

Appendix 3.1 – EIA CHECKLIST

Checklist for Environmental Impact Assessment (EIA)

Abbreviations	
SB	Environmental Impact Assessment Study Brief NO. SB-318/2019 for Technical Study on Partial Development of Fanling Golf Course Site
EIAO TM	Environmental Impact Assessment Ordinance Technical Memorandum
EIAO TM Annex 8	Environmental Impact Assessment Ordinance Technical Memorandum Annex 8: Criteria for Evaluating Ecological Impact, https://www.epd.gov.hk/eia/english/legis/memorandum/annex8.html
EIAO TM Annex 10	Environmental Impact Assessment Ordinance Technical Memorandum Annex 10: Criteria for Evaluating Visual and Landscape Impact, and Impact on Sites of Cultural Heritage, https://www.epd.gov.hk/eia/english/legis/memorandum/annex10.html
EIAO TM Annex 11	Environmental Impact Assessment Ordinance Technical Memorandum Annex 11: Contents of an Environmental Impact Assessment (EIA) Report, https://www.epd.gov.hk/eia/english/legis/memorandum/annex11.html
EIAO TM Annex 16	Environmental Impact Assessment Ordinance Technical Memorandum Annex 16: Guidelines for Ecological Impact, https://www.epd.gov.hk/eia/english/legis/memorandum/annex16.html
EIAO TM Annex 18	Environmental Impact Assessment Ordinance Technical Memorandum Annex 18: Guidelines for Landscape and Visual Impact Assessment, https://www.epd.gov.hk/eia/english/legis/memorandum/annex18.html
EIAO TM Annex 20	Environmental Impact Assessment Ordinance Technical Memorandum Annex 20: Guidelines for the Review of an EIA Report, https://www.epd.gov.hk/eia/english/legis/memorandum/annex20.html
EIAO GN	Environmental Impact Assessment Ordinance Guidance Note
EIAO GN No. 6/2010	Environmental Impact Assessment Ordinance Guidance Note 6/2010: Environmental Impact Assessment Ordinance Guidance Note, https://www.epd.gov.hk/eia/hb/materials/GN6.pdf
EIAO GN No. 7/2010	Environmental Impact Assessment Ordinance Guidance Note 7/2010: Ecological Baseline Survey for Ecological Assessment, https://www.epd.gov.hk/eia/hb/materials/GN7.pdf
EIAO GN No. 8/2010	Environmental Impact Assessment Ordinance Guidance Note 8/2010: Preparation of Landscape and Visual Impact Assessment, https://www.epd.gov.hk/eia/hb/materials/GN8.pdf
EIAO GN No. 10/2010	Environmental Impact Assessment Ordinance Guidance Note 10/2010: Methodologies for Terrestrial and Freshwater Ecological Baseline Surveys, https://www.epd.gov.hk/eia/hb/materials/GN10.pdf
EIAO GN No. 11/2010	Environmental Impact Assessment Ordinance Guidance Note 7/2010: Methodologies for Marine Ecological Baseline Surveys, https://www.epd.gov.hk/eia/hb/materials/GN11.pdf

EIA Sections and Technical Report Sections	Sections on this Checklist	Consultant(s)	Submission Section
General	A1-A6	All Consultants	2.1, 2.2, 2.3
Executive Summary	B1-B5	All Consultants	2.1, 2.2, 2.3
Introduction – Sec 1	C1-C5	All Consultants	2.1, 2.2, 2.3

Project Description – Sec 2	D1-D14	All Consultants	2.1, 2.2, 2.3
Applies to ALL Impact Sections	E1-E26	All Consultants	2.3
Air Quality Impact – Sec 3	F1-F3	SMEC Asia Ltd	2.3
Noise Quality Impact – Sec 4	G1-G8	SMEC Asia Ltd	2.3
Water Quality Impact – Sec 5	H1-H2	PMS Consulting Ltd and John Berry	2.3
Sewerage and Sewage Treatment Implications – Sec 6	I1-I10	PMS Consulting Ltd and John Berry	2.3
Waste Management Implications – Sec 7	J1-J9	SMEC Asia Ltd	2.3
Land Contamination – Sec 8	K1-K8	SMEC Asia Ltd	2.3
Ecological Impact (Terrestrial and Aquatic) – Sec 9	L1-L107	aec Ltd	2.1 and Appendix 3.6, 3.7, 3.8
Fisheries Impact – Sec 10	M1-M3	aec Ltd	N/A
Landscape and Visual Impacts – Sec 11	N1-N82	URBIS Ltd	2.2 and Appendix 3.3, 3.4, 3.5
Impact of Cultural Heritage – Sec 12	O1-O12	TAG Development Ltd	2.3 and Appendix 3.3, 3.5
Environmental Monitoring and Audit Requirements – Sec 13	P1	All Consultants	2.3
Summary of Environmental Outcomes – Sec 14	Q1	All Consultants	2.3
Conclusion – Sec 15	R1	All Consultants	2.2

(1) No.	(2) Question Item	(3) Statutory Requirement	(4) Is the EIAO TM and SB Fully Complied With?	(5) State Relevant EIA Section of EIA	(6) If “No”, Critique and Comment on EIA, EIAO TM and/or SB Non-compliances’
General					See Submission Section 2.1, 2.2, 2.3.
A1	In particular, the main environmental concerns of the general public and interest groups who may be affected by the Project should be identified and addressed in the EIA study. As such, you are strongly advised to engage the public and interest groups during the course of the EIA study. SB S3.6.5 The EIA report shall contain a summary of the main concerns of the general public, special interest groups and the relevant statutory or advisory bodies received from and	SB Cover Letter and SB S3.6.5	No	Sec 2.5.2	The EIA states that a single formal public consultation event took place with a single stakeholder group (green groups) and there is no mention of other formal stakeholder consultations held, apart from the Public Inspection of Project Profile during the course of the study. No mentioning as to the Continuous Public Involvement ("CPI") which is a key part of the EIAO and is referenced repeatedly on the EIAO and EPD’s websites and academic papers. See:

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	identified by the Applicant during the course of the EIA study and describe how the relevant concerns have been taken into account.				<p>https://www.epd.gov.hk/eia/3deia/CPI.pdf</p> <p>and:</p> <p>https://www.epd.gov.hk/epd/english/environmentinhk/eia_planning/prob_solutions/highlights03.html</p> <p>and:</p> <p>https://www.epd.gov.hk/eia/operation/english/chapter04_6.html</p> <p>and:</p> <p>https://hub.hku.hk/bitstream/10722/190773/1/Content.pdf?accept=1</p> <p>and:</p> <p>https://libproject.hkbu.edu.hk/trsimage/hp/14677210.pdf</p> <p>Key impacted stakeholders: Hong Kong Golf Club ("HKGC") members, golf professionals, Hong Kong Golf Association, HKGC full time staff and caddies were never consulted by the Project Proponent between the study commencement period from 30 September 2019 to 20 May 2022.</p> <p>The SB requires Public Consultation ("PC") <u>during</u> the EIA period; PC for certain key stakeholders and impacted parties were wholly absent.</p>

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A2	The objectives of the EIA study are as follows: (i) to describe the Project and associated works together with the requirements and environmental benefits for carrying out the Project;	SB 2.1 (i)	No	2.1 and Table 2.5	<p>Section 2, Tab 2.5 shows four stages all between 2024-2029 and Stage 5 “to be further reviewed” but with no breakdown of the stage’s time periods. This omission and the absence of any traffic and population assumptions, external to the FGC-PD in the district makes it impossible to meaningfully assess FGC-PD’s environmental impacts in an informed manner. In particular the feasibility of construction timing and validation of traffic assessments for construction and operational: noise, air and waste, stormwater, traffic and sewage capacity and infrastructure assertions.</p> <p>Suggestions on the choice of construction options are made but no decision made on the options, so impact cannot be determined.</p> <p>See Appendix 3.9.</p>
A3	The objectives of the EIA study are as follows: (ii) to identify and describe the elements of the community and environment likely to be affected by the Project, and/or likely to cause adverse impacts to the Project, including both the natural and man-made environment and the associated environmental constraints;	SB 2.1 (ii)	No		<p>CPI took place with a single stakeholder group (green groups) and there is no mentioning of other formal stakeholder consultations held, apart from the Public Inspection of Project Profile. No mentioning is made to the CPI which is a key part of the EIAO and is referenced repeatedly on the EIAO and EPD’s websites and academic papers.</p> <p>See:</p> <p>https://www.epd.gov.hk/eia/3deia/CPI.pdf and: https://www.epd.gov.hk/epd/english/environmentinhk/eia_planning/prob_solutions/highlights03.html</p> <p>and:</p> <p>https://www.epd.gov.hk/eia/operation/english/chapter04</p>

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					<p>6.html</p> <p>and:</p> <p>https://hub.hku.hk/bitstream/10722/190773/1/Content.pdf?accept=1</p> <p>and:</p> <p>https://libproject.hkbu.edu.hk/trsimage/hp/14677210.pdf</p> <p>Key impacted stakeholders: Hong Kong Golf Club members, golf professionals, Hong Kong Golf Association, HKGC full time staff and caddies were never consulted by the Project Proponent between the study commencement period from 30 September 2019 to 20 May 2022.</p> <p>The SB requires PC during the EIA period; PC for certain key stakeholders and impacted parties were wholly absent.</p>
A4	The purpose of this Study Brief is to set out the purposes and objectives of the EIA study, the scope of environmental issues which shall be addressed, the requirements that the EIA study shall need to fulfil, and the necessary procedural and reporting requirement. The Applicant shall demonstrate in the EIA report whether the criteria in the relevant sections of the Technical Memorandum on the Environmental Impact Assessment Process of the Environmental Impact Assessment Ordinance (hereinafter referred to as “the EIAO TM”) are fully complied with)	SB 3.1.1	No	All EIA Sections	This EIA checklist documents every non-compliance with the EIAO TM and SB.

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A5	For the purpose of assessing whether the environmental impacts shall comply with the criteria of the EIAO TM	SB 3.2.1	No	All EIA Sections	This EIA checklist documents every non-compliance with the EIAO TM and SB.
A6	Section 3.6.5 of the EIA Study Brief (no. SB-318/2019) requires that the EIA report shall contain a summary of the main concerns of the general public, special interest groups and the relevant statutory or advisory bodies received from and identified by the applicant during the course of the EIA study, and describe how the relevant concerns have been taken into account. The Annex 20 of Technical Memorandum on EIA Process, which outlines the guidelines for the review of an EIA report, also draws attention on whether the information identify and address the main concerns of the general public and special interest groups (clubs, societies etc) who may be affected by the project.	SB 3.6.5	No	2.5.2	<p>The EIA states that a single formal public consultation event took place with a single stakeholder group (green groups) and there is no mentioning of other formal stakeholder consultations held, apart from the Public Inspection of Project Profile. No mentioning is made to the CPI which is a key part of the EIAO and referenced repeatedly on the EIAO, the EPD’s websites and academic papers by the EPD staff.</p> <p>See:</p> <p>https://www.epd.gov.hk/eia/3deia/CPI.pdf and: https://www.epd.gov.hk/epd/english/environmentinhk/eia_planning/prob_solutions/highlights03.html</p> <p>and:</p> <p>https://www.epd.gov.hk/eia/operation/english/chapter04_6.html</p> <p>and:</p> <p>https://hub.hku.hk/bitstream/10722/190773/1/Content.pdf?accept=1</p> <p>and:</p> <p>https://libproject.hkbu.edu.hk/trsimage/hp/14677210.pdf</p> <p>Key impacted stakeholders:</p>

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					<p>Hong Kong Golf Club members, golf professionals, Hong Kong Golf Association, HKGC full time staff and caddies were never consulted by the Project Proponent between the study commencement period from 30 September 2019 to 20 May 2022.</p> <p>The SB requires PC during the EIA period; PC for certain key stakeholders and impacted parties were wholly absent.</p>
Executive Summary					See Submission Section 2.1, 2.2, 2.3.
B1	Does the executive summary contain at least a brief description of the project and the environment, an account of the main mitigation measures to be implemented by the developer, and a description of any remaining or residual impacts?	EIAO TM Annex 20 10.1	No		The Executive Summary does not include any plan of the housing development and so the proposed development is not properly described nor visualised, which is considered as non-compliant with the EIAO TM.
B2	Where appropriate does the information include reference to the consideration of the project's siting or alignment by the project proponent?	EIAO TM Annex 20 10.3	No		The Executive Summary, being the report most widely read by the public, does not include any plan of the housing development and so the proposed development is not properly described, which is considered as non-compliant with the EIAO TM.
B3	Does the executive summary include a brief explanation of the overall approach to the assessment?	EIAO TM Annex 20 10.4	No		<p>The Executive Summary does not mention it is part of a feasibility study.</p> <p>No justification of any growth in Hong Kong population numbers were provided, and it is known that Hong Kong has a negative population growth with more deaths than births presently according to the Census and Statistics Department.</p>
B4	Have the main environmental impacts of different siting or alignment options been compared clearly and objectively with those of the proposed project and with the likely future environmental conditions in the absence of the project?	EIAO TM Annex 20 10.5	No	2.1	TFLS is mentioned but the EIA omits to state that environmental factors played zero part in the TFLS selection process.

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B5	Have the areas expected to be significantly affected by the various aspects of the project been indicated with the aid of suitable maps?	EIAO TM Annex 20 3.3	No	2.6 and 2.7	Environmental impacts of different siting options have not been compared clearly and objectively with those of the proposed project. There is no comparison with the pros and cons versus the other TFLS options such a brownfield site. Only 3 options located within the 32 ha site have been considered and none outside the boundary of the area have been mentioned. Section 2.7 does not mention any environmental factors which were involved in the option selection.
Introduction: EIA Sec 1					See Submission Section 2.1, 2.2, 2.3.
C1	Where appropriate does the information include reference to the consideration of the project's siting or alignment by the project proponent?	EIAO TM Annex 20 3.1	No	1.1	Section 1 does not include any reference to the consideration of the project's siting or alignment by the project proponent, and merely mentions that the TFLS chose the site. TFLS did not consider environmental factors. The EIA omits to state that environmental factors played zero part in the selection process.
C2	Are the reasons for selecting the proposed project or its siting and alignment, and the part environmental factors played in the selection, adequately described?	EIAO TM Annex 20 3.2	No	2.1	The EIA omits to state that environmental factors played zero part in the selection process.
C3	Have the main environmental impacts of different siting or alignment options been compared clearly and objectively with those of the proposed project and with the likely future environmental conditions in the absence of the project?	EIAO TM Annex 20 3.3	No	2.6 and 2.7	Environmental impacts of different siting options have not been compared clearly and objectively with those of the proposed project. There is no comparison with the pros and cons versus other TFLS options such a brownfield site. Only 3 options located within the 32 ha site have been considered and none outside the boundary of the study area have been mentioned. Section 2.7 does not mention any environmental factors which were involved in the option selection.
C4	(i) Item F.2 - Sewage treatment works with an installed capacity of more than 5 000 m3 per day and a boundary of which is less than 200 m from the nearest boundary of an existing or planned residential area.	SB 1.3	No	Sec 1.4.2	All 3 designated projects from the SB have been removed from the project, but without any explanation, especially Item F.3.

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	<p>(ii) Item F.3 - A sewage pumping station with an installed capacity of more than 2 000 m³per day and a boundary of which is less than 150m from an existing or planned residential area.</p> <p>(iii) Item F.4 - An activity for the reuse of treated sewage effluent from a treatment plant.</p>				
C5	The purpose of this EIA study is to provide information on the nature and extent of environmental impacts arising from the construction and operation of the Project under different development scenarios and associated activities that will take place concurrently.	SB 1.5	No	2.1 and Table 2.5	It is not possible to ascertain the nature and extent of the environmental impacts arising from the construction and operation of the Project under different development scenarios as only a single different development scenario is considered throughout the EIA.
Project Description: EIA Sec 2					See Submission Section 2.1, 2.2, 2.3.
D1	The Applicant shall provide information on the purpose(s) and objectives of the Project, describe the need of the Project, describe the benefit of the Project and scenarios with and without the Project.	SB 3.3.1	No	2.1	No justification of any growth in Hong Kong population numbers were provided, and it is known that Hong Kong has a negative population growth with more deaths than births presently according to the Census and Statistics Department.
D2	The Applicant shall describe Project details that may affect the potential environmental impacts, including but not limited to the siting, proposed land uses, layout and design, facilities to be provided in the Project, scale/height of the structures and facilities with layout plans, construction methods, sequence of construction works and other major activities involved in the construction and operation of the Project, and use diagrams, plans and/or maps as necessary. The estimated duration of the construction phase and operation phase of the Project together with the programme within these phases shall be given.	SB 3.3.1	No	2.1-2.12 and Sec 2, Tab 2.5 2.11.10-2.11.16, 2.12 Sec 2.5 and Tab 2.1	<p>Environmental impacts of different siting options have not been compared clearly and objectively with those of the proposed project. There is no comparison with the pros and cons versus other TFLS options such a brownfield site. Only 3 options located within the 32 ha site have been considered and none outside the boundary of the area have been mentioned. Section 2.7 does not mention environmental factors were involved in the option selection.</p> <p>It is not possible to ascertain the nature and extent of the environmental impacts arising from the construction and operation of the Project under different development</p>

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	<p>The land taken by the Project area, works areas and any associated access arrangements, auxiliary facilities and landscaping areas shall be shown on a scaled map. The uses of the Project shall be described and the different land use areas shall be demarcated as appropriate. The Applicant shall provide information to identify and address the main concerns of the general public and special interest groups (club, societies etc.).</p>				<p>scenarios as only a single different development scenario is considered throughout the EIA.</p> <p>Section 2, Tab 2.5 shows four stages all between 2024-2029 and Stage 5 “to be further reviewed” but with no breakdown of stage’s time periods. This omission and the absence of any traffic and population assumptions, external to the FGC-PD in the district, makes it impossible to meaningfully assesses FGC-PD’s environmental impacts in an informed manner. In particular the feasibility of construction timing and validation of traffic assessments for construction and operational: noise, air and waste, stormwater, traffic and sewage capacity and infrastructure assertions.</p> <p>Suggestions on the choice of construction options are made but no proposal on the options. For example, in 2.11.10-2.11.16, there are suggestions on construction method options (large diameter bored piles and driven H-piles) but no selection is made. These have substantially different environmental impacts eg. noise, vibration to surrounding receivers - to residents and hospital patients, subterranean pollution (from bentonite) to flora and fauna, and groundwater flow constraint eg. upstream and downstream to Long Valley land users, flora and fauna). As there is no decision on the proposed options, a proper assessment of those impacts cannot be made.</p> <p>See Appendix 3.9.</p>
D3	Public Consultation / Continuous public involvement		No	Sec 2.5 and Tab 2.1	<p>The EIA states that continuous public involvement took place with a single stakeholder group (green groups) and there is no mentioning of other casual stakeholder consultations stated. No mentioning is made to the CPI which is a key part of the EIAO and is referenced</p>

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					<p>repeatedly on the EIAO, the EPD’s websites and academic papers.</p> <p>See:</p> <p>https://www.epd.gov.hk/eia/3deia/CPI.pdf</p> <p>and:</p> <p>https://www.epd.gov.hk/epd/english/environmentinhk/eia_planning/prob_solutions/highlights03.html</p> <p>and:</p> <p>https://www.epd.gov.hk/eia/operation/english/chapter04_6.html</p> <p>and:</p> <p>https://hub.hku.hk/bitstream/10722/190773/1/Content.pdf?accept=1</p> <p>and:</p> <p>https://libproject.hkbu.edu.hk/trsimage/hp/14677210.pdf</p> <p>Key impacted stakeholders: Hong Kong Golf Club members, golf professionals, Hong Kong Golf Association and staff were never consulted by the Project Proponent between the study commencement period from 30 September 2019 to 20 May 2022.</p> <p>The SB requires PC during the EIA period; PC for key stakeholders and impacted parties were wholly absent.</p>

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D5	<p>The Applicant shall include in the EIA report details of the construction programme and methodologies. The Applicant shall clearly state in the EIA report the time frame and work programmes of the Project and associated works and other concurrent projects, and assess the cumulative environmental impacts from the Project and associated works with all interacting projects, including staged implementation of the Project and associated works. The EIA study shall follow the technical requirements specified below and in the Appendices of this EIA Study Brief.</p>	SB 3.4.2	No	2.12.1 Table 2.5	<p>No details are given as to the construction programmes or content of each of the components of the Project. The ‘Tentative’ Implementation Programme has insufficient details, and there is no indication as to the timing nor methodology for foundation works, nor details as to the works outside the housing site.</p> <p>Section 2, Tab 2.5 shows four stages all between 2024-2029 and Stage 5 “to be further reviewed” but with no breakdown of stage’s time periods. This omission and the absence of any traffic and population assumptions, external to the FGC-PD in the District, makes it impossible to meaningfully assesses FGC-PD’s environmental impacts in an informed manner. In particular, the feasibility of construction timing and validation of traffic assessments for construction and operational: noise, air and waste, stormwater, traffic and sewage capacity and infrastructure assertions.</p> <p>Suggestions on the choice of construction options are made but no decision made on the options, so impact cannot be determined.</p>
D6	<p>Description of the Project</p> <ul style="list-style-type: none"> – Background and history of the project, including considerations given to different options, and the project’s different siting or alignment 	EIA TM Annex 11	No		<p>Environmental impacts of different siting options have not not compared clearly and objectively with those of the proposed project. There is no comparison of the pros and cons versus other TFLS options such as Brownfield sites. Only 3 options located within the 32 ha site have been considered and none outside the boundary of the area has been mentioned. Sec 2.7 does not mention that environmental factors were involved in option selection.</p> <p>It is not possible to ascertain the nature and extent of environmental impacts arising from the construction and operation of the Project under different development</p>

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					scenarios as only a single different development scenario is considered throughout the EIA.
D7	Are the nature and status of project decision(s), for which the EIA study is undertaken, clearly indicated?	EIA TM Annex 11	No	1.1 and 2.1-2.7	Sec 1 does not include any reference to the consideration of the project's siting or alignment by the project proponent, and merely mentions that TFLS chose the site. TFLS did not consider environmental factors. The EIA omits to state that environmental factors played zero part in the selection process.
D8	Is the estimated duration of the construction phase, operational phase and, where appropriate, decommissioning phase given, together with the programme within these phases?	EIAO TM Annex 20 2.3	No	2.12.1 Table 2.5	<p>Environmental impacts of different siting options have not been compared clearly and objectively with those of the proposed project. There is no comparison of the pros and cons versus other TFLS options such as Brownfield sites. Only 3 options located within the 32 ha site have been considered and none outside the boundary of the area has been mentioned. Sec 2.7 does not mention environmental factors were involved in option selection.</p> <p>It is not possible to ascertain the nature and extent of environmental impacts arising from the construction and operation of the Project under different development scenarios as only a single different development scenario is considered throughout the EIA.</p> <p>Sec 1 does not include any reference to the consideration of the project's siting or alignment by the project proponent, and merely mentions that TFLS chose the site. TFLS did not consider environmental factors. The EIA omits to state that environmental factors played zero part in the selection process.</p> <p>The methods and details of construction are insufficiently described.</p> <p>See Appendix 3.9.</p>

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D9	Is the design and size of the project described, using diagrams, plans and/or maps as necessary?	EIAO TM Annex 20 2.4	No	2.12.1 Table 2.5	<p>Environmental impacts of different siting options have not been compared clearly and objectively with those of the proposed project. There is no comparison of the pros and cons versus other TFLS options such as Brownfield sites. Only 3 options located within the 32 ha site have been considered and none outside the boundary of the area has been mentioned. Sec 2.7 does not mention that environmental factors were involved in option selection.</p> <p>The methods and details of construction are insufficiently described.</p> <p>See Appendix 3.9.</p>
D10	Are the methods of construction described?	EIAO TM Annex 20 2.5	No	2.12.1 Table 2.5	<p>The methods and details of construction are insufficiently described.</p> <p>See Appendix 3.9.</p>
D11	Are the nature and methods of production or other types of activity involved in operation of the project described?	EIAO TM Annex 20 2.6	No	2.12.1 Table 2.5	<p>It is not possible to ascertain the nature and extent of environmental impacts arising from the construction and operation of the Project under different development scenarios as only a single different development scenario is considered throughout the EIA.</p> <p>The methods and details of construction are insufficiently described.</p> <p>See Appendix 3.9.</p>

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D12	Has the land taken up by the project site(s), construction sites, and any associated access arrangements, auxiliary facilities and landscaping areas, been clearly shown on a scaled map?	EIAO TM Annex 20 2.7	No	2.12.1 Table 2.5	<p>Environmental impacts of different siting options have not been compared clearly and objectively with those of the proposed project. There is no comparison of the pros and cons versus other TFLS options such as Brownfield sites. Only 3 options located within the 32 ha site have been considered and none outside the boundary of the area has been mentioned. Sec 2.7 does not mention environmental factors were involved in option selection.</p> <p>It is not possible to ascertain the nature and extent of environmental impacts arising from the construction and operation of the Project under different development scenarios as only a single different development scenario is considered throughout the EIA.</p> <p>Also the different stages of construction sites are not shown.</p> <p>See Appendix 3.9.</p>
D13	Have the uses to which the project will be put different land use areas demarcated?	EIAO TM Annex 20 2.9	No	2.9	The “recreation-cum-conservation” land use is insufficiently described, which does not allow for its environmental impact to be assessed.
D14	As required under the Environmental Assessment Impact Ordinance Technical Memorandum (EIAO TM), it is customary for the proponent to include a section of any EIA on a demonstration of need for the project and a section to comprise consideration of alternatives in order to fully satisfy the EIAO TM Annex 11 and Annex 20, Section 3.	EIAO TM Annex 11 and Annex 20, Section 3 EIAO Procedure and Practice	No		<p>There is no coverage in the EIA regarding consideration of alternatives, such as other TFLS options like Brownfield sites, in order to fully satisfy the EIAO TM Annex 11 and Annex 20, Sections 2 and 3.</p> <p>Sec 1 does not include any reference to the consideration of the project's siting or alignment by the project proponent, and merely mentions that TFLS chose the site. TFLS did not consider environmental factors. The EIA omits to state that environmental factors played zero part in the selection process.</p>

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Applies to ALL Impact Sections					See Submission Section 2.3.
E1	Have the direct and indirect/secondary effects of constructing, operating and, where relevant, after use or decommissioning of the project been considered (including both positive and negative effects)?	EIAO TM Annex 20 5.1, Section 4.4.3(a)(x)	No	7	<p>Very little assessment of indirect impacts and secondary impacts from waste transport and mitigation was conducted.</p> <p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both the likelihood and uncertainty for any adverse environmental impact to be assessed.</p>
E2	Does the information include consideration of whether effects will arise as a result of "consequential" development i.e. whether additional development, which it would be difficult to resist, will be included in the area, leading to further environmental effects? For a project with multiple stages, are the impacts caused by overlapping of different stages considered and determined?	EIAO TM Annex 20 5.2, Section 4.4.3(a)(x)	No		<p>No mentioning of “consequential development” was found.</p> <p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both the likelihood and uncertainty for any adverse environmental impact to be assessed.</p>
E3	<p>Have the above types of impacts been investigated in so far as they affect the following:</p> <ul style="list-style-type: none"> – air and climate; – water and soils; – noise; – landscape; – ecology; – historic and cultural heritage; – land use; – impacts on people and communities; – impacts on agriculture and fisheries activities. 	EIAO TM Annex 20 5.3	No		No specific sections on “land use” and “impacts on people and communities” are found.

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E4	Is the investigation of each type of impact appropriate to its importance for the decision, avoiding unnecessary information and concentrating on the key issues?	EIAO TM Annex 20 5.5, Section 4.4.3(a)(x)	No	3.12	<p>Some of the assessments are not considered appropriate and/or they are flawed or wrong, for example Sec 3 Air Quality, Sec 4 Noise, Sec 5 Water Quality, Sec 7 Waste Management, Sec 9 Ecological Impacts and Sec 11 LVIA, Sec 12 Cultural Heritage and the relevant areas are highlighted in this EIA Checklist.</p> <p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both likelihood and uncertainty for any adverse environmental impact to be assessed.</p>
E5	Are impacts which may not be themselves significant, but which may contribute incrementally to a significant effect considered?	EIAO TM Annex 20 5.6	No	3.12	Cumulative and incremented impacts are not considered in every section.
E6	Does the information include a description of the methods/approaches used to identify impacts and the rationale for using them?	EIAO TM Annex 20 5.7	No	7	Assumptions are made in Sec 7 waste for CPD volume without justification or reference.
E7	If the nature of the project is such that accidents are possible which might cause severe damage within the surrounding environment, has an assessment of the probability and likely consequences of such events been carried out and the main findings reported?	EIAO TM Annex 20 5.8, Section 4.4.3(a)(x)	No	9.7.2.24	<p>Severe damage from hydrological and reduction in groundwater infiltration, and water table disruption/ changes to IUCN critically endangering Chinese Swamp Cypress nursery area and Long Valley Nature Reserve were specifically referenced in the SB and were not quantitatively assessed, despite tree compensatory planting being located in Chinese Swamp Cypress catchment only 250 m away from 5.1 ha of compensatory tree planting. EIA Sec 9.7.2.24 states that no such impacts to Chinese Swamp Cypress nor Long Valley Nature Reserve are predicted in Sub-Area 1 “as no deep tunnel nor deep foundation the change in groundwater table is not anticipated” and that “hydrological disruption to Long Valley is not anticipated”, although it is understood that foundations in this Sub-Area 1 will be up to around 100 m deep. It cannot be ruled out that severe damage within the surrounding environment will not occur as it has not been quantified.</p>

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					<p>Precautionary principle should be invoked.</p> <p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both likelihood and uncertainty for any adverse environmental impact to be assessed.</p>
E8	<p>Has the timescale over which the effects will occur been predicted such that it is clear whether impacts are short, medium or long term, temporary or permanent, reversible or irreversible?</p>	EIAO TM Annex 20 5.10	No	Sec 2.12 and Tab 2.5	<p>Environmental impacts of different siting options have not been compared clearly and objectively with those of the proposed project. There is no comparison of the pros and cons versus other TFLS options such as Brownfield sites. Only 3 options located within the 32 ha site have been considered and none outside the boundary of the area has been mentioned. Sec 2.7 does not mention that environmental factors were involved in option selection.</p> <p>It is not possible to ascertain the nature and extent of environmental impacts arising from the construction and operation of the Project under different development scenarios as only a single different development scenario is considered throughout the EIA.</p> <p>Sec 2, Tab 2.5 shows all four stages as 2024-2029 and Stage 5 as “to be further reviewed” but with no breakdown of the time periods of the stages. This omission and the absence of any traffic and population assumptions external to FGC-PD in the District makes it impossible to meaningfully assesses FGC-PD’s environmental impacts in an informed manner and especially the feasibility of construction timing and validation of traffic assessments for construction and operations: noise, air and waste, stormwater, traffic and sewage capacity and infrastructure assertions.</p>

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					<p>Suggestions on the choice of construction options are made but there is no decision on the options, so the impact cannot be determined. See Appendix 9.</p> <p>The EIA states a single formal public consultation event took place with a single stakeholder group (green groups) and there is no mentioning of other casual stakeholder consultations. No mentioning is made to Continuous Public Involvement (CPI) which is a key part of EIAO and is referenced repeatedly on the EIAO and EPD’s websites and academic papers.</p> <p>See:</p> <p>https://www.epd.gov.hk/eia/3deia/CPI.pdf</p> <p>and:</p> <p>https://www.epd.gov.hk/epd/english/environmentinhk/eia_planning/prob_solutions/highlights03.html</p> <p>and:</p> <p>https://www.epd.gov.hk/eia/operation/english/chapter04_6.html</p> <p>and:</p> <p>https://hub.hku.hk/bitstream/10722/190773/1/Content.pdf?accept=1</p> <p>and:</p> <p>https://libproject.hkbu.edu.hk/trsimage/hp/14677210.pdf</p>

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					<p>Key Impacted Stakeholders:</p> <p>Hong Kong Golf Club members, golf professionals, Hong Kong Golf Association and staff were never consulted by the Project Proponent between the study commencement period from 30 September 2019 to 20 May 2022.</p> <p>The SB requires Public Consultation (PC) during the EIA period, but PCs for key stakeholders and impacted parties are wholly absent.</p>
E9	Where quantitative predictions have been provided is the level of uncertainty attached to the results described?	EIAO TM Annex 20 5.12	No	7	No level of certainty or uncertainty has been given, and some calculations, e.g. Sec Waste Management’s C&D waste are wrong.
E10	Have the methods used to predict the nature, size and scale of impacts been described and are they appropriate to the importance of each projected impact?	EIAO TM Annex 20 5.13	No	7	Assumptions are made, e.g. on waste, without justification or reference.
E11	Are the data used to estimate the size and scale of the main impacts sufficient for the task, are they clearly described and have their sources been clearly identified?	EIAO TM Annex 20 5.14	No	9	Assumptions are made throughout the EIA, e.g. for waste, without justification or reference. Sec 9 Ecological Impact is quoted from literature review and is then not used in the ecological assessment leading to wrong evaluations, assessments and mitigation and wrong conclusions regarding Project acceptability.
E12	Has the mitigation of significant negative impacts been considered and, where feasible, have specific measures been proposed to address each impact?	EIAO TM Annex 20 6.1, Section 4.4.3(a)(x)	No	All and especially Sec 9 and 11	<p>Mitigation measures are general and overly optimistic, especially in Sec 11, LVIA, such as likelihood of full survival of retained trees in Sub-Area 1 and trees transplanted, leading to wrong conclusions. This also happens in Sec 9.</p> <p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both likelihood and uncertainty for any adverse environmental impact to be assessed.</p> <p>Precautionary principle should have been invoked.</p>

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E13	Have the reasons for choosing the particular type of mitigation, and the other options available, been described?	EIAO TM Annex 20 6.2	No	All and especially Sec 8	For Sec 8 Land Contamination, no specific measures are proposed. There is just a long list of possible measures, as the assessment has not been undertaken at this stage.
E14	Where mitigating measures are proposed, has the significance of any impact remaining after mitigation been described?	EIAO TM Annex 20 6.3, Section 4.4.3(a)(x)	No	All and especially Sec 9 and 11	<p>Mitigation measures are general and overly optimistic, especially in Sec 11, LVIA, such as likelihood of full survival of retained trees in Sub-Area 1 and trees transplanted. This also happens in Sec 9.</p> <p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires that both likelihood and uncertainty any adverse environmental impact to be assessed.</p> <p>Precautionary principle should have been invoked.</p>
E15	Where appropriate, do mitigation methods considered include modification of project design, construction and operation, the replacement of facilities/resources, and the creation of new resources, as well as "end-of-pipe" technologies for pollution control?	EIAO TM Annex 20 6.4	No	9.8	<p>Mitigation considered, e.g. Sec 9 Ecological Impact, did include avoidance but in fact was predicated on a poor and flawed baseline ecology data set which excluded the use of existing literature cited but not used for no apparent or explained reasons.</p> <p>Precautionary principle should have been invoked.</p>
E16	Is it clear to what extent the mitigation methods will be effective?	EIAO TM Annex 20 6.5, Section 4.4.3(a)(x)	No	All and especially Sec 9 and 11	<p>Mitigation measures are general and overly optimistic, especially in Sec 9 Ecological Assessment and Sec 11, LVIA, such as likelihood of full survival of retained trees in Sub-Area 1 and trees transplanted from Sub-Area 1 to Sub-Areas 2 and 3. This also happens in Sec 9.</p> <p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both likelihood and uncertainty for any adverse environmental impact to be assessed.</p> <p>Precautionary principle should have been invoked.</p>

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E17	Where the effectiveness is uncertain or depends on assumptions about operating procedures, climatic conditions, etc., or where there is a risk that mitigation will not work, is this made clear and has data been introduced to justify the acceptance of the assumptions?	EIAO TM Annex 20 6.6	No	All and especially Sec 9 and 11	Mitigation measures are general and overly optimistic, especially in Sec 11, LVIA, such as likelihood of full survival of retained trees in Sub-Area 1 and trees transplanted. Precautionary principle must be applied. This also happens in Sec 9. Precautionary principle should have been invoked.
E18	Have details of how the mitigation measures will be implemented and function over the time span for which they are necessary been presented? Does the report list out clearly what mitigation measures would be implemented, by whom, when, where and to what requirements? Is the responsibility for implementing the recommended mitigation measures clearly defined?	EIAO TM Annex 20 6.7	No	9.8 and 9.18	Mitigation measures are general and overly optimistic, especially in Sec 9 and 11, such as likelihood of full survival of retained trees in Sub-Area 1 and trees transplanted. This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both likelihood and uncertainty for any adverse environmental impact to be assessed.
E19	Have any adverse environmental effects of mitigation measures been investigated and described?	EIAO TM Annex 20 6.8	No	9 and 11	Adverse impacts in Sub-Area 4 from mitigation measures such as compensatory tree planting in Sub-Areas 2 and 3 are notably absent in Sec 9 and 11, which is a material failure of EIAO TM and SB requirements. Further, mitigation measures are general and overly optimistic, especially in Sec 9 and 11, such as compensatory tree planting which does not in any way mitigate impacts from destroying old woodland habitats in Sub-Area 1 and leaving significant residual ecological impacts which have not been assessed in Sec 9.
E20	Has the potential for conflict between the benefits of mitigating measures and their adverse impacts been considered?	EIAO TM Annex 20 6.9, Section 4.4.3(a)(x)	No		Further, mitigation measures are general and overly optimistic, especially in Sec 9 and 11, such as compensatory tree planting which do not in any way mitigate impacts from destroying old woodland habitats in Sub-Area 1 and leaving significant residual ecological impacts which have not been assessed in Sec 9.

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					<p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both likelihood and uncertainty for any adverse environmental impact to be assessed.</p> <p>Precautionary principle should have been invoked.</p>
E21	Have the available standards, assumptions and criteria which can be used to evaluate the impacts been discussed?	EIAO TM Annex 20 7.1	No	12	No assessment of impact on FGC’s cultural landscape is included.
E22	Have the residual impacts, which are the net impacts with the mitigation measures in place, been described and evaluated against the available Government policies, standards and criteria?	EIAO TM Annex 20 7.3	No		<p>Further, mitigation measures are general and overly optimistic, especially in Sec 11, LVIA, such as compensatory tree planting which do not in any way mitigate impacts from destroying old woodland habitats in Sub-Area 1 and leaving significant residual impacts which have not been assessed in Sec 9.</p> <p>This seems to be a significant risk in which the precautionary principle should be invoked.</p>
E23	Have the magnitude, location and duration of the residual impacts been discussed in conjunction with the value, sensitivity and rarity of the resource?	EIAO TM Annex 20 7.5	No	9.7.2.24	<p>Severe damage from hydrological and reduction in groundwater infiltration, and water table disruption/ changes to IUCN critically endangering Chinese Swamp Cypress and Long Valley Nature Reserve were specifically referenced in the SB and were not quantitatively assessed, despite tree compensatory planting being located in Chinese Swamp Cypress catchment only 250 m away from 5.1 ha of compensatory tree planting. EIA Sec 9.7.2.24 states that no such impacts to Chinese Swamp Cypress and and Long Valley Nature Reserve are predicted in Sub-Area 1 “as no deep tunnel nor deep foundation the change in groundwater table is not anticipated” and that “hydrological disruption to long Valley is not anticipated”, although it is understood that foundations in this Sub-Area 1 will be around 100 m deep. It cannot be ruled out that severe damage within the</p>

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					<p>surrounding environment will not occur as it has not been quantified.</p> <p>This seems to be a significant risk in which the precautionary principle should be invoked.</p>
E24	Have the residual impacts, if any, arising from the implementation of the proposed mitigation measures, been considered?	EIAO TM Annex 20 7.7	No	9.7.2.24	<p>Severe damage from hydrological and reduction in groundwater infiltration, and water table disruption/ changes to IUCN critically endangering Chinese Swamp Cypress and Long Valley Nature Reserve were specifically referenced in the SB and were not quantitatively assessed, despite tree compensatory planting being located in Chinese Swamp Cypress catchment only 250 m away from 5.1 ha of compensatory tree planting. EIA Sec 9.7.2.24 states that no such impacts to Chinese Swamp Cypress and Long Valley Nature Reserve are predicted in Sub-Area 1 “as no deep tunnel nor deep foundation the change in groundwater table is not anticipated” and that “hydrological disruption to long Valley is not anticipated”, although it is understood that foundations in this Sub-Area 1 will be around 100 m deep. It cannot be ruled out that severe damage within the surrounding environment will not occur as it has not been quantified.</p> <p>This seems to be a significant risk in which the precautionary principle should be invoked.</p>
E25	If the development cannot categorically prove zero significant residual impacts then the precautionary principle must be employed (EIAO TM) and the PDA must be considered “no-go” and the project abandoned.	EIAO TM 4.4.3 (a) (x), Section 4.4.3(a)(x)	No	9.7.2.24	<p>The precautionary principle has not been employed, and severe damage from hydrological and reduction in groundwater infiltration, and water table disruption/ changes to IUCN critically endangering Chinese Swamp Cypress and Long Valley Nature Reserve were specifically referenced in the SB and were not quantitatively assessed, despite tree compensatory planting being located in Chinese Swamp Cypress</p>

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					<p>catchment only 250 m away from 5.1 ha of compensatory tree planting. EIA Sec 9.7.2.24 states that no such impacts to Chinese Swamp Cypress and Long Valley Nature Reserve are predicted in Sub-Area 1 “as no deep tunnel nor deep foundation the change in groundwater table is not anticipated” and that “hydrological disruption to Long Valley is not anticipated”, although it is understood that foundations in this Sub-Area 1 will be around 100 m deep. It cannot be ruled out that severe damage within the surrounding environment will not occur as it has not been quantified.</p> <p>This is not complying with EIAO TM Section 4.4.3(a)(x), which requires both likelihood and uncertainty for any adverse environmental impact to be assessed.</p>
E26	<p>Commitment to Environment Bureau’s Biodiversity Strategy Action Plan (BSAP) (2016) should be considered. Any EIA studies and future development in the PDA should strictly comply with Environmental Bureau’s BSAP. Secondly, commitment to Environmental Bureau’s sustainability mission should be considered. Any EIA studies and future development in the PDA should strictly comply with Environmental Bureau’s sustainability mission. In addition, the National concept of “ecological civilization” should be referenced as National policy and filling compiled with.</p>	<p>EIAO TM Annex 11, Biodiversity Strategy Action Plan (BSAP) (2016) and The National concept of “ecological civilization”</p>	No		<p>The national concept of “ecological civilization” and Environmental Bureau’s Biodiversity Strategy Action Plan (BSAP 2016) are not referenced in the EIA, which seems to be a grave omission.</p>

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Air Quality Impact: : EIA Sec 3					See Submission Section 2.3.
F1	<p>The assessment area for the air quality impact assessment shall be defined by a distance of 500 metres from the boundary of the Project area and the works of the Project as identified in the EIA, which shall be extended to include major existing, committed and planned air pollutant emission sources identified to have a bearing on the environmental acceptability of the Project. The assessment shall include the existing, committed and planned sensitive receivers within the assessment area as well as any proposed air sensitive receivers within the Project as identified in the EIA and areas where air quality may be potentially affected by the Project. The assessment shall be based on the best available information at the time of the assessment. Odour impacts from the operation of new sewage treatment works, the sewage pumping station and refuse collection points proposed under the Project shall also be assessed. The assessment shall also take into account the impacts of emission sources from nearby concurrent projects, if any. The Applicant shall describe the transportation routings and frequency of the dump trucks, if any, with a view to addressing potential nuisance caused by dump truck movements during the construction phase of the Project.</p>	<p>SB 3.4.3.2, EPD’s Guidelines for Local-Scale Air Quality Assessment Using Models including latest unofficial requirements, EPD’s updated Air Quality Objectives (AQOs) to be enacted tentatively in 2022 though this EIA should be exempted.</p>	No	<p>3.6 and 3.7</p> <p>7.5.36</p>	<p>SB para 3.4.3.2 requires nuisance caused by dump trucks during the construction phase to be addressed, but this is not mentioned in EIA Report.</p> <p>In waste Sec 7.5.36, an average of 16 trucks/day is estimated across the entire 6-year construction stage, with no maximum number of truck movements on a monthly or even yearly basis, so the worst-case impacts cannot be assessed. There is no calculation provided to justify the average of 16 trucks/day, but this is wrong! We estimate an average of at least 42 trucks/day for every working day throughout the entire six years construction stage – this is at least a 250% difference, which does not account for the higher rate of soil excavation and disposal at the start of construction during site formation.</p> <p>On this basis, the AQ impacts (not to mention traffic impacts) from truck movement is grossly underestimated.</p>

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F2	(iii) Identification of existing and potential chimneys and obtainment of relevant chimney emission data in the assessment area, where appropriate, by carrying out a survey for assessing the cumulative air quality impacts of air pollutants through chimneys. The Applicant shall ensure and confirm the validity of the emission data used in their assessment. Any errors found in their emission data used may render the submission invalid.	SB Appendix B 2(iii) EPD’s Guidelines for Local-Scale Air Quality Assessment Using Models including latest unofficial requirements	No	3.5.16 and 3.5.17	There is no confirmation whether any other chimneys are located within the study area mentioned in Sec 3.5.16 and 3.5.17; there is also no correspondence confirming the use of Towngas boilers only at North District Hospital and such information is different from the approved EIA for North East New Territories New Development Areas approved in 2013. Besides, SB, EIAO TM Annex 12 S.3.6 is also not complied with for the worst-case scenario. Chimney emission from North District Hospital is underestimated.
F3	Air Quality and EIA Conclusions	SB Appendix Band B1 and 3.4.3	No	3.10 and 15	This assessment’s erroneous assumptions and impact assessments lead to substantive errors to technical section conclusions, and overall EIA conclusions.
Noise Quality Impact: : EIA Sec 4					See Submission Section 2.3.
G1	(iii) potential noise impacts on the noise sensitive receivers (NSRs) (e.g. domestic premises including Ming Tak Court, Cheung Lung Wai Estate, On Po Tsuen, Ping Kong Village; education institutions including Tung Wah Group of Hospitals Ma Kam Chan Memorial Primary School, HHCKLA Buddhist Wisdom Primary School and Elegantia College; North District Hospital, etc.) during the construction and operation of the Project, including noise impacts from construction activities, road traffic, operation of fixed noise sources and helicopters. Consideration shall be given to assessing the noise impacts during different phases of the Project on the residents of the development upon population intake;	SB 3.2.1 (iii)	No	4.4.5 selects residential buildings, schools, church, hospital and social welfare facilities as representative NSRs, but not the Old, Eden or New Course at FGC, the latter two which host the HKO.	Annex 13 of the EIAO TM does not limit the definition of NSRs, meaning that other NSRs can be added as needed. It is known that golfers need a quiet environment when playing and, particularly during competitions, Tournament Marshalls hold up “Quiet Please” signs for every shot for every player. It is therefore a significant omission that the Eden and New Courses at FGC were not identified as Representative NSRs for the noise assessment, nor was the FGC Clubhouse, located 90m from the works and 110m from tower blocks. Further, there is no justification as to why the Special School, which will be completed one year ahead of the rest of the project, is not considered as a NSR during the final year of construction.

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G2	<p>Identification of Assessment Area and Noise Sensitive Receivers</p> <p>(a) The Applicant shall propose the assessment area for agreement of the Director before commencing the assessment. The assessment area for the construction noise impact assessment shall generally include areas within 300 metres from the boundary of the Project area and the works of the Project.</p>	SB Appendix C 2.2.1, EIAO TM Annex 13 s.3	No	Section 4.5.1.1 HKO/ Clubhouse not mentioned	Old Course (west of Fan Kam Road), Eden Course, New Course and the Clubhouse at FGC, and the new Special School (during 2028-2029) were not identified as Representative NSRs.
G3	<p>Inventory of Noise Sources</p> <p>(a) The Applicant shall analyse the scope of the proposed road alignment(s) to identify appropriate new and existing road sections for the purpose of road traffic noise impact assessment. Road sections to be included in road traffic noise impact assessment shall be confirmed with the Director prior to the commencement of the assessment. In determining whether the traffic noise impact due to road improvement project/works is considered significant, detailed information with respect to factors including at least the change of nature of road, change of alignment and change of traffic capacity or traffic composition, and change of traffic flow pattern in the associated road networks, shall be assessed. Figures showing extents of new/altered roads, existing roads and the associated road networks shall be provided in the EIA report.</p>	SB Appendix C 3.2.2	No	Sections 4.6.1.4 and 4.6.1.5, Figure 4.6.2 and Appendix 4.6.2	The noise impact at future residential blocks facing Fan Kam Road has been attenuated by virtue of the setback provided by the 10m “proposed amenity area” strip within the Project Site that runs along the west side of the Sub-Area 1. However, the EIA also refers to this “proposed amenity area” as a “10m Setback for Future Road”, i.e. the widening of Fan Kam Road, but this does not also extend into Sub-Areas 2-4. The noise assessment for Sub-Area 1 has not addressed the increased noise levels at future residential blocks due to the "amenity area" being replaced by a "future road", which would significantly change the current Sec 4-6 conclusions.
G4	(c) The Applicant shall provide the input data sets of traffic noise prediction model adopted in the EIA study as requested by the Director for the following scenarios:	SB Appendix C 3.3.1 (c), EPD’s GN for Road Traffic	No	The input data shall be in the form of e-copy and provided to	The noise impact at future residential blocks facing Fan Kam Road has been attenuated by virtue of the setback provided by the 10m "proposed amenity area" strip within the Project Site that runs along the west side of the but

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	(i) unmitigated scenario at assessment year; (ii) mitigated scenario at assessment year; (iii) scenario without the Project at assessment year; and (iv) prevailing scenario for indirect mitigated measures eligibility assessment	Noise Impact Assessment under EIAO		EPD for vetting only. Road segments of the noise model are shown in Appendix 4.6.2	Sub-Area 1 (SA1). However, the EIA also refers to this "proposed amenity area" as a "10m Setback for Future Road", i.e. the widening of Fan Kam Road, but this does not also extend into SA2-4. The noise assessment for SA1 has not addressed the increased noise levels at future residential blocks due to the "amenity area" being replaced by a "future road", which would significantly change the current Sec 4-6 conclusions. The widened Fan Kam Road has not been modelled, therefore traffic noise impacts during the operation stage of the Project have been underestimated in Sec 4-6.
G5	(d) 3-dimensional electronic visualizations of the road traffic noise predictions of the EIA report, including impacts with and without the Project, and the mitigated and unmitigated impacts shall be presented. The Applicant shall follow the requirements set out in section 5.3 of this EIA Study Brief when producing the electronic visualizations.	SB Appendix C 3.3.2 (d)	No	3-dimensional electronic visualizations Website	The 3-dimensional electronic visualizations do not show the widened Fan Kam Road (see comment G3 above) nor the impact of increased traffic noise on future residential units.
G6	SB Appendix C5.2. Identification of Helicopter Noise Impact 5.2.1. Identification of Assessment Area and Noise Sensitive Receivers (a) The Applicant shall propose the assessment area for agreement of the Director before commencing the assessment. The assessment area for helicopter noise impact shall include area of existing, committed and planned NSRs on the proposed Project under or near to the flight tracks in vicinity of the existing and planned helicopter pad(s). (b) The Applicant shall identify all existing, committed and planned NSRs on the proposed Project in the assessment area. (c) For planned noise sensitive land uses without committed site layouts, the Applicant should use	SB Appendix C 5	No	4	Only the planned NSRs of the Proposed Development Area are focused on.

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	the relevant land use and planning parameters and conditions to work out representative site layouts for helicopter noise assessment purpose. However, such parameters, conditions and site layouts together with any constraints identified shall be confirmed with the relevant responsible parties including Planning Department and Lands Department.				
G7	<p>5.3.1 Prediction and Evaluation of Helicopter Noise Impact</p> <p>5.3.1.1.Scenarios (a) The Applicant shall quantitatively assess the helicopter noise impact from the operation of the existing and planned helicopter pad(s) and related off site facilities during helicopters approaching and departure from the helicopter pad(s), with respect to the criteria set in Annex 5 of the TM, of unmitigated scenario and mitigated scenario at assessment years of various operation modes including, but not limited to, (i) the worst operation mode which represents the maximum noise emission in connection of helicopter types, flight paths, flight frequency and flight hours, and; (ii) any other operation modes as agreed by the Director. (b) Validity of the above operation modes shall be confirmed with relevant government/authorities and documented in the EIA report.</p>	SB Appendix C 5	No.	Sec 4.9	Only required buffer distances were assessed.

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G8	Noise Quality Impact and EIA Conclusions	SB Appendix C and 3.4.4	No	4.10 and 15	This assessment erroneous assumptions and impact assessments lead to substantive errors to technical section conclusions, and overall EIA conclusions.
Water Quality Impact: EIA Sec 5					See Submission Section 2.3.
H1	FGC-PD effects on Groundwater Table / Hydrology / Flow Regime	Study Brief (Appendix D item 2).	No	5.6.19 and 9.7.2.24	<p>There is no justification on why the impact from foundation works would be considered insignificant. Furthermore, nowhere in the EIA Report states what the foundation works will be. The EIA requires such statements to be quantified (SB Appendix D item 2) and this has NOT been done.</p> <p>However, EIA Sec 9.7.2.24 states that no such hydrological disruption impacts to Chinese Swamp Cypress and Long Valley Nature Reserve are predicted in Sub-Area 1 “as no deep tunnel nor deep foundation the change in groundwater table is not anticipated” and that “hydrological disruption to Long Valley is not anticipated”.</p> <p>Deep tunnels (which implies “drained”) and deep foundations are not the only changes in subterranean landscape that can impact groundwater table. Geology described in Section 8 shows a highly permeable sand and alluvium layer which are unable to take the load from the proposed tower blocks. From simple engineering principles, this loose geological matrix will have to be replaced by something more substantial to bear the superstructure loads and these foundations will displace groundwater flows. It defies basic engineering knowledge to state that adverse impact to groundwater table is not anticipated.</p>

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					The EIA Report also describes the removal of some 1255 trees in Sub-Area 1 in Sec 11. In addition, Sec 9 and 11 relate to 5.1 ha of compensatory tree planting in Sub-Areas 2 and 3, and this and in Sub-Area 1 removal of trees will both have a profound impact on the hydrological cycle, in which groundwater is one element to both Chinese Swamp Cypress (Sec 9 and 11) and Long Valley Nature Reserve. This impact on the groundwater table has not been quantified as required under the SB (Appendix D item 2).
H2	Water Quality and EIA Conclusions	SB Appendix D and 3.4.5	No	5.13 and 15	This assessment erroneous assumptions and impact assessments lead to substantive errors to technical section conclusions, and overall EIA conclusions.
Sewerage and Sewage Treatment Implications: EIA Sec 6					See Submission Section 2.3.
I1	(vii)potential sewerage and sewage treatment implications to cope with discharges from population and any development from the Project, taking into account the capacity requirements for the existing, committed and planned developments within the same sewage catchment and the capacity of the Shek Wu Hui Sewage Treatment Works;	SB 3.2.1 (vii)	No	2 and 6	There is inadequate population data assumptions and other information provided in the EIA and Sec 2 and 6, specifically for an informed meaningful assessment of Shek Wu Hui’s Sewage Treatment Works’ capacity.
I2	(xii)measures/actions to avoid or minimize potential human health impacts associated with reuse of treated sewage effluent during the operation of the Project;	SB 3.2.1 (xii)	No	6	No mentioning is made regarding the reuse of treated sewage effluent during the operation of the Project although Shek Wu Hui is stated to provide water to the North District.
I3	Requirements for Assessment of Sewerage and Sewage Treatment Implications 1. The Applicant shall study and assess the impacts of discharging sewage to the existing/planned sewerage systems in North District.	SB Appendix E	No	2 and 6	No EIA mentioning is made recording how FGC-PD’s sewage is pumped to Shek Wu Hui Sewage Treatment Works.

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14	(i) investigate and review to establish whether there is adequate capacity in the existing, committed and planned sewerage systems, and sewage treatment works in North District for the Project, in particular the Shek Wu Hui Sewage Treatment Works, taking into account the sewage arising from the existing sources, and committed and planned developments within the sewage catchment. The Applicant shall quantitatively address the impacts of the Maximum Development Flows on the sewerage system under different development phases. The appropriate treatment level of interim discharge, if required, shall be assessed. The water quality impacts arising from the interim and ultimate effluent discharge, if any, shall be assessed;	SB Appendix E	No	2 and 6	There is inadequate population data assumptions and other information provided in the EIA and Sec 2 and 6, specifically for an informed meaningful assessment of Shek Wu Hui Sewage Treatment Works’ sewage capacity.
15	(ii) employ the latest version of the computer model “InfoWorks” or equivalent computer models to assess impacts of future development under different phases on the existing and planned sewerage networks in North District;	SB Appendix E	No	2 and 6	No EIA mentioning is made recording how FGC-PD’s sewage is pumped to Shek Wu Hui Sewage Treatment Works.
16	(iii) propose and undertake all required measures to mitigate any forecast shortfalls in the sewerage system as a result of the Project under different development phases and demonstrate the proposed measures would be adequate for the Maximum Development Flows under different development phases. Any proposed sewerage system and/or on-site sewage treatment facility should be designed to meet the current government	SB Appendix E	No	2 and 6	No EIA mentioning is made recording how FGC-PD’s sewage is pumped to Shek Wu Hui Sewage Treatment Works.

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	standards and requirements and agreed by DSD and EPD; (iv) identify and quantify the water quality and ecological impacts due to the emergency discharge from on-site sewage treatment plant/pumping station, if any, and sewer bursting discharge, and to propose measures to mitigate these impacts;				
17	(v) identify the appropriate alignment and layouts of the new sewerage to connect to the existing/planned/future sewerage systems in North District, and investigate and assess the technical feasibility of connection (e.g. technical feasibility and details for connection to public sewer and sewage pumping station)	SB Appendix E	No	2 and 6	No EIA mentioning is made recording how FGC-PD’s sewage is pumped to Shek Wu Hui Sewage Treatment Works.
18	(vi) set out the design, operation and maintenance requirements and undertake or obtain agreement to undertake the construction and maintenance of any proposed sewerage and sewage treatment facilities, such as pumping station and sewage treatment plant, including electrical and mechanical components to eliminate the problem of septicity incurred in long rising mains during low flows and to facilitate maintenance. The above shall be agreed by DSD and EPD. (Twin rising mains for each pumping station should be provided to make sure that the proposed sewage rising mains are maintainable without shutting down and discharging untreated sewage into the natural stream/ drainage channel directly).	SB Appendix E	No	2 and 6	There is inadequate population data assumptions and other information provided in the EIA and Sec 2 and 6, especially for an informed meaningful assessment of Shek Wu Hui’s Sewage Treatment Works’ capacity.

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I9	Sewage Treatment Works/ Sewage Pumping Stations	SB 1.3	No	Sec 6	<p>No details are provided as to how these flows are to be connected to the dedicated offsite sewers (800m to San Wai Road and possibly further to Shek Wu Hui Sewage Treatment Works).</p> <p>No EIA mention is made recording how FGC-PD’s sewage is pumped to Shek Wu Hui Sewage Treatment Works.</p>
I10	Sewerage and Sewage Treatment Implications and EIA Conclusions	SB 3.4.3 EIAO TM Appendix 14	No	6.8 and 15	This assessment erroneous assumptions and impact assessments lead to substantive errors to technical section conclusions, and overall EIA conclusions.
Waste Management Implications: EIA Sec 7					See Submission Section 2.3.
J1	(i) The Applicant shall identify the quantity, quality and timing of the wastes arising as a result of the construction and operation activities of the Project, based on the sequence and duration of these activities, e.g. any dredged/excavated sediment/mud, construction and demolition (C&D) materials and other wastes, floating refuse and other wastes which would be generated during the construction and operation phases.	SB Appendix F 1(i)	No	Table 7.5.3 and 7.5	While quantities arising have been identified, there is no information on the timing of the waste arising – Table 7.5.3 only lists waste arisings within a timeline that spans the whole construction phase, from 2024 to 2028/29, when yearly waste arisings would be expected and needed to be able to evaluate impacts from transportation off-site (which has not been provided).
J2	(i) Prior to considering the disposal options for various types of wastes, opportunities for reducing waste generation, on-site or off-site re-use and recycling shall be fully evaluated. Measures that can be taken in the planning and design stages e.g. by modifying the design approach and in the construction phase for maximizing waste reduction shall be separately considered.	SB Appendix F 2(i)	No	7.5.19	No such full evaluation is provided, there is only an assumption in Sec 7.5.19 (without any justification) that 9% of inert C&D materials can be reused and an assumption in Table 7.5.4 (also without any justification) that 20% of non-inert C&D materials can be reused.

(1) No.	(2) Question Item	(3) Statutory Requirement	(4) Is the EIAO TM and SB Fully Complied With?	(5) State Relevant EIA Section of EIA	(6) If “No”, Critique and Comment on EIA, EIAO TM and/or SB Non-compliances’
J3	(i) Prior to considering the disposal options for various types of wastes, opportunities for reducing waste generation, on-site or off-site re-use and recycling shall be fully evaluated. Measures that can be taken in the planning and design stages e.g. by modifying the design approach and in the construction phase for maximizing waste reduction shall be separately considered.	SB Appendix F 2(i)	No	7.5.21 and 7.5.22	<p>The assumption in Sec7.5.21 that topsoil comprises only the top 10cm or less below the turfgrass is unsubstantiated and not based on the actual situation, in which valley areas will contain relatively deeper topsoil. Topsoil is a vital landscape resource yet it is treated as waste.</p> <p>Although Sec7.5.22 states “topsoil will be treated as other organic materials under non-inert C&D materials, to be backfilled in-situ for landscaping and tree transplanting activities”, Table 7.5.4 proposes only that the 56,000m³ of “non-inert C&D material” (including an unspecified quantity of topsoil) arising from “Recreation Facilities and Ancillary Facilities in Sub-Area 2” and “Landscaping works in Sub-Areas 2 to 3” is “backfilled in situ for tree transplanting”.</p> <p>For all other activities, for the total of an estimated 274,000m³ of non-inert C&D material (including an unspecified quantity of topsoil), it is assumed (without any justification) that 20% can be recycled – topsoil should not be recycled, but reused as topsoil. Inert C&D material, on the other hand, IS proposed to be reused, but this does not include topsoil. From Table 7.5.4, it can therefore be inferred that the majority of the topsoil excavated from the Site is intended to be disposed of at North East New Territories landfill and not reused.</p>
J4	(ii) After considering the opportunities for reducing waste generation and maximizing re-use, the types and quantities of the wastes required to be disposed of as a consequence shall be estimated and the disposal methods/options for each type of wastes shall be described in detail. The disposal methods/options recommended for each type	SB Appendix F 2(ii)	No	7.5	<p>Disposal of inert C&D material has been estimated at 570,000m³ (without any calculation or justification), but no bulking factor (typically 1.2) has been applied. The excavated volume should therefore be 684,000m³, or around 20% more than has been stated.</p>

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	of wastes shall take into account the result of the assessment in section (iv) below.				
J5	(iii) The EIA report shall state the transportation routings and the frequency of the trucks/vessels involved, any barging point or conveyor system to be used, the stockpiling areas and the disposal outlets for the wastes identified; and	SB Appendix F 2(iii)	No	7.5.6	Sec 7.5.36 states this would require “...16 vehicles per day during the construction phase (Year 2024 to 2029)”. This is wrong. Assuming the incorrect volume of 570,000m ³ of inert C&D material, a six years construction phase, and a truck capacity of 7.5m ³ (typically this ranges from 5.5m ³ to 7.5m ³), there will be a total of 76,000 truck-loads to be transported off-site. Excluding Sundays and general holidays when there will be no construction activities, this equates to at least 42 vehicles per working day on average, not 16. Given that there will be much more material excavated at the start of construction than at the end (although no phasing has been provided), the EIA has significantly underestimated the average daily number of truck trips, and has not even mentioned the more important daily maximum in each phase of the construction stage (no phasing is provided anywhere in the EIA Report).
J6	The impacts caused by handling (including stockpiling, labelling, packaging and storage), collection, transportation and re-use/disposal of wastes shall be addressed in detail and appropriate mitigation measures shall be proposed. This assessment shall cover the following areas: <ul style="list-style-type: none"> – potential hazard; – air and odour emissions; – noise; – wastewater discharge; – ecology; and – public transport. 	SB Appendix F 2(iv)	No	7.5-7.8	There is no assessment of secondary impacts of waste handling and transportation, and especially for transportation because truck trips are grossly underestimated. There is no assessment of any of these impacts for inert C&D material, and only a brief mentioning that “water-tight containers and covered trucks are used”.

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J7	Have the types and quantities of waste matter, energy (noise, vibration, light, heat, radiation etc.) and residual materials generated during construction and operation of the project, and the rate at which these will be produced, been estimated?	EIAO TM Annex 20 2.10	No	7	Not mentioned.
J8	Have the means by which the quantities of residuals and wastes were estimated been indicated and has uncertainty been acknowledged and ranges provided where appropriate?	EIAO TM Annex 20 2.13	No	Table 7.5.3 and 7.5.19	Table 7.5.3 states that 950,000m ³ of C&D materials will arise but does not indicate how this was estimated, nor acknowledge there is any level of uncertainty. Similarly, Sec 7.5.19 states that 9% of inert C&D materials can be reused and Table 7.5.4 states that 20% of non-inert C&D materials can be reused, without explaining how and without acknowledging any level of uncertainty.
J9	Waste Management Implications and EIA Conclusions	SB 24.7 and Appendix F	No	7.10 and 15	This assessment erroneous assumptions and impact assessments lead to substantive errors to technical section conclusions, and overall EIA conclusions.
Land Contamination: EIA Sec 8					See Submission Section 2.3.
K1	(vi) potential extent of land contamination arising from natural occurrence and anthropogenic input within any Project area for development works and relevant mitigation measures;	SB 3.2.1 (vi)	No	8	Based on the findings of the approved EIA report of North East New Territories New Development Areas, it has been concluded that the entire PDA is unlikely to have high level of naturally occurring arsenic-containing soil. But since no Site Investigation (SI) was carried out during the EIA study, this cannot be confirmed. Furthermore, after a future SI is carried out, it is recommended that “...further assessment would be conducted to review whether the elevated concentration is due to natural sources or anthropogenic activities”, but there is no indication as to how the two sources would be identified.
K2	The Applicant shall follow the guidelines for evaluating and assessing potential land contamination issue(s) as stated in sections 3.1 and 3.2 of Annex 19 of the TM respectively.	SB 3.4.8.1	No	8	CAP provided but no SI, CAR, RAP, RR, etc. Deferred to a later date when the site is handed back to government.

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K3	The assessment of the potential land contamination issue(s) shall follow the detailed requirements given in Appendix G of this EIA Study Brief.	SB 3.4.8.2	No	8	Appendix G was not followed because no SI was carried out.
K4	The Applicant shall refer to the results of land contamination assessment, and where necessary, carry out further work to assess whether there is the presence of high level of arsenic within the Project area and any associated works area. If confirmed, the Applicant shall determine with justifications whether the arsenic is arising from anthropogenic input or natural occurrence.	SB 3.4.8.3	No	8	No SI was conducted and therefore no assessment was carried out and there is no determination of anthropogenic vs natural arsenic.
K5	If high level of naturally-occurring arsenic is found present within the Project area and any associated works area, a health impact assessment shall be conducted, which shall be based on established international practices. A literature search shall be carried out to determine the best approach and methodology for the health impact assessment, including any codes of practices, guidelines, etc. applicable to Hong Kong with suitable reference to the approved EIA report of North East New Territories New Development Areas (Register no.: AEIAR-175/2013).	SB 3.4.8.4	No	8	No SI was carried out therefore there is no indication of arsenic concentration – whether natural or anthropogenic – and so no HIA was carried out.
K6	If there are potential contaminated sites which are inaccessible for conducting sampling and analysis during the course of the EIA study, e.g. due to site access problem, the Applicant’s CAP shall include: a confirmation of whether the contamination problem at these sites would be surmountable.	SB Appendix G 3 (iii) (c)	No	8	Based only upon a desktop study and site walkover (just one day), Sec 8.7.5 has concluded that “... no adverse residual impacts are anticipated from the construction and operation of Project activities as the land contamination assessment and remediation would be completed before the commencement of any construction works”. This conclusion is not supported by the limited assessments carried out during the EIA Study and is based on the unproven assumptions that:

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					<p>(i) whatever remediation options are chosen will be 100% effective in removing contamination to acceptable levels; and</p> <p>(ii) there will be no secondary impacts from the remediation activities themselves, including potential transport impacts if large volumes of soil have to be moved off-site.</p> <p>Adopting these assumptions effectively means that any impacts, whatever their magnitude, can somehow be mitigated to acceptable levels such that there is no adverse residual impact. This approach is not justified and is not reasonable.</p>
K7	Groundwater drawdown and potential risk of settlement of surrounding infrastructure from FGC-PD Sub-Area 1	SB (Appendix D item 2).	No	8.4.6	<p>Water level in a borehole is a one-dimensional measurement. Gammon boreholes BH1 and BH21 as presented in Appendix C appear to be spurious data (relating to Cheung Chi College, Ma Liu Shui). The PDA has no ground level exceeding 30 mPD and the given coordinates are inconsistent with the PDA study area. Ground water levels are typically within 2 m of the surface as one would expect in a well-managed golf course with trees.</p> <p>PDA construction including basements will result in drawdown of the groundwater and potential risk of settlement of surrounding infrastructure, including the Fan Kam Road, The FGC Clubhouse (1914) and FGC swimming pool.</p>
K8	Land Contamination and EIA Conclusions	SB 3.4.8 and Appendix B EIAO TM Appendix A	No	8.8 and 15	This assessment erroneous assumptions and impact assessments lead to substantive errors to technical section conclusions, and overall EIA conclusions.

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Ecological Impact (Terrestrial and Aquatic): EIA Sec 9					See Submission Section 2.1 and Appendix 3.6, 3.7, 3.8.
L1	Literature targeting moths and HKGC’s Audubbon Environmentally-Friendly Certification is mentioned.	SB Appendix H 2(i and viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.3.1.1	There appears to be no coverage of literature targeting moths at all. Literature review misses completely the data held by Agriculture, Fisheries and Conservation Department at Tai Lung Experimental Farm (TLEF) where moth recording has taken place since at least the 1950s. TLEF is within the 500m inclusion zone of the project site. Literature review for other taxa groups is not thorough either. Key publications such as Hong Kong Bird Watching Society Bird Reports, the Memoirs of the Hong Kong Natural History Society were apparently not included. A comprehensive list of literature reviewed is also missing from the report.
L2	References relating to the Chinese Swamp Cypress	SB Appendix H 2(i and viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.3.1.1	See Submission Appendix 3.7. Two essential references relating to the Chinese Swamp Cypress have been overlooked: Thomas, P., Yang, Y., Farjon, A., Nguyen, D. & Liao, W. 2020. <i>Glyptostrobos pensilis</i> (amended version of 2011 assessment). The IUCN Red List of Threatened Species 2020: e.T32312A177795446. https://dx.doi.org/10.2305/IUCN.UK.2020-3.RLTS.T32312A177795446.en Zhang, J-L. and Fischer, G.A., 2021. Reconsideration of the native range of the Chinese Swamp Cypress (<i>Glyptostrobos pensilis</i>) based on new insights from historic, remnant and planted populations. <i>Global Ecology and Conservation</i> . V.32, 15pp.
L3	Survey method for <i>Glyptostrobos pensilis</i>	SB Appendix H 2(viii)	No	9.3.2.6	The survey method for <i>Glyptostrobos pensilis</i> is wrong. According to the SB, the Applicant should “ <i>evaluate ecological impacts based on the best and latest information available during the course of the EIA</i> ”

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		EIAO GN No. 7/2010 (Section 2.3)			<i>Study</i> ”. According to the EIAO Guidance Note No. 7, “ <i>survey methods used should be scientifically robust and appropriate for the target taxa groups</i> ” and “ <i>if the methods used vary from accepted methods in order to meet the specific needs of a study, the justifications and reliability of the results should be thoroughly presented in the EIA report</i> ”. What is stated to have been done in the Study is a standard arboricultural tree survey which is not common practice in an EcoIIA. This only records trees above a certain size (>95mm DBH) and ignores seedlings. For a Critically Endangered species such as this, a more comprehensive ecological survey is essential.
L4	Methodology for bat surveys	EIAO GN No. 7/2010 (Section 2.2 and 2.3) EIAO GN No. 10/2010 (Section 2.2)	No	9.3.2.7	<p>Survey details should be provided in accordance with the EIAO Guidance Notes. However, the methodology for bat surveys does not provide critical details such as:</p> <ul style="list-style-type: none"> • Survey locations; • Survey time and frequency; • Duration of surveys; and • Type(s) and number of bat detector(s) used for each survey event; and • Details of how roost surveys were conducted (i.e. whether all buildings in Project Site were checked for potential roosts, or trees to be lost were carefully surveyed for defects and potential roost locations); and any dawn surveys conducted for swarming surveys to identify potential roost locations. <p>The Project Site and the Assessment Area are very large sites to be covered in a single night. There is considerable variation in the functionality of different bat detectors, and such information is critical understanding the survey methodology.</p> <p>See Note 1 of this Appendix.</p>

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L5	Terminologies re ‘flight path’, ‘flight-line’ and ‘flight line’	<i>Clauses 3 and 4 , EIAO GN No. 10</i>	No	9.3.2.9, 9.3.2.10 & 9.5.4; Figure 9.6a, b & c	The terms ‘flight path’, ‘flight-line’ and ‘flight line’ are used interchangeably, however these do not have the same meaning. No elaborations or definitions are given to any of these terms.
L6	Timings of surveys	EIAO GN No. 7/2010 (Section 2.2 and 2.3) EIAO GN No. 10/2010 (Para. 6 and Section 2.2)	No	9.3.2.9, 9.3.2.10 & 9.5.4; Figure 9.6a, b & c	No details of timings of surveys are shown. Flightline surveys are time critical; most activity occurs in the 30-minute period either side of sunrise when young egrets are actively being fed.
L7	Evening surveys of Black-crowned Night Herons	EIAO GN No. 7/2010 (Section 2.2 and 2.3)	No	9.3.2.9, 9.3.2.10 & 9.5.4	For evening surveys of Black-crowned Night Herons, it is difficult to ascertain the direction/distance of the flight of birds departing given the low-light conditions at that time of day. These limitations of the survey are not mentioned in the methodology.
L8	Vantage points elevation for Flight-line Surveys	EIAO GN No. 7/2010 (Section 2.3)	No	9.3.2.9, 9.3.2.10 & 9.5.4; Figure 9.6a, b & c	The vantage point (Fig 9.6a) at ground level is not elevated enough to determine how far departing ardeids fly from their nesting location at Ho Sheung Heung, given that Sec. 9.3.2.9 states “.... <i>Focus was put on birds carrying out long-distance flights from the egrettries, especially those to their feeding grounds.</i> ” Vantage points from elevated areas within Project Site or nearby Assessment Area could have been selected to observe birds arriving/departing at dawn and dusk.
L9	Survey methodology for moths	EIAO GN No. 7/2010 (Section 2.2 and 2.3) EIAO GN No. 10/2010 (Section 2.2)	No	9.3.2.13; Table 9.1	Details of survey methodology for moths are lacking; these include but are not limited to weather condition, lunar phase, type of light source(s) used, duration of survey, etc. There is no statement mentioning whether voucher material was retained, nor how identifications were made.

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L10	Nomenclature: taxonomy and conservation status	EIAO GN No. 7/2010 (Section 2.3) SB Appendix H 2(viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.3.2.13; Table 9.1	In terms of nomenclature, there is no statement of taxonomy followed, nor how the conservation status of each species was assessed – no Hong Kong moth species are listed in the IUCN Red Book.
L11	Methodology for aquatic fauna surveys	EIAO GN No. 7/2010 (Section 2.2 and 2.3) EIAO GN No. 10/2010 (Section 2.2 and Clauses 9.1-9.5) Clause 5.1.3, Annex 16, EIAO TM	No	9.3.2.14	The methodology for aquatic fauna surveys is unclear. No details are given to elaborate the “active searching” method, i.e. whether hand-netting or trapping had been employed as suggested in the relevant EIAO Guidance Note. If hand-netting or trapping was used, permit(s) under Wild Animals Protection Ordinance (Cap.170 of the Laws of Hong Kong) would have been required.
L12	Moth surveys at key wet season	EIAO GN No. 7/2010 (Section 2.2 and 2.3) EIAO GN No. 10/2010 (Section 2.2)	No	Table 9.1	Moth surveys were not conducted in August 2020 (which is a key wet season month) nor in November 2020. No explanation or elaboration was given on these gaps. Also, the methodology for moth surveys is inconsistent, e.g. no moth traps were deployed in the first three months of surveys. No explanation or elaboration is given on this.
L13	Timing of ecological surveys	SB Appendix H 2(iii) EIAO GN No. 7/2010 (Section 2.3)	No	Table 9.1	Due to safety concerns (the Project Site being an active Golf Course), the Applicant’s (or their representatives’) access to the Project Site was arranged with the HKGC via email. The email correspondence detailed dates of access and timing of surveys, which are summarised in the table in Note [1] (p.180):

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		EIAO GN No. 10/2010 (Para. 6)			<p>No access to the Project Site was arranged for November and December 2019, even though these are listed in the EIA as part of the Ecological Survey Programme. As such, the Ecological Survey for the Project Site may have only covered 11 months (January to November 2020), which would violate the requirement in Clause (iii) of Section 2 in Appendix H of the SB which requires at least 12 months of ecological field surveys. For some faunal groups (birds and mammals), the survey of the Project Site apparently covered only 10 months (January to October 2020).</p> <p>Apparently, no day-time surveys within the Project Area commenced before 10 am. Bird surveys in particular are time sensitive. EIAO Guidance Note No.10/2010 states that <i>‘In general, early mornings are usually the best time of day for bird surveys unless some nocturnal species or behaviours are to be studied.’</i> However, night-time bird surveys were also conducted. As such, day-time bird surveys conducted from 10am onwards would not conform with the above Guidance Note and would not be considered best practice. If night-time surveys within the project area mostly ended at 10 pm, taking into account that in mid-summer it may not be getting dark until 7:30pm, then on certain nights, the night-time survey within the project area had a duration of only 2.5 hours for a 32 ha area.</p> <p>See Note 1 of this Appendix (p.180).</p>

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L14	Nomenclature for aquatic macroinvertebrates	EIAO GN No. 7/2010 (Section 2.3) SB Appendix H 2(viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.3.2.14	It is stated that the nomenclature for aquatic macroinvertebrates followed Dudgeon (1999), a publication that focused on stream organisms. However, many of the waterbodies within or near the project site are ponds or marshes.
L15	Literature Review	EIAO GN No. 6/2010 (Para. 6 and 17) SB Appendix H 2(i and ii)	No	9.4	The results of the literature review are not subsequently referred to in the EIA, rendering the whole exercise redundant.
L16	Evaluation on collected information	SB Appendix H 2(ii)	No	9.4	No evaluation of the information collected, identification of any information gaps or input to the ecological field surveys has been undertaken.
L17	Important Habitats	EIAO TM Annex 16 (Note 2)	No	9.4.1.3	Despite this paragraph being headed “Important Habitats”, within the Project Site, it only lists out two plant species of conservation importance which are identified from the literature review. Logically, important habitats might be expected to accord with the definition of “Important Habitat” types in Hong Kong as stated in the Note to Table 1 of Annex 8 to the TM. See further comment under Sec 9.6.
L18	Moth species documentation	SB Appendix H 2(viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.4.2.3 & Table 2	There is a marked under-documentation of moth species in the Project Site and the 500m Assessment Area in the literature review process.

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L19	Watercourse	EIAO GN No. 7/2010 (Section 2.3) SB Appendix H 2(viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	Table 9.4	It was reported that no watercourse was found within the Project Site. However, there is one watercourse at the Chinese Swamp Cypress woodland area. Breeding of Small Snakehead was noted previously in this watercourse. The watercourse also supports the freshwater crab <i>Somanniathelphusa zanklon</i> .
L20	Terminology regarding ‘Mixed Woodland’ and ‘Woodland’	EIAO GN (Para. 4, No, 6)	No	9.5.1.7	The differences between ‘Mixed Woodland’ and ‘Woodland’ are not explained.
L21	Reference to Zhang and Fischer (2021) regarding precautionary conservation principle Reference: Zhang, J-L. and Fischer, G.A., 2021. Reconsideration of the native range of the Chinese Swamp Cypress (<i>Glyptostrobus pensilis</i>) based on new insights from historic, remnant and planted populations. <i>Global Ecology and Conservation</i> . V.32, 15pp.	EIAO GN No. 1/2010 Basic Principles SB Appendix H 2(i and viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.5.1.30	The EIA does not refer to (Zhang and Fischer 2021) who note as follows (emphasis added): Indeed, some of these trees no matter whether they were planted or not could well be the descendants of historical natural populations and probably play a very important role in conserving the genetic diversity of this species (Wu <i>et al.</i> , 2020) and therefore deserve a high level of protection under a precautionary conservation principle until proven otherwise. For example, recently a population of Chinese Swamp Cypress trees was discovered at the Hong Kong SAR Golf Club in a small patch of forest squeezed in between the main road and a fairway. Within a 2.1 ha area 38 large reproducing Chinese Swamp Cypress trees and numerous seedlings grow together with ~120 other native plant species, including other rare and restricted species such as <i>Ardisia villosa</i> . It is important to note that the occurrence of seedlings of Chinese Swamp Cypress trees has rarely been observed even within the 12 km ² core area of occupancy (Thomas <i>et al.</i> , 2020), indicating that this population is potentially a remnant or a successfully rewilded natural population deserving the highest protection status. As

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					<p>almost all populations have regeneration problems, studying the structure, diversity and maintenance of the population would provide essential information to the conservation of this critically endangered species. Special reserves should be established to protect such rare populations and the vegetation in the surrounding water catchments has to be protected and restored to guarantee the long-term survival of this critically endangered species. Efforts have to be made to maintain a stable water table in the swampy areas of occurrence.</p> <p>Reference: Zhang, J-L. and Fischer, G.A., 2021. Reconsideration of the native range of the Chinese Swamp Cypress (<i>Glyptostrobus pensilis</i>) based on new insights from historic, remnant and planted populations. <i>Global Ecology and Conservation</i>. V.32, 15pp.</p>
L22	Abundance of Chinese Swamp Cypress	EIAO GN No. 7/2010 (Section 2.3) SB Appendix H 2(viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.5.1.30	The abundance of Chinese Swamp Cypress has been underestimated with around 30 trees stated. However, 38 mature trees and at least 50 seedlings have been recorded (refer to item No. 1 above). This is significant in the context of the global rarity of this Critically Endangered species (100-249 mature individuals remaining globally), and that very few individuals have been known to produce viable seeds or to reproduce vegetatively, and seedlings of this species have been rarely found within its global core area of occupancy (Zhang and Fischer 2021).
L23	Reference to propagation	EIAO GN No. 6/2010 (Para 3)	No	9.5.1.30	The reference here to propagation is not subsequently referred to in Table 9.16 Evaluation of Swampy Woodland which erroneously states under ‘Nursery/breeding ground’ - ‘No significant record.’

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L24	Description of ecological characteristics	SB Appendix H 2(iv)(c) EIAO GN No.7/2010 (Section 2.4)	No	9.5.2 to 9.5.9	In the EIA Study Brief, it is stated that ecological characteristics including but not limited to species diversity and abundance of major taxa groups, community structure, seasonal patterns, and inter-dependence of the habitats and species should be described, none of these have been discussed in the sections concerned.
L25	Foraging sites of bats (or any other mammals)	SB Appendix H 2(v)(c) EIAO GN No.7/2010 (Section 2.4) Clause 1.2, Annex 16, EIAO TM	No	9.5.2	In the EIA Study Brief, it is stated that “ <i>roosting, breeding and/or feeding sites of resident and migratory birds, and mammals</i> ” should be investigated and described. In the EIA Report, no relevant discussions on foraging sites of bats (or any other mammals) are found. AEC’s data suggest that the aerial space above the turfgrass and at the habitat boundaries with wooded areas is an important foraging habitat for numerous bat species. No descriptions of potential bat roosts are made, either from built structures or mature trees. Numerous artificial bat roosts are located throughout the Project Site, although no reference is made in the EIA Report to these. At least one of the buildings within the Assessment Area supports a Japanese Pipistrelle roost.
L26	Bat species (Japanese Pipistrelle) recorded.	EIAO GN No. 7/2010 (Section 2.3) SB Appendix H 2(viii)	No	9.5.2	Only one bat species (Japanese Pipistrelle) was recorded from the Project Site at one single location during the 12-month survey. AEC has recorded 15 species of bats within the Project Site using static bat detectors and through direct observation, such data would indicate that the entire Project Site is used by multiple species of bats throughout the year. A summary of bat abundance and distribution recorded by AEC is provided in <i>Annex 1</i> of this document.
L27	Ecological corridor claim.	SB Appendix H 2(iv)(c)	No	9.5.2.11	This section ignores the fact that the entire project site forms an ecological corridor, especially at night when there is negligible human activity.
L28	In the EIA Study Brief, it is stated that “ <i>roosting, breeding and/or feeding sites of resident and migratory birds, and mammals</i> ” .	SB Appendix H 2(v)(c)	No	9.5.3	In the EIA Study Brief, it is stated that “ <i>roosting, breeding and/or feeding sites of resident and migratory birds, and mammals</i> ” should be investigated and described.

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		EIAO GN No.7/2010 (Section 2.4)			However, in the EIA Report, no relevant discussions are found. In the EIA Report, no relevant discussions on feeding sites of birds are found. Turfgrass is an important foraging habitat for Eastern Cattle Egret for example. However, such activity peaks in the early morning and is often closely associated with routine management activities such as mechanical grass-cutting when large groups of Cattle Egrets feed on insects disturbed by mowers.
L29	Bird Surveys within the Project Site.	EIAO GN No. 7/2010 (Section 2.2 and 2.3)	No	9.5.3	As noted above, the Bird Surveys within the Project Site did not commence until 10 am, and only covered 11 months. As such bird data for the Project Site are questionable.
L30	Details on size of egretries.	SB Appendix H 2(v)(c), 2(viii)	No	9.5.4; Figs 9.6a-c; Appendix 9C	No details on size of egretries or species composition is provided. As such, relevance of ‘major’ flightlines are not fully understood – e.g. what constitutes a ‘major’ flightline?
L31	Assessment on flightline surveys	EIAO GN No. 7/2010 (Section 2.2 and 2.3)	No	9.5.4; Figs 9.6a-c; Appendix 9C	Flightline surveys have only covered one part Man Kam To Road Egret, which has split into two locations (see Fig. 3.10 in Anon. 2021) – this survey is therefore incomplete. <i>Reference:</i> <i>Anon, 2021. Summer 2020 Report: Egret Counts in Hong Kong with particular reference to the Mai Po Inner Deep Bay Ramsar Site. Report by The Hong Kong Bird Watching Society to the Agriculture, Fisheries and Conservation Department, Hong Kong Special Administrative Region Government.</i>
L32	Herpetofauna species recorded.	SB Appendix H 2(v)	No	9.5.5	Only one herpetofauna species of conservation importance (Many-banded Krait) was recorded in the Project Site. However, in previous surveys, AEC has recorded Chinese Bullfrog, Many-banded Krait, Chinese Water Snake and Reeves’ Turtle in the Project Site.

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L33	Moth species recorded from the Project Site.	SB Appendix H 2(e) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.5.8.1; Appendix 9G	Only 38 species of moths were recorded from the Project Site. The moth diversity there is severely understated as HKGC data confirm 453 species within the same area. Furthermore, the number of moth species of conservation interest within the project site is stated as being one species whereas HKGC data note that 34 species have been recorded. A summary of moth abundance and distribution recorded by HKGC is provided in <i>Annex 1</i> of this document.
L34	Moth species recorded from Sub-Area 1.	EIAO GN No.7/2010 (Section 2.4) SB Appendix H 2(v)(g)	No	9.5.8.1	According to Appendix 9G, 13 moth species were recorded from Sub-Area 1. However, 8 out of these were not recorded anywhere else in the Assessment Area. This suggests that the distribution of moth species is not homogenous across the golf course and that Sub-Area 1 is important for some species of moth. Nevertheless, there is no discussion relating to this.
L35	Discussion on any ecological parameter for moths.	EIAO GN No.7/2010 (Section 2.4) SB Appendix H 2(v)(g)	No	9.5.8.1; Appendix 9G	There is no attempt here to discuss any ecological parameter for moths that would assist in provide a comprehensive ecological baseline and an understanding of the potential impacts of the proposed project.
L36	The claim that <i>Somanniathelphusa zanklon</i> is endemic.	SB Appendix H 2(viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.5.9.2	The claim that <i>Somanniathelphusa zanklon</i> is endemic to Hong Kong is out-of-date. The species has been recorded from other parts of southern China in recent years. The best available information has not been reviewed on this matter.
L37	The freshwater crab <i>Somanniathelphusa zanklon</i> .	SB Appendix H 2(e)	No	9.5.9.2	The freshwater crab <i>Somanniathelphusa zanklon</i> was not recorded from the pond in Sub-Area 2 but is known to occur here from surveys conducted by AEC.
L38	Small Snakehead.	SB Appendix H 2(e)	No	9.5.9.3	Small Snakehead was only recorded from the Assessment Area outside the Project Site Assessment Area. As noted above AEC have previously recorded this species within the Project Site.

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L39	Assessment on Section 9.6 and overall Ecological Values	EIAO GN No. 6/2010 (Para. 17) SB Appendix H 2(iv and viii) EIAO TM Annex 16 (Section 5.1.2.1)	No	9.6	This section is considered fallacious and that most Overall Ecological Values ascribed to habitats are considered an underestimation of the actual value for multiple reasons. Specifically, these evaluations do not take into consideration any species of conservation importance referred to in the literature review but not recorded during the Ecological Surveys for the EIA. Further, the baseline data for bats and moths are not representative, and the baseline data for birds are problematic due to the questionable survey methodology.
L40	Woodland areas.	SB Appendix H 2(i, iv and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.1.2.1)	No	9.6	<p>With regards to age, many of the woodland areas are very old in a Hong Kong context; with trees over 160 years old* in the case of some of the Woodland and Mixed Woodland. Annex 8 of the EIAO TM states: Ancient natural or semi-natural habitats are normally highly valued. For some habitats such as woodlands, older ones are normally valued much higher than recent ones.</p> <p>It is considered unacceptable to simply state that the age of a habitat as ‘n/a’ when a review of historical aerial photographs would easily allow for an informed assessment. This task took less than an hour when preparing the evaluation tables for Woodland and Mixed Woodland in Annex 2 of this document. Furthermore, photographs pertinent to this are included in both Section 8 and Section 12 of the EIA, although are not referred to here. The age of habitats has largely been ignored in the EIA Report, despite its relevance to the assessment of habitat value, which has a material effect on the assessment and ecological value of Sub-Area 1-4, conclusions and resultant development and mitigation recommendations and residual impacts.</p> <p>*Source: Jim, C.Y., Cheung, P.K., & Leung, Y.Y. 2020.</p>

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					Evaluation and Valuation of Heritage Trees in the HKGC Fanling Site: Old Course.
L41	Rarity of the habitats.	EIAO TM Annex 8 (Table 2)	No	9.6	Rarity of the habitats are not evaluated in this section, which is not in accordance with the EIAO TM.
L42	Abandoned agricultural land.	EIAO GN No. 6/2010 (Para. 6) EIAO TM Annex 8 (Table 2)	No	Table 9.5	Abandoned agricultural land is considered to be of low value, despite it being of a large size (26.7ha) and five species of conservation importance recorded. The rating is inconsistent with the evaluation in Table 9.6 for active agricultural land.
L43	Assessment on Table 9.10	EIAO TM Annex 8 (Table 2)	No	Table 9.9	<i>Somanniathelphusa zanklon</i> has occurred in this habitat in very high numbers in the past (possibly the highest number recorded anywhere and has certainly bred, along with Chinese Water Snake.
L44	Assessment on Table 9.10	EIAO TM Annex 8 (Table 2)	No	Table 9.10	The Table contains multiple errors and inaccuracies. The ecological value reported is considered to be downplayed. An alternative evaluation table is provided in <i>Annex 2</i> to this document.
L45	Assessmemt on Plantation	EIAO TM Annex 8 (Table 2)	No	Table 9.12	Plantation should be given a “Low to moderate” rating instead of “Low” given the presence of various species of conservation importance.
L46	Assessment on Ponds.	EIAO TM Annex 8 (Table 2)	No	Table 9.13	Pond should be given a “Low to moderate” rating instead of “Low” given the presence of various species of conservation importance.
L47	Assessment on Table 9.16	EIAO TM Annex 8 (Table 2)	No	Table 9.16	The Table contains multiple errors and inaccuracies. The overall ecological value reported is considered to be too low. An alternative evaluation table is provided in <i>Annex 2</i> to this document.
L48	Assessment on Table 9.17.	SB Appendix H 2(v)(b) EIAO TM Annex 8 (Table 2)	No	Table 9.17	The Table contains multiple errors and inaccuracies. The ecological value reported is considered to be downplayed. An alternative evaluation table is provided in <i>Annex 2</i> to this document.

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					<p>Most notably, the evaluation did not consider the fact that it is a foraging habitat for a number of species of conservation importance, esp. various bat species, as well as Eastern Cattle Egret (a species specifically referred to in para. 2(v)(e) of the SB.</p> <p>It is also a corridor between woodland patches (esp. at night where there is no traffic and human presence), but in the report it is only stated there is no functionally ecological linkage.</p> <p>Other contradicting information include:</p> <p>The table states both that it is “<i>not functionally linked to habitats of ecological importance</i>” and that the overall ecological value is low, “<i>as most of the recorded species associated to other habitats</i>”. These are two entirely contradictory statements and this undermines the integrity of the overall ecological evaluation.</p> <p><i>Glyptostrobus pensilis</i> is listed as a species of conservation importance. Whilst no trees of this species occur outside of the Swampy Woodland, the pneumatophores extend into areas of turfgrass. Again, this is inconsistent with the statement “<i>not functionally linked to habitats of ecological importance</i>”</p> <p>Given the age of the trees within mixed woodland and woodland, their roots are likely to extend well into the turfgrass beyond their own driplines. Any impacts to the turfgrass will also impact woodland and mixed woodland (directly and indirectly); these habitats are functionally linked to turfgrass.</p>

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					The table concluded that the species of conservation importance recorded in turfgrass are mostly associated with other habitats, though this claim is not substantiated. For example, the highest abundance of Eastern Cattle Egret and Chinese Pond Heron was recorded from turfgrass. For both birds and butterflies, species richness in turfgrass is the second highest among all habitats in Project Site (second only to woodland).
L49	Important watercourse within the Project Area.	EIAO TM Annex 8 (Table 2)	No	Table 9.18	An important water course within the Project Area, which is linked to the Swampy Woodland, is omitted from the assessment.
L50	Watercourse outside of the Project Area.	EIAO TM Annex 8 (Table 2)	No	Table 9.18	Watercourse outside of the Project Area should be given a “low to moderate” rating instead of “low” given the presence of species of conservation importance.
L51	Mature native woodland larger than one hectare.	EIAO TM Annex 8 (Notes for Table 1, Table 2)	No	Table 9.19	Mature native woodland larger than one hectare is listed as an important habitat type in Annex 8 of the TM. In this context and taking into account the old age of the woodland and the presence of many plant and animal species of conservation importance, the evaluation of woodland in the Assessment Area as medium and in the Project Area as low to medium are both too low; that in the Assessment Area should at least be evaluated as medium to high and that in the Project Area as medium. Further, it is highly misleading to state that the woodland is fragmented; much of the woodland in the Assessment Area comprises a single large block in the south which, as is stated under Ecological Linkage in Table 9.20, is functionally linked to Pak Tai To Yan SSSI and Lam Tsuen Country Park.

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L52	Table 9.20 provides an evaluation of all habitats in each of the Sub-Areas combined.	EIAO TM Annex 8 (Table 2)	No	Table 9.20	This table provides an evaluation of all habitats in each of the Sub-Areas combined. This is not a common or normal practice in an EcolIA for a number of reasons, notably because of the different habitats and habitat areas in the four Sub-Areas and is also not a practice recommended in the EIAO TM. Furthermore, there is clear evidence of cherry-picking of evaluation criteria in order to downplay the evaluation of the Sub-Areas. To give just one example, under the criterion Fragmentation, for Sub-Areas 1 to 3 the degree of fragmentation of woodland is addressed, but for Sub-Area 4, where the woodland forms a large contiguous block (and hence is clearly not fragmented) this is not mentioned, instead reference is made to the purported fragmented nature of the swampy woodland which is described as an isolated stand.
L53	Ecological value reported in Table 9.20 is considered to be downplayed. An alternative evaluation table is provided in <i>Annex 2</i> to this document.	EIAO TM Annex 8 (Table 2)	No	Table 9.20	The Table contains multiple errors and inaccuracies. The ecological value reported is considered to be downplayed. An alternative evaluation table is provided in <i>Annex 2</i> to this document.
L54	Species reported from the literature review but not recorded in field surveys.	EIAO GN No. 6/2010 (Para. 17) SB Appendix H 2(i, ii, iv and vii)	No	Table 9.22	This table does not include the species reported from the literature review but not recorded in field surveys.
L55	The potential direct impacts during construction phase (e.g., habitat loss, fragmentation; species mortality) to habitats/species in Sub-Areas 2 – 4.	SB 3.3.3 EIAO TM Annex 8 (Table 1)	No	9.7.2.1 to 9.7.2.10. Table 9.24 and Figure 9.7	The potential direct impacts during construction phase (e.g., habitat loss, fragmentation; species mortality) to habitats/species in Sub-Areas 2 – 4 are mentioned only briefly; no layout/plans for Sub-Areas 2 – 4 are provided, despite the explicit requirement in Clause 3.3.3 of the SB that the different land use areas shall be demarcated. These are also not evaluated in accordance with EIAO TM as in Table 9.24. As such, there is no basis for the statement in 9.7.2.5 that direct impacts to habitats in Sub-

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					Area 2 to 4 will be very limited and no direct impacts to the important habitats are expected.
L56	SB (Clause. 3.2.1(xiv)) making reference to ‘the potential widening of Fan Kam Road and/or other road works’.	SB 3.2.1(xiv) and 3.3.3 EIAO TM Annex 16 (Section 5.2.2)	No	9.7.2.1 to 9.7.2.10. Table 9.24 and Figure 9.7	Despite the SB (Clause. 3.2.1(xiv)) making reference to ‘the potential widening of Fan Kam Road and/or other road works’ there is no indication as to whether (or not) there will be any road (or other) works outside Sub-Area 1. Figure 9.7 appears to show that all works are confined to Sub-Area 1 which is contradicted by Figures elsewhere in the EIA (see below). Provision of an overlay of the project layout on the habitat map of the site to provide an overview of impacts to local habitats is an explicit requirement of the EIAO TM.
L57	Figure 9.7 and a plan prepared by CEDD entitled ‘Notional plan for the proposed development’.	SB 3.3.3 EIAO TM Annex 16 (Section 5.2.2)	No	9.7.2.1 to 9.7.2.10. Table 9.24 and Figure 9.7	There is a significant difference between Figure 9.7 which shows the layout scheme in Sub-Area 1 overlaid with the habitat map which suggests that there will be no development outside Sub-Area 1, and a plan prepared by CEDD entitled ‘Notional plan for the proposed development’ which clearly shows a structure labelled ‘1-storey building for further use’ together with a new access road from the Fan Kam Road, located in Sub-Area 2. Since the latter plan is undated, it is unclear if this supersedes or is superseded by the plan in Figure 9.7. Irrespective of the status of this 1-storey building and access road, it is simply not credible that there will be no development whatsoever in Sub-Areas 2 to 4 given that the proposed zoning is Other Specified Uses annotated Recreation cum Conservation – it is inevitable that such a zoning would be accompanied by at least some structures, hard standings, walls and fences etc.
L58	Impact of loss of turfgrass.	SB Appendix H 2(vii)	No	9.7.2.3	Impact of loss of turfgrass is considered to be minor. This has not taken into consideration the value of this habitat for foraging bats and other species of concern. See above comment on Table 9.17.

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L59	Disturbances during construction phase (Noise, dust and human activities) to habitats/species outside of Project Site (e.g., the FGC area immediately west of FKR, and the open country/farmland area at Ping Kong).	SB Appendix H 2(vii)(b) EIAO TM Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.11 to 9.7.2.14. Table 9.24	Disturbances during construction phase (Noise, dust and human activities) to habitats/species outside of Project Site (e.g., the FGC area immediately west of FKR, and the open country/farmland area at Ping Kong) are not mentioned, let alone assessed.
L60	The statement in the report: ‘ <i>As Sub-Area 3 and Sub-Area 4 are separated by Sub-Area 2</i> ’.	SB Appendix H 2(vii)(b)	No	9.7.2.11 to 9.7.2.14. Table 9.24	The statement ‘As Sub-Area 3 and Sub-Area 4 are separated by Sub-Area 2’ does not make sense. It also could not justify the subsequent claim that “potential impacts from construction disturbance (e.g. noise and human disturbance) are considered minor”.
L61	Habitat loss of 5.1 ha of Turfgrass in Sub-Area 2 - 4.	SB Appendix H 2(vii)(a) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.5	There is a habitat loss of 5.1 ha of Turfgrass in Sub-Area 2-4, this has not been assessed. Without details of the ‘recreational facilities and ancillary facilities’ it is not possible to address the potential impacts of these. It is stated that there will be direct impacts to habitats arising from this part of the project (‘Direct Impacts to habitats in Sub-Area 2-4 will be very limited’). These direct impacts have not been assessed although this is clearly required under the EIA SB.
L62	It was stated in the report that “ <i>some of the nearby areas outside Sub-Area 1 are well developed and it is unlikely these areas are inhabited by light-sensitive nocturnal animals</i> ”.	SB Appendix H 2(viii)	No	9.7.2.15	It was stated in the report that “some of the nearby areas outside Sub-Area 1 are well developed and it is unlikely these areas are inhabited by light-sensitive nocturnal animals”. This is not true according to AEC’s surveys on bats and moths. Any further evaluation based on this false assumption should not be considered valid.
L63	Construction light glare impacts to habitats and species outside of the Project Site (esp. the FGC area west of FKR, and the open country/farmland area at Ping Kong).	SB Appendix H 2(vii)(b) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.15 to 9.7.2.16. Table 9.24	Construction light glare impacts to habitats and species outside of the Project Site (esp. the FGC area west of FKR, and the open country/farmland area at Ping Kong) are not mentioned or assessed.

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L64	Water quality impacts during construction phase to the watercourse in Sub-Area 3 and 4.	SB Appendix H 2(vii)(c) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.17 to 9.7.2.22. Table 9.24	Water quality impacts during construction phase to the watercourse in Sub-Area 3 and 4, including next to the Swampy Woodland and Chinese Swamp Cypress are not mentioned or assessed. This is compounded by the fact that the existing watercourse there was overlooked in the EIA.
L65	Impacts on water table and hydrological conditions during construction phase due to removal of ground water during excavation works.	SB Appendix H 2(vii)(c) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.23 to 9.7.2.25. Table 9.24	Impacts on water table and hydrological conditions during construction phase due to removal of ground water during excavation works are not mentioned or assessed. Despite a specific requirement specified in the SB 3.2.1(iv) downstream water quality impacts on water sensitive receivers are not addressed.
L66	It is stated that woodland compensation should avoid Sub-Area 4 to ‘ <i>preserve the hydrology that supports the wetland habitats there</i> ’; this includes the Swampy Woodland.	SB Appendix H 2(vii)(c) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1)	No	9.7.2.25	<p>It is stated that woodland compensation should avoid Sub-Area 4 to ‘<i>preserve the hydrology that supports the wetland habitats there</i>’; this includes the Swampy Woodland. However, this fails to recognise that a large part of the woodland compensation proposed in Sub-Area 3 is within the water catchment of the Swampy Woodland, and less than 250m from the Chinese Swamp Cypress. This demonstrates a profound lack of understanding of the hydrology of the Project Site and undermines any statement regarding impacts to hydrology. It also highlights a fundamental methodological flaw in the overall impact assessment in that the Sub-Areas are routinely treated as distinct ecological units; these are entirely artificial sub-divisions and have no ecological merit.</p> <p>The potential impacts to the Chinese Swamp Cypress therefore include silty run-off, and run-off of plant fertilizers (both of which could impact seedlings or pneumatophores), and hydrological impacts arising from</p>

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					<p>the run-off differences between turfgrass and the compensation woodland and changes to the water table as the woodland matures.</p> <p>A requirement of the EIA SB is to assess the ecological characteristics of the species present. Chinese Swamp Cypress has a unique ecological which makes it particularly sensitive to hydrological change. As this unique ecology has not been discussed in the EIA, this sensitivity is not recognised.</p>
L67	Construction phase impacts to floral/faunal species of conservation importance recorded from surveys.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1) EIAO GN No. 6/2010 (Para. 17)	No	9.7.2.27 to 9.7.2.28. Table 9.24	Construction phase impacts to floral/faunal species of conservation importance recorded from surveys are briefly mentioned in text only; and are not evaluated in accordance with EIAO TM as in Table 9.24.
L68	Construction phase impacts to floral species of conservation importance found in literature review.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1) EIAO GN No. 6/2010 (Para. 17)	No	9.7.2.29 to 9.7.2.30. Table 9.24	Construction phase impacts to floral species of conservation importance found in literature review are briefly mentioned in text only; and are not evaluated in accordance with EIAO TM as in Table 9.24.

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L69	Summary of Construction Phase and Operational Phase Impacts		No	Table 9.24	<p>This table contains a number of inaccuracies or errors:</p> <p><i>Construction phase impacts -</i></p> <p>Habitat loss for Turfgrass is c. 10 ha rather than 5.07 ha.</p> <p>Turfgrass also forms part of the ecological corridor</p> <p>Disturbance and light glare impacts are only considered to occur within the project site</p> <p><i>Operational phase impacts –</i></p> <p>Habitat loss for Turfgrass is c. 10 ha rather than 5.07 ha.</p> <p>Noise, traffic and human activities, surface run-off and drainage discharge, and artificial lighting are all considered temporary impacts during the operational phases of the project. This is patently incorrect.</p>
L70	The evaluation on direct impact to fauna species of conservation importance.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1) EIAO GN No. 6/2010 (Para. 17)	No	9.7.2.29	The evaluation on direct impact to fauna species of conservation importance is not valid. Only 4 species of conservation importance was recorded from Sub-Area 1, which is a significant downplay.

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L71	The reports states “...While Japanese Pipistrelle is considered the most common bat species in urban areas, but no roosting and breeding habitats were found within Sub-Area 1, and only scarce number of this species were recorded”.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1) EIAO GN No. 6/2010 (Para. 17)	No	9.7.2.30	<p>The reports states “...While Japanese Pipistrelle is considered the most common bat species in urban areas, but no roosting and breeding habitats were found within Sub-Area 1, and only scarce number of this species were recorded”.</p> <p>This is not apparent from the EcolIA where details on methodology for bat roosts are absent and nor are there any results/descriptions of any bat roost survey, e.g., presence / absence / potential. AEC’s data indicates regular, high levels of bat activities in Sub-Area 1 and it is highly likely roosts are close by given timings of activity i.e., close to sunset and sunrise.</p> <p>Different bat species have varying roost requirements. The Applicant has not considered the roost requirements of those additional species listed in the literature review when forming this impact assessment, including those species specifically referred to in the EIA SB.</p>
L72	The impacts to fauna species of conservation importance.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1)	No	9.7.2.30 to 9.7.2.34	The impacts to fauna species of conservation importance have not been fully assessed.
L73	The claim that “the potential indirect impacts to flying mammals including Short-nosed Fruit Bat and Japanese Pipistrelle as well as the bat species mentioned in EIA Study Brief or reviewed literature (e.g., Lesser Bamboo Bat	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex	No	9.7.2.31, Table 9.1.7 and 9.7.2.3	The claim that “the potential indirect impacts to flying mammals including Short-nosed Fruit Bat and Japanese Pipistrelle as well as the bat species mentioned in EIA Study Brief or reviewed literature (e.g., Lesser Bamboo Bat <i>Tylonycteris pachypus</i> and Lesser Yellow Bat <i>Scotophilus kuhlii</i>) are considered minor” is not

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	<i>Tylonycteris pachypus and Lesser Yellow Bat Scotophilus kuhlii) are considered minor.”</i>	16 (Section 5.2.1, 5.2.3 and 5.3.1)			substantiated. For example, the fact that these bat species utilised the aerial spaces above turfgrass as open country foraging area was overlooked.
L74	In the report it is stated that “As there will be no night-time construction works for the present Project, and there will be only security lighting after construction works. Hence, the light glare impact to moth is considered insignificant.”	SB Appendix H 2(vii)(b), 2(viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1)	No	9.7.2.34	In the report it is stated that “ <i>As there will be no night-time construction works for the present Project, and there will be only security lighting after construction works. Hence, the light glare impact to moth is considered insignificant.</i> ” However, security lighting is still an impact and thus it is inappropriate for the report to suggest light glare is insignificant with no data or information to support. Given the inadequate data presented, the report is not giving a realistic statement on this issue. Further, there is no reference whatsoever to any published literature on the impact of light pollution (including “glare”). Recent research has pointed to both individual light sources (giving “glare”) and accumulated background illumination as being detrimental to nocturnal wildlife, especially moths.
L75	Noise, traffic, and human activities during operation phase from Sub-Area 1 to habitats/species in the 500m Assessment Area outside of the Project Site.	SB Appendix H 2(vii)(b), 2(viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.40 – 9.7.2.43. Table 9.24	Noise, traffic, and human activities during operation phase from Sub-Area 1 to habitats/species in the 500m Assessment Area outside of the Project Site are not assessed.
L76	Noise, traffic, and human activities during operation phase from Sub-Areas 2 - 4 to habitats/species in the 500m Assessment Area outside of the Project Site.	SB Appendix H 2(vii)(b), 2(viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.40 – 9.7.2.43. Table 9.24	Noise, traffic, and human activities during operation phase from Sub-Areas 2 - 4 to habitats/species in the 500m Assessment Area outside of the Project Site are not assessed.

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L77	Potential operational impacts to the wetland habitats in Sub-Areas 2 to 4.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1)	No	9.7.2.41	<p>It is stated that the potential operational impacts to the wetland habitats in Sub-Areas 2 to 4 are considered minor, but little elaboration has been given to support this claim. Further, it is misleading to state that the habitats in Sub-Areas 2 to 4 ‘will be properly managed with the aims of conservation’. In fact, as is stated in Sec 9.7.2.5, the proposed zoning for Sub-Areas 2 to 4 is “Other Specified Uses” annotated “Recreation cum Conservation”.</p> <p>In the absence of further details, it would be appropriate, on a precautionary basis, to assume that large numbers of visitors and/or noisy activities (such as team sports) may occur and that disturbance impacts may be significant in the absence of specific (and defined) mitigation measures. Furthermore, there is no statement regarding the times of access for these recreation activities. Should these extend into the night then this would presumably result in additional human disturbance and an increase in night-time light levels with additional artificial lighting. Both could impact bat and moth populations and disturb nocturnal mammals.</p>
L78	Wrong assumption of mentioned sections.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1)	No	9.7.2.42 to 9.7.2.46	<p>Most of the claims in these sections are based on the wrong assumption that the area is already disturbed with very few sensitive species. The EIA simply under-records the numbers and diversity of sensitive species (esp. moths and bats). The report stated clearly that there will be an increase in run-off due to increase in paved areas.</p> <p>However, it fails to consider that the reduction in permeable area would result in lowered groundwater level, which could potentially affect the Chinese Swamp Cypress. There is no assessment of how noise interferes with bat or moth ecology. No description of light pollution impacts are provided, nor any assessment attempted.</p>

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L79	Surface runoff and drainage discharge into aquatic/wetland habitats and water pollution during operation phase.	SB Appendix H 2(vii)(c), 2(viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.44 – 9.7.2.46. Table 9.24	Surface runoff and drainage discharge into aquatic/wetland habitats and water pollution during operation phase from Sub-Areas 2 - 4 to habitats/species in the 500m Assessment Area outside of the Project Site are not assessed.
L80	Hydrological disruption impacts (esp. to groundwater table) to other habitats/species during operation phase.	SB Appendix H 2(vii)(c), 2(viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3)	No	9.7.2.44 – 9.7.2.46. Table 9.24	The hydrological disruption impacts (esp. to groundwater table) to other habitats/species during operation phase, which would arise from the reduction in permeable area due to the development are not assessed.
L81	Issue of artificial light.	SB Appendix H 2(vii)(b), 2(viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1)	No	9.7.2.47 & 9.7.2.48. Table 9.24	These section address the issue of artificial light only superficially: There is no attempt to measure or describe existing light levels or the increase in artificial light during the operational phase. Without such information, it is simply not possible to assess the impacts. Systematic recording (<i>Annex 1</i>) of light pollution across the Fanling Golf Course, including the Project Site, demonstrates a general trend where the night sky brightness gradually decreases from the northeast to the southwest. The northern part of the Golf Course is subject to obvious light pollution being closest to the urban area, whilst the southern part has the brightness typical of rural sky. It can be reasonably assumed that a comprehensive, high-rise development within this area which extends the urban area would have an impact on this pattern of light pollution.

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					<p>The claim that “<i>the potential impact of light glare from artificial lightings on habitats near Sub-Area 1 is considered minor</i>” is fundamentally not valid as sensitive species (e.g., bats and moths) utilising the area have been under-recorded. There are no data on existing or predicted night-time light levels or prediction on the increase of artificial light during the operational phase of the Project</p> <p>Only “glare” has been considered in this impact assessment. The increase of ambient night-time artificial light during operation phase in the wider area was neglected. A limited understanding of light pollution and its impact to wildlife is demonstrated</p> <p>It is claimed that in Sub-Area 1 “<i>Fauna sensitive to light might have already avoided these habitats</i>”. However, the survey data presented in the EIA suggest otherwise. The moth diversity recorded in Sub-Area 1 is higher than that of Sub-Area 2 and equals that of Sub-Area 4. The only bat species recorded from the Project Site, i.e., Japanese Pipistrelle, was also recorded from Sub-Area 1, and nowhere else in the Project Site nor the Assessment Area.</p> <p>It is also stated that “there are also existing light sources in the vicinity of Sub-Area 1, e.g., village houses at Ping Kong and public housing estates (Cheung Lung Wai Estate and Ching Ho Estate), streetlamps”. However, it fails to note that the total population from all these together would still be lower than that of the proposed development (c. 33,600 residents).</p>

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					<p>Operation phase impacts from additional light glare in Sub-Area 1 to habitats/species in the 500m Assessment Area outside of the Project Site are not assessed</p> <p>Operation phase impacts from additional light glare in Sub-Areas 2 – 4 to habitats/species in the 500m Assessment Area outside of the Project Site are not assessed</p> <p>In the so-called precautionary approach, only at-grade level lighting such as streetlamps are considered. However, the proposed development comprised of buildings of 37-43 storeys, with a population of 33,600. The artificial light generated from the residents was not assessed.</p>
L82	Habitat management approach in Sub-Areas 2 to 4.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1)	No	9.7.2.55 ; Table 9.24	<p>This section address the issue of artificial light very superficially and not in accordance with EIAO TM or SB:</p> <p>There is no attempt to measure or describe existing light levels or the increase in artificial light during the operational phase. Without such information, it is simply not possible to assess the impacts. Systematic recording (<i>Annex 1</i>) of light pollution across the Fanling Golf Course, including the Project Site, demonstrates a general trend where the night sky brightness gradually decreases from the northeast to the southwest. The northern part of the Golf Course is subject to obvious light pollution being closest to the urban area, whilst the southern part has the brightness typical of rural sky. It can be reasonably assumed that a comprehensive, high-rise development within this area which extends the urban area would have an impact on this pattern of light pollution.</p>

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					<p>The claim that “<i>the potential impact of light glare from artificial lightings on habitats near Sub-Area 1 is considered minor</i>” is fundamentally not valid as sensitive species (e.g., bats and moths) utilising the area have been under-recorded. There is no data or prediction on the increase of artificial light during the operational phase of the Project.</p> <p>Only “glare” has been considered in this impact assessment. The increase of ambient night-time artificial light during operation phase in the wider area was neglected. A limited understanding of light pollution and its impact to wildlife is demonstrated</p> <p>It is claimed that in Sub-Area 1 “<i>Fauna sensitive to light might have already avoided these habitats</i>”. However, the survey data presented in the EIA suggest otherwise. According to the Appendix, the moth diversity recorded in Sub-Area 1 is higher than that of Sub-Area 2 and equals that of Sub-Area 4. The only bat species recorded from the Project Site, i.e., Japanese Pipistrelle, was also recorded from Sub-Area 1, and nowhere else in the Project Site nor the Assessment Area.</p> <p>It is also suggested that “there are also existing light sources in the vicinity of Sub-Area 1, e.g., village houses at Ping Kong and public housing estates (Cheung Lung Wai Estate and Ching Ho Estate), streetlamps”. However, it fails to note that the total population from all these together would still be lower than that of the proposed development (c. 33,600 residents).</p>

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					<p>Operation phase impacts from additional light glare in Sub-Area 1 to habitats/species in the 500m Assessment Area outside of the Project Site are not assessed</p> <p>Operation phase impacts from additional light glare in Sub-Areas 2 – 4 to habitats/species in the 500m Assessment Area outside of the Project Site are not assessed</p> <p>In the so-called precautionary approach, only at-grade level lighting such as streetlamps are considered. However, the proposed development comprised of buildings of 37-43 storeys, with a population of 33,600. The artificial light generated from the residents was not assessed.</p>
L83	Indirect impacts to species of conservation importance.	SB Appendix H 2(vii, viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1) Para. 17, EIAO GN No. 6	No	9.7.2.54 & Table 9.24	Indirect impacts to species of conservation importance during both construction and operation phase are assessed briefly and collectively as a whole, with no details or elaboration. Species reported from literature but not found in the surveys are ignored.
L84	Area’s importance to foraging bats.	SB Appendix H 2(viii)	No	9.7.2.57	No consideration of area’s importance to foraging bats.
L85	Details on Management Plan.	SB Appendix H 2(x) EIAO TM Annex 16 (Section 5.4.2)	No	9.7.2.58	The “management plan” is mentioned many times although no details are provided all. The claim that the formulation and implementation of this plan would prevent relevant impacts remains unsubstantiated.

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		EIAO GN No. 6/2010 (Para. 24)			
L86	Mitigation measures for bats and moths.	SB Appendix H 2(vii)(b), 2(viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1 and 5.2.3) Para. 17, EIAO GN No. 6	No	9.8	No mitigation measures for bats and moths are proposed as the relevant impacts have been overlooked.
L87	Misleading statement.	Clauses 3 and 4, EIAO GN 10/2010 (Para. 3 and 4)	No	9.8.2.2	This statement is misleading, in that it combines ‘woodland’ and ‘mixed woodland’ despite these having been ascribed different overall ecological values in the EIA. It glosses over the fact that all of the higher value ‘woodland’ within Sub-Area 1 will be lost under the proposed development. Furthermore, a loss of 75% of all woodland within this area can scarcely be described as minimisation as claimed.
L88	Secondary fragmentation impacts from the proposed 4m noise barrier (as a mitigation measure for noise generated) to less mobile fauna.	SB Appendix H 2(viii and x) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1) Para. 17, EIAO GN No. 6	No	9.8.2.6	Secondary fragmentation impacts from the proposed 4m noise barrier (as a mitigation measure for noise generated) to less mobile fauna are not mentioned or assessed. This could be a physical wall to all terrestrial non-climbing mammals as well as flying animals that use a flight path close to the ground (many moth species, a large number of other forest fauna). The relevant impacts have not been considered in the EcolIA.

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L89	Address light pollution issues, and the phrase “careful planning of lighting”.	SB Appendix H 2(x) EIAO TM Annex 16 (Section 5.4.2) EIAO GN No. 6/2010 (Para. 24)	No	9.8.2.9	The wording for mitigation at 9.8.2.9 fails to address light pollution issues, and the phrase “careful planning of lighting” should include a carefully planned use laid out in full detail for assessment, which is absent from the EIA report.
L90	The EIA SB requires that the Applicant shall “ <i>evaluate the feasibility and effectiveness of the recommended mitigation measures and define the scope, type, location, implementation arrangement, resource requirement, subsequent management and maintenance of such measures.</i> ”	SB Appendix H 2(x) EIAO TM Annex 16 (Section 5.4.2) EIAO GN No. 3/2010 (Para. 3.1.4) EIAO GN No. 6/2010 (Para. 24)	No	9.8.3	The EIA SB requires that the Applicant shall “evaluate the feasibility and effectiveness of the recommended mitigation measures and define the scope, type, location, implementation arrangement, resource requirement, subsequent management and maintenance of such measures.” This has not been done.
L91	Secondary impacts to existing habitat(s).	SB Appendix H 2(x) EIAO TM Annex 16 (Section 5.4.2) EIAO GN No. 6/2010 (Para. 24)	No	9.8.3.1 – 9.8.3.4	Any secondary impacts to existing habitat(s), esp. turfgrass due to the proposed woodland compensation are not mentioned or assessed. Whilst this approach can compensate for the loss of woodland, the corresponding secondary loss of habitat it results in should be assessed as part of the EcolIA.
L92	Impacts to species of conservation importance.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section	No	9.8.3.1 – 9.8.3.4	Any impacts to species of conservation importance due to the proposed woodland compensation are not mentioned or assessed.

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		5.2.1, 5.2.3 and 5.3.1)			
L93	Secondary impacts to water quality and hydrology.	SB Appendix H 2(vii and viii) EIAO TM Annex 8 (Table 2) and Annex 16 (Section 5.2.1, 5.2.3 and 5.3.1)	No	9.8.3.1 – 9.8.3.4	Any secondary impacts to water quality and hydrology due to the proposed woodland compensation are not mentioned or assessed.
L94	The details of the “management plan”.	SB Appendix H 2(x) EIAO TM Annex 16 (Section 5.4.2) EIAO GN No. 6/2010 (Para. 24)	No	9.8.3.6	As noted above, details of the “management plan” are lacking. Key details relevant to its efficacy that are lacking include who would be responsible for drafting it, the anticipated time frame, implantation and management agents and resources required. In this regard, since this is largely a Schedule 3 project under the EIAO (and hence an Environmental Permit (EP) is not issued) the option of requiring the management plan to be submitted to DEP (which might resolve this issue for a Schedule 2 project) is not available, hence it is essential that this issue is resolved at the current stage and not deferred.
L95	Provision of a list of other projects, ongoing or planned, within close to relatively close proximity of the Project Site.	SB Appendix H 2(vii)(h), 2(viii) EIAO TM Annex 16 (Section 5.2.3) EIAO GN No. 6/2010 (Para. 21)	No	9.9.1.1 – 9.9.1.2. Table 9.25	Table 9.25 provides a list of other projects, ongoing or planned, within close to relatively close proximity of the Project Site. It acknowledges some impacts from construction phases, but totally ignores cumulative impacts of lighting, human activities, traffic and pollution (particulate) increases that would inevitably result from these projects. The issues of both direct light pollution at point source of individual lights (termed light glare in the EIA) and the cumulative background light pollution from buildings, paths and highways would lead to further erosion of habitat viability for all nocturnal wildlife. Further, Table 25 states that Road improvement works at

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					Fan Kam Road are “...over 1km from Sub-Areal 1, cumulative impacts are not expected”. However, no further details on these road works are provided.
L96	Residual loss.	SB Appendix H 2(xi) EIAO TM (Section 4.4.3) and Annex 16 (Section 5.4.2) EIAO GN No. 6/2010 (Para. 3)	No	9.10.1.2 & Table 9.23	Residual loss of 4.48ha of turfgrass is incorrect, as the area lost under the compensation woodland is excluded.
L97	Assessment of residual impacts.	SB Appendix H 2(xi) EIAO TM (Section 4.4.3) and Annex 16 (Section 5.4.2) EIAO GN No. 6/2010 (Para. 3)	No	9.10.1.4	Residual impacts have not been fully assessed in accordance with Clause 4.4.3 of the EIAO TM. For example, item “(vii) the ecological context: More weight shall be given to those adverse environmental impacts that occur in areas or regions that are ecologically fragile and/or rare or undisturbed or which have little resilience to imposed stresses. The Swampy Woodland and the associated Chinese Swamp Cypress, as an example, have not been assessed in this context.
L98	Environmental impact and EIA conclusions	SB Appendix H 2(vii) and 3.4.9	No	9.12 and 16	As detailed in points L1 to L97 above, the Ecological Impact Assessment fails to establish an accurate baseline for certain faunal groups specified in the SB, most notably for bats and moths. That and other failings of the baseline survey result in a comprehensive under evaluation of the conservation value of the project site and assessment area, the habitats present, and the number and the complexity of the species of conservation importance that occur there. As such, the applicant has missed wide ranging and significant ecological impacts that will occur should the proposed development proceed. This is further compounded by a failure to assess multiple

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					<p>direct and indirect impacts and in not using suitable methodologies to assess many of the impacts that are recognised. The proposed mitigation measures lack sufficient detail regarding their implementation to demonstrate that they are feasible. Therefore, the conclusion in the EcolIA that with the implementation of mitigation measures the residual ecological impacts of the project is considered acceptable is fallacious. The proposed development will result in major, irreversible, and unmitigated ecological impacts.</p> <p>See Submission Appendix 3.6 and Submission Section 2.1.</p>
L99	Abundance values.	EIAO TM (Section 4.4.2) and Annex 20 (Section 1.5)	No	Appendices 9B(1) and 9B(2)	The abundance values ‘+’, ‘++’ and ‘+++’ are not explained; and as such it is not possible to interpret the data.
L100	Values in the Tables of Appendices 9C(1) and 9C(2)	EIAO TM (Section 4.4.2) and Annex 20 (Section 1.5)	No	Appendices 9C(1) and 9C(2)	The values in the Tables are not explained. These could be average per survey, maximum count, or total count. As such it is not possible to interpret the data.
L101	Values in the Tables of Appendices 9E(1) and 9E(2)	EIAO TM (Section 4.4.2) and Annex 20 (Section 1.5)	No	Appendices 9E(1) and 9E(2)	The values in the Tables are not explained. These could be average per survey, maximum count, or total count. As such it is not possible to interpret the data.
L102	Values in the Tables of Appendices 9F(1) and 9F(2)	EIAO TM (Section 4.4.2) and Annex 20 (Section 1.5)	No	Appendices 9F(1) and 9F(2)	The values in the Tables are not explained. These could be average per survey, maximum count, or total count. As such it is not possible to interpret the data.
L103	Abundance values.	EIAO TM (Section 4.4.2) and Annex 20 (Section 1.5)	No	Appendices 9G(1) and 9G(2)	The abundance values ‘+’, ‘++’ and ‘+++’ are not explained; and as such it is not possible to interpret the data.

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L104	Habitat map	SB Appendix H 2(iv)(b) EIAO TM (Section 4.4.2) and Annex 20 (Section 1.5) EIAO GN No.6/2010 (Para. 2)	No	Habitat Maps	None have a Scale, and the symbols for many of the species of importance are inseparably. As such it is difficult to interpret the habitat map.
L105	Major Flight-lines.	EIAO TM (Section 4.4.2)	No	Figures 9.6a, 9.6b and 9.6c	The percentage figures for the Major Flight-lines are not explained, nor is that fact that the numbers do not add up to 100%. As such it is not possible to interpret the data.
L106	Interpretation of figure.	EIAO TM (Section 4.4.2)	No	Figure 9.7	This Figure is difficult to interpret as it does not clearly show the footprint of the development; it appears for example, that some of the Woodland is retained.
L107	Real impacts of the project.	EIAO TM Annex 16 (Section 5.5)	No	9.11 & EM&A Manual	There is a failure to follow through with the actual documentation of real impacts of the project for in-situ taxa. No post-project construction provision for monitoring all the species of conservation concern is made. There is also a lack of a full timeframe as to which habitats and which species are to be monitored, how, nor instructions based upon best published (internationally) practice.
Fisheries Impact: EIA Sec 10					N/A
M1	The assessment area for fisheries impacts shall include areas within 500 metres distance from the boundary of the Project area which is the same area as aquatic ecological impact assessment. This assessment area shall be extended to include other areas if there are also found being impacted by the construction or operation of the Project during the course of the EIA study. Special attention should be given to fish pond culture resources and activities as well	SB 3.4.10.2	N/A	N/A	N/A

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	as any watercourses which serve as water sources for fish pond areas.				
M2	(ii) description and quantification of the existing culture fisheries activities;	SB Appendix I 5(ii)	N/A	N/A	N/A
M3	(v) prediction and evaluation of any direct/indirect and on-site/off-site impacts on culture fisheries such as permanent loss or temporary occupation of fish ponds, deterioration of water quality in fish ponds and any surrounding water courses, hydrological disruptions and draw-down of water table, disruption or disturbance of pond culture related activities;	SB Appendix I 5(v)	N/A	N/A	N/A
Landscape and Visual Impacts: EIA Sec 11					See Submission Section 2.2 and Appendix 3.3, 3.4, 3.5.
N1	Potential landscape impacts arising from the Project and potential visual impacts arising from the above-ground structures of the Project, including impacts to the existing landscape resources, the users of the Fanling Golf Course and residents of the nearby residential areas;	SB 3.2.1 (x)	No	Section 11.8 Table 11.7 Section 11.9	<p>The LVIA is based on incorrect assumptions and is not supported by adequate data and evidence. There are significant errors and omissions in the identification of potential sources of impact arising from the Project.</p> <p>The area of direct physical impact due to the proposed housing development and mitigation measure areas to some LRs are under-estimated (e.g. LRs 1.1 and 1.2) in Section 11.9.1. There are errors in the measurement of the affected areas of LRs, LR1.1 and LR1.2 mapped on Figure 11.2. Sec 11.9.1.2 states, for LR1.1, ‘Total area affected is approximately 0.13 ha’ whereas 0.15 ha is measured on Figure 11.2. Similarly, Sec 11.9.1.3 states, for LR1.2, ‘Approximately 8% (2.82ha) will be lost due to site formation and construction of the proposed public housing development and infrastructure works’ whereas 3.09 ha is measured on Figure 11.2.</p>

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					The proposed future change in landscape management and maintenance party will also be a source of adverse impact not identified in the LVIA.
N2	<p>Landscape and Visual Impacts</p> <p>The Applicant shall follow the criteria and guidelines for evaluating and assessing the landscape and visual impacts as stated in Annexes 10 and 18 of the TM.</p> <p>The assessment area for the landscape impact assessment shall include all areas within 500 metres distance from the boundary of the Project area and the works of the Project as identified in the EIA, while the assessment area for the visual impact assessment shall be defined by the visual envelope of the Project. The defined envelope shall be shown on a plan in the EIA report.</p> <p>Based on the latest scope and information of the Project, the Applicant shall make reference to the technical requirements given in Appendix J and submit a methodology statement to provide with justifications the scope, approach and methodology to be adopted in the landscape and visual impact assessments for the agreement of the Director prior to the commencement of assessment.</p>	SB 3.4.11	No	<p>Figures 11.1, 11.2 LR, 11.3 LCAs</p> <p>Figures 11.4 Visual Envelope, 11.5 VSRs, 11.6 VPs</p>	<p>The LVIA does not provide sufficient details and is not supported by adequate data and evidence. Annexes 10 and 18 of the EIAO TM have not been followed entirely.</p> <p>The broadbrush / group tree survey fails to cover the entire landscape study area (all areas within 500 metres distance from the boundary of the Project area) – the tree survey area only covers the area within the PDA.</p> <p>The PDA being split into four sub-areas distorts the value of the Trees of Particular Interest (TPIs) located within Sub-Area 1 vs the TPIs located in Sub-Areas 2-4.</p> <p>Only the Visual Envelope is shown / defined on a plan.</p>
N3	The Applicant shall review relevant plan(s) and conduct surveys/studies to identify existing sensitive landscape characters and landscape resources (including but not limited to Old and Valuable Tree (OVT), tree of large size, and protected/rare plant species such as Aquilaria sinensis), and recommend landscape areas of high landscape value as country park, coastal protection area, green belt, conservation area	SB Appendix J 1	No		<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>FGC is indisputably an important cultural and historic landscape. FGC may reasonably and objectively be considered the oldest and most beautiful large-scale structured man-made landscape in all Hong Kong and the protection and preservation of important cultural</p>

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	<p>designations, watercourses and woodland areas. Any guidelines on landscape and urban design strategies and frameworks that may affect the appreciation of the Project shall also be reviewed. The aim is to gain an insight to the future outlook of the area affected so as to assess whether the Project can fit into the surrounding setting. Any conflict with the statutory town plan(s) and any published land use plans shall be highlighted and appropriate follow-up action shall be recommended. A system shall be derived for judging the landscape and visual impact significance as required under the Annexes 10 and 18 of the TM. Cumulative landscape and visual impacts of the Project with other existing, committed and planned developments in the assessment area shall be assessed.</p>				<p>(including <i>fung shui</i> significance) and historic landscapes should be properly considered, which has totally been omitted in the LVIA.</p> <p>There is no assessment of the PDA having a higher landscape quality and landscape heritage value compared to the remaining areas of the FGC west of Fan Kam Road.</p> <p>The area of direct physical impact due to the proposed housing development and mitigation measure areas to some LRs are under-estimated (e.g. LRs 1.1 and 1.2) in Section 11.9.1. There are errors in the measurement of the affected areas of LRs, LR1.1 and LR1.2 mapped on Figure 11.2. Sec 11.9.1.2 states, for LR1.1, ‘<i>Total area affected is approximately 0.13 ha</i>’ whereas 0.15 ha is measured on Figure 11.2. Similarly, Sec11.9.1.3 states, for LR1.2, ‘<i>Approximately 8% (2.82ha) will be lost due to site formation and construction of the proposed public housing development and infrastructure works</i>’ whereas 3.09 ha is measured on Figure 11.2.</p> <p>There is an inconsistency in the internal data / information cross-referenced / provided – the sensitivity for LCA1 is classified as ‘High’ in Table 11.4, the sensitivity of LCA1 carried forward to Table 11.11 “Significance Threshold for LR & LCA” is ‘Medium’ not ‘High’ which renders the subsequent assessment in Table 11.11 to be erroneous and contributes to the residual impact (“Moderate”) being understated.</p> <p>There is an inconsistency found within / throughout the Landscape Impact Assessment (LIA) in regards to the number of TPIs found / located within the PDA (Sub-Area 1-4) – There are 449 TPIs reported within LCA1 in Table</p>

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					<p>11.5 under Section 11.6.2 (Noting this is the lowest number indicated and that the land area that LCA1 covers is a lot larger than that of the tree survey boundary / PDA.) There are 459 TPIs tabulated in the TPIs Tree Schedule in Appendix 11.2. There are 70 TPIs reported within Sub-Area 1 in Section 11.6.3.3 and 395 TPIs reported in Section 11.6.3.7 within Sub-Area 2-4 – added together that is 465 TPIs. There are 465 TPIs when added together in Table 11.10 under Section 11.10 of the LVIA. The tree survey conducted during the EIA had not accurately recorded the correct data as there were numerous factual errors found in the information provided on some tree species identification, measurements of some tree heights and DBH in the tree schedule – leading to some underestimated and over-estimated tree sizes hence it is unreliable. There is no statement in the LVIA or indication at the top of the tree schedule to confirm that the Tree Survey was undertaken by a Certified Arborist.</p> <p>There are additional TPIs with DBH larger than 1m (T1712, T1718, T1730 and T1952) that were wrongly not identified as TPIs within Sub-Area 1.</p> <p>A very large (917mm DBH) ‘Heritage Tree’ (as classified by Prof. CY Jim in 2020) located near the Car Park is missing altogether from the tree survey as well as many other smaller trees (approx. 24 minimum) are also found to be missing near the Car Park area.</p> <p>There is a general under-estimation of tree quality in the Tree Survey, of all the trees in the individual tree survey, only one individual tree was assessed as having High Amenity value. This suggests there was a lack of objectivity by the surveyors.</p>

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					<p>There were trees (T55, T58, etc) listed in the tree schedule that are not shown on the tree survey plans. There were also trees found on Site to be completely missing (not surveyed or recorded at all) in the EIA tree survey within Sub-Area 1 whereby these trees will be directly affected therefore the number of trees required to be felled due to the proposed project is not accurate and hence the compensatory tree number is also not correct.</p> <p>There are also nine ‘Dead Trees’ proposed to be Retained within Sub-Area 1 listed in the tree schedule – even though these trees are proposed to be Retained they would also need to be compensated for – these are not accounted for in the proposed compensatory tree numbers in the LVIA.</p> <p>Landscape Impact Assessment stated that “No registered “Old and Valuable Trees” (OVT) were recorded during the tree survey.” which is misleading because the land is private and OVTs are not recorded on Private land.</p> <p>However, OVT number LCSD N/40 (found on the Register of OVTs) is located on Fan Kam Road near the water pumping station, just outside the FGC boundary, almost dead centre in the 500m Landscape Assessment Study Area. Irrespective of whether or not OVT LCSD N/40 falls within the precise boundary of the Tree Survey, its presence should have been recorded in the Landscape Baseline Survey / Study.</p> <p>Furthermore, the Landscape Impact Assessment fails to mention that many, if not all, of the TPIs will become registrable as OVTs as soon as Government resumes the land. The 459 TPIs identified within the 32 ha PDA in the EIA tree survey plus the additional TPIs (T1712, T1718,</p>

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					<p>T1730 and T1952) that were wrongly not identified as TPIs within Sub-Area 1 would, when registered as OVTs, double the total existing number of OVTs (459) in all of Hong Kong.</p> <p>The baseline studies completely failed to identify the uniqueness of the existing sensitive, cultural (including <i>fung shui</i> significance), historic, important, landscape character of FGC in the National context – the baseline landscape sensitivities used in the assessment are not consistent throughout the LVIA. The description of LCA1 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LCA1 has been wrongly assessed as ‘Semi-mature - Mature’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LCA has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of High Local, Regional and National importance being the oldest continuously managed and maintained golf course in all of China and probably Asia.</p> <p>The LVIA fails to mention or consider the Government’s plan (as announced in the Chief Executive’s Policy Address in October 2021) for the Northern Metropolis in the Review of Planning and Development Control Framework, undertakes no review of it, hence there is no description of the implications for the study area which is a significant omission with consequential adverse impact on the subsequent assessment.</p> <p>The LVIA failed to make reference to relevant important published papers on scientific research previously undertaken at the FGC including the papers on Legacy Effect of Trees in the Heritage Landscape of a peri-urban</p>

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					golf course, Cooling Effects in a Golf Course and Heritage Trees in FGC by Prof.Jim et al etc.
N4	<p>The Applicant shall describe, appraise, analyse and evaluate <u>the existing and planned landscape resources and character</u> of the assessment area. A system shall be derived for judging landscape and visual impact significance. Annotated oblique aerial photographs and plans of suitable scale showing the baseline landscape character areas and landscape resources and mapping of impact assessment shall be extensively used to present the findings of impact assessment. Descriptive text shall provide a concise and reasoned judgment from a landscape and visual point of view. The sensitivity of the landscape framework and its ability to accommodate change shall be particularly focused on. The Applicant shall identify <u>the degree of compatibility of the Project with the existing and planned landscape setting, recreation and tourism related uses</u>, and scenic spot. The landscape impact assessment shall quantify the potential landscape impacts as far as possible so as to illustrate the significance of such impacts arising from the proposed development. Clear mapping of the landscape impacts is required. Broad brush tree and vegetation survey shall be carried out and the impacts on existing trees shall be addressed. Cumulative landscape and visual impacts of the Project with other committed and planned developments shall be assessed.</p>	SB Appendix J 2	No	<p>Section 11.6.3 Table 11.10 (CM1)</p> <p>Section 11.14 Figure 11.9.1</p>	<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The Landscape Baseline Survey is ambiguous and inaccurate, because the baseline studies failed to identify the uniqueness of the existing sensitive landscape character of FGC – the baseline landscape sensitivities used in the assessment are not consistent throughout the LVIA, as well as the assessment of the maturity, regional importance and rarity, leading to grossly inaccurate (understated) adverse impact significance predictions.</p> <p>The description of LR2 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LR2 has been wrongly assessed as ‘Young’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LR has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of National importance being the oldest continuously managed and maintained golf course recreational grassland in all of China and probably Asia. There is no mention of its special integrated relationship with/ supportive role to the adjacent woodland and tree roots allowed to freely stretch underneath the grassland areas with no restrictions.</p> <p>The description of LCA1 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct.</p>

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					<p>The area of direct physical impact due to the proposed housing development and mitigation measure areas to some LRs are under-estimated (e.g. LRs 1.1 and 1.2) in Section 11.9.1. There are errors in the measurement of the affected areas of LRs, LR1.1 and LR1.2 mapped on Figure 11.2. Sec 11.9.1.2 states, for LR1.1, ‘<i>Total area affected is approximately 0.13 ha</i>’ whereas 0.15 ha is measured on Figure 11.2. Similarly, Sec11.9.1.3 states, for LR1.2, ‘Approximately 8% (2.82ha) will be lost due to site formation and construction of the proposed public housing development and infrastructure works’ whereas 3.09 ha is measured on Figure 11.2.</p> <p>The tree survey conducted during the EIA had not accurately recorded the correct data as there were numerous factual errors found in the information provided with some trees missing (not recorded in the tree survey) hence it is unreliable and therefore the impacts on existing trees are not accurately assessed / addressed. There is no statement in the LVIA or indication at the top of the tree schedule to confirm that the Tree Survey was undertaken by a Certified Arborist.</p> <p>A very large (917mm DBH) ‘Heritage Tree’ (as classified by Prof. CY Jim in 2020) located near the Car Park is missing altogether from the tree survey as well as many other smaller trees (approx. 24 minimum) are also found to be missing near the Car Park area.</p> <p>There are significant errors and omissions in the identification of potential sources of impact arising from the Project.</p> <p>There is a lack of any evidentiary support for the effectiveness of the proposed mitigation measures. The</p>

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					<p>proposed mitigation measures should be identified and assessed as potential sources of impact. The potential impacts to the proposed compensatory tree planting locations in Sub-Area 3 are not identified / assessed.</p> <p>The proposed future change in landscape management and maintenance party will also be a source of adverse impact not identified in the LVIA.</p> <p>The LVIA fails to mention or consider the Government’s plan (as announced in the Chief Executive’s Policy Address in October 2021) for the Northern Metropolis in the Review of Planning and Development Control Framework, undertakes no review of it, hence there is no description of the implications for the study area which is a significant omission with consequential adverse impact on the subsequent assessment.</p>
N5	<p>The Applicant shall assess the visual impacts of the Project. Clear illustration including mapping of visual impacts is required. The assessment shall mainly include the following:</p> <ul style="list-style-type: none"> (i) identification and plotting of visual envelope of the Project; (ii) appraisal of existing visual resources and character as well as the future outlook of the visual system of the assessment area; (iii) identification and justification of the key groups of existing and planned sensitive receivers within the visual envelope with regard to views from ground level, sea level and elevated vantage points, and clearly indicate the sensitive receivers on a plan of appropriate scale; (iv) description of the visual compatibility of the Project with the surrounding and the planned 	SB Appendix J 3	No		<p>The LVIA does not provide sufficient details.</p> <p>There are no detailed descriptions, evaluation or assessment of the existing visual character, existing conditions or the heritage setting reported / illustrated in the existing baseline conditions.</p> <p>There are no plans / images / photos / any visual aids that identify and show the existing visual character of the FGC or the existing area in which the proposed housing development area in Sub-Area 1 is located.</p> <p>There are no clear and accurate descriptions / justifications on the compatibility of the proposed housing development for the proposed location in Sub-Area 1.</p> <p>There are no descriptions regarding the changes in visual amenity when viewed from within the FGC (from either east or west of Fan Kam Road) or when viewed from outside the FGC.</p>

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	<p>setting, its obstruction and interference with the key views of the study areas, and changes in visual amenity;</p> <p>(v) identification and description of the severity of visual impacts in terms of distance, nature and number of sensitive receivers. The glare impacts of the Project shall be considered in the assessment. Assessment on effectiveness of the proposed mitigation measures of visual impacts during the construction and operation phases stages shall be carried out by comparing the impacts with and without mitigation measures; and</p> <p>(vi) evaluation and explanation with supportive arguments of factors considered in arriving the significance thresholds of visual impacts. The visual impacts should include presentation of an evaluation matrix derived for judging impact significance.</p>				<p>There is no detailed assessment on the actual effectiveness of the proposed mitigation measures during the construction and operation phases.</p>
N6	<p>In evaluation of the potential glare impacts due to man-made light sources generated from the Project and associated works and recommending practicable mitigation measures, reference could be made to “Charter on External Lighting” and “Guidelines on Industry Best Practices for External Lighting Installations” promulgated by the Environment Bureau.</p>	SB Appendix J 4	No	Section 11.9.3 Table 11.10 (CM2)	<p>The LVIA does not provide sufficient details for implementation.</p> <p>Only ‘control of night-time lighting glare’ during the construction phase is included in the mitigation measures. There are no mitigation measures for any potential glare impacts during the operation phase.</p>
N7	<p>The Applicant shall evaluate the merits of <u>preservation in totality</u>, in parts or <u>total destruction of existing landscape and the establishment of a new</u> landscape character area. In addition, alternative location, layout, design, built-form and construction method that will avoid or reduce the identified landscape and</p>	SB Appendix J 5	No	The formulation and brief examination of three development options within	<p>The LVIA does not provide sufficient details for implementation.</p> <p>The LVIA baseline study failed to identify the existing unique and historic landscape character of the 110+ year old FGC Old Course which is unlike any other landscape</p>

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	<p>visual impacts shall be <u>evaluated for comparison before adopting other mitigation</u> or compensatory measures to alleviate the impacts. The mitigation measures proposed shall not only be concerned with damage reduction but shall also include consideration of potential enhancement of existing landscape and visual quality. The Applicant shall recommend mitigation measures to minimize adverse effects identified above, including provision of a master landscape plan illustrating the landscape design and mitigation measures.</p>			<p>the overall PDA are described in Section 2.6 for different development densities. A comparison of proposed construction methodologies are provided in Section 2.11 and Table 2.4</p>	<p>in Hong Kong and which has national importance in this context.</p> <p>The predicted future conditions without and with this project are described briefly in Section 2.3 however the merits ‘preservation in totality’ and ‘total destruction of existing landscape...’ are not clearly defined and evaluated for the heritage / historic landscape of national importance.</p> <p>There are no alternative locations, layout, designs, built-form or construction method that will avoid or reduce the identified landscape and visual impacts provided.</p>
N8	<p>The mitigation measures shall also include the preservation of vegetation and natural landscape resources, e.g. transplanting trees in good condition and value, provision of screen planting, re-vegetation of disturbed lands, compensatory planting, woodland restoration, peripheral landscape treatment to blend in with the surrounding environment, design of structures/chimneys, provision of finishes to structure, colour scheme and texture of material used and any measures to mitigate the impacts on the existing and planned land use and visually sensitive receivers. Parties shall be identified for the ongoing management and maintenance of the proposed mitigation works to ensure their effectiveness throughout the construction phase and operation phase of the Project, associated works, supporting facilities and essential infrastructures. A practical programme and funding proposal for the implementation, management and maintenance of the</p>	SB Appendix J 6	No	Mitigation Measures Table 11.10	<p>The LVIA does not provide sufficient details for implementation.</p> <p>There is a lack of any evidentiary support for the effectiveness of the proposed mitigation measures. The proposed mitigation measures including preserving / retaining existing trees in-situ in Sub-Area 1 and transplanting TPIs to Sub-Area 3 are not practical / viable to implement as there has been no apparent detailed consideration on the proposed housing development platform levels against the existing levels of the existing trees or the route to the receptor site for the trees to be transplanted (travelling through undulating land with change in elevation and dense existing vegetation which may be impacted) – no description or details are provided. There is also no apparent rationale given for felling some trees while retaining other adjacent trees.</p> <p>There is no explanation / demonstration on how the proposed transplanting of two large mature trees (T60 and T71) will be achieved as this seems not potentially viable / feasible due to their large size (difficulties would include</p>

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	<p>recommendation measures, and the parties responsible for all the mitigation measures from design stage to operation stage shall be provided.</p>				<p>the rootball preparations and extraction, distance and elevation changes of the route, adverse impact to other trees along the route, receptor site location, etc).</p> <p>There is no identification of any Tree Protection Areas on any plan in the LVIA to protect the trees during the Site formation and Building construction.</p> <p>Mitigation Measure CM1 “Preservation of Existing Vegetation” incorrectly groups together tree retention and tree transplanting. These should be separated as two independent Mitigation Measures as they have completely different impacts and environmental outcomes on landscape resources and landscape character. The LVIA failed to identify that the proposed Mitigation Measures OM1 & OM4 in Sub-Areas 2 and 3 will be potential sources of adverse landscape impact.</p> <p>In the EIA LVIA Mitigation Measures Table 11.10 under both the ‘Management Agency’ and ‘Maintenance Agency’ for the Operation Phase – OM1 (Landscape Treatment in Sub-areas 2-4) and OM4 (Compensatory Tree Planting): <i>Proposed usage of Sub-areas 2-4 has not been confirmed yet, the proposed maintenance party is subject to further confirmation.</i></p> <p>So therefore the 2 MMs (OM1 and OM4) must both be discounted and not included in the LVIA.</p> <p>No practical programme and funding proposal for the implementation, management and maintenance of all the recommendation measures, and the parties responsible for all the mitigation measures from design stage to operation stage is provided.</p>

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N9	<p>Annotated illustration materials such as colour perspective drawings, plans and section/elevation diagrams, annotated oblique aerial photographs, photographs taken at vantage points, and computer-generated photomontage shall be adopted to fully illustrate the landscape and visual impacts of the Project. In particular, the landscape and visual impacts of the Project with and without mitigation measures from representative viewpoints, particularly from views of the most severely affected visually sensitive receivers (i.e. worst case scenario), shall be properly illustrated in existing and planned setting at four stages (existing condition, Day 1 with no mitigation measures, Day 1 with mitigation measures and Year 10 with mitigation measures) by computer-generated photomontage so as to demonstrate the effectiveness of the proposed mitigation measures. Computer graphics shall EIA Study Brief No. SB-318/2019 Technical Study on Partial Development of Fanling Golf Course Site July 2019 - 44 - be compatible with Microstation DGN file format. The Applicant shall record the technical details in preparing the illustration, which may need to be submitted for verification of the accuracy of the illustration. If any noise barriers/enclosures are proposed, the choice of their colours, design and materials should be compatible with the surrounding buildings and development context and their aesthetic designs should be considered.</p>	SB Appendix J 7	No	Figures 11.10.1 to 11.10.16	<p>The LVIA does not provide sufficient details.</p> <p>No elevations are provided at all and no meaningful cross section drawings are included to clearly convey the findings of the LVIA or the proposed Mitigation Measures within the PDA, especially to show the landscape impact on the trees to be retained in-situ within Sub-Area 1.</p> <p>The information portrayed in general is very rudimentary and insufficient to be able to interpret, analyse and interrogate the findings of the LVIA, especially the feasibility / practicality of the proposed retention of existing trees within Sub-Area 1 as well as the tree transplanting proposals, which appear not feasible according to industry standards.</p> <p>There is no evidence / details presented to support the practicality or feasibility for the retention of 11 TPIs located within the proposed housing development in Sub-Area 1.</p>

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N10	(vi) the degree to which the adverse environmental impacts are reversible or irreversible: Irreversible adverse environmental impacts shall be considered as key concerns. The planned decommissioning or rehabilitation activities that may influence the degree to which the adverse environmental impacts are reversible or irreversible may be considered;	EIAO TM 4.4.3 (a) (vi)	No	Sec 11.9.2.3 11.9.2.4 Tables 11.8, 11.9	<p>The LVIA is based on incorrect assumptions and is not supported by adequate data and evidence.</p> <p>There is a lack of any evidentiary support for the effectiveness of the proposed mitigation measures. The proposed mitigation measures including preserving / retaining existing trees in-situ in Sub-Area 1 and transplanting TPIs to Sub-Area 3 are not practical / viable to implement as there has been no apparent detailed consideration on the proposed housing development platform levels against the existing levels of the existing trees or the route to the receptor site for the trees to be transplanted (travelling through undulating land with change in elevation and dense existing vegetation which may be impacted) – no description or details are provided. There is also no apparent rationale given for felling some trees while retaining other adjacent trees.</p> <p>The proposed mitigation measures should be identified and assessed as potential sources of impact.</p> <p>There is no identification of any Tree Protection Areas on any plan in the LVIA to protect the trees during the Site formation and Building construction. Mitigation Measure CM1 “Preservation of Existing Vegetation” incorrectly groups together tree retention and tree transplanting - These should be separated as two independent Mitigation Measures as they have completely different impacts and environmental outcomes on landscape resources and landscape character.</p> <p>The LVIA failed to identify that the proposed Mitigation Measures OM1 & OM4 in Sub-Areas 2 and 3 will be potential sources of adverse landscape impact.</p>

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					<p>In the EIA LVIA Mitigation Measures Table 11.10 under both the ‘Management Agency’ and ‘Maintenance Agency’ for the Operation Phase – OM1 (Landscape Treatment in Sub-areas 2-4) and OM4 (Compensatory Tree Planting): <i>Proposed usage of Sub-areas 2-4 has not been confirmed yet, the proposed maintenance party is subject to further confirmation.</i></p> <p>So therefore the 2 MMs (OM1 and OM4) must both be discounted and not included in the LVIA.</p>
N11	<p>Landscape and visual impact assessment shall be directed towards the predicting and judging the significance of the effects that new development may have on landscape character and visual amenity. This annex describes the general approach and methodology for assessment of landscape and visual impacts. The methodology may vary from case to case, depending on the nature of the issues. However, it must be admitted that such an assessment involves subjective judgement and preference. The perception and aspiration of the community on particular landscape features must be taken into account.</p>	EIAO TM Annex 18 Section 1	No		<p>The LVIA is based on incorrect assumptions and is not supported by adequate data and evidence.</p> <p>The Landscape Baseline Survey is ambiguous and inaccurate, because the baseline studies failed to identify the uniqueness of the existing sensitive landscape character of FGC – the baseline landscape sensitivities used in the assessment are not consistent throughout the LVIA, as well as the assessment of the maturity, regional importance and rarity, leading to grossly inaccurate (understated) adverse impact significance predictions.</p> <p>The description of LR2 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LR2 has been wrongly assessed as ‘Young’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LR has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of National importance being the oldest continuously managed and maintained golf course recreational grassland in all of</p>

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					<p>China and probably Asia. There is no mention of its special integrated relationship with / supportive role to the adjacent woodland and tree roots allowed to freely stretch underneath the grassland areas with no restrictions.</p> <p>The description of LCA1 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct.</p> <p>The perception and aspiration of the HKGC FGC community on this landscape has not been taken into account.</p>
N12	<p><u>Study Process</u></p> <p>2.1 A landscape and visual impact assessment shall cover the following:</p> <ol style="list-style-type: none"> 1. defining the scope and contents of the study; 2. a baseline study to provide for a comprehensive and accurate description of the baseline landscape and visual character; 3. a review of the relevant planning and development control framework; 4. impact studies to identify the potential landscape and visual impacts and predict their magnitude and potential significance; and <p>recommendations on mitigation measures and implementation programme.</p>	EIAO TM Annex 18 Section 2	No		<p>The LVIA is based on incorrect assumptions and is not supported by adequate data and evidence.</p> <p>The Landscape Baseline Survey is ambiguous and inaccurate, because the baseline studies failed to identify the uniqueness of the existing sensitive landscape character of FGC – the baseline landscape sensitivities used in the assessment are not consistent throughout the LVIA, as well as the assessment of the maturity, regional importance and rarity, leading to grossly inaccurate (understated) adverse impact significance predictions.</p> <p>The description of LR2 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LR2 has been wrongly assessed as ‘Young’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LR has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of National importance being the oldest continuously managed and maintained golf course recreational grassland in all of</p>

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					<p>China and probably Asia. There is no mention of its special integrated relationship with / supportive role to the adjacent woodland and tree roots allowed to freely stretch underneath the grassland areas with no restrictions.</p> <p>The description of LCA1 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct.</p>
N13	<p><u>Scope and Contents</u> 3.1 In setting the scope of the study, the following aspects shall be considered:</p> <ul style="list-style-type: none"> • limits of the study area; • stages in the project life-cycle; • key issues to be addressed; • level of details required for baseline studies; • principal viewpoints to be covered; • system to be used for judging impact significance; • alternatives; <p>other development if cumulative impacts are to be assessed.</p>	EIAO TM Annex 18 Section 3	No		<p>The LVIA does not provide sufficient details.</p> <p>The level of details and descriptions provided in the baseline study are not sufficient given it fails to mention a lot of the key resources and issues to be addressed and significance of the landscape resources and characters in the study area.</p> <p>The LVIA baseline study fails to mention anything in regard to the important critically endangered Chinese Swamp Cypress or identify the important swampy habitat / environment in which the Chinese Swamp Cypress require to live in, hence the impact significance was not assessed accurately / at all.</p> <p>The broadbrush / group tree survey fails to cover the entire landscape study area (all areas within 500 metres distance from the boundary of the Project area) – the tree survey area only covers the area within the PDA.</p> <p>The PDA being split into four sub-areas distorts the value of the TPIs located within Sub-Area 1 vs the TPIs located in Sub-Areas 2-4.</p> <p>There are no alternative locations, layout, designs, built-form or construction method provided.</p>

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N14	<p><u>Baseline Study</u></p> <p>4.1 The baseline study shall at least cover the following aspects:</p> <ol style="list-style-type: none"> 1. physical aspects such as geology, landform, drainage, soil, climate, including micro-climate; 2. human aspects such as cultural features, landscape history, buildings and settlements, people affected and their perception of the landscape character; and 3. aesthetic aspects such as the views available, visual amenity and visual character. <p>4.2 The baseline study shall present an appraisal of the landscape and visual resource of the study area. It shall focus particularly on the sensitivity of the landscape and visual system and its ability to accommodate change.</p>	EIAO TM Annex 18 Section 4	No		<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The LVIA fails to mention the distinctive landform and consider the significant topographical undulations and elevation changes within the PDA, which are a fundamental and critical component of the existing uniqueness of the landscape character at FGC.</p> <p>The PDA (including Sub-Area 1) contains significant hydrology / water features including streams, ponds, and an area of low-lying swampy ground in Sub-Area 4 that is critical to the survival of the community of critically endangered Chinese Swamp Cypress, however the swamp land is not described at all nor is it identified as a LR, so consequently the LIA fails to address any potential adverse impacts upon them and any necessary mitigation measures with consequential failure to identify and address the potential risk to the critically endangered Chinese Swamp Cypress.</p> <p>It is reasonable to expect that the PDA contains a large volume of topsoil which exists in varying depths according to the location. The LIA fails to identify the existing topsoil as a landscape resource and consequently fails to address any potential adverse impacts upon it and any necessary mitigation measures to protect and preserve it.</p> <p>The LIA fails to identify the PDA’s effect on micro-climate (within either North District or Northern Metropolis) as a landscape resource and consequently fails to address any potential adverse impacts on climate</p>

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					<p>caused by changes to the landscape within the PDA, and any potential mitigation measures.</p> <p>There is no mention of any cultural landscape features, landscape history or settlement aspects (including <i>fung shui</i> significance) regarding the PDA or study area taken into account despite the long history of the area in North District. The HKGC FGC community’s perception of / on this landscape has not been taken into account.</p> <p>The Landscape Baseline Survey is ambiguous and inaccurate, because the baseline studies failed to identify the uniqueness of the existing sensitive landscape character of FGC – the baseline landscape sensitivities used in the assessment are not consistent throughout the LVIA, as well as the assessment of the maturity, regional importance and rarity, leading to grossly inaccurate (understated) adverse impact significance predictions.</p> <p>The description of LR2 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LR2 has been wrongly assessed as ‘Young’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LR has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of National importance being the oldest continuously managed and maintained golf course recreational grassland in all of China and probably Asia. There is no mention of its special integrated relationship with / supportive role to the adjacent woodland and tree roots allowed to freely stretch underneath the grassland areas with no restrictions.</p>

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					The description of LCA1 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct.
N15	<p><u>Review of the Planning and Development Control Framework</u></p> <p>5.1 Plans or planning studies such as development statements, outline development plans, outline zoning plans, layout plans or planning briefs, and lease conditions may contain guidelines and control on urban design concept, building height profile, designated view corridors; specific design elements including areas of high landscape value, coastal protection areas, landmarks and monuments, special design areas and open space network; and other design specifications that may affect the architectural form of the project. A review of these documents shall provide an insight to the future outlook of the area affected and the ways the project can fit into the wider environment.</p>	EIAO TM Annex 18 Section 5	No		<p>The LVIA is based on incorrect assumptions and is not supported by adequate data and evidence.</p> <p>The LVIA fails to mention or consider the Government’s plan (as announced in the Chief Executive’s Policy Address in October 2021) for the Northern Metropolis in the Review of Planning and Development Control Framework, undertakes no review of it, hence there is no description of the implications for the study area which is a significant omission with consequential adverse impact on the subsequent assessment.</p> <p>The LVIA failed to make reference to relevant important published papers on scientific research previously undertaken at the FGC including the papers on Legacy Effect of Trees in the Heritage Landscape of a peri-urban golf course, Cooling Effects in a Golf Course and Heritage Trees in FGC by Prof.Jim et al etc.</p> <p>There is no mention of surface temperatures or cooling effects in the LVIA. Reference has not been made to the highly beneficial cooling effects of the vegetation located at the FGC to the local community. Prof Jim’s 2020 Heritage Tree Reports further emphasise the surface temperatures of the foliage being a lot lower than that of the hard asphalt road / carpark surfaces.</p> <p>The Landscape Baseline Survey is ambiguous and inaccurate, because the baseline studies failed to identify the uniqueness of the existing sensitive landscape character of FGC – the baseline landscape sensitivities</p>

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					<p>used in the assessment are not consistent throughout the LVIA, as well as the assessment of the maturity, regional importance and rarity, leading to grossly inaccurate (understated) adverse impact significance predictions.</p> <p>The description of LR2 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LR2 has been wrongly assessed as ‘Young’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LR has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of National importance being the oldest continuously managed and maintained golf course recreational grassland in all of China and probably Asia. There is no mention of its special integrated relationship with / supportive role to the adjacent woodland and tree roots allowed to freely stretch underneath the grassland areas with no restrictions.</p> <p>The description of LCA1 is inaccurate and assessment is incomplete, therefore the resulting impact significance is not correct.</p>
N16	<p><u>Landscape Impact Assessment Study</u> 6.1 Landscape impact assessment shall assess :</p> <ul style="list-style-type: none"> • direct impacts upon specific landscape elements; • more subtle effects upon the overall pattern of landscape elements that give rise to landscape character, and local and regional distinctiveness; <p>impacts upon acknowledged special interests or values such as areas of high landform with special landscape significance.</p>	EIAO TM Annex 18 Section 6	No		<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The LIA fails to identify the distinctiveness / uniqueness of the landscape character of FGC – being the only example of an inland golf course within lowland secondary forest and as such is indisputably unique both locally and in Hong Kong. The failure to identify this indisputable fact in the LVIA is a gross oversight / omission.</p>

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N17	<p><u>Visual Impact Assessment Study</u></p> <p>7.2 In assessing visual impacts, it is important to cover all possible viewpoints. If this is not practicable, key viewpoints shall be selected on major routes e.g. roads, walkways, footpaths and hiking tracks; and at activity nodes e.g. residential areas, important public open spaces and landmarks etc. The location of these viewpoints shall be typical.</p> <p>It is also important to note that FGC car park which is a potential development site is located only approximately 80 m from the Grade II listed Clubhouse. In addition, the PDA EIA’s Cultural Heritage/ Built Heritage Impact Assessment must investigate the potential impact of the PDA on the environs and context which comprise part of the grade listing by AMO of the Clubhouse. Significant deterioration of the environs will undermine the cultural heritage importance and character of the Clubhouse detrimentally.</p> <p>Further the EIAO TM Annex 18 Section 7.2 mentions that the LVIA must consider viewpoints from the Grade II listed Clubhouse and also from the Grade I and Grade III listed buildings of FGC to ensure the acceptability of the proposed LVIA of the PDA development.</p>	EIAO TM Annex 18 Section 7.2 and SB Cultural Heritage	No		<p>The LVIA does not provide sufficient details.</p> <p>The Hong Kong Golf Club is one VSR (21) represented by VP10 FGC, however there are no separate assessments for the grade 1, 2, 3 listed buildings within the FGC.</p>

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N18	<p><u>Mitigation Measures</u></p> <p>8.1 Mitigation is not only concerned with damage reduction but shall include consideration of potential landscape visual enhancement. Wherever possible design that would enhance the landscape and visual quality shall be adopted.</p> <p>8.2 Alternative design that would avoid or reduce the identified impacts on landscape, or that would make the project visually compatible with the setting shall be thoroughly examined before adopting other mitigation or compensatory measures to alleviate the impacts.</p> <p>8.3 Possible measures that may mitigate or compensate the impacts include:</p> <ul style="list-style-type: none"> • remedial • compensatory <p>8.4 A practical programme and funding proposal for the implementation of the recommended mitigation measures shall be worked out. These shall be integrated with the overall development programme and costing of the whole project.</p>	EIAO TM Annex 18 Section 8	No		<p>The LVIA does not provide sufficient details.</p> <p>There are no alternative locations, layout, designs, built-form or construction method that will avoid or reduce the identified landscape and visual impacts provided.</p>
N19	<p><u>Presentation Methods</u></p> <p>9.1 To illustrate the landscape and visual impacts of a project, as well as effects of the mitigation measures, choice of appropriate presentation methods is important. These methods include perspective drawings, plans and section/elevation diagrams, photographs on scaled physical models, photo-retouching and photomontage. These methods shall be</p>	EIAO TM Annex 18 Section 9	No		<p>The LVIA does not provide sufficient details.</p> <p>No elevations are provided at all and no meaningful cross section drawings are included to clearly convey the findings of the LVIA or the proposed Mitigation Measures within the PDA, especially to show the landscape impact on the trees to be retained in-situ within Sub-Area 1.</p>

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	<p>used extensively to facilitate communication among the concerned parties.</p> <p>9.2 The technical details of preparing the illustrations shall be recorded. To facilitate verification of the accuracy, the Authority will reserve the right to examine the full details</p>				<p>The information portrayed in general is very rudimentary and insufficient to be able to interpret, analyse and interrogate the findings of the LVIA, especially the feasibility / practicality of the proposed retention of existing trees within Sub-Area 1 as well as the tree transplanting proposals, which appear not feasible according to industry standards.</p> <p>There is no evidence / details presented to support the practicality or feasibility for the retention of 11 TPis located within the proposed housing development in Sub-Area 1.</p>
N20	<p>EIA is able to fully address the consequence of the development which might potentially break the ‘essential, finite and irreplaceable link between the past and the future’ stated in EIAO TM Annex 10 Section 2.1a.</p> <p>The general presumption in favour of the protection and conservation of all sites of cultural heritage because they provide an essential, finite and irreplaceable link between the past and the future and are points of reference and identity for culture and tradition.</p>	EIAO TM Annex 10 Section 2.1a. Cultural Heritage	No		<p>The LVIA does not provide sufficient details.</p> <p>The LVIA contains no mention or description on the topography or unique landform within the study area nor is it identified as / within any LRs, therefore there is no assessment of the residual impacts on the topography within the PDA at all.</p> <p>The consequence of the development and the residual impacts are not accurately or fully addressed.</p> <p>The LVIA failed to correctly identify the residual adverse impacts of Substantial Significance on LR1.2, LR2 (which together cover ~67% of Sub-Area 1) and LCA1 (which covers 100% of Sub-Area 1).</p>
N21	<p>EIA / LVIA assessments, must conduct an in-depth assessment to prove that there are mitigation measures that would address, as mentioned in EIAO TM Annex 2 Section 3, the likely environmental impacts arising from the changes. If this cannot be proven the EIAO TM provides recourse of the precautionary principle and regarding a “no-go” alternative and</p>	EIAO TM Annex 2 Section 3 EIAO TM Annex 16 Section 5.4.4	No	Mitigation Measures Table 11.10	<p>The LVIA is based on incorrect assumptions.</p> <p>There is no in-depth assessment to prove that there are mitigation measures that would address the likely environmental impacts arising from the changes. In the EIA LVIA Mitigation Measures Table 11.10 under both the ‘Management Agency’ and ‘Maintenance Agency’ for the Operation Phase – OM1 (Landscape Treatment in</p>

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	abandoning the project as demanded under EIAO TM Annex 16 Section 5.4.4 while “no-go” alternatives may be the realistic option under EIAO Annex 16 Section 5.4.1(a).	EIAO Annex 16 Section 5.4.1(a).			<p>Sub-areas 2-4) and OM4 (Compensatory Tree Planting): <i>Proposed usage of Sub-areas 2-4 has not been confirmed yet, the proposed maintenance party is subject to further confirmation.</i></p> <p>So therefore the 2 MMs (OM1 and OM4) must both be discounted and not included in the LVIA as per the clause in the EIAO GN 8/2010 cl 3.8 (c).</p>
N22	<p>1. d. The impact is unacceptable if the adverse effects are considered too excessive and are unable to mitigate practically;</p> <p>Fundamental change in visual character which could generate substantial landscape and visual impact during both construction and operational phases before mitigation. However, based on HKSARG’s 2005 Landscape Value Mapping Study, FGC has been classified as rural fringe (inland) with significant tree cover of good condition and has been classified as a tranquil landscape of high value (LVMS 2005), that is material and significant to Hong Kong. Existing landscape characters in the Old Course are irreplaceable as there are no other similar landscapes in Hong Kong outside the FGC.</p> <p>Secondary Lowland Woodland in the PDA and adjoining area is highly sensitive to development assess the landscape, visual and ecological impacts to the large-scale secondary lowland woodland which is unique to Hong Kong.</p>	EIAO TM Annex 10 Section 1.d	No		<p>The LVIA is based on incorrect assumptions.</p> <p>There is no overall conclusion for the overall residual landscape impact of the project with reference to the five criteria listed in Annex 10 of the EIAO TM in the LVIA Section 11.14 – The correct objective conclusion of the LIA should be that the landscape impacts are ‘Unacceptable’ in accordance with the five criteria in EIAO TM Annex 10.</p> <p>The LVIA failed to correctly identify the residual adverse impacts of Substantial Significance on LR1.2, LR2 (which together cover ~67% of Sub-Area 1) and LCA1 (which covers 100% of Sub-Area 1).</p> <p>There is a lack of any evidentiary support for the effectiveness of the proposed mitigation measures. The proposed mitigation measures including preserving / retaining existing trees in-situ in Sub-Area 1 and transplanting TPIs to Sub-Area 3 are not practical / viable to implement as there has been no apparent detailed consideration on the proposed housing development platform levels against the existing levels of the existing trees or the route to the receptor site for the trees to be transplanted (travelling through undulating land with change in elevation and dense existing vegetation which</p>

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					<p>may be impacted) – no description or details are provided. There is also no apparent rationale given for felling some trees while retaining other adjacent trees.</p> <p>There is no identification of any Tree Protection Areas on any plan in the LVIA to protect the trees during the Site formation and Building construction.</p>
N23	LVIA shall be directed towards predicting and judging of the magnitude and significance of the effects that new development/redevelopment may have on landscape resources/characters and visual amenities.	EIAO GN No. 8/2010 2.1	No		<p>The LVIA is based on incorrect assumptions and is not supported by adequate data and evidence. The Landscape Baseline Survey is ambiguous and inaccurate, because the baseline studies failed to identify the uniqueness of the existing sensitive landscape character of FGC – the baseline landscape sensitivities used in the assessment are not consistent throughout the LVIA, as well as the assessment of the maturity, regional importance and rarity, leading to grossly inaccurate (understated) adverse impact significance predictions.</p> <p>The description of LR2 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LR2 has been wrongly assessed as ‘Young’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LR has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of National importance being the oldest continuously managed and maintained golf course recreational grassland in all of China and probably Asia. There is no mention of its special integrated relationship with / supportive role to the adjacent woodland and tree roots allowed to freely stretch underneath the grassland areas with no restrictions.</p>

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					<p>The description of LCA1 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct.</p> <p>There are also inconsistencies in the prediction on the magnitude of change throughout the LVIA.</p> <p>The area of direct physical impact due to the proposed housing development and mitigation measure areas to some LRs are under-estimated (e.g. LRs 1.1 and 1.2) in Section 11.9.1. There are errors in the measurement of the affected areas of LRs, LR1.1 and LR1.2 mapped on Figure 11.2. Sec 11.9.1.2 states, for LR1.1, ‘<i>Total area affected is approximately 0.13 ha</i>’ whereas 0.15 ha is measured on Figure 11.2. Similarly, Sec11.9.1.3 states, for LR1.2, ‘<i>Approximately 8% (2.82ha) will be lost due to site formation and construction of the proposed public housing development and infrastructure works</i>’ whereas 3.09 ha is measured on Figure 11.2.</p>
N24	LVIA should be an independent and informed professional assessment of the impacts from a DP. It should be based on the reasonable case scenario and/or where there is uncertainty the worst case scenario. Both positive and negative landscape and visual impacts should be given due consideration in the process.	EIAO GN No. 8/2010 2.2	No		<p>The LVIA is based on incorrect assumptions.</p> <p>The existing landscape and visual baseline review is not thorough and accurately described.</p> <p>The LVIA failed to make reference to relevant important published papers on scientific research previously undertaken at the FGC including the papers on Legacy Effect of Trees in the Heritage Landscape of a peri-urban golf course, Cooling Effects in a Golf Course and Heritage Trees in FGC by Prof.Jim et al etc.</p> <p>The LVIA does not identify the uniqueness of the landscape character of the FGC.</p>

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N25	It is recognised that, unlike other impact assessments, LVIA relies more upon experienced professional judgment and less on quantitative measurements. Hence, it is important to adopt a structured and systematic approach in LVIA to facilitate the public to understand the potential landscape and visual impacts arising from the DP.	EIAO GN No. 8/2010 2.3	No	Section 11.5 Assessment Methodology	<p>The LVIA is based on incorrect assumptions and does not provide sufficient details.</p> <p>The baseline quantitative measurements / data are not correct and have numerous significant errors in it leading to grossly under-valued and under-estimated potential impacts, flawed and erroneous conclusions.</p>
N26	In assessing the significance of impacts in LVIA, it is necessary to differentiate between judgment on the significance of change, which involves a greater degree of subjective opinion, and measurement of magnitude of change, which is normally a more objective and quantifiable task. Assessment should always be supported by quantified data, clear evidence, logical deduction, reasoned argument and informed judgment.	EIAO GN No. 8/2010 2.4	No	Table 11.8	<p>The LVIA is based on incorrect assumptions.</p> <p>The assessment on the magnitude of change for the affected LRs and LCAs are not quantified by accurate field data, reasoned argument and informed judgment.</p> <p>There are also inconsistencies in the prediction on the magnitude of change throughout the LVIA.</p>
N27	Based on the best information available at the time of the assessment, LVIA might report the main concerns on landscape and visual issues raised by interested parties (Public comment from consultation forum (if any/applicable as stated in Sec 3.1(b))).	EIAO GN No. 8/2010 2.5	No	Section 2.5 Table 2.1	<p>The LVIA does not provide sufficient details.</p> <p>There is no evidence to suggest that they have resolved the public’s concerns regarding the significant number of potential OVTs located within the PDA – the feasibility of retaining in-situ or transplanting the potential OVTs has not been fully investigated.</p> <p>The Tree Schedule has two columns identifying the “Maintenance Department to provide comments to this Tree Survey Report” – “Before” and “After”. FGC is identified as the Maintenance Department to give comment “Before” however FGC has not been consulted on the Tree Survey Report nor invited to comment on it.</p>

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					The importance of affected LRs and LCAs are under-evaluated in the LVIA and the under-estimated residual impacts due to the inadequate tree and landscape surveys conducted and baseline study are not remotely thorough enough for an EIA.
N28	<p>Information in the LVIA should be consistent with that used for other impact assessments covered by the same EIA report such as:</p> <ul style="list-style-type: none"> • noise assessment in respect of the location, extent and size of noise barriers/enclosures, • ecological impact assessment in respect of the quantification of landscape features and the potential impacts on them, and <p>assessment of waste management implications, e.g. in respect of potential loss of topsoil, vegetation removal and other landscape resources.</p>	EIAO GN No. 8/2010 2.6	No	Noise Impact Section 4, EcolIA Section 9, Waste Management Section 7.	<p>The LVIA does not provide sufficient details.</p> <p>In the Ecological Impact Assessment (Section 9 of the EIA Report), an area of ‘swampy woodland’ is identified on Figure 9.3a and Figure 9.4 at the location of the Chinese Swamp Cypress in Sub-Area 4, however the swamp land is not mentioned / described at all nor is it identified as a LR in the LVIA, so consequently the LVIA fails to address any potential adverse impacts upon this swamp land area.</p> <p>The area of ‘compensation woodland planting’ in the Ecological Impact Assessment stated in Section 9.8.3 and shown on Figure 9.8 is not shown on any of the plans / figures in the LVIA – this area appears to be a lot larger than the compensatory tree planting areas and the receptor site for transplanted trees.</p> <p>It is reasonable to expect that the PDA contains a large volume of topsoil which exists in varying depths according to the location. The LIA fails to identify the existing topsoil as a landscape resource and consequently fails to address any potential adverse impacts upon it and any necessary mitigation measures to protect and preserve it.</p>
N29	For easy understanding, annotated illustrative materials such as computer-generated photomontages, oblique aerial photographs, photographs, plans, elevations and section drawings should be extensively used to convey the findings of LVIA to the readers. Descriptive	EIAO GN No. 8/2010 2.7	No		<p>The LVIA does not provide sufficient details.</p> <p>There is in general an inadequate amount of information provided on the proposed housing development – on the design and construction details etc.</p>

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	text should provide a concise and reasoned argument.				<p>There is a lack of any evidentiary support for the effectiveness of the proposed mitigation measures. No elevations are provided at all and no meaningful cross section drawings are included to clearly convey the findings of the LVIA or the proposed Mitigation Measures within the PDA, especially to show the landscape impact on the trees to be retained in-situ within Sub-Area 1.</p> <p>The information portrayed in general is very rudimentary and insufficient to be able to interpret, analyse and interrogate the findings of the LVIA, especially the feasibility / practicality of the proposed retention of existing trees within Sub-Area 1 as well as the tree transplanting proposals, which appear not feasible according to industry standards.</p> <p>There is no evidence / details presented to support the practicality or feasibility for the retention of 11 TPIs located within the proposed housing development in Sub-Area 1.</p> <p>Table 11.7 lists “C2 – Site Formation Works and Excavation Works” as a potential source of impact however there is no elaboration of the methodologies to be adopted that enables proper assessment of the potential impacts on the existing landscape resources in Sub-Area 1, especially upon the trees, and no evidence is presented to explain how it is possible to retain so many trees as proposed in the EIA. The text fails to describe any potential impacts on existing topography, hydrology, soils, or existing trees due to impacts on the tree roots and tree canopies.</p>

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N30	As LVIA involves appraisal of landscape and visual resources, professional judgment of impact significance and formulation of sensible mitigation measures, it is therefore recommended that professional landscape architects, planners and/or urban designers, or other competent persons be appointed to carry out the full scope of LVIA as identified in the study brief.	EIAO GN No. 8/2010 2.8	No	MM Figures 11.9.1 11.9.2	<p>The LVIA does not provide sufficient details.</p> <p>The proposed mitigation measure provided of transplanting TPIs is not practical and in some cases not implementable due to the final receptor site location whereby the route for the trees to reach the location means travelling through narrow areas of extensive existing trees as well as the undulating terrain. Retaining trees in-situ within the proposed housing development platforms which are in some cases a lot lower or higher than the existing ground level of the trees.</p> <p>There is no statement in the LVIA or indication at the top of the tree schedule to confirm that the Tree Survey was undertaken by a Certified Arborist.</p>
N31	The background of the DP should include a broad description of the alternative option(s)/alignment(s)/design(s) which have been examined in related studies if such information is not included in the EIA report. The potential landscape and visual impacts of all options should be broadly stated and the rationale for the recommended option should be clearly explained.	EIAO GN No. 8/2010 3.1(a)	No	Section 2.6 and 2.7	<p>The LVIA does not provide sufficient details. No alternative layout option(s) /design(s) have been provided.</p> <p>No detailed explanation / rationale is provided for the ‘various factors’ on why Option 2 is the recommended option.</p>
N32	Comments collected from previous consultation, if any, with relevant advisory bodies including those in section 2 above and the general public on landscape and visual aspects of the project should be summarised together with a discussion on how their comments have been addressed in the report. If there is no previous consultation or no comment has been received on landscape and visual aspect, this should be clearly stated.	EIAO GN No. 8/2010 3.1(b)	No	Table 2.1 Key Comments Received from Public and Green Groups	<p>The LVIA does not provide sufficient details.</p> <p>Comments collected from previous consultation regarding concerns for OVTs included but no specific discussion on how the comments have been addressed in the report.</p> <p>Landscape Impact Assessment stated that “No registered “Old and Valuable Trees” (OVT) were recorded during the tree survey.”</p>

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					The Tree Schedule has two columns identifying the “Maintenance Department to provide comments to this Tree Survey Report” – “Before” and “After”. FGC is identified as the Maintenance Department to give comment “Before” however FGC has not been consulted on the Tree Survey Report nor invited to comment on it.
N33	The environmental, economic, social and other benefits/disbenefits of the DP and the consequences of not proceeding with the DP should also be briefly mentioned.	EIAO GN No. 8/2010 3.1(c)	No	Section 1.6	<p>The LVIA does not provide sufficient details.</p> <p>Project benefits briefly mentioned but no details on any disbenefits of the proposed housing development are provided including the significant residual impacts as a result of the project.</p> <p>The consequences of all the non-compliant practice, numerous omissions and factual errors in the LVIA are fundamental because the numerous errors will deprive the decision makers of the materials required to make well-informed and sound decisions, and condemns them to making decisions based on incorrect and unreliable or partial information and therefore contributing to wrong decision making.</p>
N34	<p>All works that may give rise to landscape and visual impacts should be clearly annotated on plans such as:</p> <ul style="list-style-type: none"> • location plan including phasing boundary where applicable, • details of all structures/buildings (in terms of length, width and height in mPD), • layouts, plans, sections and elevations, • materials of finishes (e.g. reflective or non-reflective materials) and colours of external appearance, and 	EIAO GN No. 8/2010 3.2(a)	No	Figures 11.9.1, 11.9.2	<p>The LVIA does not provide sufficient details.</p> <p>There is in general an inadequate amount of information provided on the proposed housing development – on the design and construction details etc.</p> <p>There is a lack of any evidentiary support for the effectiveness of the proposed mitigation measures. No elevations are provided at all and no meaningful cross section drawings are included to clearly convey the findings of the LVIA or the proposed Mitigation Measures within the PDA, especially to show the</p>

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	extent of temporary works area.				<p>landscape impact on the trees to be retained in-situ within Sub-Area 1.</p> <p>The information portrayed in general is very rudimentary and insufficient to be able to interpret, analyse and interrogate the findings of the LVIA, especially the feasibility / practicality of the proposed retention of existing trees within Sub-Area 1 as well as the tree transplanting proposals, which appear not feasible according to industry standards.</p> <p>There is no evidence / details presented to support the practicality or feasibility for the retention of 11 TPIs located within the proposed housing development in Sub-Area 1.</p> <p>Table 11.7 lists “C2 – Site Formation Works and Excavation Works” as a potential source of impact however there is no elaboration of the methodologies to be adopted that enables proper assessment of the potential impacts on the existing landscape resources in Sub-Area 1, especially upon the trees, and no evidence is presented to explain how it is possible to retain so many trees as proposed in the EIA. The text fails to describe any potential impacts on existing trees due to impacts on the tree roots and tree canopies.</p> <p>There are no visual diagrams, sections or elevation to demonstrate how the ‘...mature trees proposed to be preserved, tree islands should be properly formed...’ mentioned in Sec 11.6.3.6.</p> <p>The extent of the temporary works area is not provided nor is any potential temporary / permanent impacts indicated.</p>

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N35	<p>For construction phase, some impacts may be temporary in nature, but can be significant if left unattended. The assessment should include, where applicable, consideration of all permanent works and also temporary works undertaken during the construction stage. Construction works may include the following:</p> <ul style="list-style-type: none"> • reclamation (temporary and/or permanent), • site formation including slope works, • temporary works including vegetation clearance, • haul road, • borrow areas, and dumping grounds. 	EIAO GN No. 8/2010 3.2(b)	No		<p>The LVIA does not provide sufficient details.</p> <p>Table 11.7 lists “C2 – Site Formation Works and Excavation Works” as a potential source of impact however there is no elaboration of the methodologies to be adopted that enables proper assessment of the potential impacts on the existing LRs in Sub-Area 1, especially upon the trees, and no evidence is presented to explain how it is possible to retain so many trees as proposed in the EIA.</p> <p>There is no presentation of a chosen construction methodology in order to explain sources of construction impacts.</p> <p>The extent of site formation including the details of the extent of any slope works for the development platforms is not indicated on the LVIA plans.</p> <p>What the potential temporary / permanent impacts are during the construction phase are not fully described.</p>
N36	<p>For operation phase, assessment should include, where applicable, consideration of all constructed works at commencement of operation of the project, particularly the following features, which are also prominent in the landscape and visual context:</p> <ul style="list-style-type: none"> • viaducts, • retaining structures, • vent shafts, • tunnel portals, • cutting and filling, • embankments, 	EIAO GN No. 8/2010 3.2(c)	No		<p>The LVIA does not provide sufficient details.</p> <p>There is no mention or assessment of any proposed retaining structures, cutting and filling, embankments or noise barriers/enclosures for the operation phase.</p> <p><i>‘...ancillary facilities with minimal new structure/change to existing site conditions, serving the needs of the general public.’</i></p> <p>However, there is no assessment provided on this ancillary building – only mentions that one tree is affected.</p>

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	<ul style="list-style-type: none"> any mitigation measures such as noise barriers/enclosures, and ancillary buildings. 				
N37	For the Landscape Impact Assessment (LIA), the assessment area should normally include all areas within 500m from the work limit of DP.	EIAO GN No. 8/2010 3.3(a)	No	Figures 11.2 LRs, 11.3 LCAs	<p>The LVIA does not provide sufficient details.</p> <p>The broadbrush / group tree survey fails to cover the entire landscape study area (all areas within 500 metres distance from the boundary of the Project area) – the tree survey area only covers the area within the PDA.</p>
N38	For Visual Impact Assessment (VIA), the assessment area should be up to the visual envelope (zone of visual influence) which is generally the viewshed formed by natural/man-made features such as ridgeline or building blocks. The defined visual envelope must be shown on plan.	EIAO GN No. 8/2010 3.3(b)	No	Figures 11.4 Visual Envelope, 11.5 VSRs, 11.6 VPs	<p>The LVIA does not provide sufficient details.</p> <p>There are no detailed descriptions, evaluation or assessment of the existing visual character, existing conditions or the heritage setting reported / illustrated in the existing baseline conditions.</p> <p>Only the Visual Envelope is shown / defined on a plan.</p>
N39	The visual envelope may contain areas, which are fully visible, partly visible and non-visible from the DP. In order to define the visual envelope, cross-sectional drawings shall be prepared to demonstrate the various degree of visibility in the visual envelope. Such information is generally not required to be included in the LVIA but should be kept by the applicant for verification upon request by Planning Department.	EIAO GN No. 8/2010 3.3(c)	No		<p>The LVIA does not provide sufficient details.</p> <p>No cross-sectional drawings or other methods are provided to demonstrate the various degree of visibility in the visual envelope.</p>
N40	Baseline conditions are not static and may change over time according to the planning framework. Hence, it is necessary for the Baseline Study to capture the existing condition as well as the future outlook of the assessment area.	EIAO GN No. 8/2010 3.4(a)	No	Section 11.3 Review of Planning and Development Control Framework	<p>The LVIA does not provide sufficient details.</p> <p>The LVIA fails to mention or consider the Government’s plan (as announced in the Chief Executive’s Policy Address in October 2021) for the Northern Metropolis in the Review of Planning and Development Control Framework, undertakes no review of it, hence there is no</p>

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					<p>description of the implications for the study area which is a significant omission with consequential adverse impact on the subsequent assessment.</p> <p>The LVIA failed to make reference to relevant important published papers on scientific research previously undertaken at the FGC including the papers on Legacy Effect of Trees in the Heritage Landscape of a peri-urban golf course, Cooling Effects in a Golf Course and Heritage Trees in FGC by Prof.Jim et al etc.</p>
N41	The Baseline Study should include an appraisal of the landscape and visual resources and character of the assessment area focusing particularly on the sensitivity of the landscape and visual system and their ability to accommodate change.	EIAO GN No. 8/2010 3.4(b)	No		<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The Landscape Baseline Survey is ambiguous and inaccurate, because the baseline studies failed to identify the uniqueness of the existing sensitive landscape character of FGC – the baseline landscape sensitivities used in the assessment are not consistent throughout the LVIA, as well as the assessment of the maturity, regional importance and rarity, leading to grossly inaccurate (understated) adverse impact significance predictions.</p> <p>The description of LR2 is inaccurate and assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LR2 has been wrongly assessed as ‘Young’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LR has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of National importance being the oldest continuously managed and maintained golf course recreational grassland in all of China and probably Asia. There is no mention of its</p>

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					<p>special integrated relationship with / supportive role to the adjacent woodland and tree roots allowed to freely stretch underneath the grassland areas with no restrictions.</p> <p>The description of LCA1 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct.</p>
N42	<p>Landscape resources should be quantified, with respect to special landscape features. Landscape character of the project area and its relationship with the adjacent areas should be addressed. Landscape character areas (LCAs) and key landscape elements within the assessment area should be identified and annotated on plan. Some projects may require a broad tree and/or vegetation survey to be carried out.</p>	EIAO GN No. 8/2010 3.4(c)	No	Figure 11.2 LRs	<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The area of direct physical impact due to the proposed housing development and mitigation measure areas to some LRs are under-estimated (e.g. LRs 1.1 and 1.2) in Section 11.9.1. There are errors in the measurement of the affected areas of LRs, LR1.1 and LR1.2 mapped on Figure 11.2. Sec 11.9.1.2 states, for LR1.1, ‘<i>Total area affected is approximately 0.13 ha</i>’ whereas 0.15 ha is measured on Figure 11.2. Similarly, Sec 11.9.1.3 states, for LR1.2, ‘<i>Approximately 8% (2.82ha) will be lost due to site formation and construction of the proposed public housing development and infrastructure works</i>’ whereas 3.09 ha is measured on Figure 11.2. TPis are indicated on the LR plans.</p> <p>The key landscape elements within the assessment area should be identified and annotated on plan. The special landscape features are not fully described.</p>
N43	<p>A broad-brush tree/vegetation survey should be prepared as an integral part of the landscape baseline study. Unless specified elsewhere in the study brief, a detailed tree survey to fulfill the requirements as stipulated in the Environment, Transport and Works Bureau Technical Circular (Works) No. 3/2006, or Lands Administration</p>	EIAO GN No. 8/2010 3.4(d)	No	Section 11.6.3 Tree Survey Appendix 11.1 Tree Survey Plan Appendix 11.2.2 Tree	<p>The LVIA does not provide sufficient details.</p> <p>The broadbrush / group tree survey fails to cover the entire landscape study area (all areas within 500 metres distance from the boundary of the Project area) – the tree survey area only covers the area within the PDA.</p>

(1) No.	(2) Question Item	(3) Statutory Requirement	(4) Is the EIAO TM and SB Fully Complied With?	(5) State Relevant EIA Section of EIA	(6) If “No”, Critique and Comment on EIA, EIAO TM and/or SB Non-compliances’
	Office, Lands Department Practice Note No. 7/2007 for tree felling application is usually not necessary for the preparation of LIA.			Survey Schedule	
N44	Besides vegetation, other landscape resources such as topographical or geological features, reservoirs, streams and other water bodies, etc should be investigated as part of the baseline study.	EIAO GN No. 8/2010 3.4(e)	No		<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The LVIA fails to mention the distinctive landform and consider the significant topographical undulations and elevation changes within the PDA, which are a fundamental and critical component of the existing uniqueness of the landscape character at FGC.</p> <p>Section 11.4.1 describes the PDA as ‘<i>a piece of relatively flat land with general gradients of 21.8mPD at the northern and 23.3mPD at the southern area intertwined with random pockets of small hilly areas ranged from 29mPD to 39mPD at their upper levels.</i>’</p> <p>Mostly vegetation within LRs are listed, no topographical or geological or hydrological features within LRs are mentioned in the landscape baseline study and therefore consequently the landscape assessment fails to address any adverse impacts upon them.</p> <p>The LIA is intentionally fragmented to minimise the value, facts, significance in/of its context in the baseline study as well as for the impact assessment and conclusion.</p> <p>The broadbrush / group tree survey fails to cover the entire landscape study area (all areas within 500 metres distance from the boundary of the Project area) – the tree survey area only covers the area within the PDA.</p>

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					<p>The PDA being split into four sub-areas distorts the value of the TPIs located within Sub-Area 1 vs the TPIs located in Sub-Areas 2-4.</p> <p>The area of direct physical impact due to the proposed housing development and mitigation measure areas to some LRs are under-estimated (e.g. LRs 1.1 and 1.2) in Section 11.9.1. There are errors in the measurement of the affected areas of LRs, LR1.1 and LR1.2 mapped on Figure 11.2. Sec 11.9.1.2 states, for LR1.1, ‘Total area affected is approximately 0.13 ha’ whereas 0.15 ha is measured on Figure 11.2. Similarly, Sec 11.9.1.3 states, for LR1.2, ‘Approximately 8% (2.82ha) will be lost due to site formation and construction of the proposed public housing development and infrastructure works’ whereas 3.09 ha is measured on Figure 11.2.</p> <p>There are description errors and assessment of LR2 Grassland is not accurate as it should be recreational grassland, hence the impact assessment is under-estimated based on incorrect assumptions in the landscape baseline study. The ‘Scale of LR/LCA Affected’ of LR2 is wrongly described as ‘Small’. On the removal of parts / sections of LR2 means a loss of function that the wider impact on the Old Course at FGC can no longer function as a 18 hole golf course.</p>
N45	Visual resources such as key views, viewing corridors/viewing directions, harbour and ridgelines, and visual characters should also be identified on plans.	EIAO GN No. 8/2010 3.4(f)	No	Section 11.4 Section 11.7.1.4	<p>The LVIA does not provide sufficient details.</p> <p>There are no detailed descriptions, evaluation or assessment of the existing visual character, existing conditions or the heritage setting reported / illustrated in the existing baseline conditions.</p> <p>There are no plans / images / photos / any visual aids that identify and show the existing visual character of the FGC</p>

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					or the existing area in which the proposed housing development area in Sub-Area 1 is located.
N46	Landscape and visually sensitive receivers (SRs) should be identified. SRs with similar landscape and visual sensitivity can be grouped with their locations clearly shown on plans.	EIAO GN No. 8/2010 3.4(g)	No	Figures 11.5, 11.6	<p>The LVIA is based on incorrect assumptions and does not provide sufficient details.</p> <p>Some landscape resources have not been identified / mapped with their locations clearly shown on any plans and so are missing along with their sensitivity.</p> <p>The PDA (including Sub-Area 1) contains significant hydrology / water features including streams, ponds, and an area of low-lying swampy ground in Sub-Area 4 that is critical to the survival of the community of critically endangered Chinese Swamp Cypress, however the swamp land is not described at all nor is it identified as a LR, so consequently the LIA fails to address any potential adverse impacts upon them and any necessary mitigation measures with consequential failure to identify and address the potential risk to the critically endangered Chinese Swamp Cypress.</p>
N47	Annotated oblique and aerial photographs, photographs taken at key viewpoints and relevant maps/plans with short notes should be used to illustrate the existing baseline conditions.	EIAO GN No. 8/2010 3.4(h)	No	Figure 11.4	<p>The LVIA does not provide sufficient details.</p> <p>There are no detailed descriptions, evaluation or assessment of the existing visual character, existing conditions or the heritage setting reported / illustrated in the existing baseline conditions.</p> <p>There are no plans / images / photos / any visual aids that identify and show the existing visual character of the FGC or the existing area in which the proposed housing development area in Sub-Area 1 is located.</p>

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N48	The review should cover information in the statutory plans prepared under the Town Planning Ordinance, and non-statutory plans ² published by the Planning Department when the EIA report is under public inspection. Planning Department can advise on the updated information in respect of planned use.	EIAO GN No. 8/2010 3.5(a)	No	Section 11.3 Review of Planning and Development Control Framework Section 11.12 Cumulative Impacts	The LVIA does not provide sufficient details. The LVIA fails to mention or consider the Government’s plan (as announced in the Chief Executive’s Policy Address in October 2021) for the Northern Metropolis in the Review of Planning and Development Control Framework, undertakes no review of it, hence there is no description of the implications for the study area which is a significant omission with consequential adverse impact on the subsequent assessment.
N49	Planned uses shown in plans as described in paragraph 3.5a above which are within the study area should also be taken as SRs.	EIAO GN No. 8/2010 3.5(b)	No	Planned VSRs are included .	The LVIA does not provide sufficient details. The LVIA fails to mention or consider the Government’s plan (as announced in the Chief Executive’s Policy Address in October 2021) for the Northern Metropolis in the Review of Planning and Development Control Framework, undertakes no review of it, hence there is no description of the implications for the study area which is a significant omission with consequential adverse impact on the subsequent assessment.
N50	For areas zoned under “Undetermined ” use or areas of unspecified use in the plans as detailed in paragraph 3.5a above, existing conditions should be based on for identification of SRs.	EIAO GN No. 8/2010 3.5(c)	N.A.		
N51	If plans in paragraph 3.5a above are outdated or unavailable, the LVIA should be based upon existing conditions on site.	EIAO GN No. 8/2010 3.5(d)	N.A.		
N52	Relevant planning/landscape guidelines as recommended in planning studies, planning briefs or planning documents relevant to the assessment area such as landscape/urban design strategies, frameworks and concepts, building height profiles, special design areas, landmarks, designated view corridors, open space networks,	EIAO GN No. 8/2010 3.5(e)	No		The LVIA is based on incorrect assumptions and does not provide sufficient details. Standards and Guidelines are listed in Section 11.2 but it is questionable if these documents were all used as part of the baseline review study as it appears that the Landscape Value Mapping Study (2006) (LVMS) is listed as a LVIA

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	landscape links and landscape character types, etc. should also be studied and highlighted.				<p>reference document, however the landscape sensitivity used in the assessment Table 11.11 is not consistent with that identified in the LVMS.</p> <p>The LVIA failed to follow requirements and procedures in accordance with DEVB TC(W) 5/2020 ‘Registration and Preservation of Old and Valuable Trees’ (which is listed in Section 11.2) and consequently failed to identify that the presence of 70 potentially registrable OVTs in Sub-Area 1 may preclude the development of Sub-Area 1 as a Public Housing Development. DEVB TC(W) 5/2020 Paragraph 2 states “<i>OVTs should be given priority protection. Requirements re also stipulated in the Circular for preservation and maintenance of OVTs at different stages of government projects...</i>”. Furthermore, paragraph 6 states “<i>It is Government policy to provide priority protection to the OVTs in the Register.</i>” Furthermore, paragraph 11 states that “<i>For public works projects requiring tree surveys to be carried out, the responsible project departments should assist to identify potentially registrable trees in the surveys and submit relevant details to the GLTMS for assessment using the nomination form at Appendix C.</i>”. Furthermore, paragraph 20 describes what shall be done in the event of the death of an OVT and paragraph 21 states: “<i>Except under the situation as stated in paragraph 20 above, removal of OVTs is prohibited.</i>” Thus, removal of living OVTs is prohibited.</p> <p>The LVIA failed to make reference to relevant important published papers on scientific research previously undertaken at the FGC including the papers on Legacy Effect of Trees in the Heritage Landscape of a peri-urban</p>

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					golf course, Cooling Effects in a Golf Course and Heritage Trees in FGC by Prof.Jim et al etc.
N53	Any departure from the published town plans arising from the DPs should be highlighted.	EIAO GN No. 8/2010 3.5(f)	N.A.		
N54	The study could be presented in a table form to cover: <ul style="list-style-type: none"> • plan title/number, • land use zonings, • approximate area of the land use zones to be affected by the DP, • design and conservation intention, and future outlook of the area. 	EIAO GN No. 8/2010 3.5(g)	N.A.		
N55	LIA should comprise assessments of the impacts both on landscape resources and landscape character of the area, which is created by the combination of landscape resources and built developments.	EIAO GN No. 8/2010 3.6(a)	No	Section 11.11.1	<p>The LVIA is based on incorrect assumptions and does not provide sufficient details.</p> <p>The LIA does not comprise accurate assessments of the potential impacts and impact significance both on affected LRs and LCA, arisen from the proposed housing development due to the substantively inaccurate and flawed baseline study.</p>
N56	VIA should identify and predict the type and extent of impacts from visual obstruction, glare, changes in visual amenity and compatibility with surroundings.	EIAO GN No. 8/2010 3.6(b)	No	Section 11.11.2 11.12.4	<p>The LVIA does not provide sufficient details.</p> <p>The extent of impacts from the visual obstruction of the proposed housing development is not clearly described / portrayed in the assessment.</p> <p>There are no clear and accurate descriptions / justifications on the compatibility of the proposed housing development for the proposed location in Sub-Area 1.</p> <p>There are no descriptions regarding the changes in visual amenity when viewed from within the FGC (from either east or west of Fan Kam Road) or when viewed from outside the FGC.</p>

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N57	The presentation of landscape and visual impacts in construction and operation stages should preferably be in table form covering items as specified in section 3.7 below.	EIAO GN No. 8/2010 3.6(c)	No	Table 11.11	The LVIA does not provide sufficient details. The items specified under EIAO GN No. 8/2010 Section 3.7 are not all covered / detailed in Table 11.11.
N58	Extent of work limits including temporary works areas should be presented on plan. The duration of construction impact should be stated.	EIAO GN No. 8/2010 3.6(d)	No	Timeline in Table 2.5 Section 2.12 Implementation Programme shows construction duration for Sub-Area 1. No duration information provided for Sub-Area 2-4	The LVIA does not provide sufficient details. The extent of temporary works areas / limits are not presented on any plans. The duration of the construction impacts are not clearly stated.
N59	For DPs under Schedule 3 of the EIA Ordinance, the LVIA should include a list of all DPs under Schedule 2 within the assessment area. If possible, it should contain individual LVIA for each DP under Schedule 2 or for each contract, which may consist of a number of DPs under Schedule 2, with a cumulative assessment of the potential landscape and visual impacts from all DPs and non-DPs within the assessment area. This may save the need to carry out further LVIA prior to the application of environmental permit (EP) for the DPs under Schedule 2. However, if detailed information for the DPs under Schedule 2 is not available, the LVIA for the DP under Schedule 3 should contain a broad assessment of the potential landscape and visual impacts arising from all DPs and non-DPs within the	EIAO GN No. 8/2010 3.6(e)	N.A.		

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	assessment area with a recommendation to carry out further detailed LVIA before the application of EP for the DPs under Schedule 2.				
N60	LVIA should take into account existing/planned/approved land uses as the baseline conditions. All direct and indirect impacts on existing/planned/approved land uses, and on future outlook of the area should be discussed.	EIAO GN No. 8/2010 3.7(a)	No	Section 11.3 Review of Planning and Development Control Framework Section 11.12 Cumulative Impacts	The LVIA does not provide sufficient details. No indirect impacts are described / discussed in the LVIA.
N61	Landscape impacts should be quantified based on landscape dynamics i.e. different conditions at different planning horizons should be provided when considering the magnitude of change.	EIAO GN No. 8/2010 3.7(b)	No		The LVIA does not provide sufficient details. Landscape impacts are not quantified based on different landscape conditions and locations within the landscape study area. There are also inconsistencies in the prediction on the magnitude of change throughout the LVIA.
N62	Prediction of potential landscape and visual impacts should cover beneficial/ adverse, direct/indirect, short term/long term, reversible/irreversible and cumulative impacts.	EIAO GN No. 8/2010 3.7(c)	No	Tables 11.8, 11.11 LR&L Cas Tables 11.6, 11.9, 11.12 VSRs	The LVIA is based on incorrect assumptions. The LIA does not comprise accurate assessments of the potential impacts and impact significance both on affected LR and LCA, arisen from the proposed housing development due to the substantively inaccurate and flawed baseline study.

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N63	Impact of the DP on landscape resources including special landscape features and on the LCAs should be assessed. Where situations warrant, it may be necessary to evaluate the merits of preservation in totality, in parts or total destruction of existing landscape and the establishment of a new landscape character area.	EIAO GN No. 8/2010 3.7(d)	No	Figures 11.13.1 to 11.13.4	<p>The LVIA does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The area of direct physical impact due to the proposed housing development and mitigation measure areas to some LRs are under-estimated (e.g. LRs 1.1 and 1.2) in Section 11.9.1. There are errors in the measurement of the affected areas of LRs, LR1.1 and LR1.2 mapped on Figure 11.2. Sec 11.9.1.2 states, for LR1.1, ‘<i>Total area affected is approximately 0.13 ha</i>’ whereas 0.15 ha is measured on Figure 11.2. Similarly, Sec11.9.1.3 states, for LR1.2, ‘<i>Approximately 8% (2.82ha) will be lost due to site formation and construction of the proposed public housing development and infrastructure works</i>’ whereas 3.09 ha is measured on Figure 11.2.</p> <p>The merits of preservation in totality are not evaluated, nor is the preservation in parts or total destruction of the existing landscape and the establishment of a new LCA.</p>
N64	Impact assessment can be made for individual SR, SR group, or if appropriate for representative SRs.	EIAO GN No. 8/2010 3.7(e)	N.A.		
N65	LVIA should be determined in significance thresholds, which are made up of two components, namely magnitude of change to baseline conditions due to the DP and sensitivity of receivers. An evaluation matrix shall be derived for judging impact significance. Broadly speaking, magnitude of change relates to parameters of the DP in the context of baseline conditions while sensitivity of receivers refers to properties of SRs. The following are some common but non-exhaustive factors normally considered in deriving the magnitude of change	EIAO GN No. 8/2010 3.7(f)	No		<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The Landscape Baseline Survey is ambiguous and inaccurate, because the baseline studies failed to identify the uniqueness of the existing sensitive landscape character of FGC – the baseline landscape sensitivities used in the assessment are not consistent throughout the LVIA, as well as the assessment of the maturity, regional importance and rarity, leading to grossly inaccurate (understated) adverse impact significance predictions.</p>

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	<p>and sensitivity in assessing landscape and visual impacts:</p> <p>(i) Factors affecting the magnitude of change for assessing landscape impacts include:</p> <ul style="list-style-type: none"> • compatibility of the project with the surrounding landscape, • duration of impacts under construction and operation phases, • scale of development, and • reversibility of change. <p>(ii) Factors affecting the sensitivity for evaluation of landscape impacts include:</p> <ul style="list-style-type: none"> • quality of landscape characters/resources, • importance and rarity of special landscape elements, • ability of the landscape to accommodate change, • significance of the change in local and regional context, and • maturity of the landscape. <p>(iii) Factors affecting the magnitude of changes for assessing visual impacts include:</p> <ul style="list-style-type: none"> • compatibility of the project with the surrounding landscape, • duration of impacts under construction and operation phases, • scale of development, • reversibility of change, • viewing distance, and • potential blockage of view. <p>(iv) Factors affecting the sensitivity of receivers for evaluation of visual impacts include:</p>				<p>The description of LR2 is inaccurate and assessment is incomplete, therefore the resulting impact significance is not correct. The maturity of LR2 has been wrongly assessed as ‘Young’ as well as the regional importance wrongly assessed as ‘Medium’, when this significant LR has been in existence for over 110 years during the course / over the development of the Old Course’s very long history. It should be classified as being of National importance being the oldest continuously managed and maintained golf course recreational grassland in all of China and probably Asia. There is no mention of its special integrated relationship with / supportive role to the adjacent woodland and tree roots allowed to freely stretch underneath the grassland areas with no restrictions.</p> <p>The description of LCA1 is inaccurate and the assessment is incomplete, therefore the resulting impact significance is not correct.</p> <p>There are also inconsistencies in the prediction on the magnitude of change throughout the LVIA.</p>

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	<ul style="list-style-type: none"> • value and quality of existing views, • availability and amenity alternative views, • type and estimated number of receiver population, • duration or frequency of view, and degree of visibility. 				
N66	<p>Landscape impacts should be classified depending on whether the impacts are adverse/beneficial, and irreversible/reversible. Separate assessment should be made for construction phase and operation phase impacts. Assessment of landscape impacts should include presentation of the following in a matrix format:</p> <ul style="list-style-type: none"> • Landscape resources / landscape character, • Sources of impact, • Type of impacts: impact on landscape resources and impact on landscape character, • Magnitude of change: negligible, small, intermediate or large with quantification if possible, • Landscape sensitivity: low, medium or high, • Significance thresholds of potential landscape impact (before mitigation); • Mitigation measures, and <p>Significance thresholds of residual impact (after mitigation): Operation Day 1 and Year 10.</p>	EIAO GN No. 8/2010 3.7(g)	No	Tables 11.8, 11.11 LRs&L CAs	<p>The LVIA is based on incorrect assumptions.</p> <p>There are numerous significant errors and omissions in the identification of potential sources of impact arising from the Project.</p> <p>The LVIA failed to correctly identify the residual adverse impacts of Substantial Significance on LR1.2, LR2 (which together cover ~67% of Sub-Area 1) and LCA1 (which covers 100% of Sub-Area 1).</p> <p>Table 11.7 lists “C2 – Site Formation Works and Excavation Works” as a potential source of impact however there is no elaboration of the methodologies to be adopted that enables proper assessment of the potential impacts on the existing LRs in Sub-Area 1, especially upon the trees, and no evidence is presented to explain how it is possible to retain so many trees as proposed in the EIA.</p> <p>There is no presentation of a chosen construction methodology in order to explain sources of construction impacts.</p>

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N67	<p>Similarly, visual impacts should be classified depending on whether the impacts are adverse/beneficial, and irreversible/reversible. Separate assessment should be made for construction phase and operation phase impacts. Assessment of visual impacts should include presentation of the following in a matrix format:</p> <ul style="list-style-type: none"> • Location of visually sensitive receivers (VSR), • Type and approximate number of VSRs, • Description of existing view and degree of visibility of DP (such as no view, glimpse, partial view, vista, open view, and panorama view), • Receiver sensitivity: low, medium or high, • Source of impact, • Minimum viewing distance of VSRs • Magnitude of change: negligible, small, intermediate, large, • Significance thresholds of potential visual impact (before mitigation), • Mitigation measures, and <p>Significance thresholds of residual impact (upon mitigation): Operation Day 1 and Year 10.</p>	EIAO GN No. 8/2010 3.7(h)	No	Tables 11.6, 11.9, 11.12 VSRs	<p>The LVIA does not provide sufficient details.</p> <p>There are no detailed descriptions, evaluation or assessment of the existing visual character, existing conditions or the heritage setting reported / illustrated in the existing baseline conditions.</p> <p>There is no detailed assessment on the actual effectiveness of the proposed mitigation measures during the construction and operation phases.</p>
N68	For some DPs such as transport projects, different sections may create different landscape and visual impacts. The LVIA should contain assessments and mitigation measures specific to each section and the SRs affected.	EIAO GN No. 8/2010 3.7(i)	N.A.		

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N69	<p>In order to illustrate the landscape and visual impacts and to demonstrate the effectiveness of the proposed landscape and visual mitigation measures, photomontages at selected representative viewpoints shall be prepared to illustrate :</p> <ul style="list-style-type: none"> • existing conditions, • unmitigated impacts at Operation Day 1 of the DP (may not be required for assessment of DP under Schedule 3), • partially mitigated impacts after implementation of the proposed mitigation measures at Operation Day 1 of the DP (may not be required for assessment of DP under Schedule 3), and residual impacts at Year 10 of the operation stage. 	EIAO GN No. 8/2010 3.7(j)	No	Figures 11.10.1 to 11.10.16 VPs Photomontages	<p>The LVIA does not provide sufficient details.</p> <p>There are no detailed descriptions, evaluation or assessment of the existing visual character, existing conditions or the heritage setting reported / illustrated in the existing baseline conditions.</p> <p>There are no plans / images / photos / any visual aids that identify and show the existing visual character of the FGC or the existing area in which the proposed housing development area in Sub-Area 1 is located.</p> <p>There are no clear and accurate descriptions / justifications on the compatibility of the proposed housing development for the proposed location in Sub-Area 1.</p> <p>There are no descriptions regarding the changes in visual amenity when viewed from within the FGC (from either east or west of Fan Kam Road) or when viewed from outside the FGC.</p> <p>There is no detailed assessment on the actual effectiveness of the proposed mitigation measures during the construction and operation phases.</p>
N70	Applicants may consult Planning Department on the proposed selection of suitable representative viewpoints for the preparation of the photomontages after the preliminary assessment.	EIAO GN No. 8/2010 3.7(k)	N.A.		
N71	Alternative alignment(s), design(s) and construction method(s) that would avoid or reduce the identified impacts on landscape, or that would make the DP visually more compatible with the setting shall be thoroughly examined before adopting other mitigation measures to alleviate the impacts.	EIAO GN No. 8/2010 3.8(a)	No	Section 2.6, Section 2.7	<p>The LVIA does not provide sufficient details.</p> <p>No alternative design(s) that would avoid / reduce the identified impacts on the landscape or be more visually compatible with the surrounding setting is provided / examined in the LVIA.</p>

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N72	Solid mitigation measures that are practical and viable to implement rather than design intent should be proposed.	EIAO GN No. 8/2010 3.8(b)	No	Mitigation Measures Table 11.10 Figures 11.9.1, 11.9.2	<p>The LVIA is based on incorrect assumptions.</p> <p>There is a lack of any evidentiary support for the effectiveness of the proposed mitigation measures. The proposed mitigation measures including preserving / retaining existing trees in-situ in Sub-Area 1 and transplanting TPis to Sub-Area 3 are not practical / viable to implement as there has been no apparent detailed consideration on the proposed housing development platform levels against the existing levels of the existing trees or the route to the receptor site for the trees to be transplanted (travelling through undulating land with change in elevation and dense existing vegetation which may be impacted) – no description or details are provided. There is also no apparent rationale given for felling some trees while retaining other adjacent trees.</p> <p>There is no identification of any Tree Protection Areas on any plan in the LVIA to protect the trees during the Site formation and Building construction.</p>
N73	<p>The agreement from relevant parties should be sought in respect of the responsibility of funding, implementation, management and maintenance of the proposed mitigation measures prior to their inclusion into the LVIA. It should be noted that any “grey” areas in these aspects would affect the implementation and/or the effectiveness of the mitigation measures during the operation phase.</p> <p>Unless these issues have been resolved, the effects of these mitigation measures should be discounted in the LVIA.</p>	EIAO GN No. 8/2010 3.8(c)	No	Mitigation Measures Table 11.10	<p>The LVIA is based on incorrect assumptions and does not provide sufficient details.</p> <p>In the EIA LVIA Mitigation Measures Table 11.10 under both the ‘Management Agency’ and ‘Maintenance Agency’ for the Operation Phase – OM1 (Landscape Treatment in Sub-areas 2-4) and OM4 (Compensatory Tree Planting):</p> <p><i>Proposed usage of Sub-areas 2-4 has not been confirmed yet, the proposed maintenance party is subject to further confirmation.</i></p> <p>So therefore the 2 MMs (OM1 and OM4) must both be discounted and not included in the LVIA.</p>

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N74	Project boundaries should be clearly indicated on all scaled plans including mitigation plans, which can indicate any off-site mitigation measures. Land matters arising from such measures should be fully resolved prior to inclusion of any off-site mitigation measures into the LVIA. In addition, the locations and types of VSRs should also be annotated on mitigation plans to facilitate assessment of residual impacts.	EIAO GN No. 8/2010 3.8(d)	No		The LVIA does not provide sufficient details. No off-site mitigation measures have been identified in the EIA. VSRs are not annotated on mitigation plans to facilitate assessment of residual impacts.
N75	In addressing environmental monitoring and audit, a schedule should be prepared to show the implementation details and the parties responsible for all the mitigation measures from design stage to operation stage.	EIAO GN No. 8/2010 3.8(e)	No	EM&A Manual Section 13 Table 13.2	The LVIA does not provide sufficient details. Only vague implementation details are provided. The schedule shows the funding, implementation, management and maintenance agencies but the 2 MMs (OM1 and OM4) must both be discounted and not included in the LVIA as: <i>Proposed usage of Sub-areas 2-4 has not been confirmed yet, the proposed maintenance party is subject to further confirmation.</i> No practical programme and funding proposal for the implementation, management and maintenance of all the recommendation measures, and the parties responsible for all the mitigation measures from design stage to operation stage is provided.
N76	A practical programme for implementation of the recommended mitigation measures shall be worked out to ensure timely completion of the mitigation measures.	EIAO GN No. 8/2010 3.8(f)	No	Section 11.10 Table 11.10	The LVIA does not provide sufficient details. There is no programme provided for implementation of the recommended mitigation measures.

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N77	<p>Noise Barriers / Enclosures</p> <p>(a) Given the fact that using noise barriers/enclosures as a means to reduce adverse noise impact have their own impact on the visual amenity, they should not be widely adopted as the only way to reduce traffic noise. Alternative ways for mitigation and good environmental land-use transport planning should firstly be explored.</p> <p>(b) The choice of colours, design and materials of the noise barriers/enclosures should be compatible with the surrounding buildings and development context.</p> <p>(c) If there is insufficient space to screen the noise mitigation structures by design features, integrating with boundary walls, or landscape plantings, efforts should be made in the design of the overall form and surface treatment of the structures to make them to become features of aesthetic value in order to give character to the area.</p> <p>(d) To ensure good and innovative design, it is advisable to seek early advice from the ACABAS and agreement with relevant implementation and maintenance departments.</p>	EIAO GN No. 8/2010 3.9	N.A.		
N78	<p>Presentation Materials</p> <p>(a) All illustration materials should be clearly annotated to facilitate understanding of the LVIA.</p> <p>(b) Colour photos should be used to show special landscape elements, LCAs, key views and VSRs.</p>	EIAO GN No. 8/2010 3.10	No		<p>The LVIA does not provide sufficient details.</p> <p>No elevations are provided at all and no meaningful cross section drawings are included to clearly convey the findings of the LVIA or the proposed Mitigation Measures within the PDA, especially to show the landscape impact on the trees to be retained in-situ within Sub-Area 1.</p>

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	<p>(c) Mapping of landscape impacts and visual impacts should be made in colour.</p> <p>(d) If possible, computer-generated photomontages should be prepared to illustrate LVIA and the mitigation effects. In preparing the photomontage from key viewpoints, the following should be considered :</p> <ul style="list-style-type: none"> • where necessary, it shall include photomontages to illustrate the effect of the proposed mitigation measures at close range, • the main associated features of the DP such as viaducts, retaining structures, noise barriers, catenary system, tunnel portals, vent shafts, cuttings, embankments, lighting poles and associated buildings, etc as in the case of road project should be reflected in the photomontages, • viewpoints shall be taken at practical human eye level and at representative locations, • the overall impact of the DP on the adjacent setting should be shown, and • photomontages shall be presented at a minimum of A4 size. <p>(e) graphics shall be in a common format compatible with desktop computers.. In addition, technical details such as system set-up, software, data files and functions in preparing the illustrations shall be recorded as these may need to be submitted for</p>				<p>The information portrayed in general is very rudimentary and insufficient to be able to interpret, analyse and interrogate the findings of the LVIA, especially the feasibility / practicality of the proposed retention of existing trees within Sub-Area 1 as well as the tree transplanting proposals, which appear not feasible according to industry standards.</p> <p>There is no evidence / details presented to support the practicality or feasibility for the retention of 11 TPIs located within the proposed housing development in Sub-Area 1.</p>

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	<p>verification of the accuracy of the illustrations.</p> <p>(f) Other illustrative materials shall be legible and of suitable sizes, preferably no larger than A3 size, can be used to supplement photomontages to facilitate easy understanding of the DP by the public:</p> <ul style="list-style-type: none"> • oblique and aerial photographs showing the general setting of DP in relation to the surrounding setting, • plans, cross-sections and elevations showing important details of the DP, and physical models and computer-aided drawings. 				
N79	<p>The conclusion should briefly recap the impacts of the DP. Any localised areas where the residual impacts remain significantly adverse after exhaustive mitigations should be clearly highlighted and the justifications for accepting such cases should be put forward.</p>	EIAO GN No. 8/2010 3.11(a)	No	Section 11.14	<p>The LVIA does not provide sufficient details.</p> <p>The LVIA failed to correctly identify the residual adverse impacts of Substantial Significance on LR1.2, LR2 (which together cover ~67% of Sub-Area 1) and LCA1 (which covers 100% of Sub-Area 1).</p> <p>There is no overall conclusion / acceptability on landscape impacts with reference to the five criteria listed in Annex 10 of the EIAO TM – ‘<i>considered acceptable</i>’ etc included in the conclusion of the LVIA in Section 11.14 – The correct objective conclusion of the LIA should be that the landscape impacts are ‘Unacceptable’ in accordance with the five criteria in EIAO TM Annex 10.</p> <p>The EIA consultant has had 2.5 years to prepare the LIA which is ample time to undertake accurate detailed site surveys, identify development options, identify the potential sources of impacts predict the adverse impacts and prepare and present detailed proposals to mitigate</p>

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					<p>those impacts yet, there is inadequate information on the proposed housing development, numerous significant errors and omissions in the baseline survey information, no detailed critical analysis of potential impacts of alternative construction options, and no evidentiary support for the practicality of the proposed landscape mitigation measures.</p> <p>The LVIA contains numerous significant errors and omissions in the baseline survey and identification of sensitivities to change; significant errors and omissions in the identification of sources of impact and magnitude of change; lack of any evidentiary support for the effectiveness of the proposed mitigation measures; and numerous significant errors, omissions, and deficiencies in the assessment methodology which mean that, most critically, if the baseline survey and assessment had been conducted correctly / objectively.</p> <p>There may be a lot more missing trees and more inaccuracies in tree measurements and data etc that we have been unable to identify / check via an independent checker within the short time available during the EIA public comments period.</p>
N80	All mitigation measures should be summarised and a comparison with quantification should be made on the net gain/loss of landscape resources affected by the DP.	EIAO GN No. 8/2010 3.11(b)	No	Mitigation Measures Table 11.10	<p>The LVIA does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>The area loss of LRs affected by the proposed housing development and mitigation measure areas are not quantified or compared to the original area, only the number of trees proposed to be removed is quantified in the summary.</p>

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					<p>The permanent irreversible loss of 100+ year old trees and woodland landscape cannot be adequately compensated by compensatory planting at either ‘Day 1’ or ‘Year 10’.</p> <p>The area of direct physical impact due to the proposed housing development and mitigation measure areas to some LRs are under-estimated (e.g. LRs 1.1 and 1.2) in Section 11.9.1. There are errors in the measurement of the affected areas of LRs, LR1.1 and LR1.2 mapped on Figure 11.2. Sec 11.9.1.2 states, for LR1.1, ‘Total area affected is approximately 0.13 ha’ whereas 0.15 ha is measured on Figure 11.2. Similarly, Sec11.9.1.3 states, for LR1.2, ‘Approximately 8% (2.82ha) will be lost due to site formation and construction of the proposed public housing development and infrastructure works’ whereas 3.09 ha is measured on Figure 11.2.</p>
N81	The impacts on individual LCAs or VSRs should be clearly stated as to how they are synthesized to arrive at the overall impact of the DP.	EIAO GN No. 8/2010 3.11(c)	No		<p>The LVIA is based on incorrect assumptions.</p> <p>The scale and magnitude of the impacts described are minimal, as it was not based on correct assumptions, as the baseline study had also not correctly identified the quality of the existing landscape.</p>
N82	LVIA Conclusion	SB 3.4.11, SB Appendix J, EIAO TM, EIAO GN No. 8/2010	No		<p>The LVIA is based on incorrect assumptions, does not provide sufficient details and is not supported by adequate data and evidence.</p> <p>Taking all of the above points into account, to conclude and summarise, the Technical Review revealed that the LIA does not follow correctly, nor satisfy numerous requirements of, the Environmental Impact Assessment Study Brief (SB), Environmental Impact Assessment Ordinance Technical Memorandum (EIAO TM) and EIAO Guidance Note 8/2010 (EIAO GN 8/2010) and as a result, the findings and conclusions of the LIA are</p>

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					<p>objectively unsustainable and therefore they should be rejected and dismissed.</p> <p>The LIA contains numerous significant errors and omissions in the baseline survey and identification of sensitivities to change (e.g., fails to identify the unique, cultural, historic and nationally important nature of the Old Course recreational grassland, and associated unique landscape character comprising a matrix of grassland, ancient lowland secondary woodland, undulating topography and hydrology in the Potential Development Area (PDA); significant errors and omissions in the identification of sources of impact and magnitude of change (e.g., serious underestimation of impacts on the Trees of Particular Interest (TPIs), secondary woodland, grassland and landscape character); lack of any evidentiary support for the effectiveness of the proposed mitigation measures (e.g., tree preservation, tree transplanting, and compensatory tree planting, of which the latter actually exacerbates adverse impacts); and numerous significant errors, omissions, and deficiencies in the assessment methodology which mean that, most critically, if the baseline survey and assessment had been conducted correctly and objectively in accordance with the methodology set out in the SB, EIAO TM and EIAO GN8/2010, the assessment should have identified five Adverse Landscape Impacts of Substantial Significance, none of which can be adequately mitigated, which, in turn, means that the correct objective conclusion of the assessment, in accordance with the five criteria in EIAO TM Annex 10, should be that the landscape impacts are ‘Unacceptable’.</p>

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					<p>The Technical Review also revealed that the EIA consultant has apparently failed to advise CEDD of the procedures laid down in DEVB TC(W) 5/2020 requiring submission of details of potentially registrable Old and Valuable Trees (OVTs) to the GLTMS and furthermore, that if the correct procedure is followed, there is high likelihood that identification of the presence in Sub-Area 1 of 70 potentially registrable OVTs effectively precludes the development of Sub-Area 1 as a public housing development, since removal of living OVTs is prohibited.</p> <p>See Submission Appendix 3.4 and Submission Sec 2.2.</p>
Impact on Cultural Heritage: EIA Sec 12					See Submission Section 2.3 and Appendix 3.3, 3.5.
O1	(xi) potential cultural heritage impacts, in particular impacts on built heritage including whole of FGC (Item N340), Fanling Lodge, Clubhouse of The Hong Kong Golf Club Fanling Golf Course, Half-way House of The Hong Kong Golf Club Fanling Golf Course, and No. 5 Ng Uk Tsuen, as well as graves, due to the Project;	SB 3.2.1 (xi)	No	Section 12 Table 3	<p>No assessment of heritage value of the whole of FGC (New item N340) is conducted.</p> <p>Para. 12.5.5.1 of the EIA report stated that impact to FGC is subject to “further assessment pending to the grading of the golf course conducted by AAB.”, and therefore no impact assessment to FGC is conducted. As such, no mitigation measures to the whole of FGC are proposed in the EIA.</p> <p>However, for scientifically uncertain elements, the precautionary principle should apply, and immediate protective measures are required.</p>
O2	The assessment area for the cultural heritage impact assessment shall be defined by a distance of 500 metres from the boundary of the Project area. The cultural heritage impact assessment shall include a Built Heritage Impact Assessment (BHIA) and an Archaeological Impact Assessment (AIA) for the construction and operation of the Project. Based on the latest	SB 3.4.12.2	No	12.3.2.1 and 12.3.2.3	<p>The following technical requirements given in Appendix K of the EIA have not been addressed:</p> <ul style="list-style-type: none"> – The impacts on historic buildings and structures, including impacts on feng shui, potential settlement and change of water table. – Assessment of impacts of cultural heritage based on the EIAO TM Annex 18.

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	scope and information of the Project, the Applicant shall make reference to the detailed technical requirements given in Appendix K of this EIA Study Brief and submit a methodology statement to provide with justifications the scope, approach and methodology to be adopted in the BHIA and AIA for the agreement of the Director prior to the commencement of assessment.				<p>– Recommendation of practicable mitigation measures and monitoring with detailed implementation agent and period.</p> <p>The whole integral part of FGC, which falls within 500m from the boundary of Project Area, has not been assessed according to the required scope. Other nearby areas within 500m from the boundary, such as Tai Lung Experimental Farm and Chan Uk Po, have not received any coverage in cultural heritage assessment.</p>
O3	<p>Built heritage impact assessment (BHIA)</p> <p>The Applicant shall conduct a built heritage impact assessment (BHIA), taking the results of the previous studies and other background of the site into account, to identify known and unknown built heritage items within the assessment area that may be affected by the Project and its associated works and to assess the direct and indirect impacts on built heritage items. The impacts include visual impacts, impacts on the feng shui/visual corridor of the historic buildings and structures through change of water-table, vibration caused by the Project. Assessment of impacts on cultural heritage shall also take full account of, and allow where appropriate, the Guidelines for Landscape and Visual Impact Assessment of Annex 18 of the TM. The Applicant shall demonstrate that all reasonable efforts have been made to avoid or keep the adverse impacts of built heritage items to the minimum through modification of design of the Project, or use of latest construction/engineering techniques. For those built heritage items that may still be directly and indirectly affected by</p>	SB Appendix K 1	No	Section 12 Table 3	<p>A checklist of graded and non-graded structures was created, but their values were not assessed on their full potential. Regarding the graded items, value assessment was done by heavily relying on AAB/AMO’s documents, with a focus on historic and architectural value only. According to the grading assessment criteria of Hong Kong’s heritage designation system, social value, group value, rarity and authenticity, have to be considered as well. Instead of only including a historic and architectural appraisal in the table, it is necessary to evaluate other values of heritage assets with reference to geographical, historical, archaeological, ethnographical and other cultural data (as specified in EIAO TM Annex 19 2.4).</p> <p>For the non-graded structures, the checklist only provided photographs and basic descriptions to the heritage assets, without the provisions of any value assessment. The absence of value assessment for these features will result in a lack of foundation for the impact assessment and thus for the mitigation measures proposal.</p> <p>The impact assessment and mitigation measures are based on incorrect assumptions. On table 3, it is mentioned that “If the golf course is recognised as a heritage site and</p>

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	the Project, the Applicant shall recommend practicable mitigation measures and monitoring to avoid or keep the adverse impacts to the minimum. A checklist including all the affected sites of cultural heritage, impacts identified, recommended mitigation measures as well as the implementation agent and period shall also be included in the EIA report.				<p>development goes ahead within the Old Course, direct impacts are expected.” The notion behind is that if the golf course is not recognised by the Antiquities Advisory Board (AAB), direct impact might not be expected. However, the duty of value assessment should lie upon the preparator of the EIA who initiates the project. Also, it is a wrong assumption that the heritage grading means value, and that no grading implies no heritage significance. EIA Report should conduct its independent value assessment on each heritage items identified, as per the requirements under the SB.</p> <p>SB Appendix K1 mentioned that the impact evaluation should include “visual impacts, impacts on the feng shui /visual corridor of the historic buildings and structures through change of water table, vibration caused by the Project”. The cultural heritage impact assessment completely missed out the requirements on settlement, the change of water table to the Clubhouse (Grade II) and feng shui as stated as requirements under the SB.</p>
O4	Archaeological impact assessment (AIA) The Applicant shall engage qualified archaeologist(s) to conduct an archaeological impact assessment (AIA), taking the results of previous studies and other background of the site into account, to evaluate the archaeological impacts imposed by the Project and its associated works. The scope of the AIA baseline study consisting of desk-top research and field evaluation (if found necessary), shall be submitted to the Director prior to the commencement of the assessment for consideration. In case the existing information is inadequate or where the assessment area has not been adequately studied before, the	SB Appendix K 2	No	12.6.5.2	<p>The data currently used for archaeological assessment is not up-to-date.</p> <p>The statement in the EIA report “Will engage archaeologist and conduct an AIA after taking back the 32 ha FGC-PD area” demonstrates the lack of necessary information at time of preparation of this EIA.</p> <p>For scientifically uncertain elements, in this case the archaeological findings, the precautionary principle should apply and immediate protective measures are required.</p>

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	<p>archaeologists shall conduct archaeological survey to assemble data. The archaeologists shall obtain licenses from the Antiquities Authority prior to the commencement of archaeological survey.</p> <p>Based on existing and collected data, the Applicant shall evaluate whether the proposed developments and works associated with the Project are acceptable from archaeological preservation point of view. In case adverse impacts on archaeological heritage cannot be avoided, appropriate mitigation measures should be designed and recommended in the EIA report. If archaeological survey is required, it shall follow detailed technical requirements to be given by the Director on archaeological survey, archaeological report and handling of archaeological finds and archives.</p>				
O5	<p>(c) whether the assessment methodologies adopted in the EIA report are consistent with the methodologies set out in Annexes 12 to 19 inclusive and with the general principles laid down in Section 4.3, and whether the evaluation of the predicted impacts are consistent with the criteria listed in Annexes 4 to 10 inclusive. Where specific methodologies are not listed in the annexes or where the methodologies for certain issues can only be established on a case-by-case basis, the Director will assess whether the proposed methodologies are consistent with the methodologies adopted for Hong Kong projects having similar issues or with</p>	EIAO TM 4.4.2 (c)	No	Entire Section 12	<p>Procedural</p> <p>The mitigation solutions proposed are not supported by adequate data and evidence. According to the Methodologies for Assessment listed in EIAO TM 4.3.1, the general procedure in assessment should be “Description – Impact Prediction – Impact Evaluation – Impact Mitigation”. Putting the assessment into cultural heritage context, the procedure would be “Attribute Identification & Mapping – Value Assessment – Impact Assessment (Prediction & Evaluation) – Mitigation”, in which all impact evaluation and mitigation proposals have to be based on attribute mapping and value assessment. However, no section in the EIA report was dedicated to the value assessment of cultural heritage elements. Without a foundation on value of elements, impact assessment could not be conducted, and thereby</p>

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	methodologies accepted by recognised national/international organisations;				<p>mitigation measures would not directly address the affected cultural heritage elements.</p> <p>Assumptions (Category of Heritage) The assumptions employed in the EIA report for cultural heritage are wrong. Although some graded and non-graded built heritage items were mapped out, the assessment of these items has not taken into account the relevant documents on the accurate heritage category: cultural landscape. As cultural landscape is the most appropriate category to assess the Fanling Golf Course as a designed landscape, the ignorance to this concept would create a wrong basis for further value and impact assessment.</p> <p>Impact Assessment Scope Requirements on the scope of impact assessment as listed on EIAO TM 4.3 were not complied with. The impact assessment should consider cumulative impact and synergised impact apart from direct impact (EIAO TM 4.3.1 (b) (v) -examining the chain of events or ‘pathways’ linking cause with effect rather than only considering the direct and indirect effect.</p>
O6	<p>Whether the assessment methodologies adopted the latest development in methods and techniques?</p> <p>“the concept of a historic monument embraces not only the single architectural work but also the urban or rural setting in which is found the evidence of a particular civilization, a significant development or a historic event” (The Venice Charter Article 1, 1964)</p>	EIAO TM Annex 19 1.1, Venice Charter Article 1	No	12.3.2.4	<p>EIA did not mention anything on Venice Charter, which failed to address the “commonly adopted approaches and methodologies for assessment of impact on sites of cultural heritage and other environmental issues”.</p> <p>The assessment methodologies adopted were not the latest and most common methods and techniques for heritage impact assessment. The EPD website (https://www.epd.gov.hk/epd/english/laws_regulations/laws_maincontent.html) refers the general public and trades to the Convention Concerning the Protection of the</p>

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	<p>“For the purpose of this Convention, the following shall be considered as "cultural heritage": sites: works of man or the combined works of nature and man, and areas including archaeological sites which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view.” (Convention Concerning the Protection of the World Cultural and Natural Heritage, 1972)</p> <p>“Cultural landscapes inscribed on the World Heritage List are cultural properties and represent the “combined works of nature and of man” designated in Article 1 of the Convention. They are illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both external and internal.”</p> <p>“The most easily identifiable is the clearly defined landscape designed and created intentionally by people. This embraces garden and parkland landscapes constructed for aesthetic reasons which are often (but not always) associated with religious or other monumental buildings and ensembles.”</p>	<p>Convention Concerning the Protection of the World Cultural and Natural Heritage, Article 1</p> <p>Operational Guidelines for the Implementation of the World Heritage Convention, Article 47, 2021 version</p> <p>Operational Guidelines for the Implementation of the World Heritage Convention, Article 47bis, 2021 version</p>			<p>World Cultural and Natural Heritage (1972), specifying its applicability to the environmental practice of Hong Kong. Article 1 of the Convention clearly stated that “works of man or the combined works of nature and man ... Which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view” could be considered as cultural heritage. It is further supplemented by the Operational Guidelines of the Convention that “Cultural landscapes inscribed on the World Heritage List are cultural properties and represent the “combined works of nature and of man” designated in Article 1 of the Convention”. As one guiding principle of international practice, the concept of cultural landscape should be considered in the EIA report. From EIA para. 12.3.2.6 of the EIA, “cultural landscape” is included in the category of assessed cultural heritage, but it was not covered throughout the entire report.</p> <p>The common internationally applicable guideline on heritage impact assessment is the ICOMOS’s Guidance on Heritage Impact Assessment for Cultural World Heritage Properties, which is a supplementary document to the execution of the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972). In the impact assessment matrix in the Guidelance, the identification of “Value of Heritage Asset” and the “Scale & Severity of Change/ Impact” are required for conducting an impact assessment. The EIA skipped the value assessment of heritage assets before assessing the impact level.</p>

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O7	<p>A baseline study shall be conducted</p> <p>a. to compile a comprehensive inventory of places, buildings, sites and structures of architectural, archaeological and historical value within the proposed project area</p> <p>Whether architectural, archaeological and historical value assessment has been done?</p>	EIAO TM Annex 19 2.2 (a)	No	12.6.5.2 and Appendix A & B	<p>“Currently, FGC is in operation with active golf activities. In consideration of safety of the public and the archaeologist for conducting the archaeological survey, it is proposed to conduct archaeological field survey after the land is handed over to the Project Proponent so as to obtain the most up-to-date findings for archaeological assessment.”</p> <p>This statement in the EIA report demonstrates the lack of data for fundamental assessment. Such survey data must be present for an evaluation.</p> <p>However, for scientifically uncertain elements, the precautionary principle should apply, and immediate protective measures are required.</p> <p>Value assessment for FGC is absent, waiting for AAB judgement (Sec 12.5.5.1).</p> <p>Value assessment for graded structures (historic and architectural value is mainly based on AMO appraisal; some items did not consider all relevant documents for assessment)</p> <p>Value assessment for non-graded structures (esp. clans) did not evaluate the historic and architectural values.</p>
O8	<p>The best information shall be assembled for the assessment of the identified sites of cultural heritage. The entry point shall be the Antiquities and Monuments Office, public libraries and archives and tertiary institutions. Currently the whole of FGC is pending grading assessment by AAB (Item N340).</p>	EIAO TM Annex 19 2.3	No	EIA Sec 12 Table 3	<p>The EIA acknowledges that FGC is pending grading by AAB but fails to propose any mitigation measures.</p> <p>AMO and AAB assessment is just the entry point of the study, where the consultant is responsible to assemble further materials to facilitate the understanding and value assessments of the cultural heritage. The sole reliance on grading process of AAB or other third party does not align with the original concept of conducting an EIA.</p>

(1) No.	(2) Question Item	(3) Statutory Requirement	(4) Is the EIAO TM and SB Fully Complied With?	(5) State Relevant EIA Section of EIA	(6) If “No”, Critique and Comment on EIA, EIAO TM and/or SB Non-compliances’
O9	<p>Does the EIA include the analysis and mitigation for the ethnography and cultural activities and meaning of the affected antiquities in the development area?</p> <p>The assessment shall provide detailed geographical, historical, archaeological, ethnographical and other cultural data. Published papers, records, archival and historical documents as well as oral legends shall also be consulted.</p>	EIAO TM Annex 19 2.4	No	12.5.3.2 and Description on Fig 12	<p>The cultural activities and meaning of ancestral worship were not mentioned. The ritual and traditional events of villagers that were carried out within the study boundary are not identified. Impact or risk on such cultural value is not discussed in the report.</p> <p>Mitigation measure proposed to reserve safe access to graves during construction, but did not address the ancestral practice and other events.</p>
O10	<p>Does the EIA include the analysis and mitigation for the cultural, societal, national values of FGC?</p> <p>The assessment shall provide detailed geographical, historical, archaeological, ethnographical and other cultural data. Published papers, records, archival and historical documents as well as oral legends shall also be consulted.</p>	EIAO TM Annex 19 2.4	No	12.4.2.1 2-12.4.2.1 3	The EIA just partially covered FGC’s cultural, societal and national values. HKO and FGC’s contribution on Golf generally covered, but FGC’s economic value, social support (employment, community and charitable contribution etc.) and alignment on National Policy is not mentioned. Its contribution to 2008 Beijing Olympics was not mentioned or assessed as well.
O11	<p>Assessment of impacts on sites of cultural heritage shall also take full account of, and follow where appropriate, the Guidelines for Landscape and Visual Impact Assessment at Annex 18.</p> <p>Landscape Impact Assessment Study Examples of special landscape features which may contribute to the landscape character of a site, an area or a region include:</p> <ul style="list-style-type: none"> – areas of distinctive landscape character: e.g. the "genius loci" or characteristics patterns and combinations of landform and land coverage creating a sense of place; 	EIAO TM Annex 19 2.9 EIAO TM Annex 18 6.2	No	Table 11.6	<p>Impact on Clubhouse may be underestimated. The distance between Clubhouse and the nearest proposed high rise building is approximately 110m, the sensitivity of viewers should be considered high instead of medium as stated in Table 11.6.</p> <p>FGC is not evaluated from the perspective of cultural heritage. EIAO TM Annex 18 6.2 states that landscape impact assessment shall assess “areas of distinctive landscape character: e.g. the "genius loci" or characteristics patterns and combinations of landform and land coverage creating a sense of place”, which is absent in the EIA report. “Genius loci” is an important concept in evaluating the relationship between tangibles and</p>

(1) No.	(2) Question Item	(3) Statutory Requirement	(4) Is the EIAO TM and SB Fully Complied With?	(5) State Relevant EIA Section of EIA	(6) If “No”, Critique and Comment on EIA, EIAO TM and/or SB Non-compliances’
	– other conservation interest: e.g. historic landscapes, sites or buildings of culture heritage				intangibles, and between culture and nature, which is also the key behind the concept of cultural landscape. Landscape features, like Tommy Tucker and unique playing rules developed based on FGC’s unique terrain were not considered in the assessment, although the name of the hole was mentioned once in the background introduction.
O12	A practical programme and funding proposal for the implementation of the recommended mitigation measures shall be included as part of the assessment if mitigation is needed.	EIAO TM Annex 19 2.14	No		No practical details for mitigation measures were provided. The information on who to implement, locations of measures, implementation schedule, standards for the measures (as required in SB Appendix L) are all outstanding. These can only be assessed when the building methodology is confirmed. There was no mention to cultural landscape of it. See Submission Appendix 3.3 and 3.5.
Environmental Monitoring and Audit Requirements: EIA Sec 13					See Submission Section 2.3.
P1	EM&A	SB 3.5	No	Nothing specific about HKO	The numerous EIAO TM and SB non-compliances, flaws, omissions and deficiencies identified in every section (Section 1-12) of the EIA make any commentary on the EM&A (Sec 13) meaningless.
Summary of Environmental Outcomes: EIA Sec 14					See Submission Section 2.3.
Q1	The EIA report shall contain a summary of key environmental outcomes arising from the EIA study, including estimated population protected from various environmental impacts, environmentally sensitive areas protected, environmentally friendly options considered and incorporated in the preferred option, environmental designs recommended (e.g. green roof, vertical greening), key	SB 3.6.1	No		The numerous EIAO TM and SB non-compliances, flaws, omissions and deficiencies identified in every section (Section 1-12) of the EIA make any commentary on the Summary of Environmental Outcomes (Sec 14) meaningless.

(1) No.	(2) Question Item	(3) Statutory Requirement	(4) Is the EIAO TM and SB Fully Complied With?	(5) State Relevant EIA Section of EIA	(6) If “No”, Critique and Comment on EIA, EIAO TM and/or SB Non-compliances’
	environmental problems avoided, compensation areas included and the environmental benefits of environmental protection measures recommended (e.g. reduction of heat island effect).				
Conclusion: EIA Sec 15					See Submission Section 2.2.
R1	(i) Environmental benefits and dis-benefits of different land use options and layout options under different development scenarios, design and construction methods of the Project with a view to deriving the preferred land use option(s) and layout option(s) that will avoid or minimize adverse environmental impact. Particular attention shall be given to the acceptability of the overall environmental performance of the Project and associated works at all stages of implementation and cumulative effects due to interfacing existing, committed and planned projects in the vicinity of the Project;	SB 3.2.1 (i)	No		<p>The numerous EIAO TM and SB non-compliances, flaws, omissions and deficiencies identified in every section (Section 1-12) of the EIA make any commentary on the Conclusion (Sec 15) meaningless.</p> <p>Further substantive errors in technical sections have substantive and adverse impact on the environment and community and on the whole EIA conclusions (Sec 15).</p>

Note [1] (Referenced to in L13)

Month	Day-time surveys conducted at site	Night-time surveys conducted at site	Month listed in the EIA Survey Programme*
November 2019	<i>No access arranged</i>	<i>No access arranged</i>	✓
December 2019	<i>No access arranged</i>	<i>No access arranged</i>	✓
January 2020	10 am to 5 pm	5 pm to 9 pm	✓
February 2020	Present but no	Present but no information	✓
March 2020	information on time of visit available	on time of visit available	✓
April 2020	10 am to 5 pm	5 pm to 11 pm	✓

May 2020	10 am to 5 pm	5 pm to 10 pm	✓
June 2020	10 am to 5 pm	5 pm to 10 pm	✓
July 2020	10 am to 5 pm	5 pm to 10 pm	✓
August 2020	10 am to 5 pm	5 pm to 10 pm	✓
September 2020	10 am to 5 pm	5 pm to 10 pm	✓
October 2020	10 am to 5 pm	5 pm to 10 pm	✓
November 2020	10 am to 5 pm	5 pm to 10 pm	✓
December 2020	No access arranged	No access arranged	✓

* Excluding surveys for ardeid flight path which were carried out off-s

Appendix 3.2 - NORTHERN METROPOLIS SUBMISSION BY FGC

Executive Summary:

FGC Support to the Northern Metropolis and Local and National Policies

The Environmental Oversight Committee of the Hong Kong Golf Club (HKGC) at Fanling (FGC) writes to support the Northern Metropolis' (NM) vision and wishes to assist in its successful implementation by its unique cultural and natural landscape, ecological conservation, living heritage, social values and public purpose recreation, sports, tourism and education contributions.

Located adjacent to the NM, currently, FGC serves many public purposes and preservation values which align with multiple local and National policy areas, such as "Construction of Ecological Civilization", Hong Kong's Environment Bureau's nature conservation, biodiversity strategy and plan alignment through its 110-year custodianship and meticulous management.

Established in 1911, FGC is the oldest golf course in China with numerous tangible and intangible heritage assets. It has witnessed the development of Hong Kong for over a century, and it is now part of the community having coexisted and collaborated with the indigenous villagers with respect of their cultures and traditions. In addition, FGC's cultural landscape and living heritage aligns with the Development Bureau's and the Antiquities and Monuments Office's stated tangible and intangible cultural heritage conservation policy objectives, and its historical building preservation aims are aligned to the Venice Charter (1964).

FGC also aligns with the Education Bureau's education and learning policy objectives and the three Home Affairs Bureau's sports policy objectives of fostering community sports, elite sports and HKSAR Golf Team development and the hosting of major international, regional and local sporting events.

HKGC is presently ranked 52nd by the Platinum Clubs of the World, which places it comfortably in the top 1% of all golf courses in the whole world. This remarkable Hong Kong success story statistic is not only matched by its attractiveness to golf professionals to play in Hong Kong's famous tournaments, described below, but also its attractiveness to keen amateur golfers and tourists from around the world to come to FGC to both spectate and play on this renowned, and truly world-class, internationally well known, and historic golf course.

FGC's Hong Kong Open, the city's oldest professional sporting event which has been held for more than 60 years, and the Hong Kong Ladies Open attract many well-known players and visitors, which are also supportive of the Commerce and Economic Development Bureau and the Hong Kong Tourism Board's tourism and eco-tourism policy objectives.

FGC provides local employment to more than 350 full time staff and can offer policy support, opportunities and jobs to NM in the future as it has to its surroundings for over a century. All FGC's policy-aligned contributions are delivered at no additional cost to HKSARG and risk free by FGC's proven management for significant and meaningful public purpose.

FGC's today provides public purpose use through extensive public access to its golf courses and night driving range, educational visits by multiple local schools and tertiary institutions for

teaching, organised sport, recreation and eco-recreation and learning. Additionally, from 6-10pm every day, FGC's Old Course serves the function as an informal flexible 'district nature park'. FGC can continue these multiple public purpose roles to contribute social value to the wider NM and its 1 million residents and workers in the future.

Further, FGC can also materially contribute an essential climate-friendly, North District cooling "green lung" and lowland forest with unique, local and internationally, protected biodiversity, rich ecological and heritage landscape. FGC holistically can also contribute valuable eco-recreational and educational green open space and ecosystem habitats and ecological corridors and Urban-Rural Greenway connectivity for future benefit of NM residents, workers and visitors, the wider HKSAR, Greater Bay Area and mainland China.

Utilising FGC's reserve allows continuity to achieve the multiple benefits from Ecological Civilization, in an intact cultural and natural landscape, providing recreation for residents, the economic, tourism and sporting benefits of international standard golf, all provided with the present efficient management at zero additional cost to the Government.

In conclusion, with FGC's close proximity to NM and the influx of around 1 million new NM residents, utilising FGC's unique and precious biodiversity, cultural landscape, living tangible and intangible heritage, and FGC's social values of education, sports, recreation, economic employment and tourism assets can meaningfully contribute to the successful implementation and complement and enhance the NM strategy.

15 March 2022

Mrs Carrie Lam Cheng Yuet Ngor
Chief Executive of the Hong Kong SAR
Office of The Chief Executive
Tamar, Hong Kong
Dear The Hon Mrs Lam,

Support for the Northern Metropolis Development Strategy

1. The Environmental Oversight Committee (*described in Appendix A*) of the Hong Kong Golf Club (HKGC) at Fanling (FGC) writes to express our appreciation of the HKSARG's vision in its unprecedented strategic planning North Metropolis (NM) Development Strategy. This shows the government's determination to provide housing and job opportunities in an appropriate metropolis' scale and seize the opportunity to deepen the cooperation with mainland China through its adjacent proximity.
2. Due to its location in the NM, we believe FGC can enhance and complement the visionary NM development, and this submission is organised to share how FGC can contribute to a successful implementation of the NM Strategy, for Hong Kong, the Greater Bay Area (GBA) and mainland China from:
 - its unique, holistic biodiversity and ecology of conservation values;
 - its cultural landscape, living heritage, history, and Feng Shui assets; and
 - its social value, public purpose and community contributions through FGC's education and sports assets to elevate FGC into an important territory-wide semi-community facility as a green recreation and tourism open space.

A: ECOLOGICAL CONSERVATION CONTRIBUTIONS

World-class Biodiversity Merits of FGC and How it can Contribute to the Local and National Ecological and Conservation Objectives

3. The NM Development Strategy suggests planning for an implementation of green open space for the strategic development areas. It is considered that FGC can proactively contribute to landscape ecology, the overall biodiversity and environmental capacity of NM through this enriched connectivity and enhanced ecological habitat network for the entire NM area.
4. Under no additional cost to HKSARG, FGC has been a well-managed sports, educational and recreational asset to Hong Kong, which is regulated while protecting a cultural and natural heritage landscape of National importance. FGC comprises a rare but fully functioning asset, that meets all the ecological and conservation objectives of the NM strategy, which states that efforts should be made to enhance the ecological value of ecologically sensitive areas, expand environmental capacity and preserve the integrity of strategic ecological corridors such as FGC within North District, and allows extended connectivity and the potential for enhanced corridors throughout the NM.
5. FGC comprises many protected and endangered faunal and floral species, and reverts to nature every evening upon darkness (*see Appendix B*). FGC's holistic connectivity to the

west of Fan Kam Road, and the streams and hills of Country Parks comprises ecological function of considerable value to Hong Kong.

6. FGC has thousands of rare and mature lowland secondary woodland trees, including the critically and internationally endangered Chinese Swamp Cypress, and about 400 potentially Old and Valuable Trees (OVTs), which would account for around half of Hong Kong's existing OVTs.
7. Under 110 years of custodianship and FGC's meticulous management, and at no additional cost to HKSARG, FGC comprises an important holistic lowland ecosystem, which is now rare and threatened in China and is greater than the sum of its parts.
8. FGC's rich biodiversity and ecological conservational assets (*see Appendix B*) can materially assist Hong Kong to support National policy objectives in addition to introducing ecological and biodiversity conservation into strategic decision making, planning and development. These also comprise part of the Convention on Biological Diversity international principles and are consistent with the HKSARG's 2016 Biodiversity Strategy and Action Plan Policy, given that FGC is already an efficiently managed asset that represents a unique mixture of biodiversity and heritage worthy of conservation. With its excellent and proven track record in ecological conservation, FGC helps carry out the "Construction of Ecological Civilization" National policy vision, which forms a cornerstone of the new era of the Constitution of China that was championed during COP15.

FGC's Contribution to Northern Metropolis' Implementation of a Proactive Conservation Policy to Create Environmental Capacity

9. Given FGC's green nature, it would be a complementary fit for NM's implementation of a proactive conservation policy. FGC can provide the necessary green open space and mature lowland woodland, as part of the NM's network of habitats planned and properly regulated both for conservation and recreation. FGC is also considered a climate-friendly "green lung" for the North District and Hong Kong. 45% of FGC is covered by woodland and approximately 95% comprises absorptive soft surfaces (grassland and mature woodland) that assist district drainage. The whole of FGC helps to cool the North District and combats the heat island effect as mentioned in peer reviewed international academic paper, in which it was calculated that FGC contributes 2–3-degrees Celsius cooling benefit for the North District (*Fung, K.W., Jim, C.Y. Assessing the cooling effects of different vegetation settings in a Hong Kong golf course. In Procedia Environmental Sciences, 2017, v. 37, p. 626-636*).
10. FGC comprises one of the largest green and proactively well managed areas in the NM, and FGC is also a tried and tested example where the current use under competent golf club management comprises the wisest use and protection of the land. FGC is a fully functioning and territory-wide "landmark" biodiversity and conservation asset, which meets the objectives of the NM Strategy and can complement and enhance its image as a metropolitan area.

FGC's Contribution to an Ecological Corridor for Northern Metropolis

11. The NM map shows the New Territories North Urban-Rural Greenway with the present line of wetland parks ending near Long Valley without connection by a corridor in the centre. Strategic NM planning can be enhanced by a connection marked to FGC and the other green areas, and hills to the south. FGC can contribute to NM's ecological habitat network policy,

linking up existing and proposed wetland parks to Long Valley and beyond as far as Wutong Shan in Shenzhen. Connectivity would create a comprehensive ecological habitat system stretching from west to east of the NM and beyond. Furthermore, FGC's high quality woodland represents a habitat otherwise missing from the NM.

12. FGC considers that the ecological plan shown on NM Development Strategy (*page 51*) should include FGC's comprehensive mature ecological habitats as it comprises a significant remnant area of lowland secondary woodland habitat. Inclusion would ensure that the golf course is preserved to best protect the surrounding hydraulic conditions and hydrology of FGC's internationally critically endangered indigenous Chinese Swamp Cypress grove (*see Appendix B*), within the cultural and natural landscape and biodiversity of National and international importance.

FGC's Contribution of Green Open Space and Enhanced Recreational Potential to Northern Metropolis and the New Territories North: Urban-Rural East West Greenway Policy

13. An enhanced East West Greenway, as proposed in the NM Development Strategy, can provide better public access through the existing habitat networks, via creative public and ecological connectivity. Utilising animal underpasses and public thoroughfares can connect a green link via FGC all the way from east to west across the NM, to facilitate the ecological, recreational and educational potential and connectivity of rare and remnant lowland habitats of Fanling, and Sheung Shui to the North District, and beyond into GBA.

FGC's Contribution Towards NM's Comprehensive Ecological Habitat Network

14. The green visions in NM enable existing green open space and mature remnant lowland woodlands to be conserved as part of the network of habitats planned and properly regulated for biodiversity conservation, education and active sports development and passive recreation. FGC is an essential habitat to add into the NM's Comprehensive Ecological Habitat Network. FGC is home to the most mature lowland forest habitat and heritage landscapes and green areas in the NM. FGC also comprises a remnant secondary lowland forest habitat for southern China and the GBA, which has been elsewhere lost to housing and infrastructure development.

FGC's Central Green Reserve Contribution to National Ecological Civilization and NM Policies

15. FGC comprises a key cultural and natural landscape required for creating part of Hong Kong's Ecological Civilization in the NM and GBA.
16. The success of the NM policy of having a comprehensive network of ecological habitats requires the FGC with its mature lowland forest habitat, and the success of the east to west Greenway policy will be greatly enhanced by including the attractive landscapes here.
17. Importantly, the NM is a much larger scale plan, requiring resumption to provide some 600 hectares for housing as a priority, and this scale of urbanisation demands at least one intact central green reserve, such as FGC already provides.
18. Utilising FGC's green reserve allows continuity and integrity to achieve the multiple benefits from Ecological Civilization, in an intact cultural and natural landscape, providing recreation for residents, and the economic, tourism and sporting benefits of international

standard golf. All this is provided with the present efficient FGC management, and can contribute such social values to complement and enhance the future NM.

FGC's Contribution to National Ecological Civilization Policies and Hong Kong's Climate Change Abatement Objectives

19. In the recent Policy Address, the Government has targeted carbon neutrality by 2050. Given the large number of trees and the continuously functioning ecological system and custodianship in FGC, the golf course can be a supportive force in achieving the objective of carbon neutrality, through sequestration of carbon from mature woodland and grassland.

B: LIVING HERITAGE CONTRIBUTION

FGC's Cultural and Historical Contribution to Northern Metropolis

20. In both cultural and historical perspectives, the history of FGC area shows the close co-existence of our ancestors and the natural environment. There are numerous graves and urns throughout FGC, with the earliest dating back to Ming Dynasty at around 460-year-old. These graves are still actively worshipped today and form part of the unique and intangible cultural heritage and community of Hong Kong's indigenous villagers (see Appendix C), as detailed in academic research by Patrick Hase and David Faure since the 1980s.
21. When FGC was built 110 years ago, it was intentionally designed to accommodate the natural environment to retain the original shape, undulating landform and existing heritage of the area, which makes FGC Hong Kong's highest value landscape (Planning Department, Landscape Value Mapping Study of Hong Kong, 2005), according to former Director of Lands, Patrick Lau, who believes FGC should be retained for future generations for this and its support to multiple policy objectives of HKSARG.
22. FGC is an old landscape and itself a living heritage, which has witnessed the history and development of Hong Kong and is still actively serving as a golf course today. The Old Course of FGC is the oldest golf course not only in Hong Kong and China, but also the second-oldest course in Asia, after the Royal Calcutta Golf Club's course in India.
23. In addition, FGC's heritage cluster includes three graded historical buildings, namely the Grade I listed Fanling Lodge (1934), Grade II listed Clubhouse (1914), and Grade III listed Halfway House (1916). Protection of these tangible heritage resources and environs is required by the International Charter for the Conservation and Restoration of Monuments and Sites (The Venice Charter 1964). Their assimilation into NM would accord with the need for protection for the buildings in their settings and their surroundings into perpetuity.

The Historic Bonding between FGC, Indigenous Villagers and the Potential Bonding with the Future Northern Metropolis

24. The earliest record of local villages in the Fanling area where the FGC is located is the Xin'an Gazetteer 1688 edition. There were 6 villages and clans that lived at close proximity to FGC's present location, according to the Gazetteer (*see Appendix C for the list of indigenous villages listed in Xin'an Gazetteer 1688 and 1819 edition*). Among the 6 villages, the Liu Clan lived at the eastern boundary of the present FGC in Ping Kong Village. The villagers used the undulating FGC area in the past as their ancestors' place for burial given the good Feng Shui value there, and ancestral worship in FGC still routinely takes place.

FGC coexists with the indigenous villagers and later the residents in Sheung Shui new town peacefully throughout the past 110 years. It showcases the example of rural-urban coexistence in Hong Kong history.

25. Indeed, the Antiquities Advisory Board is currently assessing the whole FGC as a graded historical cluster given that FGC comprising of many historical buildings and their unique cultural landscape surroundings from the past century. Given this rich historical background and cultural and ancestral traditions of the nearby communities, it is considered that holistically FGC can complement and enhance the tangible and intangible cultural heritage of the NM, as a heritage asset of Hong Kong.

Contribution of FGC's Intangible Cultural Heritage to Enhance Northern Metropolis

26. Historically, FGC has hosted the same professional tournament, the Hong Kong Open (HKO), continuously for over 60 years (since 1959), making it Hong Kong's oldest professional sports event, and has attracted world-renowned golfers like Rory McIlroy, Tom Watson, Peter Thomson and Justin Rose, who are past and proud HKO champions. Further, FGC uniquely hosted the equestrian cross country component of the 2008 Beijing Olympics, for the HKSAR, which with the HKO show how FGC has contributed to global scale events and boosted Hong Kong's reputation to an international audience as "Asia's World City". With these historical and sporting values already in place, FGC, as a world-class tournament venue, can continue to make meaningful contributions to the North District and the enhancement of the NM and Hong Kong's international reputation.

C: FGC's SOCIAL VALUE CONTRIBUTIONS: RECREATION, SPORTS, EDUCATION, TOURISM AND CHARITY

An Introduction to FGC's Contribution to Social Value

27. FGC contribution to social value and its public purpose role comprises its support for HKSARG's sports, education, recreation, tourism, employment and economic development policy objectives, and in its support to Hong Kong's under privileged and grassroots citizens and charitable institutions.
28. In addition to FGC's above usefulness to society, as described in the previous sections of this submission, FGC's 110-year custodianship and meticulous management of FGC has also afforded protection to the unique biodiversity, living heritage and history aligned with HKSARG's environmental, biodiversity, landscape, cultural and living heritage policy objectives, which also contribute to FGC's wider social value and public purpose contribution, described in the sections below, and, which can complement and enhance the government's future NM vision.

FGC's Contribution to Organised Recreation for NM

29. The NM Development Strategy has explicitly mentioned NM would be developed into "a liveable metropolis where industrial and ecological spaces are interlinked." There will be a 1 million person growth of the residential and working population in the NM. There is a present dearth of organised recreation in NM, but this objective can, in part, be assisted by the continued and enhanced wise recreation use of the FGC, which can enhance and complement the future NM.

High-Quality Outdoor Eco-Recreation Outlets

30. With its mature green open space, long history of recreation value and high landscape value, FGC would play a crucial role in providing quality outdoor eco-recreation/tourism outlets of high historic and landscape value (this makes high quality green open space of this maturity and heritage even more important), which benefits the community both locally and internationally. Because it includes a mature lowland forest habitat, FGC has considerable biodiversity which is protected with its conservation and environment management programme, accredited by Audubon International's Audubon Cooperative Sanctuary Program for Golf (ACSP) Certification (*described in Appendix A*). In addition, HKGC has been nominated as "World's Best Eco Friendly Golf Facility" by the World Golf Awards every year since 2020. FGC, therefore, cost-effectively provides mature and 'ready-made' eco-recreation and education and rare habitats for NM. This can also allocate sufficient green and recreational space for NM residents and visitors, which can enrich people's lives and encourage a healthy lifestyle while avoiding damage, and, where desirable, enhancing and protecting history, cultural heritage, natural biodiversity and cultural landscape resources in perpetuity.

FGC's Use for Individual Public and Public Bodies' Golf, Recreation and Enjoyment

31. FGC has long been cooperating and integrating with the community, and non-members can play on the courses at FGC on weekdays throughout the year. The night-time driving range, where golfers practice, is open to the public every day of the year. Non-member play on the golf courses accounts for a considerable amount of total play. In 2021, 72,201 rounds of golf were enjoyed by non-members, which equates to approximately 40% of total play.
32. Importantly, the cost for the public to practice at FGC's night-time driving range at HK\$70/hour is cheaper than the driving range at the Jockey Club Kau Sai Chau Public Golf Course.
33. In addition, for many decades, FGC has hosted, promoted and fostered public and community golf, supported the Home Affairs Bureau's public sports development policy objectives and the Hong Kong Golf Association (HKGA) throughout the year by welcoming numerous eligible outside public bodies, non-member and non-profit groups, including Sheung Shui District Rural Committee, the Hong Kong Police and many eligible golf societies.
34. FGC has also always had a significant role in the development of young and under privileged golfers from grassroots families, and is continually enhancing its public purpose and social value contributions, which are described later in this submission.
35. Beyond golf, FGC's Old Course is open for public access from 6-10pm every day serving the function as an informal 'district nature park' for families (and their dogs on leads) to enjoy a sunset walk recreation. It can continue and expand this role to the wider NM in the future.

FGC Contribution to Professional Golf, Tourism and Eco-tourism Outlets and NM

36. At professional level, FGC supports the Home Affairs Bureau's elite (professional) sports development and events' policy objectives, as FGC is the training base for the HKGA's national amateur teams (male and female, juniors and adults) and hosts the overwhelming

majority of national and international amateur golf tournaments in Hong Kong with free of charge green fees. FGC is an extremely well utilised, world-class, sports facility that can enhance and benefit the NM, the North District and Hong Kong. Tiffany Chan, who represented Hong Kong at the 2016 and 2020 Olympics, developed her game at FGC since childhood and continues to play and practice at FGC when not participating in professional events overseas.

37. The Hong Kong Open (HKO), a world-class yearly international Professional Golf Association (PGA) tournament, co-sanctioned by both the Asian and European Tour, and recognised around the world, attracts world-famous professional golfers and celebrities to Hong Kong, and approximately 50,000 local and overseas spectators each year. HKO generates around HKD\$440 million in direct and indirect income for Hong Kong and is broadcast to over 400 million households globally. Through the HKO, the Hong Kong Ladies Open and numerous other tournaments held throughout the year, FGC supports the Home Affairs Bureau's international, regional and local sporting events calendar development policy objectives. Further, the hosting of such renowned international tournaments supports both the Commerce and Economic Development Bureau and the Hong Kong Tourism Board's tourism policy objectives.
38. There are estimated to be around 40,000 golf courses in the world today, and HKGC is presently ranked 52nd by the Platinum Clubs of the World, which places it comfortably in the top 1% of all golf courses in the whole world. This remarkable Hong Kong success story statistic is not only matched by its attractiveness to golf professionals to play in Hong Kong's famous tournaments, but also its attractiveness to keen amateur golfers and tourists from around the world to come to FGC to both spectate and play on this renowned, and truly world-class, internationally well known, and historic golf course.
39. With FGC's close proximity to NM and the influx of around 1 million new NM residents, FGC's education, recreation and local sports policy and international sports events' assets can complement and enhance the NM, North District, and the GBA.

FGC's Economic and Employment Contributions to Hong Kong, NM and Beyond

40. FGC has a long history of contributing value and public purpose to the community, and is one of the oldest and most sizeable private sector employers in the North District, and has been so for several generations since FGC was built. 70% of FGC's over 350 staff come from North District. FGC engages the services of over 350 regular caddies and utilises numerous suppliers and contractors in the North District area. FGC will continue this practice and the practice of recruiting staff from the nearby community and can provide a diverse range of job opportunities for the future NM.

FGC Contributions to Community Education to Hong Kong, NM and Beyond

41. FGC proudly takes part in and provides ecological and sports education to students from all over Hong Kong. Many schools and tertiary education institutes (including Hong Kong University and the Vocational Training Council) currently use FGC for social and public purposes, and partake in ecological tours on the Old Course which highlight the rich biodiversity of FGC and provide an education of Hong Kong nature and environmental matters.

42. Locally, 10 neighbourhood schools are part of FGC's golf for schools programme, which provides golf tuition to children on a weekly basis, and also proudly works with organisations supporting both under privileged and grassroots citizens, as described later in this submission.
43. Further, FGC is planning to further expand and publicise the educational use for more schools, colleges and the public in the post-Covid period, and in future plans to attract even more school children and university students to experience its ecological, living heritage, sports and recreation, and educational/learning assets. In this regard, FGC has built a Butterfly Garden and has 33 beehives producing honey, which are also used for education and community outreach.

FGC Organised Community Tours, Outreach and Routine Open Days

44. FGC has invested in an internal team of outreach professionals and external consultants to both outreach to the community and to protect the delicate FGC environment and to allow the FGC to be used in tandem with golf/sports development to actively welcome the public to visit and partake in guided ecological, living heritage and history, and sports tours, which will be offered to the public.
45. FGC has also planned more formal routine community environmental, nature and sports themed Open Days, to showcase the FGC and the sport of golf and to acquaint the community with FGC's 110-year custodianship of the biodiversity and living landscape.
46. Looking forward, it is also believed FGC can assist NM further in the future with creative mega arts and culture events such as a hub for outdoor concerts and tourism and eco-tourism mentioned earlier in this NM submission.
47. Whilst these tours and outreach open days have been challenged by Covid restrictions for the last 2 years, it is intended for this to be expanded further going forwards, when Covid restrictions are lifted, to complement and enhance the NM.

FGC Contributions to Sports and Recreation to NM and Beyond

48. FGC proudly takes part in and provides ecological and sports education to students from Beyond golf, other sports activities, such as woodball, cross country running, and tree climbing, and the more conventional soccer and basketball, take place at FGC at no charge. The Old Course at FGC has been the venue for the Hong Kong Inter-School Cross Country Championships for 40 consecutive years. Other public users of the FGC include the Hong Kong Football Association, the Hong Kong Woodball Association and various local football clubs (including Ching Ho Football Club and North District Football Club) on the FGC-funded Multi-purpose Sports Court (MPSC) on FGC. We believe FGC is an ideal option to provide the necessary regional recreational areas for the future NM vision and are looking forward to continuing the role for the NM as a livable metropolis and a prosperous, healthy community.

FGC Social Value Contributions to Under Privileged and Grassroot Citizens, and Local Charities

49. FGC has been proudly cooperating with Lok Kwan Social Services, which sees 1,000 children and families visit FGC per year to learn about both golf and ecology as part of a HK\$6.12 million programme. The programme also sees the Club fund tutorials and extra-curricular classes for 440 children from “grassroots” families, and those with individual needs. 96 of programme participants who develop further interest in golf have the opportunity to receive advanced training with the aim to nurture future talented golfers. Additionally, the Club provides professional golf training to 60 children from the InspiringHK Sports Foundation per week. InspiringHK is a local charity founded in 2012 which has the vision of developing young people through sports, promoting social mobility, gender equality, social inclusion and a healthy lifestyle.
50. Throughout its history FGC has been a popular venue for charitable events like golf days, marathons and walkathons that today raises approximately HK\$30 million in a year, serving charities including The Community Chest, Po Leung Kuk, Pok Oi Hospital, the North District Hospital, and many others.

Conclusions: FGC’s Enhanced Social Value, Public Purpose and Community Benefit to NM

51. In the NM Strategy, the Government stressed the importance of formulating and implementing a proactive conservation policy. It has taken the Long Valley Nature Park as an example of restoration and proactive conservation of the natural ecology. Indeed, with the custodianship and active management for sports, recreation and education under the stewardship of Hong Kong Golf Club, FGC can actively and readily contribute to the HKSAR’s biodiversity conservation and recreation plans for NM in terms of immediately providing more green open, recreational and sports development spaces, as an actively functioning green lung, climate-friendly, district cooling space in North District.
52. FGC also has rich cultural and historical value and is a living heritage in the North District with a deep connection to the nearby community. Utilising FGC’s reserve allows continuity and integrity to achieve the multiple benefits from Ecological Civilization, in an intact cultural and natural landscape, providing recreation for residents, the economic, tourism and sporting benefits of world-class golf, all provided with the present efficient management at zero additional cost to the Government, so it can give the public the multiple purposes currently enjoyed, and with a vision that it will be appreciated even more in the future when the NM is established.
53. FGC’s 110-year custodianship and meticulous management of FGC has also afforded protection to the unique biodiversity, living heritage and history aligned with HKSARG’s environmental, biodiversity, landscape, cultural and living heritage policy objectives.
54. HKGC is presently ranked 52nd by the Platinum Clubs of the World, which places it comfortably in the top 1% of all golf courses in the whole world. HKGC has also been nominated as “World’s Best Eco-Friendly Golf Facility” by the World Golf Awards every year since 2020. These remarkable Hong Kong success story statistics are not only matched by its attractiveness to golf professionals to play in Hong Kong’s famous tournaments, but also its attractiveness to keen amateur golfers and tourists from around the world to come to FGC to both spectate and play on this renowned, and truly world-class, internationally well known, and historic golf course.

55. With FGC's close proximity to NM and the influx of around 1 million new NM residents, utilising FGC's unique and precious biodiversity, cultural landscape, living tangible and intangible heritage, and FGC's social values of education, sports, recreation, economic employment and tourism assets can meaningfully contribute to the successful implementation and complement and enhance the NM strategy.

Yours sincerely,
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Annex A: FGC’s Environmental Oversight Committee (EOC) and FGC’s Certification for Audubon Cooperative Sanctuary Program for Golf (ACSP) Certification

The purpose of FGC’s Environmental Oversight Committee is to oversee the Club’s environmental and sustainability efforts, which includes the management of the rich ecology assets found at FGC, community outreach and habitat creation. These efforts have seen FGC recognised as one of the world’s most environmentally friendly golf courses. (HKGC has been nominated as “World’s Best Eco Friendly Golf Facility” by the World Golf Awards every year since 2020).

The EOC was set up as a requirement of the Audubon Cooperative Sanctuary Program for Golf (ACSP), an environmental education and certification programme that helps golf courses protect the environment, preserve the natural heritage of the game of golf, promote environmental sustainability and gain recognition for their efforts. Through collaborative efforts begun in 1991 with the United States Golf Association, membership in the ACSP has steadily grown to include approximately 2,000 golf courses in the United States and three dozen countries worldwide.

The “plan-do-check-act” approach of the ACSP mirrors that of other environmental management systems, but also includes certification, which the FGC applied for in 2016 and was awarded in 2020, as an incentive and reward for positive environmental actions and results.

Only around 2% of world golf courses have this ‘environmentally-friendly’ certification.

The ACSP assists each golf course member to determine its environmental resources and any potential liabilities, and then develop a plan that fits its unique setting, goals, staff, budget, and schedule. Audubon International provides information and guidance to help golf course personnel with six key environmental components:

- Site Assessment/Environmental Planning
- Wildlife and Habitat Management
- Chemical Use Reduction and Safety
- Water Conservation
- Water Quality Management
- Outreach and Education

FGC’s designation as a Certified Audubon Cooperative Sanctuary was awarded upon meeting environmental management standards in each area. FGC’s achievement of certification demonstrates its leadership, commitment, and high standards of environmental management.

Certification also provides an efficient way for FGC to work directly regarding our unique property while also providing guidance and motivation to take action on key environmental components and promote environmental sustainability.

FGC has developed and implements an environmental management plan and documents the results.

Recertification is required every three years to maintain the Certified Sanctuary designation.

The EOC has an independent Chairperson and includes FGC personnel, FGC members and non-members and international technical environmental experts and consultants. EOC's members are as follows:

- Ruy Barretto (Chairman)
- Professor Jim Chi-yung
- Dan Bradshaw
- Paul Leader
- Martin Hadaway
- Clarence Leung Wang-ching, BBS, JP
- Andy Kwok Wing-leung, JP
- Billy Lam Chung-lun, GBS, JP
- Dominique Boulet
- Bryant Lu Hing-yiu, JP
- Andrew Tsui Sau-yat
- Ian Gardner
- Darry Koster
- Prisca Tsui
- Alex Jenkins

Annex B: Biodiversity Assets of FGC

FGC has been acting as the custodian of this attractive landscape with its biodiversity. The mammals protected here include shy and endangered species including Leopard Cats, Masked Palm and Small Indian Civets, Barking Deer, Small-toothed Ferret-Badgers, and East Asian Porcupines all of which highly sensitive to human disturbance and increasing light levels. FGC has 40% of all non-flying mammal species in Hong Kong.

FGC has at least 10 foraging bat species and 40% of all bat species in Hong Kong, and many reptiles, including the Chinese Water Snake and the native Reeve's Turtle, comprising 24% of all land reptiles of Hong Kong and 40% of all 25 amphibian species.

FGC's Collared Crow, Brown Fish Owl, Eastern Cattle Egret feed on the fairways and rare lowland secondary woodlands; FGC has 29% of Hong Kong's bird species. FGC is also home to the protected Golden and Common Birdwing butterflies, the Common Rose and 46% of all Hong Kong butterfly species. Around 600 moth species, many of international/local concern and sensitive to increasing light, have been recorded at FGC. 29% of Hong Kong's dragonfly species, and 34 aquatic faunal species, including a rare, endemic Freshwater Crab (*Somanniathelphusa zanklon*) have also been recorded at FGC.

FGC's holistic connectivity to the west of Fan Kam Road and the streams and hills of Country Parks comprises ecological function of considerable value to Hong Kong.

FGC has thousands of rare and mature lowland secondary woodland trees, including the critically endangered Chinese Swamp Cypress, which FGC alone accounts for 20% of its world population, and about 400 potentially Old and Valuable Trees (OVTs) which would account for around half of Hong Kong's existing OVTs, as estimated by tree expert Professor CY Jim (Education University, Hong Kong).

FGC is a valuable mature lowland forest habitat. The thriving relict stand of Critically Endangered Chinese Swamp Cypress on the Old Course features trees of up to 212 years of age (Prof CY Jim, Education University, Hong Kong). This resource is well regulated with the awareness of protecting a cultural and natural landscape of National importance. This species is almost extinct in the wild in China, yet this grove is thriving and reproducing. The swamp and grove comprise the lowest lying area of the Old Course and represent a surviving part of ancient swamp forests, a landscape which in ancient times covered over a million square kilometres along the coasts of Southern China.

Finally, FGC is certified for Audubon Cooperative Sanctuary Program for Golf (ACSP) Certification (*described in Appendix A*), and has been nominated as "World's Best Eco Friendly Golf Facility" by the World Golf Awards every year since 2020.

Annex C List of Indigenous Villages Near FGC Listed in Xin'an Gazetteer 1688 and 1819 Edition

	Historic Village	Clan Groups	Location in relation to FGC	1688	1819
1	Ping Kong	Lius	By the east boundary of the old course of FGC	√	√
2	Tsiu Keng	Haus/Wongs/Chans/ Leis/Pangs/Loks/ Tangs/Wongs	About 1,000m south of FGC	√	√
3	Fanling	Pangs	About 1,280m northeast of FGC	√	√
4	Lung Yeuk Tau	Tangs	About 2,820m northeast of FGC	√	√
5	Sheung Shui	Lius	About 1,370m north of FGC	√	√
6	Ho Sheung Heung	Haus	About 1,190m northwest of FGC	√	√
7	Tsuang Pak Long	Wongs	About 350m north of FGC		√
8	Shek Wu Hui	Lius	About 930m north of FGC		√
9	Kam Tsin	Haus	About 260m northwest of FGC		√
10	Kwu Tong	About 10 clan groups including the Chan, Yiu, Cheung, Chung, Chow, Tseung, Man and Hau etc.	About 1,600m northwest of FGC		√
11	Yin Kong	Haus	About 480m northwest of FGC		√

Appendix 3.3 – FGC AS A CULTURAL LANDSCAPE

Recommendation of the Fanling Golf Course as a Cultural Landscape for Inscription in Heritage Grading

The Fanling Golf Course (FGC), with the Old Course, the New Course and the Eden Course completed in 1911, 1931 and 1970 respectively, is a living heritage of 110-year history. The entire golf course presents a unique opportunity for implementing a holistic conservation approach of cultural landscape in Hong Kong.

The Vision of Point-Line-Plane Conservation in Hong Kong

The Antiquities Advisory Board completed a policy review on the conservation of built heritage of Hong Kong in 2014 and recommended the protection of selected building clusters or areas of unique heritage value under the “Point-Line-Plane” approach.

The "Point-Line-Plane" approach looks at individual buildings as points; buildings along a street as lines and collections of streets or defined areas as planes. It calls for the extension of the scope of heritage conservation beyond individual buildings and considers the wide urban or rural settings with distinctive features. It signifies an important move from a ‘micro’ level of discreet heritage structure to a ‘macro’ level of landscape.

Cultural Landscape as a conservation approach of the “Plane”

This “Plane” conservation has been adopted in many countries by defining the heritage area or district as a cultural landscape. The United Nations Educational, Scientific and Cultural Organisation (UNESCO) defines cultural landscapes as:

“cultural properties [which] represent the ‘combined works of nature and man’... [and] are illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic, and cultural forces, both external and internal.”

In 1993, the category of cultural landscapes was included within the scope of the World Heritage Convention. It was an important step in recognising the complexity and often mutually-supportive role of nature and culture. It was a milestone event to look at heritage sites in a holistic manner that weighs on both cultural and natural values. Since then, there have been numerous sites being nominated or included on the World Heritage List under this category of cultural landscapes. One of these nominations is St. Andrew’s – Medieval Burgh and Links which is currently under the UK Tentative List of Potential Sites for World Heritage Nomination.

According to golf historian Paul Jansen, the FGC Old Course constructed in 1911 drew design inspiration from the Old Course of St. Andrew’s, Scotland. A striking feature of golf course design during that period was to present golfers with challenging shots inherent in the landscape. It was of utmost importance to make use of existing natural features in the design, making it a journey of discovery. The FGC Old Course preserves this character-defining element where the land dictates the play and gives rise to a layout that could not be found elsewhere in Hong Kong and China.

The existing features preserved by the FGC include the long-existing graves of local clans in which the oldest one having a 460-year history. Respecting the villagers’ living traditions and

ancestral practice, the three-course environment links up scattered character-defining elements of outstanding historical importance into one. This includes the Clubhouse constructed by Major E. A. Ram who also designed the Helena May Building in Central and Bishop's Hill Service Reservoir in Shek Kip Mei. These tangible and intangible ties are retained due to the continued and evolutive use of the whole site as a golf course.

FGC as a designed Cultural Landscape

Regarding assessment of cultural landscape, it looks into both cultural and natural values of a site. Attachment 1 presents the assessment on the cultural values. On natural values, The International Union for Conservation of Nature (IUCN) has brought forward the Guidelines for Cultural Landscape Review which are used as operational assessment guidelines after the World Heritage Convention in 1993. There are several key criteria for evaluating the natural values of a site being considered as a cultural landscape. These natural qualities are summarized in the guidelines as follows:

“Cultural landscapes often reflect specific techniques of sustainable land use, considering the characteristics and limits of the natural environment they are established in, and a specific spiritual relationship to nature. Protection of cultural landscapes can contribute to modern techniques of sustainable land use and can maintain or enhance natural values in the landscape. The continued existence of traditional forms of land use supports biological diversity in many regions of the world. The protection of traditional cultural landscapes is therefore helpful in maintaining biological diversity.”

Following the UNESCO definition of cultural landscape and the IUCN guidelines on assessing the natural values, the entire Fanling Golf Course can undoubtedly be viewed as a cultural landscape that reflects an idealistic fusion of human and nature. The design of the three courses that intentionally made use of geographical features is a combination of natural environment and human creation over the period of their development, resulting in a place of rich and unique landscape characteristics. The sustainable use of the land as a golf course preserves the tangible architectural heritage, biological diversity of the natural environment as well as the intangible culture of a historic sporting ground in Hong Kong.

FGC as pilot site for area conservation in Hong Kong

As stated in “HK2030+ Planning and Urban Design for a Liveable High-Density City”, Hong Kong envisages to upgrade the approach to heritage conservation by moving beyond a focus on built heritage only to a wider approach encompassing intangible heritage, setting and historic vibe, urban character and uniqueness, cultural significance of districts and natural landscapes. FGC is an ideal site for pilot implementation through a proper heritage grading.

The grading of the entire FGC including the Old Course, the New Course and the Eden Course is definitely a visionary milestone of heritage conservation policy and its implementation in Hong Kong, especially on filling the gap of a “Plane” conservation. Notwithstanding the major difficulty of Plane conservation on demarcating an exact extent of such area, the whole course of FGC with its well-defined site boundary offers an excellent opportunity to take this significant step forward in the field of heritage conservation in Hong Kong.

Curry Tse Ching Kan
Architectural Conservationist
September 2021

Attachment 1: Assessment of Cultural Significance of Fanling Golf Course (FGC)

FGC represents a designed intervention of the natural landscape, within the wider context of a rapidly growing city. Its values listed below further explain the complexity of culture imbued with the three golf courses and reinforce the significance of the whole area.

(a) Regional and Local Significance

The site has formed an important part of the local landscape since its establishment in 1911. To the local villagers, the Club has always respected and promoted their traditions. Local clans chose the valley as burial areas due to its good Feng Shui. The site is seldom relocated, reconstructed, and the graves largely repaired in the hope of maintaining the clans' prosperity. Villagers from the clans are allowed to access the site freely to worship their ancestors at any time of the year, even during competitions. The site is significant locally for its historic ties with many generations of indigenous villagers and local population.

To the wider community, FGC is a crucial practice and competition venue for golfers and an important contributor to charities. The site welcomes local school visits and has nurtured numerous local golf talents, including Hong Kong first's Chinese professional golfer Tang Shu Chuen, and the 2020 Tokyo Olympian Tiffany Chan. It also hosts local charitable fundraising events every year to foster local development. Its efforts in sports promotion and charity should not be neglected.

(b) Historic Significance

The historic interest towards the site can be dated back before the course was built, when there were settlements and clans living nearby. Several existing graves were constructed back in the Ming and Qing Dynasty, with the oldest grave of Tang's Clan constructed 460 years ago. FGC maintains this part of living history by respecting the traditional settlements and culture.

Constructed in 1911, the site is the oldest surviving golf course in Hong Kong and the second oldest in Asia. Affiliated with the Hong Kong Golf Club (HKGC), the four oldest sports club and the oldest golf club in Hong Kong, it has made enormous contributions to golf development in Hong Kong and Asia. It is one of the two courses in the world (another being the Augusta National Golf Club in the United States) that has held the same professional tournament annually for more than 60 years by first hosting the Hong Kong Open (HKO) in 1959.

Being the first 18-hole golf course in Hong Kong and China, it has nurtured a myriad of golfing talents. Most investors of Chung Shan Hot Spring, the first golf club in modern China, and members of the first China golf team also share a close relationship with HKGC and are its long-time members.

As a rare recreational facility dating back to early British rule of New Territories that survived the Second World War, the Japanese Occupation and the post-war economic depression, FGC is also a witness of Hong Kong's major socio-political events and local development. The selection of Fanling Valley as the location of the golf course was influenced by the 1910 opening of the Kowloon-Canton Railway (KCR). A mutually beneficial relationship between KCR and FGC was established, with golfers' regular fare accounting for one of the KCR's earliest major income sources. During the Japanese occupation, most parts of the golf course were used for vegetable cultivation. In 1960s, Hong Kong's water supply was inadequate to cater for the needs of locals. The Water Supplies Department suspended water usage at FGC. The club had to seek its own source of water to maintain its operation, and since then has used grey water from the nearest sewage treatment works. In 2008, FGC served as a venue for the 2008 Beijing Olympic Games equestrian competitions. These illustrated events demonstrate FGC's close relationship with Hong Kong in both glorious events or daily dilemmas that every household has faced.

The decision of Governor Sir William Peel to choose Fanling as an official residence cannot be separated from the appealing surroundings of the site, which has also fated FGC's mission in connecting the elites and political figures. Several important figures have visited FGC in the past. Notably, former Governor David Trench and founding father of Singapore Lee Kuan Yew played golf in FGC after the 1967 Hong Kong riots to discuss the future development of Hong Kong and the whole Asia Pacific region.

(c) Aesthetic Significance

Aesthetically, the entire FGC is evidence of a uniquely informative past relationship between humanity and nature. All three golf courses are constructed in line with the existing terrain and landforms of Fanling Valley, with drainage, irrigation systems and kart paths incorporating the natural elements to avoid destruction to the existing natural environment. The natural elements are not only used as decorations of the course; they are also included as legitimate "luck" elements that could affect the result of a golf competition. As modern golf course design has been standardised with such "luck" elements being eliminated intentionally, FGC preserves this historical design principle and qualifies as an exceptional example of human creativity in a natural landscape.

Largely inspired by the Old Course at St. Andrews Scotland, the Old Course in FGC represents the first instalment of the "Golden Age" of golf course architecture in China, which is also a representative of the 1900-1939 period golf course architecture. The tree-lined classical golf course design respects the natural landscape, as well as the graveyards constructed before the golf course. Without significant alterations and reconstruction work carried out for the graves, FGC protects and maintains the Feng Shui principles aligned by the ancestors of local clans, showing its respect to the spiritual relationship with nature.

Beyond the well-designed landscape, built structures within FGC also exemplifies Hong Kong's architectural features and characteristics. The golf-playing supporting facilities were constructed in a mix of Chinese and Western architectural styles, such as the Grade 3 Qing-vernacular Style Half-way House and the Grade 2 Clubhouse with Doric details. Most structures were designed and constructed by important architectural figures in Hong Kong. A striking example is the Clubhouse designed by Major Edward Albert Ram who also designed the Helena May Building and Bishop's Hill Service Reservoir. This links the site with other significant historic buildings in Hong Kong contextually.

(d) Ecological Significance

The biodiversity of FGC inherited from the past is exceptional on both local and international levels. FGC is an important "green lung" in the northern New Territories, inhabiting several indigenous and internationally endangered tree species, such as Banyans, Camphor Tree, and Chinese Swamp Cypress. With the oldest tree predating the Old Course for more than a hundred years and a multitude of valuable trees older than FGC, it is apparent that the course designer consciously conserved these natural elements together with other heritage resources. This also provides a habitable home for a variety of endangered wildlife and domestic species, including Reeve's Turtle and Common Birdwing and Rose protected butterflies.

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