satisfied.

B. Comments on the Proposed Options

6. Without the clarification on the conceptual intent, any detail comment on the development densities (the Options) would become superfluous.
7. In particular, it would appear conceptually contradictory in Government policies as currently the public are being consulted on the relocation of the Shatin Sewage Treatment Plant into caverns while at the same time a new plant in the ex-quarry site in Lamma Island is being proposed. If cavern buildings are viable for sewage treatment plant, the same should also be adopted for Lamma.
8. As for the proposed partial reclamation of the man-made lake in Option 1b, the HKIA wonders if the retained lake is ecologically sustainable or not. As noted, the current water quality is unfit for swimming and is only good for limited water sports. From planning perspective, the preservation of the lake provides very limited amenity value considering the site is fronting onto Sok Kwu Wan waterfront anyway. If the land reclaimed from the lake proves to be useful for better infrastructure or help lower the development density then priority should be given to reclamation for improving the new development site. Otherwise, the Government should install a proper environmental monitoring/enhancing programme to proactively improve the existing water quality of the retained lake to ensure the marine ecology is thriving and the lake will become good for meaningful uses in the future.

C. Comments on the Community Envisioned

9. The lack of clarity is also noted in the envisioned future community planning in Lamma. The consultation document mentioned that the average flat size is about 50s.m. to 100s.m. for private and subsidized housing. The HKIA is strongly doubtful of such standards.
10. There should be a further study of the type of residents who will choose to live in the subject site and to commute daily by ferries between work and home. Can the residents of subsidized housing afford the cost of daily commuting? Residents in Marina Residential developments can most probably afford the cost of commuting, but will they be satisfied with a 100s.m. unit? Will a family with kid(s) be satisfied with the "small" flat sizes and what will be their combined family commuting cost? Are the flats only for "singles" with high income level who can afford the expensive ferry services? What is the projected demographic profile of the proposed Marina residential zone? The "Lift Style" of target residents is very unclear and should be studied for an appropriate household planning.



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11. Although comparisons with Cheung Chau have often been cited, but the demographic conditions and traditions of Cheung Chau is very different from Lamma's, especially for the proposed Marina residential zones. Many existing household units in Cheung Chau and Lamma are being used for holiday homes, which must not be confused with residential planning.
12. It is also noted from existing local residents of Cheung Chau that the island is in lack of good quality schools, and the flats are too small for family with kids. These are major reasons that middle class families have been moving out of Cheung Chau. Cheung Chau may not be a good reference model for Lamma. By introducing more residential units into Lamma Island, the same school shortage problem may repeat. The proposed G/IC sites must address such need. Finding school operators investing in a remote island has always been a challenge which may not be easily resolved. Hence, it may be a constraint for the proposed development scale.

D. Comments on Connectivity and Others

13. Connectivity to the CDA site to the west of the study area should not be ignored. It is noted that the waterfront promenade is disrupted by a residential site and a GIC site near the CDA site. It is desirable to set back these two sites from the waterfront so that the waterfront promenade can extend towards the CDA site.
14. The future pedestrian route along the coastline should allow for retail kiosks and spectator stands for a vibrant waterfront promenade. The Sok Kwu Wan bay area would be ideal for future water sporting events.
15. Existing ferry service is expensive and generates a lot of pollution. A more environmentally-friendly means of transportation should be considered. The proposed development may be subject to constraint not on land supply but on transportation.

The HKIA would be pleased to meet with you to discuss on the above in more detail, should it be considered necessary.

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