



**Joint green group recommendations on Northern Metropolis Strategy:  
A call for a holistic conservation policy and timetable for the protection of sites of  
conservation importance**

We appreciate and welcome the proactive conservation measures proposed by the Government under the Northern Metropolis Strategy, including the resumption of private fishponds and other wetlands in the Deep Bay area in the Northwestern New Territories under the Land Resumption Ordinance (Cap. 124). However, the Northern Metropolis also has been planned to host a population of about 2.5 million people. With development at such mammoth scale, we consider that a series of measures and actions are required to ensure current conservation efforts are not compromised by developments in the Northern Metropolis area before and during the planning, construction and operation phases. Thus, we urge the Chief Executive and her teams to take the following measures in regard to the nature conservation issues of the Northern Metropolis Strategy:

**1. Recognise and protect sites of conservation importance through effective policies and regulations**

- We support the Government's commitment to resume private land under the Land Resumption Ordinance (Cap. 124) for the public purpose of nature conservation.
- We appreciate the establishment of Wetland Conservation Parks (WCPs) to conserve and manage 2,000 hectares of ecologically important wetland ecosystems and enhance the ecological value of the area.
- We ask for an extension of the Ramsar Site to cover all the ecologically important wetland ecosystems in the Deep Bay area and continue to work with the Shenzhen side to protect the wetland habitats in Deep Bay / Shenzhen Bay.
- We suggest the Government adopt a holistic conservation approach to enhance the integrity of the Deep Bay wetland ecosystem.
- All fishponds and other wetlands within the existing "Wetland Conservation Area" designated under the Town Planning Board Planning Guideline No. 12C must be included in the WCPs.
- The proposed Robin's Nest Country Park should be expanded from about 500 hectares to 1,120 hectares<sup>1</sup>. This would properly establish the ecological corridor that will connect terrestrial habitats in Shenzhen – particularly Wutong Shan - with Pat Sin Leng Country Park and thereby to Hong Kong's wider Country Park Network.
- We recognise the role and functions that farmland plays in our local food supply and in nature conservation. Therefore, we recommend the government to safeguard active farmlands and abandoned farmlands with good potential for rehabilitation to promote sustainable agriculture and biodiversity.

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<sup>1</sup> Environmental NGO's Joint Statement on the Designation of the Robin's Nest Country Park (10 May 2019)

## 2. **Alleviate development pressure on sites of conservation importance**

- Impacts arise from any development projects in all ecologically important sites and habitats, including but not limited to Sites of Special Scientific Interest (SSSI), Conservation Area (CA), Coastal Protection Area (CPA), Green Belt (GB), natural stream, mudflat, fishponds, egretry and other areas with important species recorded in any ecological studies, should be greatly avoided and minimized.
- Being mindful of ‘edge effects’ which the quality of the habitat to be conserved would be affected by the surrounding development, there must be a buffer between ecologically important sites and planned developments. We affirm the value of buffer zone and specifically the Wetland Buffer Area as an important part of the conservation strategy currently adopted for the alleviation of development pressure in the Deep Bay area, including the future development of the Northern Metropolis.
- As a genuine commitment, conservation initiatives in the Northern Metropolis, particularly WCPs, must not be environmental and ecological ‘compensations’ for any future development projects in Northern Metropolis. The wetlands will represent ‘green spaces’ that add value and contribute to the health and well-being of the people in the Northern Metropolis and in Hong Kong, and will be safe havens for Hong Kong’s biodiversity. They will also make significant regional and global contributions to conserving global biodiversity by providing critically important habitats for the migratory birds that use the East Asian-Australasian Flyway.
- The Town Planning Board Planning Guideline No. 12C should be maintained and followed, including the principles of “no-net-loss in wetland” and “precautionary approach” to maintain a continuous coverage of fishponds in the wetland landscape, and to maintain ecological connectivity therein, when developing the Northern Metropolis.
- Existing legal framework for nature conservation, environmental protection, planning and land use, including but not limited to the Environmental Impact Assessment Ordinance (Cap. 499), Town Planning Ordinance (Cap. 131), Water Pollution Control Ordinance (Cap. 311), Hong Kong Planning Standards and Guidelines, should be maintained and followed in the establishment of WCPs and all developments.
- In any review of relevant ordinances, we insist effectiveness should not be sacrificed to efficiency, and that provision for public consultation should be retained.
- Mainstreaming and integrating biodiversity, climate resilience and other environmental considerations in the planning process of the Northern Metropolis is important to truly reduce the negative impacts of habitat degradation and climate change in advance at the policy and planning level.

## 3. **Ensure no ecological degradation during the transition from policy announcement to designation of protected areas**

- Private landowners may have expectations for the land resumption process and may change the operation of the fishponds or wetlands, which may have potential adverse impacts on the



overall ecological value of the Deep Bay wetlands. There should be measures to maintain and enhance the existing ecological values of wetlands during the transitional period and a timeframe for land resumption should be prepared.

- We recognise the contribution of fishermen in maintaining the operation of fishponds active in the Deep Bay area. Their livelihood and experience in fish farming should be treasured and respected, and their engagement as stakeholders and managers of the fishponds and wetlands is crucial to the maintenance and management of the WCPs.
- We request an ecological study prior to the planning of Northern Metropolis with a clear timeframe to avoid loss of wetlands. All data and findings of the study to assess the current wetland status must be shared with the public and concerned green groups for transparency and effective coordination and collaboration.

#### 4. **Ensure the protected areas are planned, established, and managed for conservation**

- There should be a detailed study into the delineation of the boundary of WCPs and buffer area to safeguard the connectivity and function of the wetland ecosystem.
- Conservation should come first in the planning and management of the WCPs, with minimal built-up areas.
- Any infrastructure or horticulture within the proposed WCPs must promote, rather than segment the contiguity of the current wetland landscape and compromise the ecological integrity to the Deep Bay wetland ecosystem.
- Any proposed recreation and public education facilities and activities should not cause any loss of wetland and undermine the nature conservation objectives of the WCPs, and their planning, design, construction and operation should be adequately and properly regulated and managed.
- Common conservation goals for the proposed WCPs should be formulated through a holistic, landscape-scale conservation strategy and policy.
- Sufficient funding should be committed and allocated for management and operation of this wetland system and particularly the WCPs. A working group should be established in the design stage to proactively address potential and foreseeable environmental and ecological issues in the proposed parks during the construction and operation phases.

#### **Co-organised groups (in alphabetical order):**

The Conservancy Association

Designing Hong Kong

Green Power

Hong Kong Bird Watching Society

WWF-Hong Kong