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Town Planning Board
15/F North Point Government Offices
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North Point, Hong Kong
(Email: tpbpd@pland.gov.hk)

By E-mail ONLY

Dear Chairman and Board Members,

Comments and Recommendations on the
Draft Ngau Tam Mei Outline Zoning Plan (OZP) No. S/YL-NTM/15

WWF Hong Kong (hereinafter WWF) would like to submit our representation on the captioned Plan and provide our recommended amendments.

With joint effort from the Hong Kong Institute of Landscape Architects (HKILA), WWF hereby provide comments and recommendations to improve the Draft NTM OZP. Our ultimate vision is to drive the Ngau Tam Mei (NTM) New Town and other New Development Areas (NDAs) in the Northern Metropolis (NM), particularly those near the Mai Po and Inner Deep Bay Ramsar Site, towards the direction of Ramsar-accredited Wetland City, in which the wise use, conservation and restoration of (peri-)urban wetlands are integrated into the development and management plans for the benefits of human and nature.

Our key guiding principles in this exercise are as follows:

a. To create a liveable new town highlighting human well-being
b. To strive for human-nature harmony in the new town
c. To solve societal challenges in the new town with Nature-based Solutions (NbS)
d. To achieve urban-rural integration
e. To minimise biodiversity loss brought by the proposed development
f. To mainstream urban biodiversity in the new town design

Our detailed recommendations and proposed amendments to the draft OZP are detailed in the below sections.

1. Creating Thematic Parks under the "Single Site, Multiple Use" principle

A relatively large and intact wetland cluster (approximately 7ha in size) comprised mainly of active fishponds is located immediately west of the Ngau Tam Mei Water Treatment Works (NTMWTW) (see **Figure 1**). Under the current Draft NTM OZP, this wetland cluster will be sandwiched between the proposed UniTown and the existing NTMWTW, with part of the wetlands in the east to be lost to the development. Based on our site survey records, these ponds are regularly used by waterbirds, including iconic wetland species like Pied Kingfisher, egrets and waders. Ponds of this wetland cluster are unique in Hong Kong, in which fish species being raised is prized koi carp. Furthermore, during our on-site interview with the pond operator in this location, he confirmed seeing a Eurasian Otter occurring in these ponds in recent years. As such, we believe that this wetland cluster is of certain cultural, heritage and ecological value and should be preserved.

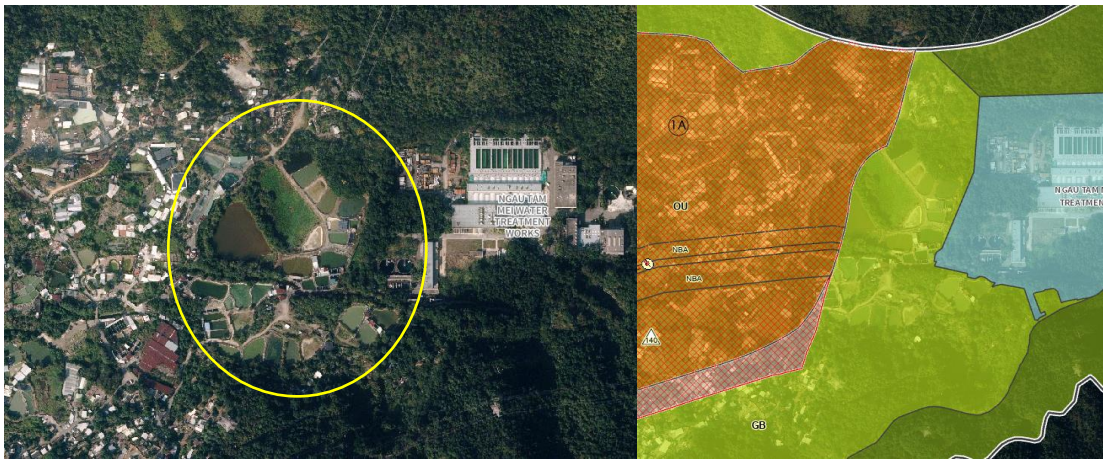

Figure 1. *Aerial photograph of the wetland cluster west of the NTM Water Treatment Works (left) and the proposed zonings of the area under the Draft NTM OZP No. S/YL-NTM/15 (right)*

The proposed Station Plaza and Riverside Park located in Area 3G is the largest open space to be provided in the NTM New Town. These will be connected to the Wai Cheung Ancestral Hall, which would be preserved in situ, via a 20m-wide Non-built Area (NBA). Altogether these will cover an area of approximately 12ha. Currently, this area is mostly comprised of farmland and fishponds.

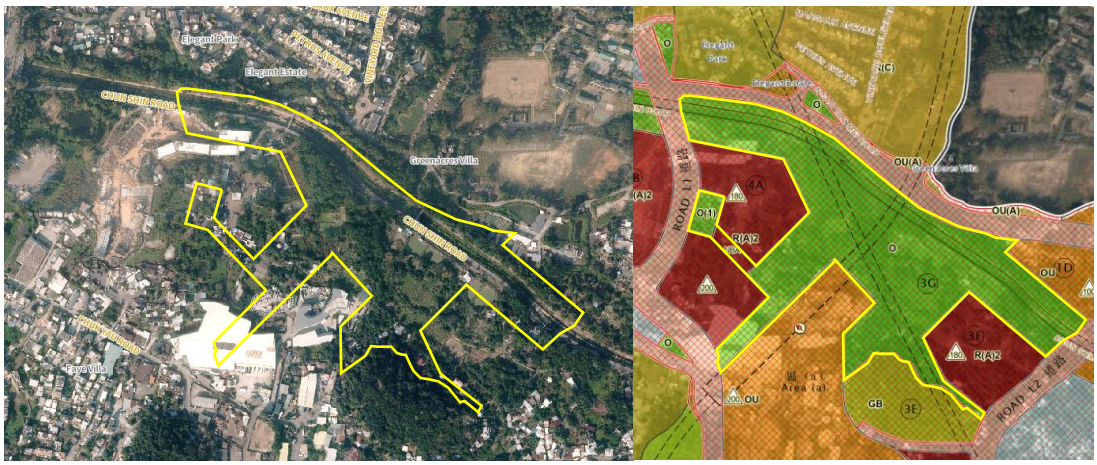

Figure 2. *Aerial photograph of the mosaic of farmlands and ponds near the future MTR station (left) and the proposed zonings of the area under the Draft NTM OZP No. S/YL-NTM/15 (right)*

Our proposal is to design two iconic parks with special themes (特色公園), by preserve the existing landscape features of these two distinct areas as far as possible. Together these two parks will cover a total size of 19ha, which is comparable to new town parks such as Tuen Mun Park, North District Park, and Tai Po Waterfront Park. The two parks will also be integral parts of the proposed Blue-green Spine that serves as a backbone of the town. It is envisioned that the parks will be planned and designed under the "Single Site, Multiple Use" principle, to serve multiple purposes, including public enjoyment, recreation, flood retention, run-off capture and treatment, provision of wildlife habitats, and urban green lungs for the NTM new town. This type of multifunctional urban wetland park has a

proven track record as urban Nature-based Solutions (NbS) that benefit both human and wildlife; the Benjakitti Forest Park in Bangkok and the Haizhu National Wetland Park in Guangzhou are successful examples.

For the pond clusters between the UniTown and the NTMWTW, a small extension of the NBA from the Blue-green Spine (covering only about 0.75ha) will be sufficient to preserve the wetland areas that fall into the UniTown (see **Figure 3** below). As this strip of wetland is located on the planned breezeway, there should not be any significant impacts to the planning and design of the overall layout of the UniTown. It could also be functionally linked with the planned view corridor and focal point in the UniTown for synergistic effects, creating a stronger visual anchor.

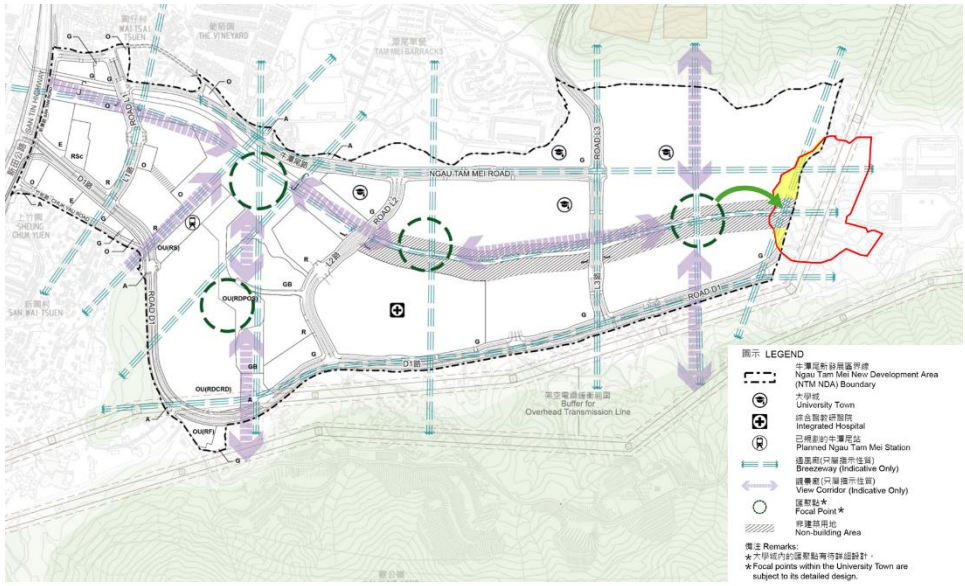

Figure 3. *Location of the proposed park (highlighted in red) between the UniTown and the NTMWTW, and layout of the planned view corridors, breezeways and focal points; the yellow-shaded area indicates our proposed additional NBA*

Furthermore, the establishment of these thematic parks, coupled with the preservation and revitalisation of the preserved historic buildings, would reflect the existing rural culture and history, enhancing rural-urban integration and symbiosis in the New Town. This initiative is in line with the "Development Blueprint for Hong Kong's Tourism Industry 2.0", which proposes to unleash the cultural heritage and local village history in the NM as potential tourism resources; as well as the 2025 Policy Address, which actively pushes for "Local Thematic Immersive Tours".

2. Blue-green Spine as the Backbone of NTM

We welcome the Government's proposal to revitalise the concrete-lined NTM Main Channel and convert it to the Blue-green Spine that would serve as the backbone of the NTM New Town. If well designed and managed, it would serve as physical and ecological connection to other open spaces and the NBAs, providing ample open space for the residents and also creating synergistic ecological gains. Again, the design of the Blue-green Spine should also follow the "Single Site, Multiple Use" principle, where various functions such as public amenity for leisure, recreation and nature appreciation of nature, as well as wildlife habitats, are integrated into one.

Due to its proximity to the Mai Po wetlands, the fully-concreted NTM Main Channel attracts typical riverine wildlife, with records of rarer bird species such as Eurasian Teal and Plumbeous Redstart. The NTM Blue-green Spine should be designed with a wide riparian zone that is floodable. Under normal circumstances, the floodable riparian zones could be used for various recreational activities such as hobby farming, picnicking, walking, jogging, etc. However, in extreme weather events with flood risk, the floodway could delay flow peaks by accommodating excessive flood water, and creates sufficient freeboard for the Main Channel. To re-establish a healthy aquatic ecosystem, the channel's concrete bottom must be restored to natural material with provision of deeper pools. A successful example of such eco-friendly river park is the Bishan-Ang Mo Kio Park in Singapore, which has been globally recognised as an urban NbS attractive to both residents and biodiversity.

According to our calculation, a total of 3.5ha of farmland and 2.6ha of fishpond are located within the boundary of the proposed Blue-green Spine (see **Figure 4**). Albeit relatively small and isolated, they still provide certain ecological functions to various lowland wildlife species occurring along the main channel. We urge the Government to consider preserving these habitats in situ as far as possible, and incorporate them into the widened floodable open space, enhancing the flood capacity, landscape and biodiversity values of the Blue-green Spine. It would also help mitigate for the ecological impacts of the Ngam Tam Mei development by retention of existing habitats.

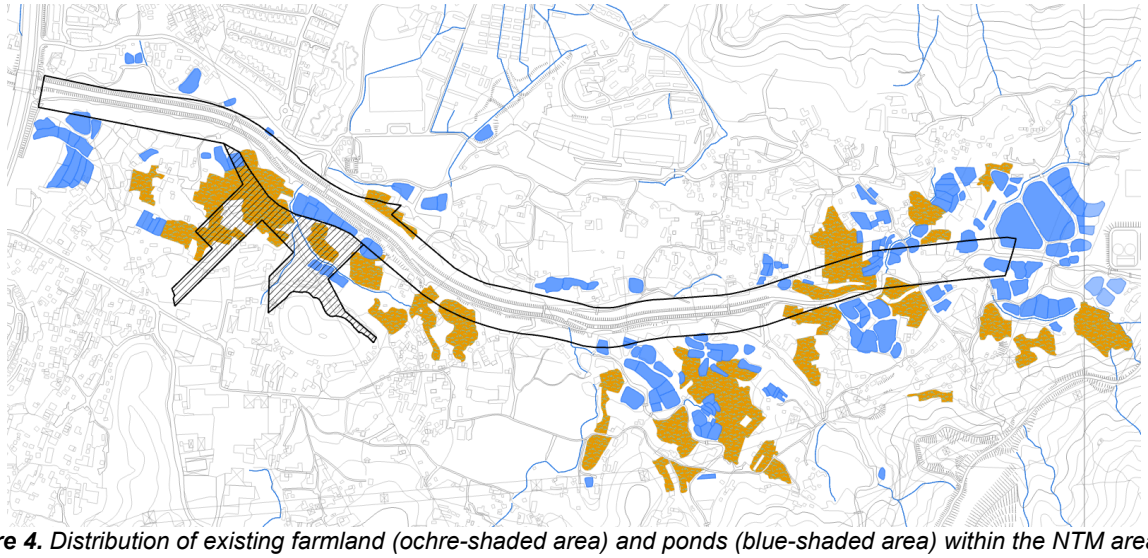

Figure 4. *Distribution of existing farmland (ochre-shaded area) and ponds (blue-shaded area) within the NTM area; the black-lined area covers the proposed Blue-green Spine, and the hatched area comprises the Station Plaza and Riverside Park*

We note from the previous relevant TPB meeting that, for the NTM Main Channel, the width of its wet channel would be expanded from the present 15m - 25m to about 26m - 40m to increase the hydraulic capacity. From an ecological perspective, over-widening of a river channel is undesirable, as water becomes shallow to the detriment of many aquatic species, and the stream may cease to flow during the dry season.

3. Connection and Synergy with the Sam Po Shue Wetland Conservation Park

Historically, the NTM river was hydrologically and ecologically linked to the Mai Po marshes (see **Figure 5** below). The subsequent developments in the rural landscape and the construction of the NTM Main Channel have weakened that connection, but waterbirds and even Eurasian Otter still visit this valley due to its proximity. We believe there is huge potential to reconnect the ecological linkage between the future NTM New Town to Sam Po Shue Wetland Conservation Park (SPSWCP) (see **Figure 6**).

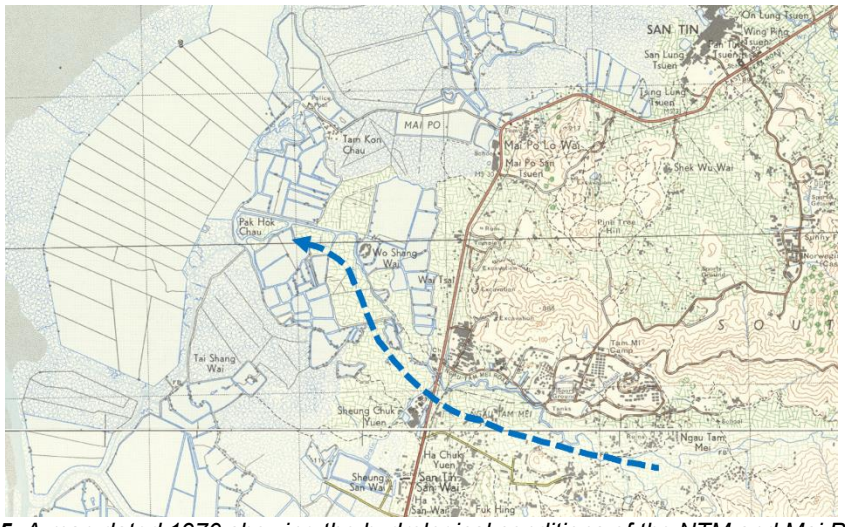

Figure 5. *A map dated 1970 showing the hydrological conditions of the NTM and Mai Po areas*

Figure 6. *Location of the NTM New Town and other wetland areas in the Deep Bay wetland ecosystem*

From a planning perspective, we recommend the Board to review whether it is possible to amend the zonings of the NTM Main Channel section under the Approved Mai Po and Fairview Park OZP No. S/YL-MP/8 from "REC" and "OS" to "O", to align with the Blue-green Spine in NTM, as indicated below in **Figure 7**. We believe this approach will enable the development of a more holistic river corridor and increase the ecological integrity, thus boosting the connectivity of the NTM Main Channel and the future SPSWCP.

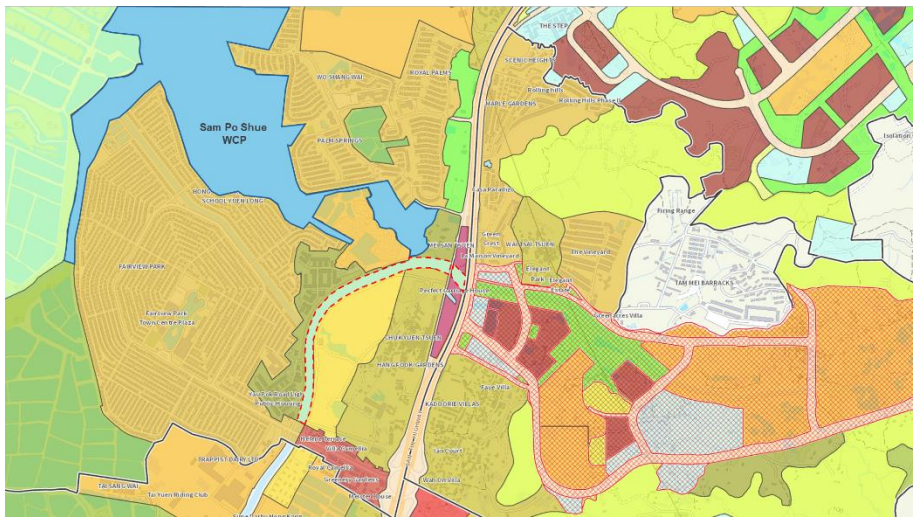

Figure 7. *Proposed amendments for the red-dashed areas to be rezoned from "REC" and "OS" to "O" to align with the zoning for the proposed Blue-green Spine in the NTM OZP*

To further strengthen the ecological connectivity, CEDD, DSD, together with AFCD, should also look into the feasibility of restoring the hydrological flow from NTM to the Mai Po Nature Reserve (MPNR) via the southeastern corner of SPSWCP sandwiched between Palm Springs and Fairview Park. A drainage bypass could be constructed to feed part of the water flow from the NTM Main Channel into this wetland strip, creating reliable source of fresh water for MPNR which is in short supply. This could also help alleviate the potential flood risk in the New Town by increasing the drainage capacity, especially when tidal backflow occurs at the lower reach of NTM Main Channel.

In addition, it is noted that the permitted building height at Areas 4A, B and C will be at +180m to +200mPD. These areas are located besides the proposed Blue-green Spine, and is only approximately 360m away from the proposed SPSWCP (see **Figure 8**). Considering that the vicinity comprises of village houses and low-rise residential villas with buildings height no more than +20mpD, the high-rise clusters at Areas 4A-C is incompatible with the surrounding rural character and visually intrusive to the general low-lying landscape. The landscape impacts would in turn alter the perception of wild birds to the area, deterring them from entering and utilising the NTM Main Channel.

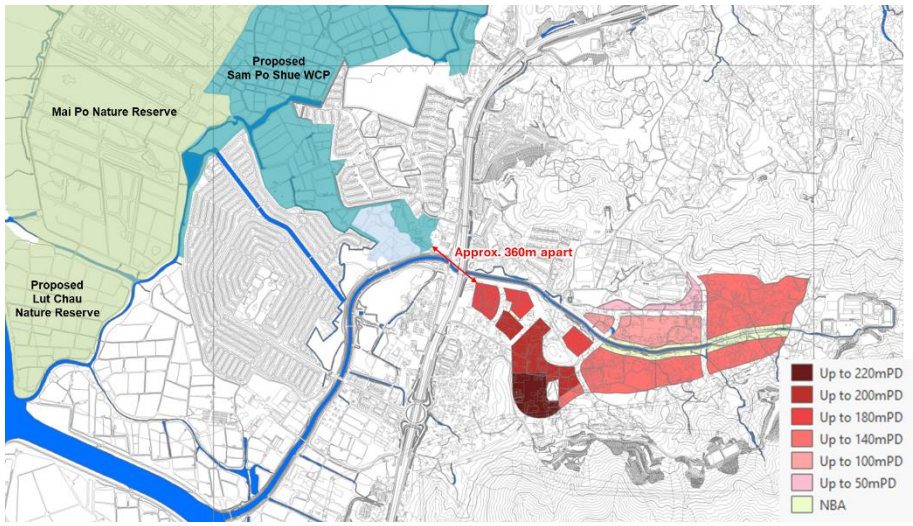

Figure 8. *Permitted building height in the NTM New Town*

For comparison, the roof level of the Tin Heng and Tin Chak Estates are at below +120mPD. These two Estates are located next to the Tin Shui Wai Main Channel, where migratory waterbirds including Black-faced Spoonbills, ducks and other shorebirds are regularly recorded. In view of that, we believe the Government should look into reducing the permitted building height in Areas 4A-C to create a more stepped height profile along the interface between the residential area and the Blue-green Spine. We also note that the proposed Roads L1, L2 and L3 will span across the Blue-green Spine. From a design perspective, we wish to advise the government to leave appropriate headroom between the bottom of the flyovers or crossings and the channel bed. This approach will create sufficient space for wildlife movements, especially flying birds.

An alternative NTM OZP with our recommendations incorporated is attached with this representation paper for the Board's and relevant departments' considerations. To conclude, WWF Hong Kong is committed to supporting the government in developing a Northern Metropolis where people live in harmony with nature. To that end, we would be pleased to elaborate on the details of any of our comments and suggestions. Thank you for your kind attention.

Yours sincerely,

Dr. Bosco Chan Pui Lok
Director, Conservation
WWF Hong Kong