



BY EMAIL ONLY

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

(E-mail: eiaocomment@epd.gov.hk; Fax: 2147 0894)

5 October, 2016

Dear Sir/Madam,

**Environmental Impact Assessment Report for
Hung Shui Kiu New Development Area Planning and Engineering Study – Investigation**

Green Power would like to lodge a submission in response to the Environmental Impact Assessment (EIA) Report for Hung Shui Kiu New Development Area (HSK NDA) Planning and Engineering Study – Investigation.

General Comments about Land Uses

1. The proposed extent of HSK NDA including Hung Shui Kiu, i.e. the existing settlement along Castle Peak Road, are largely disturbed by human activities such as established villages, scattered low-density residential areas and open storages. Further developments should aim at improving environmental quality, regulating incompatible land uses, increasing land-use efficiency and establishing a novel green city model for Hong Kong.
2. Comprehensive integrated land uses should be in place in the NDA to establish a community which is as self-sustained as possible, in order not to compete the social, transport and community resources of the neighbouring communities, namely Tin Shui Wai(TSW), Tuen Mun(TM) and Yuen Long(YL) town.

Brownfield Proliferation

3. Approximately 200 ha of lands is currently occupied by brownfield operations in the Project Area. However, only approximately 24 ha of lands at the northern fringe of the Project Area are reserved for multi-storey buildings to accommodate some of affected Port Back-Up, Storage and Workshop Uses (“OU(PBU+SWU)”). We doubt that the floor area of multi-storey buildings are insufficient to accommodate the affected brownfield operations that will lead to further proliferation of these environment-damaging activities to nearby unspoilt areas in the Northwest New Territories.
4. These multi-storey buildings to accommodate “OU(PBU+SWU)” should be in operation in prior to displacement of these activities in the HSK NDA in order to smoothly transfer the businesses. We agree “OU(PBU+SWU)” should be developed in the earlier stage of development programme for the Project.

Air Quality

5. According to EPD’s yearly average Air Quality and Health Index (AQHI) data of 2014-2015 (Appendix 1), Yuen Long and Tuen Mun ranked amongst the most polluting districts in terms of number of hours with AQHI ≥ 7 and days with daily maximum AQHI ≥ 7 .



6. The Project Area, i.e. Hung Shui Kiu area, is located between Yuen Long and Tuen Mun which is highly prone to air pollution. The health and well-being of population of 218,000 in the future should be protected by stricter mitigation measures.
7. Table 3.1 of Executive Summary indicates that the predicted construction dust impact barely meet the criteria level even with the proposed mitigation measures implemented (10th highest 24-hr RSP and FSP concentrations). That means in the construction phase the citizens in Hung Shui Kiu area will receive unacceptably high level of dust nuisance if proposed mitigation measures are improperly implemented or fail to act.

Noise Nuisance

8. Table 3.3 of Executive Summary indicates that the predicted mitigated overall noise levels barely meet the criteria level for both residential and educational institutes. That means in the construction phase the citizens and schools in Hung Shui Kiu area will receive unacceptably high level of noise nuisance if proposed mitigation measures are improperly implemented or fail to act.

Land Contamination

9. We are highly concerned that the majority of the potentially contaminated sites could not be accessed to assess the site conditions, and land contamination assessment was conducted based on the findings from desktop study, helicopter reconnaissance and site surveys. We worry that the progress of land contamination assessment and identification of any contaminated sites will defer the implementation schedule of the Project site, especially the early construction of multi-storey building for “OU(PBU+SWU)”.

Waste Dumping

10. Reuse of C&D materials generated from the Project can reduce wastes and avoid fly-tipping in farmlands, fishponds or rural areas. However, in construction phase, the C&D wastes will be generated in different construction sites during different periods (from 2019 to 2038) and managed by different contractors.
11. In Table 7.5 of EIA report, the estimated cumulative stockpiled volume of fill materials will be peaked in 2030 which is 296,485 cubic metres. On the other hand, a total surplus volume of 5047 cubic metres fill materials will be generated in 2035 and 2036 which is not proposed to reuse in the Project Area.
12. We opine that the effectiveness of reuse of C&D materials highly depends on the availability of stockpiling areas, coordination of waste management among different sites and the surveillance of transport of C&D wastes to stockpiling areas. The proponent should set up a team to oversee, liaise and monitor all waste-related operations in the Project Area during construction phase.

A Blue-Green City

13. We concur with establishing Sustainable Drainage System which is multi-functional to regulate flooding, collect rainwater for non-potable uses, moderate city's microclimate and relieve urban heat island effect. The NDA should maintain high proportion of permeability by keeping soil surface and vegetation. The public spaces or green areas, such as Regional Park, “RO”, “DO”, “LO” and etc, with tree plantings and water conservation features are necessary for both reducing the heat stress and community enjoyment.



14. We agree to implement Total Water Management and Green Energy Saving in future HSK NDA to set up a good precedent of water- and energy-saving city for Hong Kong.
15. We appreciate
 - (a) the reuse of treated sewage effluent as reclaimed water after adequate health, hygiene and environment assessments,
 - (b) the introduction of stormwater control measures to abate non-point source water pollution which has been ignored by the Administration for a long time.
 - (c) new public sewers proposed to collect sewage in the proposed development area which will replace the existing unsewered areas.
16. We welcome the removal of Tin Ying Road abutting the Tin Shui Wai Nullah because roads will contribute non-point source pollution to the channel which feeds Deep Bay where Ramsar Site and oyster fields locate. Tin Shui Wai Nullah should be restored to a more naturally-looking river with enhanced water quality and ecological functions.
17. However, retail and dining facilities are planned be provided along the riverside promenade after removal of Tin Ying Road. We are concerned that these facilitates will generate considerable wastewater through misuse of stormwater drainage. The resulting bad water quality of river channel will ruin the regenerated river channel and river ecology. More importantly, the filthy water and odour will bring nuisance to the neighbouring residents. Therefore, no additional stormwater drains should be connected to Tin Shui Wai Nullah to avoid water pollution and degrading the function of the promenade.
18. We urge the Administration to explore community organic farming in HSK NDA to promote efficient use of open space and amenity areas for promoting organic produces, green living, urban greening, public enjoyment and education.

Transport

19. Regarding the proposed measures for “Creating a Green City” for the HSK NDA, Green Power supports the theme of Rail-based Development and Green Mobility. We appreciate the concept of Green Transit Corridor (GTC), Environmentally Friendly Transport Services (EFTS), artery cycleway and major cycle track and pedestrian walkway network to create a transit based, cycle friendly and walkable city.
20. However, we are disappointed that the EFTS is not confirmed in this stage that may affect the air quality and traffic impact assessment, and makes the EIA incomplete and vulnerable to major changes.
21. We opine that the major Cycling and Pedestrian Network should be connectable and extendable to neighbouring districts, especially the southern HSK and Lam Tei.
22. Proposed Tuen Mun Western Bypass and possible new strategic highway infrastructure to and from Urban Area will be connected to the western and southern part of the Project Area respectively. These proposed new strategic highway infrastructure is essential components of the future HSK NDA, which may bring about various environmental impacts such air and noise pollution, encroachment to Country Park. However, no details about this strategic transport infrastructure are mentioned in the EIA report.



23. The capacity of West Rail Line of Mass Transit Railway is almost saturated currently, especially in peak hours. Therefore, West Rail Line will be very likely overloaded with the development of HSK NDA. If so, the loading of road-based traffic will be higher than predicted in the EIA report and generates more air pollutants and traffic jams.

Nature Conservation

24. A strip of “Industry” zone is zoned between Yuen Tau Shan and southern part of HSK NDA which is neither compatible nor buffering the natural hillsides of Yuen Tau Shan.

25. We doubt that the “GB” zoning cannot protect the San Sang San Tsuen Egretty properly, as the adjacent construction activities will be so close to it. The egrets foraging grounds and flight paths should also be preserved.

Thank you for your kind attention.

Yours faithfully,

CHENG Luk-ki
Division Head, Scientific Research and 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.