



BY EMAIL ONLY

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Environmental Protection Department
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3 September, 2016

Dear Ms. Wong,

**Elevated Pedestrian Corridor in Yuen Long Town Connecting with
Long Ping Station – Investigation, Design and Construction
Environmental Impact Assessment Report**

Green Power would like to lodge an objection to the above-captioned environmental impact assessment (EIA) report under EIA Ordinance due to the following reasons:

Need of project not adequately justified

1. The needs of an additional pedestrian corridor within Yuen Long Town can be interpreted broadly in two aspects:
 - (a) pedestrian movements across different parts of Yuen Long Town (YLT), and
 - (b) pedestrian access to major public transport facilities, such as Mass Transit Railway (MTR) stations, Light Rail Transit (LRT) stations and bus terminus/stops.
2. Yuen Long Town (YLT) can be divided into four distinct parts by Castle Peak Road -Yuen Long Section (CPR-YL) and Yuen Long Nullah(YLN), namely
 - (i) Yuen Long Town Northeastern (YLT-NE) area bounded by CPR-YL, YLN and On Lok Road,
 - (ii) Yuen Long Town Northwestern (YLT-NW) area bounded by CPR-YL, YLN and Ma Wang Road,
 - (iii) Yuen Long Town Southwestern (YLT-SW) area bounded by CPR-YL, YLN Tai Yuk Road and Ma Tin Road,
 - (iv) Yuen Long Town Southeastern (YLT-SE) area bounded by CPR-YL, YLN Ma Tong Road, Kong Yau Road and Yau Tin West Road,
3. Regarding pedestrian access to major public transport facilities, the proposed project improves to a limited extent because all LRT stations along CPR-YL are connected with existing major pedestrian crossing facilities to both sides of CPR-YL. And stops of majority of bus routes are located along CPR-YL. The proposed project only provides an additional crossing point on CPR-YL for access to bus stops along both sides of CPR-YL.
4. Compared to the existing footways connecting MTR stations (Yuen Long and Long Ping Station), the proposed project, which connects to Exit D of Long Ping Station, does not provide an attractive alternative pedestrian access to and from
 - (a) MTR Long Ping Station and YLT-NW area, because Exit B1 (and C before the adjoining construction site commenced) is preferred;

(b) MTR Long Ping Station and eastern part of both YLT-NE and YLT-SE area, because the pedestrians usually prefer Yuen Long Station to Long Ping Station;
(d) MTR Long Ping Station and YLT-SW area, because an existing footbridge connecting Merchants' School to Exit B1 of Long Ping Station is preferred.

5. Similarly, the proposed project does not provide an attractive alternative pedestrian access between different parts of YLT, except that between the western part of YLT-NE and western part of YLT-SE area. The anticipated effect of *diverting pedestrian flow from at-grade footpath to the proposed elevated pedestrian corridor.*, as stated in Section 2.3.2.2 of the EIA Report, may not be significant.
6. The proposed project, which estimated cost is over HK\$ 200 million, only provides significant convenience to the pedestrians to and from Long Ping Station and western part of both YLT-NE and YLT-SE, and the disabled and the aged.
7. The EIA report has over-estimated the capacity of the proposed project to solve the conflict between pedestrians and road traffic, and the crowded footways along CPR-YL. The proponent also has not assessed the technical feasibility and cost effectiveness of other alternative ways to achieve the aims stated in paragraph 6.
8. In Section 10.11.1, the EIA Report also admits that *the concept of the proposed footbridge and interchange has been considered to a minimum impact to enhanced connectivity to the public transportation and open space network from On Ning Road to Kau Yuk Road.*

Elevated flood risk

9. EIA Report mentions that *during operational phase, the capacity of the nullah is estimated to be reduced by 720m³ due to the construction of the supporting columns of the pedestrian corridor and box culverts at the pedestrian interchanges. The potential impact due to reduction in capacity which leads to rise in water level.*
10. Section 6.5.2.3 of EIA report clearly realized that *according to the latest design (of the elevated pedestrian corridor), the maximum increase in water levels under a 1 in 50 year peak flow event and under a 1 in 200 year peak flow event would be over 0.5m and would not meet DSD requirements and thus may increase flood risk.*
11. The proposed project will increase the flood risk of Shan Pui River catchment area, including Yuen Long Town. Ma Tin Pok (upstream of the proposed project site where suffered from a serious flooding incident in 2003), and makes public's safety and possessions vulnerable to flooding.
12. The effectiveness and locations of the proposed mitigation measures, such as construction of parapet wall, use of lens-shaped footbridge column to reduce head loss, etc., has not been mentioned in the report. The proponent should clarify whether the construction of parapet walls, which may hinder the surface runoff draining to Yuen Long Nullah, will increase the flood risk of any areas in Yuen Long Town.
13. The proposed project will be constructed on the thickest layer of alluvium deposit and ambiguous feature of underground Karst marble cavities. Section 10.9.3 accepts that *with such large geological variation and uncertainty, higher construction risk will be encountered due to the increased number and size of supporting structures.* Such increased number and size of supporting structures will definitely further lower the flood capacity of YLN and corresponding mitigation measures may no longer available or viable.

14. If the proponent proposed to increase the number and size of supporting structures of the proposed project after an EP has been issued, it constitutes a “material change” under EIAO as the drainage *requirements set out in the EIA report for this project is exceeded or violated, even with the mitigation measures in place* (Section 6.2 of TM).

Unacceptable noise nuisance

15. Table 5.6 indicates that the predicted maximum noise levels at 8 out of 18 noise sensitive receivers barely meet the criteria level (i.e. mitigated noise level equals criteria level) even with the proposed mitigation measures implemented. That means in the construction phase a large population and a school in Yuen Long Town will receive unacceptably noise nuisance even with mitigation measures.

Improper waste management

16. In Section 1.1, Annex 7 of Technical Memorandum (TM), *the criteria for assessing waste management implications are: a. provide adequate, environmentally acceptable waste handling, storage, collection, transfer, treatment and disposal facilities to deal with waste arising from the development.* However, no effective and feasible measures are proposed in the EIA report to prevent fly-tipping of C&D wastes, soil and debris generated from the project site(s) during transfer to disposal facilities.
17. Also, with limited work site areas mentioned in the report, provision of adequate space to store and segregate the wastes for reuse or recycling is highly dubious. If such practice is performed outside the project area, then we question whether the wastes and recycles can be treated according to the EIA report and under the control and monitor of Environmental Permit (EP).
18. In view of the congested traffic situation of Kau Yuk Road, CPR-YLand On Ning Road, such spaces are not available except the channel bed of YLN and neighbouring Parks. Stockpiling in the former will increase flood and pollution risk, whereas in the latter will cause closure of public’s amenity and leisure facilities.

Urban Heat Island Effect and Ventilation

19. The proposed elevated pedestrian corridor will alter the microclimate of the YLT. The construction materials of footbridge such concrete and metals, with low specific heat capacity, will increase their surrounding air temperature more promptly after having absorbed solar heat. On the other hand, the footbridge structure also obstructs the free air movement along YLN and disables the function of breeze corridor to disperse air pollutants, and relieve urban heat island (UHI) effect.
20. Green Power conducted surveys and measurements regarding Hong Kong’s urban heat island (UHI) effect in urban areas and new towns including Yuen Long (refer to the enclosed report). The temperature in Yuen Long town centre reached 39.8°C in shaded places on 18 July, 2005. On the contrary, the recorded air temperature near to the water channels is 2 to 3°C lower than the hottest places in the town centres.
21. The proposed elevated pedestrian corridor will be built above YLN which may lower the cooling effect of the open nullah and exacerbate the UHI effect. The EIA Report has not assessed the UHI effect which may impose life risk (e.g. heat stroke, warned by the Department of Health http://www.cheu.gov.hk/eng/info/accident_06.htm) according to Item g (*risk to human lives*) in Annex 3 (*Factors for consideration in identifying adverse environmental impacts*) of TM.

22. Also, the EIA Report fails to fulfill the requirement stated in Section 4.4.3 (a)(i) of TM regarding *Evaluation of the Residual Environmental Impacts* regarding *effects on public health* brought about by UHI effect.
23. Regarding Section 4.4.2 (j) of TM, *for impacts*, such as UHI effect, *where there are no applicable quantitative standards or criteria*, the report has not defined the best practicable mitigation measures that shall be adopted for the project.
24. According to EPD's yearly average Air Quality and Health Index (AQHI) data of 2014-2015 (Appendix 1), Yuen Long ranked amongst the most polluting districts in terms of number of hours with AQHI ≥ 7 and days with daily maximum AQHI ≥ 7 .
25. The proposed elevated pedestrian corridor will occupy substantial space above YLN, which is the only large and continuous open area in Yuen Long town centre, may lower the air ventilation in the town centre and weaken the dispersal of air pollutants.
26. Such concern is clearly stated with the requirement of a quantitative air ventilation assessment report for proposed developments in "Comprehensive Development Area" ("CDA") in Remark (x), Schedule of Uses, Note of *Draft Yuen Long Outline Zoning Plan(S/YL-22)*. The northern end of the proposed project falls within the boundary this "CDA" zone.
27. Regarding Section 4.4.2 (g) of TM, the EIA report has not *considered and compared the environmental benefits and disbenefits of various scenarios with or without the project* for air ventilation. Also, the report fails to *identify potential impacts on air ventilation which may be harmful or beneficial to the environment and the likely size of the community that may be affected* as required by Section 4.3.1(b)(i) and 4.4.3(a)(v) of TM respectively.
28. On the air ventilation issue, the report has not *learned lessons from other similar projects* such as *Air Ventilation Study for Kai Tak Development - Final Detail Air Ventilation* (http://www.pland.gov.hk/pland_en/info_serv/ava_register/ProjInfo/AVRG63_AVA_FinalReport.pdf) as required by Section 4.4.2 (h) of TM, and incorporate the relevant assessment into the project.

Holistic approach for works in Yuen Long Nullah

29. River conservation is one of Green Power's major concerned issues. In our opinion, YLN should not be substantially or totally covered for other landuse purposes such as roads or intruded with large structures such as pillars, which may also induce other environmental problems such as urban heat island effect, air pollution, etc.
30. The site of proposed project is totally laid within that of Rehabilitation of Yuen Long Nullahs, which PP "Improvement of Yuen Long Town Nullah (Town Centre Section) (PP-482/2013)" was launched for public inspection on 8 March 2013. The captioned project will jeopardize and hinder the "Improvement of Yuen Long Town Nullah" which will be beneficial to Yuen Long Town community with improvement of the water quality, landscape, microclimate, amenity function of Yuen Long Nullah and image of Yuen Long Town.
31. Green Power considers that the captioned project tackles only one problem, i.e. pedestrian congestion. However, neither modelling nor relevant analyses of valid data are provided in EIA report to substantiate the feasibility of the project to relieve the conflict of pedestrian and road traffic.
32. On the other hand, "Improvement of Yuen Long Town Nullah" will improve Yuen Long Town

in different aspects in the long term, such as bad water quality of nullah, odour nuisance, securing a breeze corridor to disperse air pollutants, improving city landscape and etc.

Irreversible landscape impacts

33. In Section 2.3.5 of the report, the proponent clearly realises that *the existing Yuen Long Nullah is a view corridor in north-south direction and is a visual resource within Yuen Long Town Centre*. Regrettably, the proponent distracts the fact that the opportunity to improve the cityscape of old Yuen Long Town through beautification of YLN is ruined to the proposed elevated pedestrian corridor, even with *the provision of these landscape and streetscape works, the visual and landscape resources along the nullah at the street level will be enhanced and provide beneficial visual impact to the pedestrians*.
34. Therefore, in contrary to Section 10.11.4 of the Report, the proposed project cannot improve the overall aesthetic value especially on the existing disorder hard landscape elements along Yuen Long Nullah. Instead, the footbridge and pedestrian interchanges add on the existing hard landscape elements.
35. The EIA report has also not *fully explored alternative methods to avoid, reduce and alleviate the identified visual impact*, such as the proposal of Hong Kong Institute of Architects.

Misquotation

36. In the conclusion of the report (Section 10.11.1), the proponent department claimed in this legal-binding document that *the proposed footbridge and the pedestrian interchange follow in principle the planning intentions from the Draft Yuen Long Outline Zoning Plan....* However, no corresponding, related or relevant statement(s) can be found in the Notes of this OZP (http://www1.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_YL_22_e.pdf) including the Planning Intentions stipulated for “Comprehensive Development Area”, “Residential (Group A)”, “Government, Institution and Community” and “Open space”.
37. I am grateful for the clarification from the Administration of how the proposed project *follows in principle the planning intentions from the Draft Yuen Long Outline Zoning Plan(S/YL-22) and the approved Ping Shan Outline Zoning Plan (S/YL-PS/16)* in town planning context, and how the Administration interprets the legal implications of this claim in the report from the viewpoint of EIA Ordinance and Town Planning Ordinance.
38. Therefore, Green Power urges Director of Environmental Protection to either
- (a) reject the captioned EIA report, or
 - (b) incorporate the captioned EIA with that of “Improvement of Yuen Long Town Nullah” with our above-mentioned concerns addressed.

Thank you very much for your kind attention.

Yours sincerely,



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Division Head, Scientific Research & Conservation

Appendix 1: The statistics of AQHI of General Air Monitoring Station (1 Jan 2014 to 31 Dec 2015)

	Central/ Western	Eastern District	Kwun Tong	Sham Shui Po	Kwai Chung	Tsuen Wan	Yuen Long	Tuen Mun	Tung Chung	Tai Po	Sha Tin	Tap Mun
Total hours of HHR (AQHI \geq 7, 1 Jan to 31 Dec 2015)	281	213	344	308	337	286	339	416	346	224	238	226
Total hours of HHR (AQHI \geq 7, 1 Jan to 31 Dec 2014)	251	164	390	326	378	318	499	519	454	209	286	322
Total hours of HHR in yearly average (AQHI \geq 7, 1 Jan 2014 to 31 Dec 2015)	266	189	367	317	358	302	419	468	400	217	262	274
Total days of HHR (AQHI \geq 7, 1 Jan to 31 Dec 2015)	42	32	46	46	50	47	58	64	60	39	39	37
Total days of HHR (AQHI \geq 7, 1 Jan 2014 to 31 Dec 2014)	39	26	50	46	59	56	73	70	75	38	42	43
Total days of HHR in yearly average (AQHI \geq 7, 1 Jan 2014 to 31 Dec 2015)	41	29	48	46	55	52	66	67	68	39	41	40
No of <u>hours</u> with AQHI =10 or 10+ from 1 Jan to 31 Dec 2015	32	21	48	26	26	21	31	40	47	17	19	9
No of <u>days</u> with AQHI =10 or 10+ from 1 Jan to 31 Dec 2015	9	6	10	6	5	6	8	9	16	5	4	3

Figures in red, orange and yellow box are the first, second and third highest across the row.