



世界自然基金會  
香港分會

WWF-Hong Kong

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## Chairman and Members of Public Works Subcommittee, Legislative Council

(c/o Public Works Subcommittee)

Legislative Council Complex,

1 Legislative Council Road, Central, Hong Kong

28 June 2021

(By e-mail)

Dear Sir/Madam,

### **Re: Public Works Subcommittee Meeting on 30 June 2021, agenda item #II “New Towns and Urban Area Development”**

WWF-Hong Kong (WWF) would like to express following concerns regarding the New Territories North (NTN) Development.

- 1. WWF is concerned about the potential ecological impact from the proposed development on sensitive ecosystems and their biodiversity.** The San Tin/ Lok Ma Chau Development Node proposed under the NTN Development could cause chemical, air, light and noise pollution impacts, during and after construction, to the Mai Po Nature Reserve, Mai Po Inner Deep Bay Ramsar site, Wetland Conservation Area, and Wetland Buffer Area, which are legally protected by Town Planning Board Planning Guidelines No. 12C due to their ecological importance. Therefore, appropriate safeguards and mitigations should be taken to ensure that the development will not affect these areas.

We note that illegal fuel stations and vehicle repairing workshops can be found on the proposed development site. Removal of such facilities should be undertaken with appropriate safeguards to prevent chemical leakage to the Deep Bay area, which could cause irreversible damage to ecosystems.

The flight paths of herons and egrets between their night roosts and the Ramsar site are likely to be obstructed by inappropriate development (e.g., tall buildings at density) (Fig 1)<sup>1</sup>. High-rise development on the Lok Ma Chau Control Point would very likely block the flight paths of Great Cormorants (*Phalacrocorax carbo*) as they move to and from their roost and foraging grounds near Lok Ma Chau Loop. To avoid such disturbance, we strongly advise that the government retain the existing building height and development intensity of the Lok Ma Chau Boundary Control Point in the new development plan.

- 2. WWF is concerned that the NTN development will legitimize unauthorized development (UD) and encourage a more pervasive and damaging “destroy first,**

together possible™

<sup>1</sup> According to the latest findings from the AFCD’s Newsletter of Hong Kong Biodiversity Issue No. 26 published in December 2020, active roosting sites of ardeids (herons and egrets) were present in the NTN Development area such as those at Lok Ma Chau and Tam Kon Chau (marked as “LMC & “TKC” in Figure 1).

**build later” policy and practice.** We found that almost 30% of the proposed San Tin/ Lok Ma Chau development area that falls within Wetland Buffer Area has been subject to UD since 1991. UDs are also present within the proposed Man Kam To Logistics Corridor of the NTN development. For example, in 2017, an unauthorized land/pond filling and site formation occurred at an “Agriculture” zone site in Man Kam To<sup>2</sup> (Fig. 2). According to the “Preliminary Feasibility Study on Developing the New Territories North” in 2018, the aforesaid site is proposed to be developed for “Agri-logistic / Light Industry”. Resuming lands with UD records will encourage landowners to adopt a “destroy first, build later” approach in expectation of land resumption by the government, resulting in further damage to ecologically sensitive areas. Although some “destroy first, build later” cases have obtained Town Planning Board approval for development, WWF requests that, in the context of NTN development (and more widely), government should avoid such resumption in order to not reward land-owners for destructive practices and to prevent the deliberate degradation of ecologically important sites that have not yet been destroyed.

**3. WWF is concerned about the potential loss of farmland.** According to the “HK2030+” study, extensive active and abandoned agricultural land can be found in NTN. Agricultural land offer enormous benefits to Hong Kong society, including: ecosystem services for social well-being, livelihood support to local farmers; low-carbon fresh food for local consumption; soil erosion reduction; soil biodiversity enhancement from organic farming practices; carbon sinks for global climate change mitigation; and wildlife population support<sup>3</sup>. Agriculture land can support high biodiversity if managed in an environmentally friendly manner; nearly 300 bird species have been recorded from agricultural land in Hong Kong<sup>4</sup>. WWF strongly urges government to preserve all active farmland, and abandoned farmland with good potential for rehabilitation, in NTN from future developments.

**4. WWF is concerned that the NTN development could cause water pollution in the Ramsar Site.** The proposed Man Kam To Logistics Corridor and the NTN New Town are situated in the watersheds of two important tributaries that become confluent with Shenzhen River (Fig. 3), which ultimately drains into Deep Bay and the Mai Po Inner Deep Bay Ramsar Site. In accordance with the Deep Bay Zero Discharge Policy, WWF requests appropriate, strong mitigations and safeguards to prevent pollution of any streams and rivers during construction and operation of the development.

**5. WWF is concerned the San Tin / Lok Ma Chau development will damage the ecological integrity of the “Green Belt” (GB) zones.** The proposed development will undermine the “GB” zones’ buffer function to the Lam Tsuen Country Park and the nearby “Conservation Area” zones (Fig. 4). According to the approved Ngau Tam Mei Outline Zoning Plan No. S/YL-NTM/12, the planning intention of these “GB” zones is “... primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this

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<sup>2</sup> Enforcement Notice No. E/NE-FTA/161 & E/NE-FTA/163

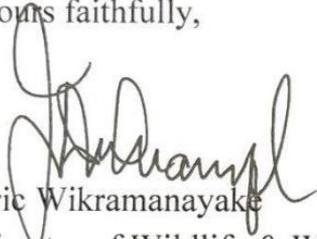
<sup>3</sup> Some bird species are more readily found in agricultural land than elsewhere, e.g. yellow-breasted bunting (*Emberiza aureola*) and quail (*Coturnix coturnix*).

<sup>4</sup> <https://www.legco.gov.hk/yr14-15/english/panels/fseh/papers/fseh20150609cb2-1621-17-e.pdf>

zone”. WWF strongly supports conserving the “GB” zones within the development boundary to maintain their ecological integrity and buffer function.

**6.WWF opposes the last-minute addition of potential extension areas to the NTN Development.** According to the discussion paper PWSC(2021-22)26 uploaded to the Legislative Council platform on 24 June 2021, a new potential extension area had been added to the proposed Man Kam To Logistic Corridor and NTN New Town. This submission has by-passed scrutiny by the Legislative Council Development Committee and precludes public comment because of the short deadline, therefore, it should not be allowed to proceed.

Yours faithfully,

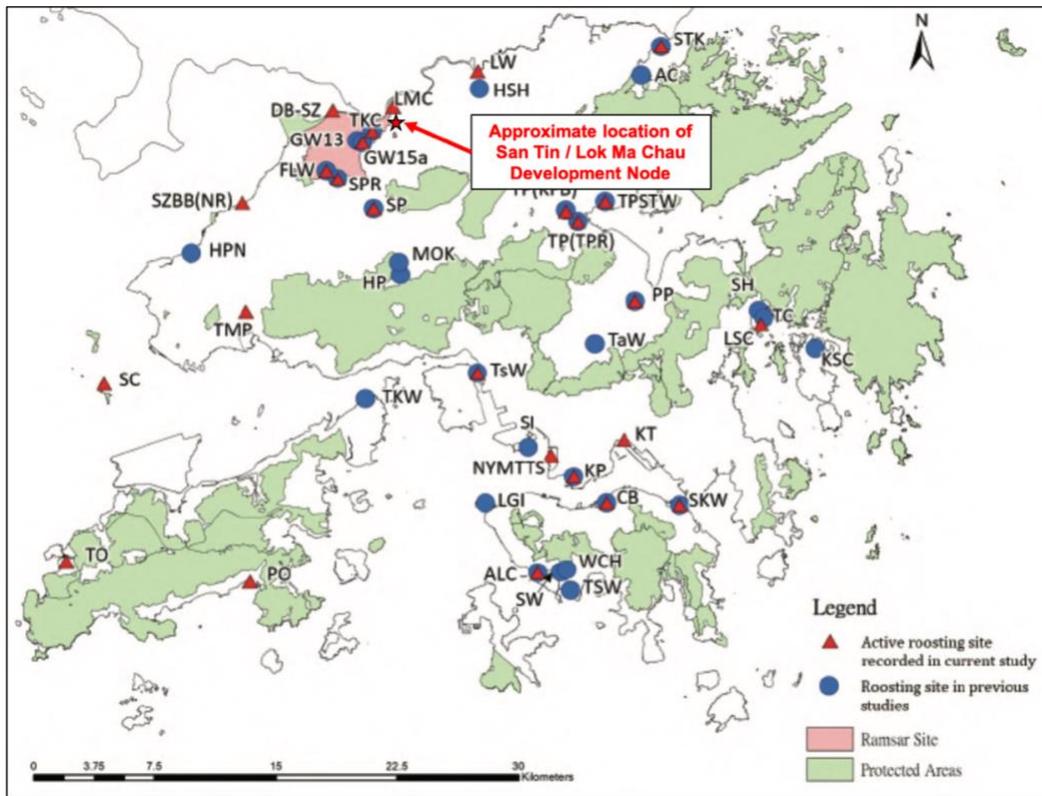


Eric Wikramanayake  
Director of Wildlife & Wetlands  
WWF-Hong Kong

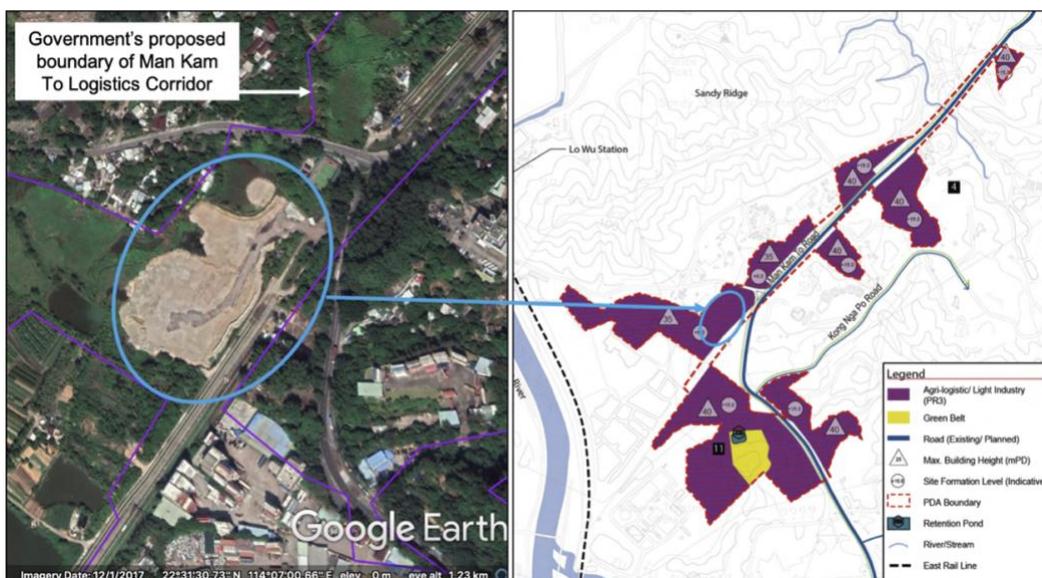
*Encl.*

Cc: Mr Michael Wong, Secretary for Development  
Mr KS Wong, Secretary for the Environment  
Ms Michelle Au, Political Assistant to Secretary for the Environment

**Fig 1. Ardeid night roost near the captioned San Tin / Lok Ma Chau Development Node (Map extracted from AFCD’s Newsletter of Hong Kong Biodiversity Issue No. 26<sup>5</sup>)**



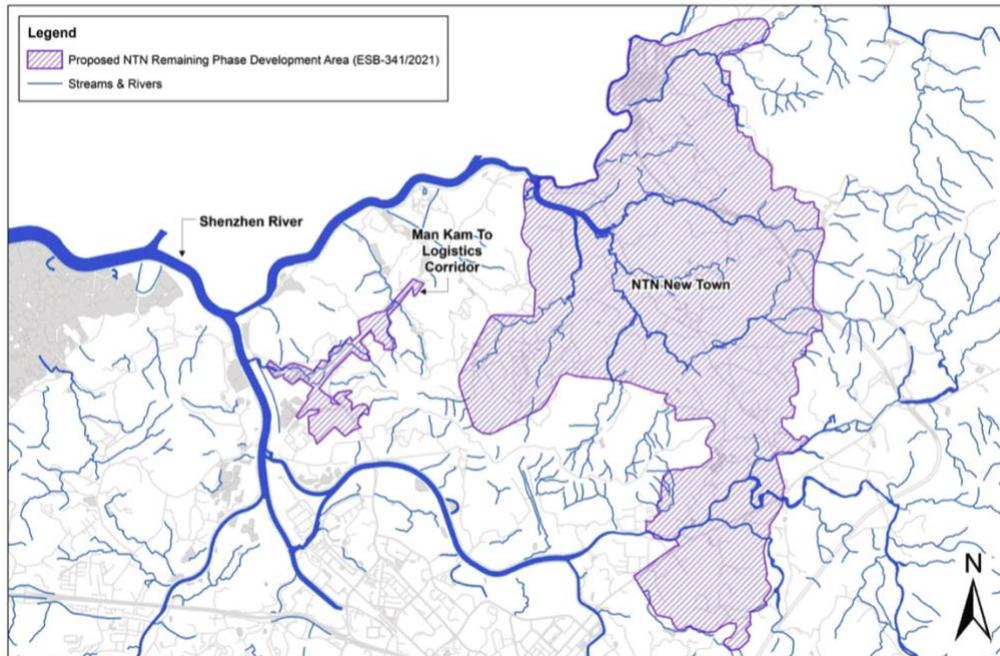
**Fig 2. A site on “Agriculture” zone at Man Kam To with unauthorized development (indicated with blue circle) is proposed for developing “Agri-logistic / Light Industry” under the NTN development**



(Image source: Google Earth [left image]; Extracted from the Broad Land Use Concept Plan of the final report of “Preliminary Feasibility Study on Developing the New Territories North” [right image])

<sup>5</sup> [https://www.afcd.gov.hk/english/publications/publications\\_con/files/Issue.No.26.pdf](https://www.afcd.gov.hk/english/publications/publications_con/files/Issue.No.26.pdf)

**Fig 3. Streams and rivers within the proposed NTN Remaining Phase Development under the captioned PP that become confluent with Shenzhen River which ultimately drains westward into Deep Bay and the Mai Po Inner Deep Bay Ramsar Site**



(Map data source: iB10000 Digital Topographic Maps downloaded from Hong Kong Map Service 2.0 of Lands Department)

**Fig 4. “Green Belt” zones within the boundary of the captioned project (marked approximately with black boundary) (Map source: Statutory Planning Portal 2)**

