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Development Bureau  
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(Email: nmlegislation@devb.gov.hk)

21st May, 2026.

**By email only**

Dear Sir/ Madam,

**Joint statement on proposed dedicated legislation to accelerate development of  
Northern Metropolis**

1. We refer to the captioned proposal.
2. We fully acknowledge that the Northern Metropolis (NM) is envisioned as a key driver of Hong Kong's future economic growth and transformation. We welcome this initiative, particularly the Government's stated intention to incorporate nature conservation and urban-rural integration into the overall planning framework. However, we are deeply concerned about the recent proposal to introduce dedicated legislation to accelerate land use planning processes in the NM. Under the current proposal, the accelerated land use planning process may lead to the gradual and irreversible loss of many remaining farmlands<sup>1</sup> within the NM.

**Urban-rural integration and Government's initiatives on farmland**

3. Urban-rural integration is identified as one of the key planning principles under the Northern Metropolis Development Strategy (NMDS)<sup>2</sup>. We expect that farmland will play an integral role in such integration. In fact, the Government's "Blueprint for the Sustainable Development of Agriculture and Fisheries"<sup>3</sup> published in 2023 explicitly recognises the long-term importance of farmland. The Blueprint states:

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<sup>1</sup> Definition of 'farmland' in this letter: including farmland suitable for cultivation and associated ponds/ fish ponds

<sup>2</sup> <https://www.policyaddress.gov.hk/2021/eng/pdf/publications/Northern/Northern-Metropolis-Development-Strategy-Report.pdf>

<sup>3</sup> [https://www.afcd.gov.hk/english/Blueprint/files/AFBlueprint\\_Eng.pdf](https://www.afcd.gov.hk/english/Blueprint/files/AFBlueprint_Eng.pdf)

*“In 2024, we plan to consult stakeholders regarding the recommendations from the consultancy study on APAs (Agricultural Priority Areas), which include reserving quality agricultural land for active agricultural use in the long run through the designation of APAs to accommodate the urban-rural integration plans for the Northern Metropolis and other districts and release the remaining land for other development purposes.”*

4. It is important to note that the remaining and scarce farmland in Hong Kong has many more functions than agricultural production: it has great community, ecological and heritage value. These initiatives can collectively advance the National Development Goal of Ecological Civilisation by integrating sustainable agriculture, biodiversity enhancement, climate resilience, and blue-green infrastructure to create a self-sustaining, climate-adaptive landscape. It also enhances community well-being, cultural preservation, local employment, food security, carbon neutrality, and high-quality living environments through inclusive, nature-based and socially cohesive development within and surrounding new development areas.

#### Risk of premature loss of high-quality farmland

5. A recent newspaper article published in April, citing a response from Agriculture, Fisheries and Conservation Department, indicated that the review of the APA policy would be completed in 2026, and the 37 proposed APAs will entail no major changes in terms of location and size<sup>4</sup>—raising hope of its imminent implementation—however, the policy has yet to take effect. In the meantime, current dedicated legislation appears to be moving in the opposite direction. In particular, the proposed acceleration of rezoning considerations, together with the extension of temporary land uses, raises serious concerns about the government’s stated policy intent to safeguard farmland.

6. Many of the proposed APAs<sup>5</sup> are located within “Agriculture” (AGR) zones under the key areas affected by the proposed legislation (i.e., Yuen Long and North Districts). At the same time, farmlands in AGR zones are frequently targeted as land banks for development, especially for temporary uses such as open storage, warehouses, and other non-agricultural activities. In the absence of a formally implemented farmland protection framework, accelerated legislative mechanisms may incentivise increased applications for development in this zone.

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<sup>4</sup> <https://news.mingpao.com/pns/港聞/article/20260405/s00002/1775325102691/諮詢完成待修細節-漁護署料年內成事>

<sup>5</sup> <https://www.legco.gov.hk/yr2024/english/panels/fseh/papers/fseh20241210cb2-1591-1-e.pdf>

7. Extending the temporary use period to seven years risks converting short-term uses into permanent land loss, leading to irreversible farmland destruction and fragmentation. Prolonged temporary uses can also render farmland difficult or economically unviable to restore, particularly affecting actively cultivated land and fallow areas with strong rehabilitation potential. Past experience indicates that some Section 16 applications within AGR zones, especially those involving land-filling, appear linked to suspected unlawful land use changes later pursued for ‘regularisation’ through the planning system. If longer temporary use periods or rezoning proposals are approved before robust farmland protection measures are implemented, the agricultural viability and arability of the affected land would likely be severely and irreversibly compromised, undermining the original planning principle of the NMDS, APA policy, and the relevant Blueprint initiatives.

8. Furthermore, it is noted that several ecologically and/ or agriculturally important farmland plots are located within proposed/ designated New Development Areas (NDAs) (e.g., those in Sandy Ridge (Lo Wu South), Tai Po Tin, Shan Kai Wat, Lei Uk, Ma Tso Lung, Chow Tin<sup>6, 7 & 8</sup>), and are consequently not covered by the proposed APA policy<sup>5</sup>. Although some of these sites (or parts thereof) fall within the Priority Development Area of the New Territories North New Town, and the majority of the Sandy Ridge farmland is currently proposed to be zoned as Green Belt (GB)—and therefore may not be immediately affected by the proposed dedicated legislation—the government document also states that “*once the new Outline Zoning Plans (OZPs) of the relevant NDAs and Priority Development Area have been formulated, the relevant streamlined measures will be applicable*<sup>9</sup>.” Moreover, the GB zoning for Sandy Ridge has yet to be confirmed. In view of these uncertainties, we consider that high-quality farmlands within the aforementioned locations (please refer to maps in 6, 7 & 8) should also be afforded protection from incompatible land-use changes.

#### Our recommendation

9. We urge the Government to carefully reconsider the sequencing and safeguards of the proposed legislative acceleration, and to ensure that meaningful and enforceable farmland protection mechanisms (e.g., the APA policy) are put in place before any legislative enactment that may accelerate the loss of farmland is implemented. Also, high-quality farmlands not included under the APA policy—but which may nonetheless be affected by the

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<sup>6</sup> [https://www.kfbg.org/images/download/KFBG\\_nm\\_farmland\\_survey\\_report\\_eng.pdf](https://www.kfbg.org/images/download/KFBG_nm_farmland_survey_report_eng.pdf)

<sup>7</sup> <https://www.kfbg.org/images/download/kfbg%20northern%20metropolis%20bird%20report%20sept%202023%20eng.pdf>

<sup>8</sup> <https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/>

<sup>9</sup> <https://www.legco.gov.hk/yr2026/english/panels/dev/papers/dev20260324cb1-245-3-e.pdf>



proposed dedicated legislation—should also be carefully considered. We therefore recommend the following:

- Proposed APAs and high-quality farmlands not covered by APAs such as those in Sandy Ridge, Tai Po Tin, Shan Kai Wat, Lei Uk, Ma Tso Lung and Chow Tin be explicitly excluded from the scope of the proposed legislation, in the same way that conservation zonings are currently treated, to safeguard their long-term agricultural/ecosystem service function and integrity.
- To strengthen the protection of high-quality farmlands and the proposed APAs, and better achieve the intended objectives of the Blueprint, a town planning approach should be adopted by zoning the currently proposed APAs and other farmlands of high agricultural/ecological value in Yuen Long, North District, or the statutory Northern Metropolis as “Other Specific Uses (Agricultural Priority Area)” (OU(APA)).
- To prevent abuse of temporary uses in farmland, temporary uses involving land filling or pond filling in AGR zones should be restricted to a maximum of three years.
- Controlled-environment Agriculture (CEA) (e.g., greenhouse, hydroponic farm, etc.) that is often linked to significant environmental degradation, including soil degradation, hydrological disruption and loss of wildlife habitats should be discouraged/excluded from APAs.

10. Thank you for your attention.

Co-signed organizations:

Kadoorie Farm and Botanic Garden

WWF-Hong Kong

cc. AFCD