



Hong Kong Institute of Qualified Environmental Professionals (HKIQEP)
香港合資格環保專業人員學會(香港環專會)

Northern Metropolis Co-ordination Office
Development Bureau
17/F, West Wing, Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong
(By Email: nmlegislation@devb.gov.hk)

Subject: Comments on the Proposed Dedicated Legislation to Accelerate the Development of the Northern Metropolis

Dear Sir/Madam,

On behalf of the Hong Kong Institute of Qualified Environmental Professionals, I am writing to provide our professional comments regarding the legislative proposals aimed at enhancing the speed and efficiency of the **Northern Metropolis (NM)** development. We recognise that the NM is a strategic area crucial for driving **high-quality socio-economic development** and serving as a new engine for Hong Kong's economy.

We would like to offer the following views specifically on **Item IV: Streamlining the procedures and requirements for Construction Noise Permit (CNP) applications**, as well as broader suggestions for the development's sustainability.

1. Comments on Streamlining CNP Applications (Item IV)

We strongly support the proposed transition from a rigid control mechanism to a **"target-oriented" approach** for construction noise management of CNPs. Our specific recommendations are as follows:

- **Support for Real-time Monitoring:** We concur the proposal to rely on **real-time on-site monitoring** rather than the current meticulous control of the types and quantity of powered mechanical equipment. This flexibility allows for optimized construction workflows while ensuring that actual noise levels at nearby residents remain within statutory limits.
- **Adoption of Intelligent Technology:** We highly recommend adopting the latest **intelligent, AI-driven noise monitoring technology**. This would allow for the **automatic recognition and exclusion of non-construction noise activities** from monitoring results, enhancing data management efficiency and providing instant reporting for public, the Environmental Protection Department (EPD) and contractors reference. To support the legislative framework, clear data verification standards for these AI systems to ensure data integrity and prevent contractual or public disputes.
- **Mandatory e-Submission:** To further streamline procedures, we suggest mandating the submission of CNP applications via the **existing EPD eCNP platform**. This ensures that all issued CNP information is readily accessible on the web for public and industry reference, aligning with the goal of providing a **clear and explicit legislative framework**.
- **Proactive Public Engagement:** We advise early communication with nearby residents regarding nighttime operations. While the legislation aims to **strike a balance between development and public interest**, proactive engagement and transparent data sharing reassures residents that effective monitoring mechanisms are in place to safeguard their community's well-being.
- **Incentivizing Innovative Mitigation Measures:** We encourage the authority to use this legislation to incentivize the adoption of **innovative construction technologies**. **Technologies** such as Silent Piling by Press-in Method, Non-Explosive Chemical Expansion Agent (Soundless Chemical Demolition Agent), Bursting System, metamaterial barrier and enclosure,

air-supported membrane structure for foundation pits, etc could be fast-tracked under the “target-oriented” review mechanism to drive industry-wide modernization.

2. Strategic Suggestions for Northern Metropolis Development

- **Holistic Carbon Monitoring: Carbon emissions** should be systematically monitored and managed across all stages—from master planning and detailed design to procurement and actual construction. Implementing a holistic lifecycle carbon assessment is critical to ensure the NM meets world-class sustainability standards and contribute towards Hong Kong’s climate goal of achieving carbon neutrality by 2050.
- **Integrating ESG and Green Finance into Industry Anchoring:** To fulfill the proposed legislation’s primary objective of accelerating “industry anchoring” and attracting high-calibre global enterprises and investment, **ESG (Environmental, Social, and Governance) requirements** should be strategically integrated into binding conditions for tendering frameworks and future operational requirements for companies operating within NM. By aligning NM developments with international sustainability standards and green taxonomies (such as the HK Green Taxonomy and the Common Ground Taxonomy), the Government can seamlessly leverage **Green Finance** frameworks to fund massive infrastructure gaps and systematically de-risk these massive infrastructure projects for institutional investors. Furthermore, establishing clear green criteria for NM will enable the newly proposed statutory bodies to leverage alternative funding structures and position NM as a world-class model for sustainable, climate-resilient financing.
- **Refining Traffic Noise Assessments and Mitigation for EVs:** We recommend that future traffic noise assessments for the Northern Metropolis be adjusted to account for the increasing prevalence of **Electric**



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Vehicles (EVs). In low-speed urban environments (below 30kph), where motor noise—rather than tyre noise—is the primary factor, higher EV adoption should lead to a **reduction in the requirement for massive noise barriers**, supporting the objective of **flexible and dynamic planning**. For high-speed roads where road-tyre noise remains dominant, we suggest leveraging the proposed **"quality-oriented mechanism"** to review and approve **innovative and non-conventional designs**. This would facilitate the transition from traditional, intrusive structures to **less massive, "landmark" style barriers or enclosures** that maintain an **open environment** while still fulfilling the **"target-oriented" requirement** to meet statutory noise control standards.

We believe these measures will enhance the **speed and efficiency** of the NM while ensuring it stands as a world-class, sustainable hub. HKIQEP welcomes the opportunity to further discuss the technical recommendations with the Bureau.

Yours faithfully,

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