



BY EMAIL ONLY

Ms. Maisie Cheng, J.P.

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

(E-mail: eiaocomment@epd.gov.hk)

3 June 2021

Dear Ms. Cheng,

Project Profile for San Tin/ Lok Ma Chau Development Node

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

General Comments about Land Uses

1. The captioned proposed Development Node (the Project) is located nearby the globally important Mai Po wetlands. Any land uses in the Project should not compromise the ecological functions of the wetlands, especially the Inner Deep Bay Ramsar Site and its associated Wetland Conservation Area (WCA) and Wetland Buffer Area (WBA).
2. The Project should aim at improving the regional environmental quality, regulating incompatible land uses, increasing land-use efficiency and establishing a self-sustainable and low-carbon city model for the territory.

Brownfield Proliferation

3. About 80 ha of land in the Project Site is occupied by brownfield operations. The proposed development will likely trigger the spreading of brownfields to the nearby rural areas and countryside including the WCA and WBA in the Deep Bay Area threatening the fishponds, farmlands, and wetlands.
4. Therefore, a proper reallocation and/or compensation plan for the existing brownfield operations should be formulated in the early stage before construction phase of the Project to prevent an expansion of unfavorable and uncontrollable land uses at the periphery of the Project Site.

Air Quality

5. The Project Site is in the Yuen Long District which is highly prone to air pollution. According to the EPD's yearly average Air Quality and Health Index (AQHI) data from 2014 to 2021, Yuen Long ranked the top three most polluting districts in terms of the number of hours with AQHI ≥ 7 and days with daily maximum AQHI ≥ 7 in at least seven consecutive years.
6. In the light of the current unsatisfactory air quality, the project proponent should fully assess the air quality impacts anticipated in the Project and formulate effective mitigation measures to control the air pollution. In addition, the project proponent should select the appropriate types of industry inside the proposed employment node such that no significant industrial emission will be generated.

Ecology

7. The Project Site is adjacent to or partially inside several important ecological sensitive receivers, including the Inner Deep Bay area, WCA, WBA, Mai Po Village SSSI, and Lam Tsuen Country Park, etc. Any intrusion or encroachment of such ecological sensitive receivers should be strictly avoided. The ecological impacts induced from the Project should be fully assessed and mitigated. Provided that there will be a prominent increase in population and employment in the Project Site, the road and footpath networks in the Development Node should be designed in a way that deters the people from entering the ecologically sensitive zones.
8. Revitalizing the closed Ngau Tam Mei Landfill within the Project Site should be considered as an ecological compensation measure of the Project.

Transportation

9. The detailed design plan of the proposed Northern Link (NOL) railway has not been mentioned in the Project Profile. It is recommended to adopt an underground tunnel railway option to minimize the permanent environmental impacts such as habitat fragmentation and noise pollution. Tunnel option can also avoid community segregation and save lands for other uses.
10. Apart from the visually "greener" transport design, the project proponent should further formulate a green transportation strategic plan for the Development Node to introduce green initiatives to reduce the potential transport-induced environmental impacts and carbon emission.

Solid Waste

11. Redundant construction and demolition materials generated from the proposed developments should be properly stored, transported, and finally disposed of at the designated disposal site. Fly-tipping and illegal dumping should be strictly prohibited during the construction phase

because the areas around the Project Sites are notorious for destruction of ecological sensitive sites by massive dumping of wastes and debris, especially C&D waste. Regrettably, restoration of filled farmlands, fishponds or wetlands are non-enforceable, inefficient, or impractical in most cases.

12. It is recommended to provide public recycling facilities in the Development Node at the operational phase to facilitate regional recycling in the node as well as the neighboring villages.

Wastewater

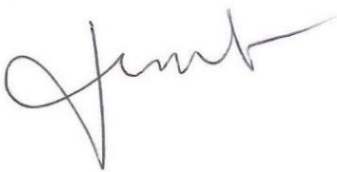
13. Non-point source pollution and site surface runoff should not be discharged or directed to the watercourses during the construction phase. Alteration of the existing natural watercourses should be minimized as far as possible.

14. The proposed drainage system (e.g. the retention lakes) could be designed in a sustainable and multi-functional approach in order to promote a Blue-green City concept. In particular, the drainage system should be capable of withstanding extreme rainstorm and providing ecological services to the community, such as microclimate regulation.

15. Zero-discharge policy in Deep Bay Area should be strictly observed for discharge of wastewater for the Project.

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 faithfully,



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Green Power