



世界自然基金會
香港分會

WWF-Hong Kong

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27 Oct 2025

Dr. CHUI Ho Kwong, Samuel, JP
Director of Environmental Protection
16/F, East Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(Email: eiaocomment@epd.gov.hk)

By email only

Dear Dr. Chui,

RE: Development at Ngau Tam Mei Area
(EIA-316/2025)

WWF would like to provide the following comments and recommendations to the captioned EIA report (hereafter as EIA Report) on the proposed development at Ngau Tam Mei Area (the Project).

Impacts to recognised biodiversity hotspot and associated at-risk species

The Project is located within the globally-recognised **Inner Deep Bay and Shenzhen River Catchment Area Key Biodiversity Area (KBA)¹** and **Important Bird Area (IBA)²**, which support a wide range of wetland-dependent species, of which many are globally-threatened. In addition, WWF-Hong Kong, in association with a group of local experts, published a report titled “**The State of Hong Kong Biodiversity 2025**” in March 2025, together with the “**Hong Kong Terrestrial Biodiversity Hotspot Map 2025**”³ (hereinafter as **the Report**). The Report concluded that 26% (232 out of 886) of the assessed terrestrial and freshwater species in Hong Kong are at risk of local extinction. The Report also identified a total of 27 biodiversity hotspots in Hong Kong, one of which is the “Inner Deep Bay”.

The Project will interfere directly and indirectly with the KBA and IBA, as well as the “Inner Deep Bay” hotspot identified in the Report. With the richest bird diversity and abundance across Hong Kong, this hotspot ranks top among all 27 hotspots. Data and information

¹ <https://www.keybiodiversityareas.org/site/factsheet/16078>

² <https://datazone.birdlife.org/site/factsheet/inner-deep-bay-and-shenzhen-river-catchment-area>

³ <https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/>

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from our expert group have shown that the “Inner Deep Bay” hotspot support at least **158 species of High or Moderate Risk, including the Eurasian Otter (*Lutra lutra*)**.

Under **Note 3** of the **Annex 16** of the **Technical Memorandum on EIA Process**, it is stated that “*Species of Conservation Importance*” refers to wild fauna or flora that are “... considered as rare in the territory or having special conservation importance by scientific studies other than those listed above.” Regrettably, the findings of the EIA Report, particularly the local species assessments, were not referenced anywhere in the captioned EIA Report. Instead, Fellowes *et al.* (2002) was still heavily referenced in the EIA study when referring to local conservation status of fauna species, despite the fact that it was published more than two decades ago and thus could not possibly reflect the current state of Hong Kong’s biodiversity. Such negligence would result in underestimation of the true ecological value of species and habitats in the EIA’s assessment.

Eurasian Otter

According to paragraph 9.8.29 of the EIA Report, it states that “...*In response to public concern received during the Public Engagement, questionnaire interviews were conducted for any sightings of Eurasian Otter within the assessment area. No Eurasian Otter within the Project Site or assessment area was reported by interviewees or recorded during the ecological baseline surveys. Thus, direct impact to Eurasian Otter is not anticipated.*”

While the consultant claimed that questionnaire interviews had been conducted, the breadth and depth of this interview survey were not provided. In the complete absence of survey design and methodology details, inferring the impact level to such an important species in an EIA study is not acceptable. We wish to highlight that during our team’s visit to Ngau Tam Mei in April 2025, we interviewed the pond owner at the koi ponds immediately west of the Ngau Tam Mei Water Treatment Works, and he remarked seeing otters in recent years along the main channel and in the ponds he managed.

Furthermore, based on scientific studies and surveys, Ngau Tam Mei is well within the known range of otters in Hong Kong, and adjoins the identified otter core area (see **Plates 1 and 2**). McMillan *et al.* (2022) reported otter presence near Yau Mei San Tsuen (see **Plate 2**), which is ecologically and hydrologically connected to Ngau Tam Mei via the main drainage channel. McMillan *et al.* (2019) also reported confirmed otter sighting within Ngau Tam Mei (see **Plate 3**). Again, such noteworthy scientific publications were not even mentioned in the EIA Report, which only jumped to the conclusion that “*direct impact to Eurasian Otter is not anticipated.*”

Finally, we strongly recommend the Project Proponent conduct thorough pre-construction surveys for otters within the Project Site as a failsafe procedure. Should otters be recorded and/or reliably reported by local residents, specific mitigations should be proposed by the Environmental Team to minimise the impacts to the species in the

construction phase. The channel revitalisation design for Ngau Tam Mei should take special considerations to the habitat requirement and habits of otter.

Incorporation of stepped building height profile

According to the Recommended Outline Development Plan, the proposed building blocks is ranged from 100 to 220 metres above Principal Datum (mPD). We view such building height would likely result in avifaunal flight line interference, particularly ardeids attempting to access roosting/foraging site along the Ngau Tam Mei River and surrounding wetlands. We recommend the Project Proponent (the Proponent) should adopt stepped-height profile along all green infrastructures, such as the Ngau Tam Mei Drainage Channel (NTMDC) and major green spaces.

Measure to mitigate water quality impacts on the Deep Bay catchment

The Project Site falls within the Deep Bay catchment and thus any discharge from the development would increase the pollution loading, thus the water quality of the Deep Bay. As such, the Proponent must not discharge surface runoff into the natural/semi-natural/modified watercourses within or near the development site, which are hydrologically connected to the Deep Bay. Surface runoff must be directed into sand/silt removal facilities before discharging into storm drains. Sediments, soil, excavated materials should not be stockpiled in close proximity to any watercourses to prevent runoff during rainstorms. Such conditions should be incorporated into the specifications of the works contract.

Regulating and monitoring disposal operations against eco-vandalism

Given the distance between the development site and the five recognised sites of conservation importance i.e. Lam Tsuen Country Park, "Conservation Area", Wetland Buffer Area, Wetland Conservation Area and Priority Site for Enhanced Conservation is within 500 meters, we recommend that specific "no-go" areas of significant ecological importance, particularly those located outside the project site boundary, be designated with entry restrictions for all dump trucks involved in waste transportation and disposal under the Project. This measure aims to protect sensitive habitats from illegal dumping and the filling of construction and demolition materials. An automated alarm system should be installed to detect and immediately alert the Proponent if any dump truck enters these restricted areas. Additionally, all dump trucks should be equipped with a Global Navigation Satellite System (GNSS), such as the Global Positioning System or an equivalent automatic identification system, to enable real-time tracking and monitoring of their routes and locations.

Re-consider the suitability of the currently proposed wetland compensation site

The EIA Report proposes a 3.5 ha wetland compensation site to compensate a total loss of 2.55 ha wetland habitats due to the development. Since the proposed compensation site is surrounded by San Tam Road to its east, Castle Peak Road-Yau Mei section to its west, pass by the San Tin Highway from above on its west, and a traffic light system

situated at its south, such isolated “green island” surrounded by traffic infrastructures can cause 24-hour disturbances to the level that make such compensation wetland of very low ecological value. Besides, paragraph 9.11.32 of the EIA Report describes that *the proposed wetland compensation site is currently a developed area/wasteland habitat overgrown with herbs/shrubs and exotic/pioneer tree species...* suggesting that the proposed compensation site may lack regular water sources, minimizing its function as a wetland. As such, we recommend the Proponent to select another site for more effective off-site compensatory impacts.

Identify opportunities to implement Nature-based Solutions (NbS)

According to Fig 5.3 of the EIA Report, two underground retention tanks would be built in the development site. While underground retention tanks can be paired with NbS in a comprehensive urban drainage system, we like to emphasize that it is an engineered-based solution using gray infrastructure, and lacks the ecosystem service functions of NbS, such as water purification, biodiversity support, and infiltration. While the drafting of NbS guideline under the Civil Engineering and Development Department’s consultancy has been ongoing, we strongly encourage the Proponent to apply more NbS such as the “floodable open space” concept that is under consideration for the Hung Shui Kiu / Ha Tsuen New Development Area. The numerous existing fishponds and wetland patches in Ngau Tam Mei areas provide ample opportunities to adopt surface flood retention ponds, which can act as open spaces in the future town.

Adopt urban ecology concept for planting at optimal vegetation density

To enhance biodiversity, we recommend the Proponent to incorporate a rich variety of native plant species that support diverse habitats and attract a wide range of wildlife when considering relevant landscape mitigation measures or buffer planting along the banks of the NTMDC. With appropriate design, such plantings can connect fragmented green spaces—such as parks, gardens, and other isolated habitats—into continuous ecological corridors that facilitate wildlife movement, foraging, and breeding. However, it’s important to recognise that overly-dense planting of vegetation can hinder wildlife movements. Therefore, any planting programmes in the Project should be thoughtfully designed and appropriately scaled in accordance with the desired ecological outcomes.

Continuous consultation on the Habitat Creation and Management Plan (HCMP)

According to paragraph 9.11.33 of the EIA Report, only a draft HCMP (refer to Appendix 9.6 of the EIA Report) is currently provided for public inspection. The detailed design of the wetland compensation site, along with the full HCMP, will only be made available during the detailed design stage which is nevertheless not open to any public member for comments. We believe that a comprehensive habitat management plan should be made publicly available for comment or at least consult with relevant concerned environmental groups such as WWF prior to the approval of the EIA report and the issue of the Environmental Permit for the development. Early dialogue allows for the identification of potential issues in the HCMP, enabling these issues to be addressed

early on, leading to more effective solutions to improve and enhance the design of the HCMP.

Thank you very much for your kind attention and consideration.

Kind regards,

A handwritten signature in blue ink, reading "Tobi Lau". The signature is written in a cursive, flowing style.

Mr. Tobi Lau
Senior Manager, HK Biodiversity and Conservation Policy
WWF Hong Kong
Tele: 2161 9626

Plates

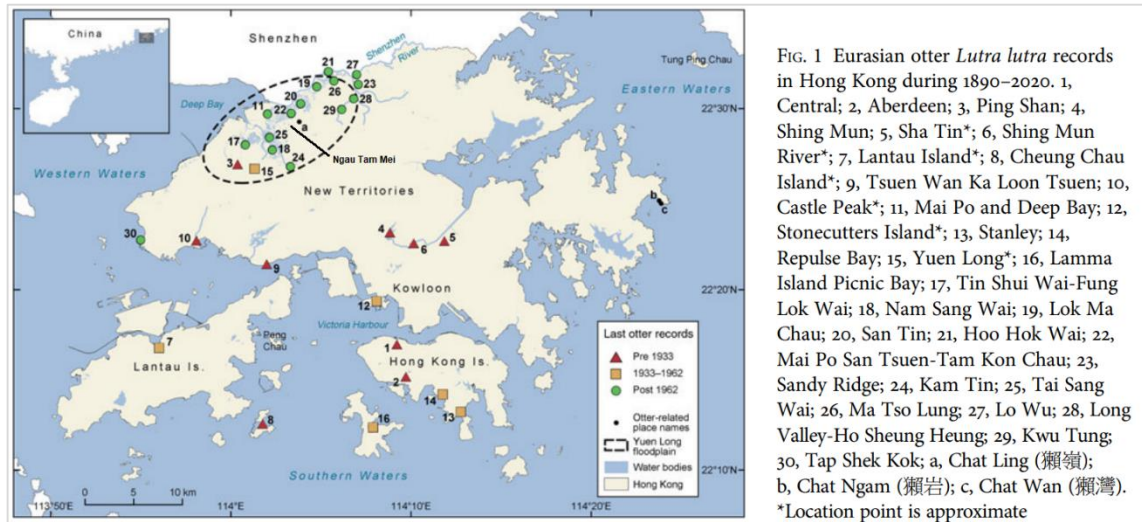


Plate 1. Locations of otter records in Hong Kong (extracted from Hui & Chan 2024; available from <https://www.cambridge.org/core/journals/oryx/article/analysis-of-a-131-year-longitudinal-dataset-of-the-eurasian-otter-lutra-lutra-in-hong-kong-implications-for-conservation/168FF4862AEC7B1B3934F4B0C77F146A>)

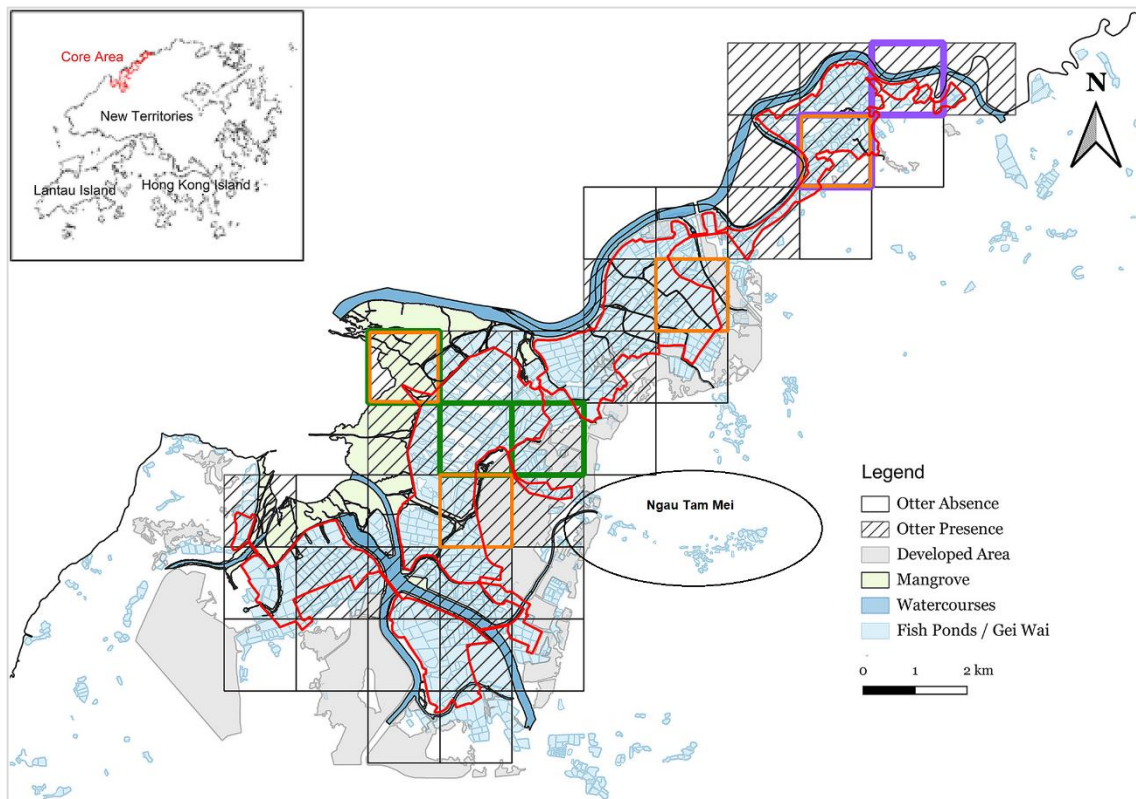


Plate 2. Locations of otter's core area and records of presence in Hong Kong (extracted from McMillan et al. 2022; available from <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/csp2.12851>)

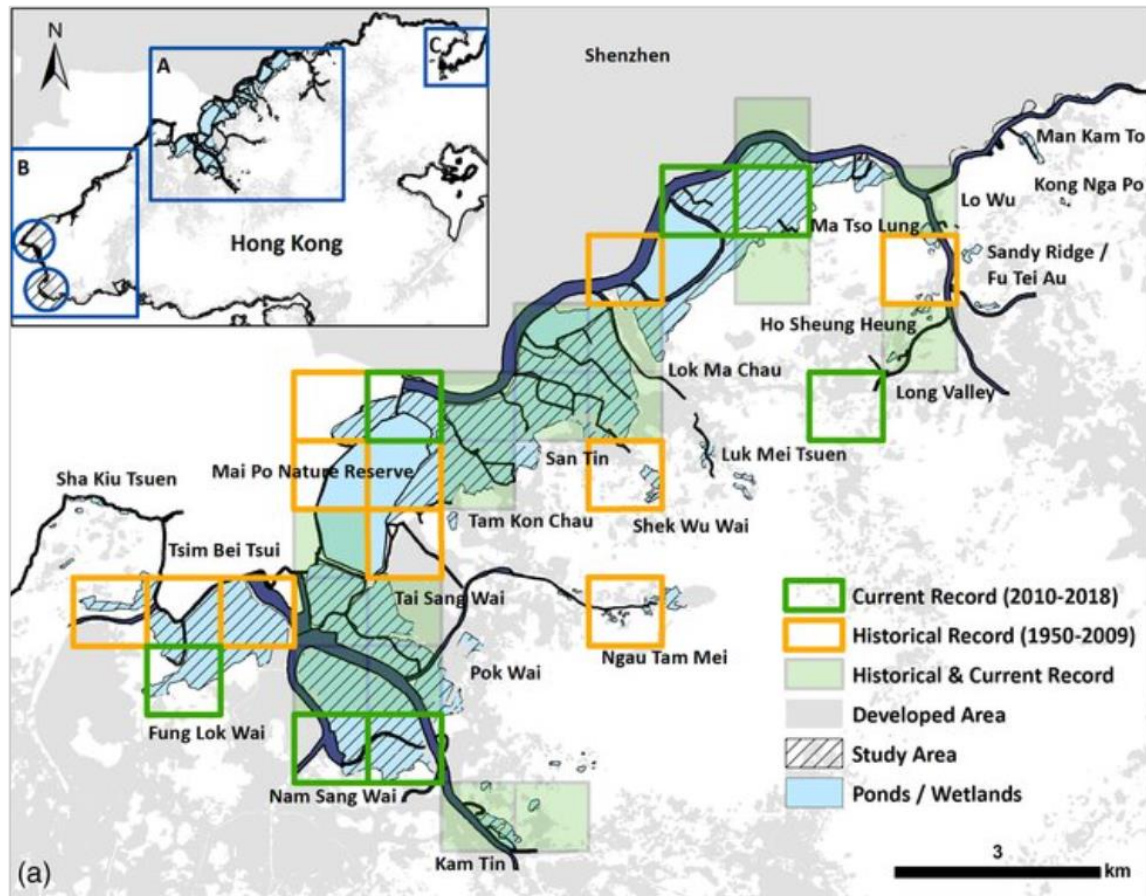


Plate 3. Historical and recent otter sightings (1950–2018) (extracted from McMillan et al. 2019; available from <https://conbio.onlinelibrary.wiley.com/doi/10.1111/csp2.79>)