



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)

27 April 2022

Dear Ms. Tse,

Project Profile for Development of Lam Tei North East

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

1. The Civil Engineering and Development Department (i.e. the project proponent) and Planning Department have completed a “Preliminary Land Use Study for Lam Tei Quarry and the Adjoining Areas - Feasibility Study” according to the governmental budget estimates¹ whereas the study results are currently not available to the public. We urge the project proponent to disclose this proposed land-use layout plan of the project area in the EIA report so that the potential environmental impacts could be effectively identified.
2. According to Environmental Protection Department’s yearly average Air Quality and Health Index (AQHI) data², Tuen Mun and Yuen Long ranked the top two most polluting districts in terms of annual average numbers of HHR hours (hourly AQHI ≥ 7) and days (daily maximum AQHI ≥ 7) in most of the past eight years. The proposed project will undoubtedly induce a lot more traffic flow and hence further deteriorate the air pollution problem. Given that there are many concurrent development projects interacting with the proposed project, a comprehensive cumulative air pollution impact assessment should be covered in the EIA process.
3. Alternation of any natural habitats, such as stream course, shrubland, woodland etc., should be avoided as far as practicable. Stockpiling areas should be set up away from these natural habitats to minimize the disturbances.
4. Explosives should be delivered to the project site on a daily basis such that overnight storage of explosives will not be required.
5. The proposed project will generate a large amount of construction and demolition (C&D) materials. The project proponent should be responsible for ensuring all the C&D waste produced from the project will be properly stored, transported, and finally disposed of at the designated facilities and/or environmentally treated. Unauthorized disposal of the C&D materials should be strictly prohibited.

6. Also, the dump trucks should be prohibited to access to sensitive areas such the hillside areas to the east of Project Sites and water gathering grounds to avoid fly-tipping and disturbance to habitats and streams/watercourses. The project proponent could consider applying real-time GPS tracking technology to trace the tracks of the dump trucks and installing 24-hour surveillance video cameras at the roads (e.g. Chui Fuk Road, Fuk Hang Tsuen Path, Shui Fu Road, etc.) leading to the sensitive areas to monitor any irregular activities of the dump trucks. Deterrent clauses should be incorporated in the work contracts to monitor and penalize any fly-tipping activities.
7. The planning intention of “Green Belt” (“GB”) zone under Tong Yan San Tsuen OZP (S/YL-TYST/14) and Lam Tei & Yick Yuen OZP (S/TM-LTYT/11) *“is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.”* As the proposed developments will encroach “GB”, approval from Town Planning Board should be sought if required under the OZPs. Also, *“as diversion of stream, filling of land and excavation of land may cause adverse drainage impacts on the adjacent areas and adverse impacts on the natural environment, permission from the Board is required for such activities.”*
8. Since the cavern portion of project site is located in granite bedrock, there is a potential health risk of radioactive radon gas emission. Although a health risk assessment of radon gas emission is not required by the EIA Ordinance, the project proponent should still consider the mitigation measures of such issue as the previous EIA for the Sha Tin Cavern Sewage Development Work did (AEIAR-202/2016). Sufficient ventilation and filtration systems should be installed in the project site to control the radon level not exceeding the latest EPD’s Indoor Air Quality Objectives.

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 sincerely



LO Wing-fung
Senior Education & Conservation Officer
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References:

- ¹ Hong Kong Government (2021). *The 2021-22 Budget – Estimates (Head 33 - Civil Engineering and Development Department)*. Available from: <https://www.budget.gov.hk/2021/eng/pdf/head033.pdf>
- ² Green Power (2022). *A Brief Review of AQHI Data of Hong Kong for 2021*. Available from: https://www.greenpower.org.hk/html5/download/concern/20220107_e.pdf