

Friends of the Earth (HK) Comment on the San Tin / Lok Ma Chau Development Node Environmental Impact Assessment

The San Tin Technopole (“the Project”) is the core of the proposed Northern Metropolis development, supporting ambitions to build a new international innovation and technology (I&T) city and synergising with Shenzhen’s I&T zone. Within the Project’s 610 ha of proposed development area, a total of 247 ha fall under sites of conservation importance, including wetland habitats, filled fishponds, and more. The government must proceed in a manner that is compatible with the ecosystem, minimising the area of exploitation and selecting sites that avoid damaging the 'cross-border wetlands' (as required under the Outline Development Plan for the Guangdong-Hong Kong-Macao Greater Bay Area).

In particular, **Friends of the Earth (HK)** have the following comments:

1. The Project will occupy around 150 ha of the Wetland Conservation Area (WCA, not including the other buffer area also affected), which is inconsistent with the idea to conserve Deep Bay Area wetland ecosystems and the Town Planning Board's principle of 'no-net-loss' of wetlands.
2. At the policy level of the central government, the Project has failed to comply with the *Outline Development Plan of Guangdong-Hong Kong-Macao Greater Bay Area (2019)*, which stated clearly the need to: 'step up joint efforts to conserve cross-border wetlands'. Although only applicable to the Mainland, China also legislated the *Law of Wetlands Conservation (2022)*, which stipulates that construction projects shall avoid siting in a wetland area.
3. Approximately 56,350 of the 64,490 trees in the development area will be chopped down or relocated according to the EIA. The report however failed to indicate the number of which to be chopped and those to be relocated. There are other areas in the planning to elaborate further, such as siting of the future San Tin parks and rest areas that can make use of relocated trees (within/outside of egrettries and night roosts) for the well-being of the community and ecosystem. Nature-based solutions, like bioswales, permeable paving, and other absorbent landscape designs, can be integrated to enhance water recharge and climate resilience of the environment.

4. In the unavoidable case where trees will have to be chopped down—preferably accounting for less than 50% of tree losses—the Project should propose means to reuse/recycle the chopped logs and wooden materials to benefit communities in Hong Kong. Temporary sites can be set up on government land to facilitate the decomposition of wood and yard waste for soil conditioner.

5. Inner Deep Bay wetlands lies at the heart of the East Asian-Australasian Flyway and is important to the survival of many migratory waterbird species. We echo the need to establish wildlife corridors and a wetland compensation strategy. At the same time, it is more desirable to mitigate possible ecological impacts via avoidance before considering minimisation and compensation measures. A committee should be formed with the inclusion of major environmental groups and ecology experts for the Project to advise and monitor its development.