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The Conservancy Association

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1st February 2011

Ms. Wong Sean Yee, Anissa
Director of Environmental Protection
Environmental Protection Department
Environmental Impact Assessment Ordinance Register Office

By Fax: 2147 0894

Dear Ms. Wong

RE: Comments on Tuen Mun Western Bypass Project Profile

The Conservancy Association (CA) would like to submit comments on project profile regarding Tuen Mun Western Bypass.

1. Justification of the project

Critique often quotes the example of Western Corridor to challenge the need for new linkage to ease the increasing cross-boundary traffic. The assessment should provide more justifications for constructing a new linkage, instead of repetitively mentioning the estimate for total boundary crossing which was indeed not a good indicator. Alternatives such as increasing carrying capacity of the existing route could be evaluated as an additional piece of information to ease public query.

2. Alignment

While conducting the environmental assessment on the preferred option, alternative alignment and design should be well assessed for comparison on both environmental benefit and defect at the same time.

3. Air ventilation

Tuen Mun Outline Zoning Plan has stated that Tuen Mun River Channel serves one of the major wind flow paths in Tuen Mun. To provide a better penetration of prevailing wind within the built-up area, the northern viaduct running parallel to the West Rail and probably Tuen Mun River Channel should be carefully assessed in the report.

4. Tree

Very often the detailed tree survey report would be submitted in separate from EIA report, but such data would be important to evaluate justification of proposed tree treatment, especially tree felling in the project. From ETWB TCW No. 3/2006 - Tree Preservation, the following order of priority should be adopted for tree removal consideration: retain, transplant on-site, transplant off-site, and fell. We strongly urge

that the detailed tree survey report should be attached in EIA report for public access to clearly evaluate if such hierarchy for tree removal have been strongly adhered to.

Regarding to tree compensation if any, the general principle of compensating ecological function of habitat loss should be upheld. Compensatory planting of trees in terms of quantity only, with trees scattering along roadsides, would not re-create an equivalent ecological value of a habitat suggested in EIAO Guidance Notes (GN 6/2010).

5. Ecological impact

CA would require for careful concern on various ecological sensitive areas along the assessment area during planning stage of the project. Areas includes Tuen Mun egretty which is used by ardeids for nesting, Siu Lang Shui SSSI which is well-known butterfly overwintering site in Hong Kong, and Castle Peak SSSI which recorded various rare plant species under protection of the Forests and Countryside Ordinance. Moreover, assessment should assess the potential of bird collision once noise barriers are provided as mitigation.

Yours sincerely,
Ng Hei Man
Campaign Officer