

Letterhead of FRIENDS OF THE EARTH

**FRIENDS OF EARTH'S SUBMISSION TO
PLANNING, LANDS AND WORKS PANEL
LEGISLATIVE COUNCIL**

**Response on
South East Kowloon Development**

22 October 1998

1. Friends of the Earth (FoE) is gravely concerned about the environmental impacts of the reclamation and landuse planning associated with South East Kowloon Development.

Environmental Impacts of Reclamation

2. The two draft Outline Zoning Plans (OZPs), draft Kai Tak (South) and (North) OZPs, for Southeast Kowloon (SE KLN) Development will involve one of the largest scale reclamation of 300 hectare within the Victoria Harbour. FoE would like to reiterate our ultimate concerns about the adverse impacts of the whole "Life Cycle" of reclamation works.
3. According to Fill Management Committee Database (*Civil Engineering Department*), a volume of over 30 million cubic metres of marine sand is required for reclamation works for SE KLN Development.
4. At the same time over one million cubic metres of contaminated mud need to be disposal of to East Sha Chau Contaminated Mud Pit threatening the well-being of the neighbouring Dolphin Sanctuary. The disturbed contaminated mud during the reclamation works also worsens the water quality of the Victoria Harbour.
5. The Administration has to prove that the fill materials are from ecologically insensitive source. The sediment in the seabed of Kowloon Bay is heavily contaminated with heavy metals such as mercury and lead. Hence dredging, stirring or other means of disturbance to contaminated mud that lead to reactivation of the heavy metals in the water column should be avoided as far as possible. Otherwise the contaminated sediment should be cleaned up in-situ in order to provide a clean and scenic waterfront.

Drainage

6. The Water Quality Index (WQI) of Kai Tak Nullah is classified as “Bad” to “Very Bad” at Kowloon City and Ngau Tau Kok (*River Water Quality in Hong Kong for 1996*). According to the draft Kai Tak (South) and (North) OZP, the Kai Tak nullah is re-directed and flow through the Metropolitan Park and the densely populated residential area respectively. The filthy nullah will impose visual impact and odour nuisance to the residents and users of the Metropolitan Park which is for recreational and leisure purposes, and attracting tourists.
7. Consequent to the massive West Kowloon Reclamation, severe floods occurred frequently after rainstorms in Mongkok area. In view of the comparative scale of SE KLN Reclamation and West Kowloon Reclamation, FoE is concerned about that similar flooding incident will reoccur.

Environmental Impacts of Traffic

8. The total area for Roads and Transport occupies 41% of the total planning scheme areas (the Areas) of the two OZPs which is similar to the proportion of reclaimed land (44%). Statistically, the purpose of reclamation in the planning scheme areas is for roads and transport development.
9. Public are not well informed with the full environmental impacts associated with traffic implication of the two OZPs. As more roads will be built, the air quality in the Harbour Air Quality Control Zone will further deteriorate and more people will suffer from the traffic noise pollution that degrade the living quality.
10. The total population of the Areas will be 320 000 that will form a belt of dense population together with the neighbouring districts: Hung Hom, To Kwa Wan, Ma Tau Kok, Kowloon City, San Po Kong, Lowloon Bay and Kwun Tong. SE KLN Development locates at the centre of this population belt and become the traffic node between East and West Kowloon.
11. The planned road network in the Area, has to not only relieve the congested traffic between East and West Kowloon but also serve the traffic demand of the population in the-Area, especially the workforce because job vacancies in the Areas are anticipated much less than the population. The unbalanced distribution of population and job vacancies in the Areas will increases the traffic load of the existing road network linking to the Areas and the cross harbour links, i.e. Cross-Habour Tunnel and Eastern Harbour Crossing
12. “Road-option” approach is certainly not sustainable for the SE KLN development. Railway link should be provided for the densely population areas such as East and West Kowloon as recommended in the *Consultation Document*

of Third Comprehensive Transport Study launched by Transport Bureau (June 1998). The need to build roads in the Areas can be further reduced with the boarder development of mass transport system and pedestrianization.

Land Contamination

13. Residential Group A Zoning of Kai Tak (North) OZP is located at the areas with heavy land contamination (*South East Kowloon Development at Kai Tak Airport, Design and Construction for Decontamination and Site Preparation, Territorial Development Department (TDD)*). The contaminants polluting the underground soil and underground water at Kai Tak Airport North Apron include methane, benzene, toluene, tetrachloroethylene and petroleum which impose safety and health hazards to the future occupants of the contaminated lands.
14. Although TDD has proposed a cleanup programme for the contaminated sites, the programme was questioned by an oversea expert experienced at land decontamination as not feasible in terms of the methods employed and scheduled time. FoE is gravely concerned about potential hazards of zoning the dense residential areas on the improperly treated contaminated lands.

FoE calls for an alternative landuse plan for SE KLN that can reduce the adverse impacts of traffic, the scale of reclamation and the potential hazards of contaminated lands to the public.