



BY EMAIL ONLY

Ms. Maisie Cheng, J.P.

Director of Environmental Protection

EIA Ordinance Register Office

Environmental Protection Department

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10 June 2021

Dear Ms. Cheng,

**Project Profile for Remaining Phase Development of the
New Territories North (NTN) – NTN New Town and Man Kam To**

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 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 Hong Kong.
2. According to the preliminary feasibility study on developing the New Territories North, there are more than one proposed conceptual land use plan based on different employment scenarios. We urge the project proponent to undergo a large-scale public engagement process in formulating the final land use plan to an extent at least comparable to the previous public consultation for the NENT NDA, provided that the scale of the captioned proposed development (the Project) is much larger than the NENT NDA development. In terms of a proper EIA procedure, the EIA should only be taken place after the land use plan and development parameters are finalized.
3. There are plenty of good quality farmlands and green belts in the Project Site. It is highly recommended to preserve these valuable green resources as much as possible. In particular, the project proponent should consider designating suitable farmlands into the Agricultural Priority Area (APA) to accommodate the affected farmers.

Brownfield Proliferation

4. About 160 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, therefore a proper reallocation and/or compensation plan for the existing brownfield operations should be formulated in the early stage before the 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. Since the Project Site is close to the highly developed Shenzhen area, the industrial emissions from mainland China may affect the air quality of the Project Site. Therefore, the air quality impact assessment of this Project should take the cross-border emissions into account.

Ecology

6. Natural habitats of well-known ecological importance such as the fung shui woods and freshwater marshes are existed in the Project Site, the ecological values of this large piece of land should not be underestimated. However, the existing ecological data of the Project Site is scattered and unorganized. The project proponent should conduct a comprehensive literature review and ecological surveys in order to identify all the historical and existing ecologically sensitive locations within the Project Site and its periphery. The ecological impacts induced by the Project should be fully assessed and mitigated by effective measures.
7. The proposed Man Kam To Logistic Corridor is overlapping with the existing avifauna flight paths connecting the Deep Bay area. According to the feasibility study of NTN, the proposed agri-logistics / light industry land use inside the Corridor will involve the “3-8 storeys” building that will very likely block these flight lines. We urge the project proponent to avoid inducing such a permanent ecological impact, especially on the migratory birds.

Solid Waste

8. 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 the destruction of ecologically 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.

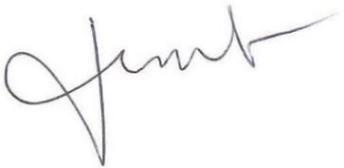
Wastewater

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

10. To promote the blue-green city concept, the project proponent should consider introducing the sustainable urban drainage system and revitalizing the modified watercourses to enhance the overall environment.

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,

A handwritten signature in black ink, appearing to read 'LO Wing-fung', written in a cursive style.

LO Wing-fung
Senior Education & Conservation Officer
Green Power