BY EMAIL ONLY

Director of Environmental Protection
EIA Ordinance Register Office
Environmental Protection Department
(E-mail: eiaocomment@epd.gov.hk; Fax: 2147 0894)

17 June 2022

Dear Sir/Madam,

Technical Study on
Partial Development of Fanling Golf Course Site – Feasibility Study EIA Report

The Potential Development Area (PDA) for the above-captioned study that covers approximately 32ha is bounded by Ping Kong Road, Po Kin Road, Fan Kam Road, rural settlements of Ping Kong, Tai Lung Experimental Farm and a green hillock. The approximate population for PDA is 33,600. Green Power would like to draw your attention to our concerns about the above-captioned EIA Report.

1. We agree the proposed development to avoid areas of higher ecological values i.e. Sub-Areas 2 to 4 (medium or medium to high ecological values), implement blue-green infrastructure, adopt green building design, energy-efficient features and renewable energy technologies in order to lower PDA's environmental and ecological impacts and enhance its sustainability.

2. In construction phase, the construction activity should be strictly confined in Sub-Area 1 to avoid disturbance to the wildlife, water quality and damage to habitats in the other parts of PDA and neighbouring environment. Restoration should not be considered as an acceptable reason for occupation of the other parts of PDA and/or neighbouring environment in construction phase.

3. Considering the transport capacity of Kam Sheung Road, use of private cars should be discouraged in PDA in operation phase. Thus, parking spaces for private cars should be limited and comprehensive and convenient public transportation should be provided in operation phase.

4. In addition to the measures for "no net increase in pollution loading' in Deep Bay, the construction site should be bounded by dykes to prevent the surface runoff from flowing out of the site, especially to ecologically sensitive sites and watercourses. In operation phase, similar practices should also be maintained to avoid pollution of habitats and watercourses. Surface runoff from wet markets and car parks, if provided, should be collected and conveyed to sewage treatment plants as far as possible.

5. Proper and effective measures should be implemented to avoid road-kill of wildlife, e.g. barriers to deter the animal from access to build-up areas. Wildlife resistant rubbish bins and refuse collection station will be used to avoid attract wildlife to reach human settlement by food waste and consequent conflict of human and wildlife.

6. Sub-Areas 2 to 4 are intended to be zoned as "Other Specified Uses" annotated Recreational *cum* Conservation" under Outline Zoning Plan. Hence, Sub-Areas 2 to 4 should be conserved and a management plan should be formulated with the aims to manage the human activities conducted in Sub-Areas 2 to 4 and conserve the ecologically sensitive habitats and species of conservation importance from disturbance. The management plan should take into account of the potential associated activities of the future social welfare services such as homes for the elderly.

7. While Sub-Areas 2 to 3 will provide recreational facilities and ancillary facilities, measures to avoid disturbance and damage to habitat and wildlife should be in place.

8. Moreover, the enforcement and maintenance authorities of all parts of the Project Site should be identified, especially for ecological conservation, before issuance of Environmental Permit. The conservation plans and works for PDA should be formulated and implemented in prior to the construction works in Sub-area 1 to safeguard the ecology and environment of other parts of the PDA.

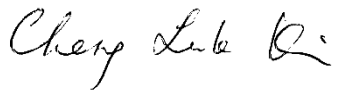
9. 34 trees in Sub-Area 1 are proposed to be transplanted, destination sites should be identified and prepared before transplantation to increase the survival rate and shortened the recovery and adaptation period of transplanted trees. The locations and species of compensatory trees proposed to be planted in Sub-Area 2 and 3 should be cautiously considered in order not to affect the ecology of these areas.

10. Most inert C&D materials generated from the Project, i.e. 570,000 m^3 out of 620,000 m^3, will be transported to other designed sites, Despite claims of trip-ticket system being effective in avoiding illegal dumping and landfilling of C&D materials at unauthorized sites, cheating of the system is possible. Stringent documentation, verification and monitoring for the waste disposal system must be implemented to avoid landfilling in rural areas by waste generated by the Project, especially rural areas in Northern District.

11. Effective and deterring measures to confine the travelling routes of dump trucks and similar machineries related to the Project should be utilized, e.g. real-time GPS devices on the trucks, instantaneous alarm alert for the trucks deviated from the designated routes, should be seriously considered. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the irregular activities of relevant contractors.

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,



CHENG Luk-ki
Director
Green Power