



長春社 Since 1968

## The Conservancy Association

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14<sup>th</sup> July 2021

Ms. Cheng Mei Sze, Maisie, JP  
Director of Environmental Protection  
Environmental Protection Department  
Environmental Impact Assessment Ordinance Register Office

By E-mail: [eiaocomment@epd.gov.hk](mailto:eiaocomment@epd.gov.hk)

Dear Ms. Cheng,

RE: Comments on Northern Link Project Profile

The Conservancy Association (CA) would like to express our concern on the captioned.

### **1. Impact on wetland within/adjacent to Wetland Conservation Area (WCA) and Wetland Buffer Area (WBA)**

The intention of the WBA “*is to protect the ecological integrity of the fish ponds and wetland within the WCA and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds*”<sup>1</sup>. According to the Project Profile, the proposed alignment of Northern Link (NOL) is close to WBA where site of conservation importance, particularly wetland, can still be spotted. While associated temporary work during construction phase might lead to direct loss of wetland, any adverse off-site impacts to adjacent wetland would also be resulted.

Section 1.4.4 mentioned that construction elements would include enabling works for potential bifurcation to Lok Ma Chau (LMC) Loop and Huanggang Port to the north of San Tin Station. Meanwhile, Transport and Housing Bureau disclosed that “*If the NOL bifurcation is realigned to connect to the redeveloped Huanggang Port through the Lok Ma Chau Loop, it will help strengthen the cross-boundary transport link as well as the connection between the Lok Ma Chau Loop and the urban area... We notice that the*

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<sup>1</sup> Section 6.4, TPB Guidelines No.12 Application for Developments within Deep Bay Area under Section 16 of the Town Planning Ordinance  
[https://www.info.gov.hk/tpb/en/forms/Guidelines/pg12c\\_e.pdf](https://www.info.gov.hk/tpb/en/forms/Guidelines/pg12c_e.pdf)



*Shenzhen authority has stated that space will be reserved in the redeveloped Huanggang Port to enable connection of the NOL bifurcation. This will provide flexibility in the planning of the NOL bifurcation. Considering that the optimisation of the Huanggang Port may drive cross-boundary transport demand, we have requested the MTR Corporation Limited to investigate the feasibility and benefits of constructing the NOL bifurcation, so that the Government can consider the way forward of the project in due course*<sup>2</sup>. This is also in line with the speech prepared by Transport and Housing Bureau on Legco member's motion on "Driving the development of New Territories North with port economy" (Figure 1). From the above, we believe that part of the NOL would directly pass through fish ponds in WCA, enter LMC Loop, and finally connect to the new Huanggang Port in Shenzhen.

An Ecological Area (EA), with an area of about 12.8 ha, would be established in the southern LMC Loop to compensate for habitats of high conservation value, such as reed marsh in the Loop and the existing flight line corridor of birds. According to the Blog of Development Bureau<sup>3</sup>, the EA "would be linked with the old Shenzhen River meander and the fishponds to form a continuous wetland". Besides, "A small island in the freshwater marsh cell will provide a variety of habitats with a view to attracting animals like birds and Eurasian otters to settle and breed there". We highly worry that all these potential efforts of EA would be offset by the construction of NOL in LMC Loop.

To ensure ecological integrity of all habitats along NOL, CA would suggest the following:

- i. The project proponent should further explore ways to avoid/minimize both direct and indirect impact on the above habitats, particularly wetland within/adjacent to WCA and WBA in both construction and operation phase.
- ii. Alternatives on cross-border transport should be explored to avoid/minimize both direct and indirect impacts on the EA and other ecologically sensitive areas in LMC Loop.

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<sup>2</sup> LCQ10: Transport facilities in New Territories North  
<https://www.info.gov.hk/gia/general/202106/09/P2021060900341.htm?fontSize=1>

<sup>3</sup> Development and conservation of Lok Ma Chau Loop (dated 11 August 2019)  
[https://www.devb.gov.hk/en/home/my\\_blog/index\\_id\\_350.html](https://www.devb.gov.hk/en/home/my_blog/index_id_350.html)



## 2. Impact on agriculture

Along the proposed NOL, both active agricultural land and abandoned land with good potential for farm rehabilitation can be spotted. Meanwhile, Section 1.4.4 mentioned that construction elements would include enabling works for potential extension to Ping Che Areas. As the agricultural land in Ping Che Areas is generally in low degree of fragmentation, we hope that the project proponent should protect them with the greatest effort.

We would expect that the following items should be covered in the assessment:

- i. Area of active and abandoned agricultural land
- ii. Temporary and permanent loss of agricultural land
- iii. Soil degradation, such as soil contamination, disturbance on topsoil and subsoil
- iv. Changes/disruption to existing hydrological condition and irrigation system
- v. Alternative land use configuration/design to avoid and minimize impacts on, for example, fragmentation of agricultural land, temporary and permanent loss of agricultural land, increase in non-agricultural uses, water quality etc., during construction and operation phase
- vi. Measures to avoid and minimize disturbance on soil for cultivation

## 3. Impact on cultural heritage

A territory-wide survey of historical buildings<sup>4</sup> has recorded 8,803 buildings and items and about 1,000 items have been studied in more details afterwards. The remaining items, though not graded or studied in details, have raised public awareness recently due to their historical importance. We note that that some of the items within the development site are also included in this list.

To ensure proper protection of all cultural resources in the project site, we hope that the following items should be included:

- i. The territory-wide survey of historical buildings should be considered in the desktop research stage of the cultural impact assessment.
- ii. Direct and indirect impacts on these heritage items should be identified.
- iii. Alternatives should be further explored to avoid/minimize direct loss on the above

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<sup>4</sup> Please refer to List of Territory-wide Survey of Historical Buildings  
[https://drive.google.com/file/d/12v2LhkRhEAOUyw191\\_J54wIRqj6BzjKx/view?fbclid=IwAR2X4WFuzlJunYS2sIqn21aIAygtw\\_rwqv1gHT--X532YQXnWQNLkXyslmQ](https://drive.google.com/file/d/12v2LhkRhEAOUyw191_J54wIRqj6BzjKx/view?fbclid=IwAR2X4WFuzlJunYS2sIqn21aIAygtw_rwqv1gHT--X532YQXnWQNLkXyslmQ)



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heritage items in both construction and operation phase.

#### **4. Disposal of construction and demolition (C&D) waste**

In the past few years, we have frequently spotted illegal dumping of C&D waste in agricultural land and fish pond along the proposed NOL. If C&D waste is not properly managed in this project, such activities would be more frequent and the environment in the adjacent WBA and even WCA would be further worsened.

We hope that the project proponent should propose stringent control and monitoring measures on the construction vehicles/dump trucks to prevent any construction waste dumping on ecologically sensitive area within and adjacent to the project site. For example, construction vehicles/dump trucks should be equipped with GPS devices. Specific transport route should be designated for construction vehicles/dump trucks to ensure proper waste disposal. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the activities of relevant contractors.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association

### Figure 1<sup>5</sup> In May 2021, Under Secretary for Transport and Housing Bureau has already mentioned that the concept of a NOL bifurcation to LMC Loop and new Huanggang Port in Shenzhen (marked in red)

LC: USTH's opening remarks on member's motion on "Driving the development of New Territories North with port economy" (Chinese only)

以下是運輸及房屋局副局長蘇偉文博士今日（五月十三日）在立法會會議上，就劉國勳議員動議的「以口岸經濟帶動新界北發展」議案的開場發言：

主席：

首先，我感謝劉國勳議員就「以口岸經濟帶動新界北發展」提出的議案。本屆政府提倡「基建先行」及「創造容量」的規劃方式，以運輸基建帶動土地發展。繼發展局局長的開場發言，我將就北環線項目、跨境鐵路規劃，以及《跨越2030年的鐵路及主要幹道策略性研究》方面作幾點補充。

政府已於去年十二月邀請香港鐵路有限公司（港鐵公司）就北環線展開詳細規劃及設計。考慮到項目的詳細規劃及設計所需的時間，北環線第一期，即落馬洲支線上增設古洞站，預計於二〇二三年動工建造，並在二〇二七年竣工，以配合古洞北新發展區公營房屋首批大量居民遷入的時間；北環線第二期，即連接錦上路站及古洞站之間的主線，則預計於二〇二五年動工建造，並在二〇三四年竣工，帶動新田、牛潭尾及凹頭一帶的發展。政府會繼續與港鐵公司跟進，以確保港鐵公司會密切監察工程進度，務求讓項目早日落成提供服務。

根據《鐵路發展策略2014》的建議，擬議的北環線除了連接錦上路站至古洞站的主線外，還可因應跨境運輸需求的增長，增設支線由錦上路站直接連接至現有的落馬洲站。

按深圳方面的皇崗口岸重建方案，重建後的皇崗口岸將成為交通樞紐綜合體。如將北環線支線改經落馬洲河套區連接至重建後的皇崗口岸，將有助於加強跨境和河套區與市區的交通聯繫，亦為往來粵港澳大灣區的市民及旅客提供多一個出行的選擇。我們留意到深圳當局表示會於重建後的皇崗口岸預留空間提供北環線支線接入的條件，這將為北環線增設支線的規劃提供彈性。

考慮到皇崗口岸的優化可帶動跨境運輸需求，我們已要求港鐵公司研究興建北環線支線的可行性及效益，讓政府適時考慮項目的未來路向。

鐵路項目涉及龐大的資本投資，政府需作出審慎的規劃。我們會研究興建北環線支線的需要及其技術與財務可行性，並會因應詳細研究、最新需求評估及資源的許可情況就鐵路發展時間表作出調整。

除了北環線支線外，正如行政長官在其二〇二〇年《施政報告》所述，特區政府會完善港深陸路口岸建設，包括於稍後進一步與深圳共同探討羅湖口岸的優化，以及有關交通接駁之建議。至於深圳灣、香園圍、文錦渡和沙頭角等其他港深邊境陸路管制站，現時已透過不同道路基建接駁，在規劃時亦未有預留空間作鐵路連接。除卻目前僅作跨境貨運用途的香園圍管制站外，市民可使用不同公共交通工具前往其他管制站過境。

事實上，隨著廣深港高速鐵路香港段開通，來往香港與其他粵港澳大灣區（大灣區）城市的時間已大大縮短。政府會與內地當局探討各項優化廣深港高鐵服務的措施，以加強香港與其他大灣區城市間的互聯互通。長遠而言，政府會密切留意因應大灣區發展的長遠跨境運輸需求，探討新的跨境基建項目的需要及效益。

為了讓大型運輸基建的規劃能配合、甚或預留容量以滿足香港整體長遠發展的需要，政府於二〇二〇年十二月展開《跨越2030年的鐵路及主要幹道策略性研究》。研究會根據《香港2030+：跨越2030年的規劃遠景與策略》（《香港2030+》）規劃研究的最終發展策略，探討未來香港鐵路及主要幹道基建的布局，以及為走線和配套設施進行初步工程技術評估。當中，如何提升《香港2030+》倡議的新界北新發展區與市區的連繫將會是其中一項重點工作。

研究會同步檢視相關的運輸基建對現有運輸網絡的影響，並擬訂相應的對策。同時，研究亦會體及規劃署的跨境運輸模型及預測、以及其建議的跨境通道項目，以檢視這些通道對香港運輸系統的影響。我們預計研究的鐵路及主要幹道部分分別需時約38個月及27個月完成，兩項研究會同步進行。待研究有初步結果後，我們會適時諮詢立法會。

主席，我謹此陳辭。

完

2021年5月13日（星期四）  
香港時間12時10分

<sup>5</sup> Under-Secretary for Transport and Housing Bureau opening remarks on member's motion on "Driving the development of New Territories North with port economy" (Chinese only)  
<https://www.thb.gov.hk/eng/psp/speeches/transport/land/2021/20210513b.htm>