



BY EMAIL ONLY

Ms. Maisie Cheng, J.P.
Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk)

30 November 2020

Dear Ms. Cheng,

Project Profile for Upgrading of Nim Wan Road (North)

Green Power would like to draw your kind attention to our concerns about the above-captioned Project Profile.

1. Currently, the bridge connecting Nim Wan Road (North) Ha Pak Nai Section and the Nim Wan Road (WENT landfill section) is blocked by a drop bar such that no public access is allowed across the two sections. The project proponent needs to explain whether “*the road is at opened condition* (Section 5.9.2)” means that the drop bar will be removed after the upgrading work.
2. If so, the public will be able to access Nim Wan Road from Lung Kwu Tang Road at the operation phase. It is concerned about the additional traffic flow would exceed the carrying capacity of both roads, as well as Deep Bay Road. Meanwhile, it will further induce visitor flow to the popular tourist hotspot Ha Pak Lai that will bring adverse human disturbances and environmental impacts to the village and adjacent rural environment. A traffic and visitor impact assessment is required before considering open the Nim Wan Road completely.
3. It is wondered why the upgrading works of Deep Bay Road (mentioned in Section 1.2.4) is not included in the captioned project. The project proponent shall liaise with the green groups about the working plan of Deep Bay Road.
4. The specific works in the two work limits away from Nim Wan Road (as shown in Drawing 1.1 & 1.2) are not described in the project profile. We urge the project proponent to provide supplementary information about these works.
5. The captioned project should avoid any unnecessary alternations of the natural watercourses (identified in Section 3.4.1) such as diversion, decking, channelization, etc.
6. Direct and indirect environmental impacts to the sensitive receivers, including but not limited to the coast of Deep Bay, Pak Nai SSSI, Pak Nai Egretty, natural watercourses, and rural villages, should be fully assessed and mitigated by effective measures. The permanent loss of woodland and pond habitats (Section 3.7.4) should be compensated according to the “no-net-loss” principle.

7. The project proponent should be responsible for ensuring all the construction waste produced from the project will be properly stored, transported, and finally disposed of at the designated facilities and/or environmentally treated. “*Inappropriate storage or dumping of construction materials* (Section 3.7.4)” should not be an anticipated construction impact, but it could be totally avoided by incorporating deterrent clauses in the works contract so as to monitor the transportation and disposal of solid wastes, such as restricting the routes of dump-trucks to and from the works sites and disposal facilities; and installing GPS device on the dump trucks to track the transportation of wastes.

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).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'LO Wing-fung', with a long horizontal stroke extending to the right.

LO Wing-fung
Assistant Senior Education & Conservation Officer
Green Power