



**BY EMAIL ONLY**

**Director of Environmental Protection**

EIA Ordinance Register Office

Environmental Protection Department

(E-mail: [eiaocomment@epd.gov.hk](mailto:eiaocomment@epd.gov.hk); Fax: 2147 0894)

11 June, 2019

Dear Sir,

**Technical Study on  
Partial Development of Fanling Golf Course Site – Feasibility Study  
Project Profile**

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

1. The potential development area (PDA), a part of the Fanling Golf Course site to the east of Fan Kam Road, is either close to operating Golf Course or adjacent to landuse zonings, including “G/IC”, “R(A)”, “V” and “REC”, which are not favourable for the preservation of species of high conservation value and their habitats found in the PDA or in its vicinity. Green Power urges for early identification of species of conservation value and their habitats in PDA.
2. The locations and dates of records of species of ecological significance should be given for devising effective measures to protect them from operation of Golf Course and any future developments.
3. In Section 3.6.5, as the Golf Course has already caused the loss and fragmentation of original habitat, any further habitat loss and fragmentation compared to the existing situation should be identified.
4. As most of the freshwater habitats have been degraded or destroyed by the Golf Course, the remaining water courses which are of conservation value should be well preserved from the operation of Golf Course and any future developments.
5. Therefore, regarding water courses of conservation value, we are concerned that civil engineering works, especially channelization, will damage the habitats. We also worry that any development will deteriorate the water quality and hydrology that threatens the inhabited aquatic life, especially the native species, and brings about human disturbance.
6. Surface runoff generated from the site and Golf Course during both construction and operation phase, which may contain fertilizers, pesticides, silt/mud, refuse and contaminants, will pollute the water courses during rainstorm and through improper discharge of effluent from various sources (e.g. sewage treatment works, sand traps or other silt removal facilities).

7. In view of the occurrence of wildlife in the Golf Course, it is highly possible that wild animals and birds scavenge the food waste in the Golf Course and future developments that will create hygiene problems and unnecessary conflict between human and wild animals.
8. Ratio of public to private housing in terms of site area, floor area or unit numbers should be provided (refer to Section 1.4.5) in prior to any further environmental study or assessment. This figure provides a basis for the need and scale of associated infrastructures such as car parks, markets, restaurants, etc. which impose different environmental impacts qualitatively and quantitatively, according to different natures of public and private housing.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 3961 0200, F: 2314 2661, Email: lkcheng@greenpower.org.hk).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Cheng Luk-ki', with a stylized flourish at the end.

CHENG Luk-ki  
Director  
Green Power