



Dec 14, 2005

Legislative Council
Planning, Lands and Works Panel
Legislative Council Building
Jackson Road
Hong Kong

By Fax

Dear Hon. Members,

Friends of the Earth (HK)'s Concern Regarding the Tamar Development Project

I am writing on behalf of Friends of the Earth (HK) to urge the Panel to re-think the Tamar Development Project and call for a new Environmental Impact Assessment (EIA) to be undertaken based on recent air pollution data and public health concern.

Main areas of concern include:

1 *Wrong Assumption on Environmental Impacts*

The EIA being submitted for the project was modeled on a false assumption applying relic data from 1999. FoE (HK) is appalled by the slipshod standard on science endorsed by the government on this project and wonders if this has become a norm for most of the government projects.

Traffic demand projection by the Transport Department is based on known and committed projects. Future traffic increase on the Gloucester Road and Connaught Road together with the new P2 and the Central Wanchai Bypass will aggravate the gridlock. The risk to public health from increased air pollution loading will undoubtedly be higher.



Using outdated EIA and data for development planning while risking public health jeopardizes Government's reputation. FoE (HK) would like to request an overhaul of the government's EIA practice and demands a new EIA of the project to be conducted.

2 *Ignoring Health Impacts Is Bad Governance*

367 hours of high air pollution index well over 100 have been recorded at the Central Roadside Station this year, the worst record compared to other monitoring stations. The proposal for a government headquarter in the district is likely to bring increased traffic to Central.

Hong Kong already has one of the world's highest density of traffic, 271 vehicles per km road, the creation of another building on the waterfront may block the dispersion of car exhaust and exacerbate the worsening air quality in the district.

According to a recent survey done by the Democratic Alliance for the Betterment and Progress of Hong Kong (DAB), the majority of the interviewees rated Hong Kong's air quality as bad. 80% of them reported suffering from respiratory illnesses like asthma and rhinitis, and half of them were depressed as a result of worsening air quality.

The appearance of a smog-covered government headquarter looming over Victoria Harbour serves as an adverse advertisement to the world of Hong Kong's environmental impotence.

3 *Heat Island Effect Intensifies City Hotspots*

A recent study commissioned by the EPD has shown that there is a two degrees Celsius difference in air temperature between downtown and suburban areas in Hong Kong, an example of urban heat island effect. With one degree Celsius' increase in air temperature an extra 1.7 billion electricity units are consumed, an equivalent of \$1.7 billion in electricity bill.



The erection of a tall concrete and steel structure on Tamar site is likely to intensify the urban heat island effect on the island and at the same time scuttling government coffers.

4 Tamar Development Bypassed the Sustainability Test

A sustainability assessment tool for strategic policy making was advocated by the Council for Sustainable Development in 2001 for application within the Government. The sustainability assessment should be conducted for the Tamar Development Project taking into account of cumulative implications on the economic, environmental and quality of life conditions of Hong Kong. The Tamar development needs to show proof that the sustainable development parameters are met and balanced.

5 City Porosity & Harbour Access is at Stake

Victoria Harbour, one of the most photographed cityscapes, is a symbolic representation of Hong Kong as a world-class city. Encroaching onto the water-front, a public asset, with tall blocks would not only succumb the public to a man-made valley of exhausts but also deprive the public access and enjoyment of the harbour.

According to Prof Alexis Lau of the Hong Kong University of Science and Technology, when a building's height is three times the width of the adjacent road, a canyon effect will form in the area, trapping the air pollutants among the tall buildings. The concentration of skyscrapers in the island has reduced the porosity of the city. A rethink on the planning of building density can improve the porosity and help dissipate air pollutants.

Conclusion

Friends of the Earth (HK) urges the Honorable Legislators:

- (a) Not to approve the Tamar Development until a new EIA is undertaken
- (b) Not to approve the Tamar Development until a comprehensive heat island effect and city porosity assessment is undertaken
- (c) Not to approve the Tamar Development until a comprehensive traffic impact



assessment is undertaken

(d) Not to approve the Tamar Development until a sustainability test is undertaken.

“Hong Kong ranked 41st on the list of livable cities in the world polled by the Economist Magazine recently. Hong Kong has slipped and trailed behind Tokyo and Singapore. Air pollution has been identified as an unfavorable factor. It is a wake-up call for Hong Kong’s policy makers and city planners.

Livability could only be achieved with political will power and definitely NOT with a political “High Tower”. It is time to break the vicious chain of air pollution. It is time to reclaim Hong Kong’s livability standard. Hong Kong can beat 41.”

Sincerely,

Mei Ng
Director
Friends of the Earth (HK)
(852) 2528-5588 (O)
(852) 2529-2777 (F)
foehk@foe.org.hk
www.foe.org.hk