



Our ref: HKIA/Council/BC/WC/20240302

2 March 2024

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Director of Environmental Protection  
Environmental Protection Department

By Email  
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Dear Dr. CHIU,

**HKIA's Comments on the First Phase Development of the New Territories North – San Tin /Lok Ma Chau Development Node Environmental Impact Assessment Report**

The Hong Kong Institute of Architects (HKIA) has carefully reviewed the Environmental Impact Assessment (EIA) report of the First Phase Development of the New Territories North – San Tin /Lok Ma Chau Development Node and would like to share our observations and recommendations.

HKIA would like to commend the Development Bureau for the comprehensive and detailed planning effort put into the project. The proposed development presents exciting opportunities for the sustainable growth and enhancement of the New Territories North region. We appreciate the emphasis on creating a well-connected, vibrant, and environmentally responsible node that will contribute to the overall development of Hong Kong.

Overall, HKIA is supportive of the First Phase Development of the New Territories North – San Tin / Lok Ma Chau Development Node and recognizes its potential to contribute to the sustainable growth of Hong Kong. We hope that our views and recommendations will be taken into consideration for further refinement of the project.

HKIA would greatly appreciate the opportunity to discuss these matters further with you and your team. Our suggestions are attached in the Appendix below for your consideration. Due to the short timeframe of the consultation period, our Institute requires more time to conduct a more in-depth study, our supplementary response shall be provided shortly.

We look forward to the opportunity to contribute further to the development process and offer our expertise in creating a successful and sustainable future for Hong Kong. Should you require any further information, please do not hesitate to contact HKIA Secretariat Mr. Nick KONG at 3155 0407 and [nickkong@hkia.org.hk](mailto:nickkong@hkia.org.hk).

Thank you for your attention to this matter.

Yours Sincerely,

Benny CHAN Chak Bun, *FKIA*, *R.A.*  
President  
The Hong Kong Institute of Architects

Cc: Ms. LINN Hon Ho, Bernadette, *JP*, Secretary for Development, Development Bureau [sdev@devb.gov.hk](mailto:sdev@devb.gov.hk)

<b>Executive Summary</b>			
<b>Section</b>	<b>Description</b>	<b>Comments</b>	<b>Remarks / Suggestions</b>
2.3.12	The feasibility of surrounding lands is considered comprehensively when planning the land use of the Project. To fully leverage the strategic positioning of the Project, a substantial area of land for I&T purposes shall be provided. However, due to the presence of hills on the eastern and southern sides of the Project, particularly the natural slopes in the southeastern part of the Loop, where the terrain is high and steep, substantial earthwork, soil filling, and infrastructure works would be required to form extensive sites. Considering factors such as associated environmental impact, ground condition, cost, and development programme, the said natural slope is therefore not recommended for development for I&T purposes. Hence, the development lands shall expand towards the inland area closer to the fishponds, while minimising any impact on bird habitats and bird flight corridors. By utilising a portion of the fishponds in a <i>reasonable</i> manner, the planning layout of the Project can be enhanced.	<ul style="list-style-type: none"> <li>• Thorough ground investigation of the slope and natural terrain are advisable so that cost benefits analysis in comparison with other development options would be possible.</li> </ul>	
2.7.17	Preserve and promote cultural heritage resources – No graded historic buildings and declared monuments is identified within the Project area. Nevertheless, a number of cultural heritage spots, such as buildings in the new list of proposed grading items, declared monuments, proposed monuments and SAI are identified around the Project area. ... To better harness the cultural values of these cultural heritage sites, improved connectivity to existing villages and archaeological sites shall be designed, incorporating appropriate interfaces that foster	<ul style="list-style-type: none"> <li>• HKIA supports urban village integration. A Heritage Impact Assessment on the seven existing villages in San Tin Area outside the project site is recommended so as to identify the potential for integration with the new development.</li> <li>• The potential impact of these surrounding villages with IT development land, characterized by flexible zoning, raises concerns. Without a clear development guideline specifically aimed at safeguarding the villages, adverse and uncontrolled</li> </ul>	

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	integration between existing and new uses...creating a proper synergy ..for heritage promotion and cultural tourism,...enhanced quality of life for the community.....	consequences may arise. It is imperative to strike a balance between development and preservation, ensuring that the unique cultural fabric of these villages remains intact	
3.9.3	Within the Project boundary, sites of conservation importance were identified, including the Wetland Conservation Area (WCA), Wetland Buffer Area (WBA), Conservation Area (CA), Priority Site for Enhanced Conservation (Priority Site), and Site of Special Scientific Interest (SSSI). All of these encroached sites of conservation importance are located on the northern portion of the Project site. Direct impacts on these sites of conservation importance and associated wetland habitats would arise from the proposed development. More specifically, among some 610 ha of proposed development area of San Tin Technopole, although 150 ha are located in the WCA and 97 ha in the WBA making a total of 247 ha, about 158 ha among them <b>(64%) are already brownfield sites, filled fishponds and developed areas including traditional villages and the boundary control point.</b> The remaining area of about 89 ha are fishponds proposed to be filled for development, and about half of them no longer have any fish farming activities or have been abandoned for years.	<ul style="list-style-type: none"> <li>The environmental degradation of the WCA, WBA, and CA sites poses a significant challenge, especially as more of these areas are converted into brownfields.</li> </ul>	<ul style="list-style-type: none"> <li>The government should prioritize the preservation and enhancement of conservation efforts outlined in the original 2030+ plan before embarking on any development initiatives.</li> <li>Proper oversight and monitoring are essential to prevent uncontrolled degradation, ensuring that our green and blue resources remain intact and upholding the integrity of any Environmental Impact Assessment (EIA) study.</li> </ul>
3.11.1	No Site of Cultural Heritage falls within the Project area and therefore there is no direct impact on any Site of Cultural Heritage. Hence, no mitigation measure is required for the conservation and preservation of Sites of Cultural Heritage and the requirements in Annexes 10 and 19 of the EIAO-TM have been met. In addition, no direct	<ul style="list-style-type: none"> <li>As discussed in Section 2.7.17, the existing villages outside the study area are of high heritage value. A Heritage Impact Assessment on the seven existing villages in San Tin Area outside the project site is recommended so as to identify the potential for integration with the new development.</li> </ul>	

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	impact is anticipated on any proposed monument, graded historic building and Government historic site.		
3.11.2	Built Heritage impact assessment (BHIA) and Archaeological impact Assessment (AIA) in clause 3.4.13 & Appendix L of EIASB	<ul style="list-style-type: none"> <li>Ditto.</li> </ul>	
3.13.2	87% of existing trees will be felled or transplanted	<ul style="list-style-type: none"> <li>The proposed development might cause significant ecological changes, lessen resilience to the extreme climatic changes. The ponds, wet agricultural land are precious climate resilience mitigation lands, and serves as sponge for the new city. This natural asset should be preserved as much as possible, and effective compensatory and mitigation measures should be adopted.</li> <li>We must prioritize environmental preservation from the start, implementing robust mitigation strategies, impact assessments, restoration plans, and sustainable construction practices. Engaging experts and stakeholders is crucial for responsible decision-making. By taking a precautionary approach and adopting sustainable practices, Government needs to ensure the preservation and resilience of our ecosystems for future generations.</li> <li>Detailed mitigation plans on landscape resources must be developed to show their effectiveness in response to each stage of development.</li> </ul>	<ul style="list-style-type: none"> <li>A detailed Climate Resilience Plan for NM is essential for integration of these natural assets into the new development, so as to avoid permanent damages &amp; irreversible loss.</li> <li>To mitigate the substantial impact during the construction phase, it is advisable to arrange off-site replanting before construction begins. This proactive approach accelerates compensation by establishing green areas and restoring ecosystems ahead of the 10-year timeframe. Off-site replanting preserves existing vegetation, promotes biodiversity, and demonstrates our commitment to environmental stewardship.</li> </ul>
3.13.3	Within the Project boundary, as far as practicable, compensation and new tree planting will be provided at a 1:1 ratio when appropriate and applicable to compensate for the tree loss due to site development works.....		
3.13.4	Under this Project, before mitigation, there would be substantial significance of impact on the following landscape resources. They are mainly permanent and irreversible loss. ...Upon completion of works, this area will become new planned development including open space, residential development, mixed use development, residential and G/IC uses. With appropriate mitigation measures, it is considered that the residual impacts on these landscape resources will remain as “substantial” residual impact during construction stage. It will be reduced to “moderate” at day 1 of operation and further reduced to “slight” impact at year 10 of operation.....		
3.13.5	During the construction phase, due to the proposed works in these LCAs, their predicted landscape impact would be substantial. ....		

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3.13.12	Mitigation against adverse impacts, a number of key planning, urban design & landscape concepts are proposed in the Revised RODP, Master Urban Design Plan, Landscape Master Plan. These Mitigation measures during construction stage could optimize their effect.	<ul style="list-style-type: none"> <li>The present report is heavily relying on mitigations to the damages caused by the development. Proactive measures to avoid irreversible damages caused is essential.</li> </ul>	<ul style="list-style-type: none"> <li>The NM development needs to be an orchestrated development towards a 'Sustainable, Smart and Green' future city.</li> </ul>
3.13.14	Furthermore, the urban design and landscape framework is an intrinsic part of the Project that must be viewed in connection with proposed mitigation measures. While it is mentioned that not all impacts can be fully reduced or eliminated through the implementation of mitigation measures, the design principles provide enhancement by specifically outlining and dedicating areas for open space, blue-green network, Green Belt, breezeway, view corridor, massing control, aesthetic above ground structure design, and provision of compensatory planting proposal. It is considered that the overall Project is appropriate to the planned context of the area and in the long term with beneficial landscape and visual impacts.	<ul style="list-style-type: none"> <li>The development should preserve and integrate with the existing blue, green, and heritage resources, but good correlation between the I&amp;T zone and the surrounding blue and green resources is not yet demonstrated. The existing villages will find themselves surrounded by roadways in future, effectively cut off from the very blue and green resources that were once intrinsic to their existence.</li> <li>While the San Tin Centre land uses exhibit a logical hierarchy, the I&amp;T zone at Sam Po Shue feels like an afterthought, undefined and lacking essential transport links and other necessary planning support.</li> </ul>	<ul style="list-style-type: none"> <li>Seamless connectivity between the I&amp;T zone and the surrounding infrastructure, as well as the restoration of access and integration for the villages, must be prioritized. By addressing these shortcomings and ensuring proper planning support, the study team can create a design that truly respects and enhances the natural and cultural fabric of the area.</li> </ul>
10.11.3.21	Based on previous approved EIA reports such as the Proposed Development at Fung Lok Wai, Yuen Long (Mutual Luck Investment Limited, 2008), it is assumed the functional value of areas of typical commercially managed ponds (i.e. active/inactive ponds) can be increased by up to 45% upon the implementation of ecological enhancement measures, including the following measures proposed under the EIA...	<ul style="list-style-type: none"> <li>More substantiations for the justification of reduced wetland solely by evaluating the ecological capacity with assumed 45% functional value increase by ecological enhancement measures is needed.</li> </ul>	<ul style="list-style-type: none"> <li>The Government should adopt an approach putting wetland conservation at the first priority. Although some reduction of wetland area might be unavoidable in San Tin Development, strategy with minimum encroachment to wetland should be adopted.</li> </ul>
10.11.3.25	With the assumed increase in functional value of 45% compared to typical active/inactive fishponds upon the implementation of ecological enhancement measures at the pond areas, the total compensation requirement for		<ul style="list-style-type: none"> <li>A complete survey to collect data for the San Tin Technopole is needed for the study.</li> </ul>

**Executive Summary**

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10.3.3	<p>pond habitats is estimated to be 253 ha which would also achieve no-net-loss in ecological function and capacity of the wetlands concerned. <i>[Remark: based on impacted area of 151.7 ha]</i></p> <p>Ecological Survey Programme</p> <p>Table 10.1</p> <p><b>Table 10.1 Schedule of Ecological Surveys</b></p> <table border="1" data-bbox="271 703 824 1034"> <thead> <tr> <th rowspan="2">Proposed Survey</th> <th colspan="6">Dry Season</th> <th colspan="6">Wet Season</th> </tr> <tr> <th>Nov 2021</th> <th>Dec 2021</th> <th>Jan 2022</th> <th>Feb 2022</th> <th>Mar 2022</th> <th>* Apr 2022</th> <th>May 2022</th> <th>Jun 2022</th> <th>Jul 2022</th> <th>Aug 2022</th> <th>Sep 2022</th> <th>* Oct 2022</th> </tr> </thead> <tbody> <tr> <td>Habitat and Vegetation Survey</td> <td>✓</td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>✓</td> <td></td> <td></td> </tr> <tr> <td>Avifauna (Day and Night)</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>Egretty Surveys (incl. Egretty Count and Flight Path)</td> <td></td> <td></td> <td></td> <td></td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td></td> <td></td> </tr> <tr> <td>Roosting Ardeids &amp; Great Cormorants (incl. Flight paths)</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>Terrestrial Mammal (Day and Night)</td> <td>✓</td> <td></td> <td>✓</td> <td></td> <td>✓</td> <td></td> <td>✓</td> <td></td> <td>✓</td> <td></td> <td>✓</td> <td></td> </tr> <tr> <td>Herpetofauna (Day and Night)</td> <td></td> <td></td> <td></td> <td></td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>Butterfly and Odonate</td> <td>✓</td> <td></td> <td></td> <td></td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>Freshwater Community</td> <td></td> <td></td> <td></td> <td>✓</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>✓</td> <td></td> <td></td> </tr> </tbody> </table> <p>Note: * Transitional Period</p>	Proposed Survey	Dry Season						Wet Season						Nov 2021	Dec 2021	Jan 2022	Feb 2022	Mar 2022	* Apr 2022	May 2022	Jun 2022	Jul 2022	Aug 2022	Sep 2022	* Oct 2022	Habitat and Vegetation Survey	✓	✓								✓			Avifauna (Day and Night)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Egretty Surveys (incl. Egretty Count and Flight Path)					✓	✓	✓	✓	✓	✓			Roosting Ardeids & Great Cormorants (incl. Flight paths)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Terrestrial Mammal (Day and Night)	✓		✓		✓		✓		✓		✓		Herpetofauna (Day and Night)					✓	✓	✓	✓	✓	✓	✓	✓	Butterfly and Odonate	✓				✓	✓	✓	✓	✓	✓	✓	✓	Freshwater Community				✓						✓			<ul style="list-style-type: none"> <li>The surveys were made from Nov 2021 to Oct 2022 before the announcement of the San Tin Technopole. There is no demonstration for ecological survey for the new additional part which added in 2023?</li> </ul>	
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10.6.3.31	<p>A total of 152 avifauna species (with 68 avifauna species of conservation importance) were recorded across the Assessment Area..., 87 avifauna species were recorded in the southern portion of the Assessment Area .... Of the 87 avifauna species in the southern portion, there were 24 species of conservation importance .....</p>	<ul style="list-style-type: none"> <li>The public concerns very much on the potential adverse impacts on the bird migratory routes, but not much information on the existing routes, the possible adverse impacts and mitigation measures are discussed in the report.</li> </ul>	<ul style="list-style-type: none"> <li>An overall map/ plan for NM showing existing migratory routes of all/ most species of birds found in NM should be included in the Report.</li> <li>Possible adverse impacts and mitigation measures should be discussed.</li> </ul>																																																																																																																																	