



BY EMAIL ONLY

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Dear Sir/Madam,

**Green Power's Response to
Feasibility Study of Site Formation and Infrastructural Works for the Development at
San Hing Road and Hong Po Road, Tuen Mun (Agreement No. CE 68/2017 (CE))
Environmental Impact Assessment - Public Consultation**

1. Green Power, a local charitable environmental NGO, is invited in August 2019 to be consulted with the above-captioned project (the Project). The Project is about 27 ha in area and located in Tuen Mun between Lam Tei and Siu Hong Light Rail Transit Station. First, **I would like the proponent to clarify whether the Project is for long term public housing sites**, as mentioned in the Project Profile.

Introduction

2. Regarding the Project, Green Power would like to draw your attention to our concerns about opportunity to achieve sustainability which includes,
- (a) Road-based development will deteriorate the living quality with air and noise pollution, segregation of community, fragmentation and loss of habitats and associated flora and fauna.
 - (b) The town planning and building design of build-up areas will create adverse urban microclimate such as canyon effect and heat island effect that further worsen the air quality and increase energy consumption (due to air conditioning for cooling).
 - (c) Pedestrianization and cycling may be discouraged because of busy and heavy vehicular traffic, nuisance of exhausted gas and traffic noise, and safety concerns.
 - (d) No strategic urban greening lead to isolated patches of green areas or open spaces that will degrade their functions of modification of urban microclimate, leisure and recreation, beautifying landscape and sheltering wildlife.

- (e) New developments and their associated works often encroached, damage or removed ecologically valuable areas
- (f) Channelization of river courses will lead to degradation of their ecological and aesthetic values without improvement of water quality. The surface runoff and storm water from the urban area is heavily polluted but rarely received proper treatment.
- (g) a sustainable and livable neighbourhood is neglected

Air Pollution

4. According to Environmental Protection Department's Air Quality and Health Index(AQHI) data from 2014 to 2018, Tuen Mun frequently recorded AQHI of 7 or above and at those high AQHI levels Tuen Mun residents were exposed to "High" to "Serious" health risk due to air pollution. Even worse, Tuen Mun recorded the highest annual average number of days (60 days) and hours (385 hours) with AQHI of higher than 7 (i.e. "High" to "Serious" health risk) amongst all General Air Quality Monitoring Stations.
5. Ranges of hills are lying to the east and west of Tuen Mun area. Therefore, the Project site, located at northern Tuen Mun area, is vulnerable to air pollution as the geographical setting will retain the air pollutants in Tuen Mun area when dispersal conditions are unfavourable, for example, existence of low-level temperature inversion that traps air pollutants near to the ground.
6. Therefore, green mass transport is recommended to link the Project site to alleviate air pollution and noise nuisance to future residents. Also, segments of tributaries of Tuen Mun River flowing through the Project site should not be decked for provision of polluting landuses such as roads. On the contrary, they should be retained and improved their ability to act as breeze corridors to disperse air pollutants and lower the temperature of the PDAs.

Blue-Green City Settings

7. The ground surfaces of Project site should maintain high water permeability as far as possible by keeping high proportion of soil surface and vegetation in order to lower the flood risk and pollution loading of surface runoff.
8. Stormwater drains of Project site should not be connected to tributaries of Tuen Mun River or natural streams to avoid odour nuisance, visual blight and water pollution that impacts on river water quality and ecology.
9. The existing streams or channels should be preserved as breeze corridors to relief urban heat island effect of future development. The public spaces or green areas with vegetation and water conservation features are necessary for both reducing the heat stress and community enjoyment.

10. The segments of tributaries of Tuen Mun Pui River within the Project Site should be restored to a more naturally-looking river channel with enhanced ecological functions. Such channel restoration provides opportunities to incorporate aesthetic water features into the city landscape to echo the Blue-green City strategy of the Administration. Examples of completed or undergoing river restoration projects may include Ho Chung River in Sai Kung and Kai Tak River in Wong Tai Sin.
11. If tributaries of Tuen Mun River can be restored within the Project site, it will be able to serve many environmental benefits (e.g. provides habitats to wildlife, relieves the heat island effect, provides amenity to the public, etc.) and improve living quality of residents.
12. The future sewage pumping station should be strategically located in order to efficiently collect sewage and polluted surface runoff generated from the Project site and surrounding areas, and facilitate the restoration of tributaries of Tuen Mun River.
13. The flooding risk of villages near to the Project site should be assessed to avoid flooding of these villages. Drainage system, for both stormwater and sewage, of the whole project site should be well planned taking into account of our concerns mentioned in this letter.

Transportation

14. The future residents in Project site will commute to neighbouring town centres, i.e. Tuen Mun and future Hung Shui Kui New Development Area (NDA), for all sorts of daily activities including shopping, dining, entertainment, consulting professionals (e.g. doctors, lawyers), customer's services (enquiries to utilities and suppliers, repair of products). This will generate substantial transport needs to Tuen Mun and Hung Shui Kiu, as well as large pressure to the government, community and commercial facilities and service providers.
15. The Project site should be well planned to blend with Hung Shui Kui NDA to facilitate the daily needs of future residents of the Project site. This can avoid unnecessary air and noise pollution generated by jammed traffic between Project site and neighbouring communities.

Thank you very much for your kind attention.

Yours faithfully,



CHENG Luk-ki
Director, Green Power