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香港分會

WWF-Hong Kong

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**Chairman and Members of Panel on Development, Legislative Council**  
(c/o Clerk to Panel on Development)  
Legislative Council Complex,  
1 Legislative Council Road, Central, Hong Kong

21 March 2022  
(By post and e-mail)

Dear Sir/Madam,

**Re: Panel on Development Meeting on 22 March 2022, agenda item**  
**#III “Legislative proposals to streamline development-related statutory processes”**

We understand the above captioned will be discussed during the meeting of the Panel on Development on 22 March 2022. WWF-Hong Kong (WWF) is concerned regarding “Enhancing Enforcement-related Provisions of Town Planning Ordinance” as stated in Annex B of the Administration’s paper on legislative proposals to streamline development-related statutory processes (LC Paper No. CB(1)78/2022(02)).

As suggested in the LC Paper No. CB(1)78/2022(02), “*We propose prescribing a new power under the Ordinance, such that Secretary for Development may designate certain **areas of high ecological values** but subject to development pressures and environmental degradation to be an “Enforcement Area”, if the area (not previously designated as a DPA) is covered by an OZP. By this new designation, the relevant enforcement provisions under the Ordinance currently applicable to a DPA will likewise apply to a designated “Enforcement Area”.*”

However, we believe that **all area that is not previously designated as a DPA** should be designated as “Enforcement Area”, as part of a precautionary approach under the pro-active conservation policy. Only enforcing in “areas of high ecological values” is problematic as this will pose huge threat to the “medium” and “lower” ecological values area, which usually serve as a buffer area to the “high ecological values area”. Moreover, the current proposal has neglected the fact that some currently degraded ecological value areas have restoration potential to become areas of high ecological values.

To have a smoother and all-rounded amendment, WWF urges for a comprehensive consultation for all public members on the proposed changes, to have public support and reduce confrontation.

Thank you for your attention. WWF is open for dialogue to exchange our thoughts on the captioned with the Panel and relevant government departments.

Yours faithfully,

**together possible**™

贊助人：香港特別行政區行政長官  
林鄭月娥女士、大紫荊勳章、GBS  
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A handwritten signature in blue ink, appearing to read 'Eric Wikramanayake', is positioned at the top left of the page.

Eric Wikramanayake  
Director of Wildlife and Wetlands  
WWF-Hong Kong

c.c. Secretary for the Environment, Mr Wong Kam-sing, GBS, JP  
Secretary for Development, Mr Michael Wong Wai-lun, JP