



BY EMAIL ONLY

Mr. CHEUNG Kin Chung, Matthew, GBM, GBS, JP
Chief Secretary for Administration
The Government of HKSAR
Email: cso@cso.gov.hk

23 June, 2018

Dear Mr. CHEUNG,

**Objection to
182TB PWSC(2018-19)21 – Elevated Pedestrian Corridor in Yuen Long Town
connecting with Long Ping Station**

Green Power, a local charitable green group, has major concerns about river conservation and urban heat island effect in the territory. We have conducted surveys, researches and education programmes on these fields for over ten years. Green Power would like to object the above-captioned project (the Project), which is recommended to the Finance Committee for upgrading to Category A, for the reasons that:

- (i) The needs and aims of the Project to solve the claimed conflict between pedestrian and road traffic are not adequately justified by any competent surveys, valid data or traffic modelling.
- (ii) The project should be fully reviewed and incorporated with the planning “Improvement of Yuen Long Town Nullah” which can improve various aspects of Yuen Long Town’s environment including the water quality, microclimate and cityscape of Yuen Long Nullah (YLN).
- (iii) As such, the expenditures, environmental and traffic impacts and the duration of these nuisances to the public can be substantially reduced and shortened. The two projects can be implemented in an alternative option that is more cost effective in terms of finance, completion time and well-being of Yuen Long community.
- (iv) The project ruins the only extensive and continuous open area in Yuen Long Town (YLT) which is an irreplaceable landscape resource to improve air ventilation, urban heat island effect and city landscape.
- (v) It poses potential flood risk to Yuen Long Town.

Holistic approach for improving Yuen Long Town

1. Green Power opines that 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 induce other environmental problems such as urban heat island effect, air pollution, etc.
2. The site of the Project is totally laid within that of “Improvement of Yuen Long Town Nullah”, and the Project jeopardizes and hinders the “Improvement of Yuen Long Town Nullah”.

3. Green Power considers that the Project tackles only one alleged problem, i.e. pedestrian congestion. However, neither traffic modelling nor relevant analyses of any valid data are provided in EIA report to substantiate the feasibility of the Project to relieve the conflict of pedestrian and road traffic.
4. In the contrary, “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 microclimate and amenity function, city landscape and town image, etc.

Irreversible landscape impacts

5. The EIA Report (Section 2.3.5) of the Project 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.
6. Therefore, in contrary to the EIA Report (Section 10.11.4), 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.

Urban heat island effect and ventilation

7. The proposed elevated pedestrian corridor will alter the microclimate of the YLT. The construction materials of footbridge such as 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.
8. Green Power conducted surveys and measurements regarding Hong Kong’s UHI effect in urban areas and new towns including YLT. The temperature in YLT 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.
9. According to EPD’s yearly average Air Quality and Health Index (AQHI) data of 2014-2017, Yuen Long, out of 13 general air quality monitoring stations, ranked amongst top three most polluting districts in terms of number of hours with AQHI ≥ 7 and days with daily maximum AQHI ≥ 7 .
10. 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, and may lower the cooling effect of the open nullah and exacerbate the UHI effect.

Need of project not adequately justified

11. The Project, which estimated cost was over HK\$ 200 million in 1996 but soars to \$1.7 billion in 2018, only provides significant convenience to the pedestrians to and from MTR Long Ping Station and western side of Yuen Long Nullah in Yuen Long Town. It neglects the existence and function of MTR Yuen Long Station which is about ten-minute walking distance from Long Ping Station. The anticipated effect of *diverting pedestrian flow from at-grade footpath to the proposed elevated pedestrian corridor*, may not be prominent. (please refer to the attached letter to Public Works Subcommittee on 25May, 2018)
12. The EIA report has over-estimated the capacity of the Project to solve the conflict between pedestrians and road traffic, and the crowded footways along Castle Peak Road(Yuen Long Section). The proponent also has not assessed the technical feasibility and cost effectiveness of other alternative options.

Elevated flood risk

13. The 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.
14. 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 EIA Report. On the other hand, improper design and installation of parapet walls may obstruct the surface runoff of YLT draining to YLN and increase the flood risk of YLT.
15. The Project will be constructed on the thickest layer of alluvium deposit and ambiguous feature of underground Karst marble cavities. The EIA report (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.

Misrepresentation

16. In the conclusion of the EIA 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 (S/YL-22) and the approved Ping Shan Outline Zoning Plan (S/YL-PS/16)*.
17. However, no corresponding, related or relevant statement(s) can be found in the Notes of the 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". We doubt whether such suspected misrepresentation or misinterpretation breaches any ordinances, codes of practice, guidelines, etc.
18. We urge that the Administration should seek the clarification of the proponent for any misrepresentation of statutory landuse plan, i.e. OZP, in a legal-binding document, i.e. EIA report.
19. Owing to the above-mentioned reasons, Green Power urges the Government to reject the Project unless it is fully reviewed and incorporated with "Improvement of Yuen Long Town Nullah" with our concerns addressed.

Thank you very much for your kind attention. I look forward to your wise and responsible decision

Yours faithfully,



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Green Power