



BY EMAIL ONLY

Ms. TSE Siu Wa, Janice, JP
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

31 January 2022

Dear Ms. Tse,

Project Profile for Route 11 (Section between Yuen Long and North Lantau)

Green Power and Eco-education & Resource Centre would like to draw your kind attention to our grave concerns about the above-captioned Project Profile.

1. Tuen Mun Bypass has been proposed in another project to enhance the road network between North West New Territories (NWNT) and North Lantau through the Tuen Mun – Chek Lap Kok Link (TM-CLKL). However, the major objective of the proposed Route 11 (i.e. “to enhance the connectivity between the NWNT and the North Lantau”) is overlapped with the proposed Tuen Mun Bypass. A traffic demand forecast should be provided in the EIA with respect to the establishment of Tuen Mun Bypass to make clear justifications of the proposed project. In addition, the project proponent should show all the relevant planned road construction projects on the Project Layout Plan, including the Tuen Mun Bypass, Hong Kong Island - Northeast Lantau Link and Road P1 (Tai Ho – Sunny Bay Section) and cumulative environmental impacts on air quality, marine water quality, noise pollution, waste generation and disposal, terrestrial and marine ecology must be conducted in Lantau North and Tuen Mun District regarding all these planned, approved, on-going infrastructural projects.
2. If any vehicular access or roads is constructed connecting the work area of the proposed project to the road at Tai Tsing Chau which lead to Sunny Bay Road and Cheung Tung Road, uncontrollable development pressures on Lantau will be worsened and irreversible in operation phase, that contradicts the pledge of the Administration to conserve natural asset of Lantau in Sustainable Lantau Blueprint launched in June 2017.
3. According to Environmental Protection Department’s yearly average Air Quality and Health Index (AQHI) data¹, Tung Chung 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 . Proposed Route 11 is part of the trunk road network that is connected to North Lantau Highway, Tuen

Mun-Chek Lap Kok Road Link, proposed P1 Road, Tsing Yi-Lantau Link and possibly roads connected to reclamation in East Lantau water, the traffic flow to and from Lantau would be further increased and air pollution on Lantau, especially North Lantau and Tuen Mun, would be further deteriorated. Therefore, comprehensive cumulative air pollution impact assessment should be conducted.

4. The proposed project will lead to destruction and disturbance of natural habitats, such as woodlands, natural stream courses, natural shoreline, especially coast of North Lantau, and mitigation and compensation may not be feasible.
5. The proposed Route 11 consists of construction of tunnels penetrating beneath the Tai Lam Country Park. The potential infiltration or drawdown of groundwater due to the tunnel construction will alter the hydraulics of the natural streams and reservoirs on the ground level. It may hence affect the aquatic ecosystem and potable water collection function of the Tai Lam Country Park and water gathering ground of Tai Lam Reservoir, Hung Shui Hang Reservoir and Lam Tei Reservoir. Unfortunately, such environmental impacts can be catastrophic but hard to estimate and mitigate.
6. The footprints of the proposed project, including the works area, concrete batching plants, vehicle parking, vessel berthing, equipment storage, stock piling area or other activities related to the proposed project works may also threaten and destroy the undeveloped coastlines and areas on Lantau and the outlying islands including Ma Wan, Tan Lung Chau.
7. The ecological importance of the remaining natural coast along North Lantau may have been underestimated. In 2012, the first record of Alligator Pipefish (*Syngnathoides biaculeatus* 擬海龍) in the western Hong Kong waters was observed in the of Yam O Bay (also called Sunny Bay) according to an underwater visual census conducted by the Eco-Education & Resources Centre and Green Power². The natural coast along North Lantau may be an important breeding and foraging ground of the threatened pipefishes that will be influenced by the proposed project, comprehensive ecological survey is needed in the EIA to access and mitigate such impacts.
8. Further away from the Yam O Bay, the recipient site of a completed Coral Translocation Scheme³ (as required by the Environmental Permit issued under the Hong Kong Airport third-runway project) near the Yam Tsai Wan (陰仔灣) should also be identified as the sensitive receiver of the captioned project.
9. The proposed project will generate a large amount of construction and demolition (C&D) materials that will induce risk of illegal dumping activities. In particular, the ecosystem and natural environment of Yam O Wan, Tai Ho Wan, Tung Chung River Valley *cum* Bay and South Lantau will be vulnerable to air pollution and illegal dumping during construction phase from large vehicles, construction / dump trucks and similar machineries associated with the proposed project if entering the road at Tai Tsing Chau connected to Sunny Bay Road and Cheung Tung Road, and then Tung Chung Road and South Lantau Road.

10. Although the numbers of detected Chinese White Dolphin around North-east Lantau has dropped significantly in recent years, the latest monitoring report of Marine Mammals in Hong Kong Waters⁴ has highlighted that “*the continuing night-time usage by (Chinese White) dolphins of this once-important habitat (Brothers Marine Park) should not be overlooked.*” Any permanent alteration of the potential habitats for dolphins, particularly the proposed project close to the Brothers Marine Park, should only be considered if there is no alternative. In addition, the working marine vessels of the proposed project will berth or station at the coast of Lantau or navigate through the Marine Park areas that will encroach the Marine Parks and threaten the survival of the endangered Chinese White Dolphin.
11. In conclusion, we appeal the Administration for concrete justification for the need of the proposed project with cautious consideration of our concerns.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 39610200, F: 2314 2661, Email: wflo@greenpower.org.hk).

For and on behalf of Green Power and Eco-Education & Resource Centre



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References:

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