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By E-mail ONLY

Dear Dr. Chui,

**Developments at Lau Fau Shan, Tsim Bei Tsui and Pak Nai Areas**  
**(Application No. PP699/2026)**

WWF would like to provide the following comments and recommendations to the captioned Project Profile (PP) on the proposed “Developments at Lau Fau Shan, Tsim Bei Tsui and Pak Nai Areas” (hereafter referred to as 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)<sup>1</sup> and Important Bird Area (IBA)<sup>2</sup>, 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 (e.g. the Hong Kong Bird Watching Society, Kadoorie Farm and Botanic Garden, and local researchers), published a report titled “The State of Hong Kong Biodiversity 2025” in March 2025, together with the “Hong Kong Terrestrial Biodiversity Hotspot Map 2025”<sup>3</sup>. The study concluded that 26% (232 out of 886) of the assessed terrestrial and freshwater species in Hong Kong are at risk of local extinction; and identified a total of 27 biodiversity hotspots in Hong Kong.

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 from our expert group have shown that this hotspot supports at least 158 species of High or Moderate Risk of local extinction.

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

<sup>2</sup> <https://datazone.birdlife.org/site/factsheet/16078-inner-deep-bay-and-shenzhen-river-catchment-area>

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

Apart from the large and unique Deep Bay wetland ecosystem, the Project would also cover a number of poorly-vegetated hills and plains. These relatively barren and exposed habitats are typically covered by a mixture of short grassland and shrubland, and are often fire-maintained. Our records suggest that these open, poorly vegetated habitats support a distinct faunal community of grassland specialists. A number of species of High or Moderate Risk, such as Golden-headed Cisticola (*Cisticola exilis*), Eurasian Eagle-Owl (*Bubo bubo*), Bonelli's Eagle (*Aquila fasciata*), Chinese Francolin (*Francolinus pintadeanus*), Spotted Angle (*Caprona alida*), Large Branded Swift (*Pelopidas subochracea*) and Small Three-ring (*Ypthima norma*) are dependent on these exposed habitats. With the maturation of our native forests, these poorly vegetated habitats are in rapid decline across Hong Kong due to vegetation succession.

We urge the Project Proponent pay due attention to these habitats and the associated wildlife during the EIA and future design and planning. These open and exposed habitats or even the wider landscape should be preserved as far as possible. We also note that these habitats are often selected as woodland compensation sites should woodland loss that require compensation arise, which in turn would lead to secondary loss of these open habitats. A possible option would be woodland enrichment planting at existing wooded sites with limited diversity or ecological value, such as plantations or mixed woodland. By removing exotic species and planting native shrubs and trees as enrichments, the overall ecological value could be increased without inducing secondary loss of grassland and shrubland, which do support a group of species of conservation concern.

### **Ensure Sufficient Survey Effort on Eurasian Otter**

In view of the recent KFBG record of Eurasian Otter (*Lutra lutra*) in Pak Nai (see **Figure 1** attached), and the recent findings at Tin Shui Wau Nullah and Tsim Bei Tsui *gei wais* as shared by an environmental consultant, it is likely that the species could be present within the Project's Study Area. It is also believed that the entire coastal area from Pak Nai to Tsim Bei Tsui and Mai Po should be considered the distribution range of the otter population of Hong Kong. Eurasian Otter is known to have large home range and would utilise a wide range of habitats such as active and abandoned fishponds, freshwater or brackish watercourses, mangroves, reedbeds, and *gei wais* (McMillan 2021). Most of these habitats, except *gei wais* and reedbeds, are present in the proposed development area, particularly along the coast. However, the Project Profile submitted did not sufficiently reflect the potential presence of Eurasian Otter. As the proposed development is very likely to result in significant direct and indirect impacts to prime otter habitats such as mangroves, watercourses and ponds, proactive initiatives should be taken to understand the baseline conditions of the species in the Lau Fau Shan area.

In the approved EIA for the Development of Lok Ma Chau Loop, it is already stated clearly that "*usually, mammal surveys are conducted simultaneously with surveys of other faunal groups, such as herpetofauna and odonata (during daytime and night-time). These surveys*

*generally comprise a fixed transect passing through a variety of habitats within a study area. Eurasian Otter, however, is a secretive creature, and consequently very difficult to survey using standard techniques. In Hong Kong, its small population size and largely nocturnal or crepuscular habits make it even more difficult to survey than other wild animals. Even the use of remote-sensing camera-trapping in areas known to support a population of the species is not very successful.” (Arup 2013).*

In view of that, WWF urges that in addition to generic transect surveys and camera trapping, the Project Proponent to carry out specific surveys for Eurasian Otter in the forthcoming EIA study. Active and intensive search for field signs of Otters (including but not limited to spraints, anal jellies, smears, footprints, scratch marks, etc.) across the EIA study area should be conducted. These surveys should be carried out by personnel with relevant expertise and previous experience in conducting surveys for otters. Due to the extreme low number and detectability of local otters, the approach of employing Local Ecological Knowledge (LEK) should also be considered by conducting questionnaire interviews with local people such as fishermen, pond operators and villagers.

In term of the proposed development, any loss and fragmentation of otter habitats should be avoided; areas where otters are present should be protected, along with a buffer area of suitable size. We also urge the Project Proponent to maintain the semi-natural and restore the channelised watercourses within the Project Site, as well as a complete, undisturbed coastal corridor that allows free passage for otters between Ha Pak Nai and Mai Po. Considerations should be taken in flood control, building design, road traffic planning, and land use zoning to minimise human disturbances to otters.

### **Freshwater and Tidal Watercourses**

A number of semi-natural and channelised watercourses are present in the proposed development area and its vicinity, draining into Deep Bay. The estuaries and lower reaches of these watercourses support a distinct faunal community, and is ecologically and hydrologically linked with the adjoining intertidal habitats, such as mangrove, mudflat and seagrass bed.

Uncommon or rare fish species such as Chinese Gudgeon (*Bostrychus sinensis*), Flathead Gudgeon (*Butis humeralis*), Javelin Goby (*Acanthogobius hasta*), Glass Goby (*Gobiopterus macrolepis*), Banded Mulletgoby (*Hemigobius hoevenii*), Taijiang Fat-nose Goby (*Pseudogobius taijiangensis*), Nipponic Goby (*Tridentiger nudicervicus*), etc., have been recorded in these watercourses. These watercourses also drain into coastal mudflats where horseshoe crabs and seagrass species are present. Furthermore, otters present along the coast would depend on these watercourses for freshwater, as they need to drink and to wash away the salt encrustation from their fur.

WWF is deeply concerned with the potential ecological impacts from the development project to these watercourses and the associated wildlife. Under the proposed development, we urge the Project Proponent to protect these watercourses, to enhance or restore them where applicable, and to provide sufficient riparian buffer zones. Alteration or modification to these watercourses, such as decking-over or diversion, should be avoided as

far as practical. Only compatible land uses with no significant disturbances and risks of pollution should be allowed near these watercourses and their catchments. The Project Proponent should also proactively investigate the feasibility of providing ecological enhancement to the watercourses within the EIA Study Area so as to bring about ecological gain under the Project.

### **Avifaunal Flight Paths**

The proposed Project Site encompasses a large swathe of coastal area that has strong linkage with the Mai Po and Inner Deep Bay Ramsar Site, which regularly support over tens of thousands of migratory waterbirds each winter. WWF is worried that the proposed LFS development is situated within the avifaunal key flight paths between the Inner and Outer Deep Bay areas. The development may risk severing the ecological connectivity within the Deep Bay ecosystem.

We believe that understanding avifauna usage of the air space over the development area has significant implication on the planning and layout of this NDA, as well as other measures to ensure the preservation of the flight corridors, including but not limited to proper building designs. As such, a robust baseline study with sufficient literature review and thorough field surveys must be carried out in the later EIA study. The baseline study should not only focus on flight paths associated with egrettries and roosting cormorants. A well-represented selection of other bird species, especially wintering/migratory bird species of conservation importance, should also be part of the scope. Special attention should be given to areas where high-rise buildings are planned, as well as in areas where loss of wetland habitats is anticipated.

Thanks fir your attention.

Kind regards,

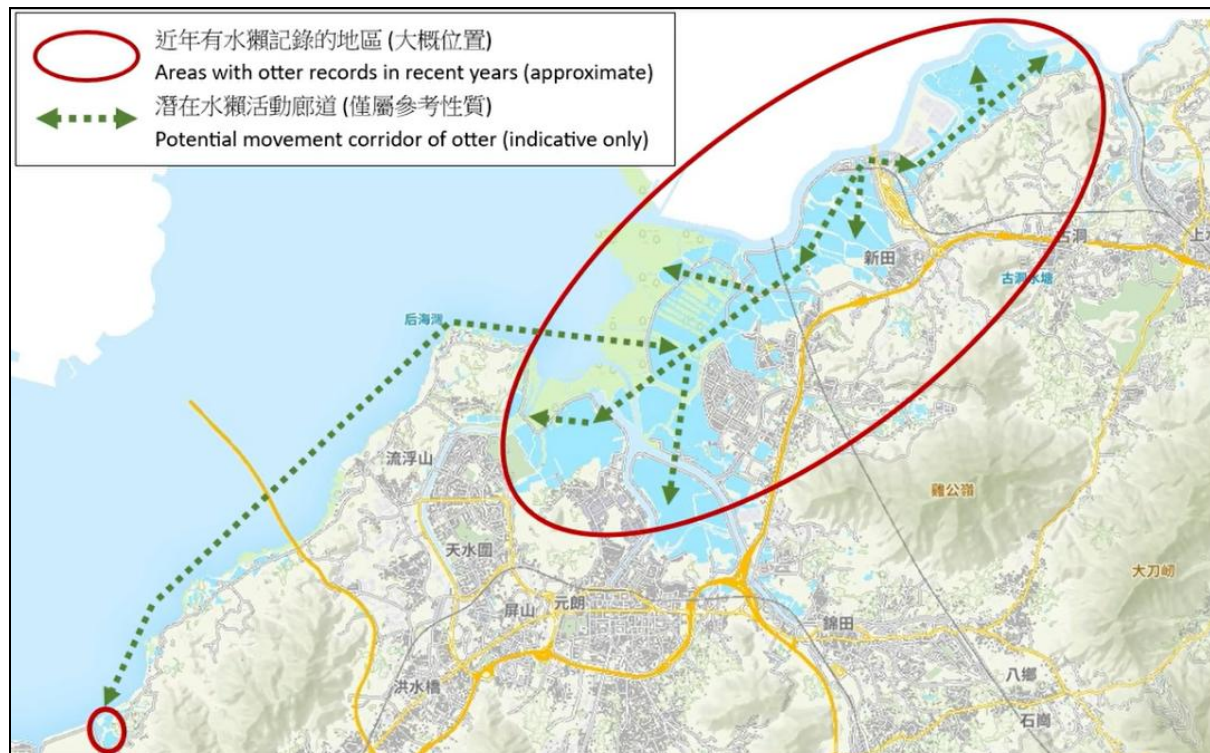
A handwritten signature in black ink, appearing to read 'Tobi Lau', written in a cursive style.

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

## References:

McMillan, S.E. 2021. The ecology and conservation of Eurasian otter (*Lutra lutra*) in Hong Kong. Thesis submitted for the degree of Doctor of Philosophy at the University of Hong Kong.

Ove Arup & Partners Hong Kong Ltd. [Arup]. 2013. Approved Environmental Impact Assessment Report for the Development of Lok Ma Chau Loop (AEIAR-176/2013). [https://www.epd.gov.hk/eia/register/report/eiareport/eia\\_2122013/Loop1.htm](https://www.epd.gov.hk/eia/register/report/eiareport/eia_2122013/Loop1.htm)



**Figure 1.** Indicative areas with records of Eurasian Otter and their potential movement corridor in Deep Bay area (map produced by KFBG; source: <https://www.facebook.com/watch/?v=632726018617748>)