



香港濕地保育協會
Hong Kong Wetlands Conservation Association

Task Force on Land Supply
17/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

14 Sept 2018

Dear Sir,

Submission on “Land for Hong Kong, Our Home, Our Say!”

The Hong Kong Wetlands Conservation Association is a newly-established, non-government organisation and our aim is to promote wetlands conservation, management and education. We refer to the “Land for Hong Kong, Our Home, Our Say!” public engagement document and would like to express our views here.

Hong Kong is facing an imminent, acute housing shortage and more affordable flats should be built for the needy in a timely manner. Hence, focus should be put on those short-medium term options that can provide large number of housing effectively. We think brownfield sites, Deep Bay Wetland Buffer Area (WBA) and the neighbouring areas will provide sufficient additional land to help meet the housing demand and there is no need to develop our Country Parks or large-scale reclamations.

The WBA provides buffer to the internationally important Deep Bay wetlands ecosystem and developments within can be a sensitive issue. Here, we provide **recommendations on how to make future developments in WBA will also result in improved conservation and management of the Deep Bay wetlands**, thus attaining a triple-win for the society, land-owner and the biodiversity.

Option 5.1 Developing Brownfield Sites

Hong Kong Wetlands Conservation Association believes that large areas of **brownfields in the New Territories should be prioritized for housing development** and wholeheartedly support this. This would not only increase the housing supply, but also improve the rural environment. A fair compensation/relocation mechanism needs to be formulated and the Government should reject new brownfield applications and strengthen enforcement to prevent their expansion into new areas.

Option 5.2 Tapping into the Private Agricultural Land Reserve in the New Territories

We share the concerns expressed in the public engagement document that PPP arrangement may affect the local agricultural industry and may pose threats to high ecological value areas.

In fact, many of the fish ponds and wetlands in the Deep Bay area are private farmland. Within the Mai Po and Inner Deep Bay Ramsar Site and the adjacent Wetland Conservation Area (WCA), there are large areas of private fish ponds and four of them totaling over 400 ha are zoned as Other Specified Uses annotated Comprehensive Development to include Wetland Enhancement Area (OU(CDWEA)). One notable case is the controversial Nam Sang Wai proposed development. If approved, substantial fish ponds and wetlands will be lost in the WCA zone and it faces many objections.

Moreover, some fish ponds have been abandoned for some years and are being invaded by vegetation including the exotic invasive *Typha angustifolia* (Photo 1). One such area is the fish ponds between Fairview Park and Palm Springs in the WCA that occupies around 30 ha which have not been managed for many years. Some of the “ponds” are now overgrown with vegetation and even trees (Photo 2) and will turn into terrestrial habitats if unchecked. As pointed out by the Planning Department “Study on the Ecological Value of Fish Ponds in Deep Bay Area”, the high numbers of fish-eating water birds foraging in fish ponds is largely due to (1) the stocking of fish and (2) the drain down of ponds during fish harvest that makes abundant preys available. These two contributing factors are absent in abandoned ponds. Hence, there is a strong need to manage these to boost their ecological value and to maintain the Deep Bay wetland ecosystem. Moreover, abandoned ponds in the WCA are susceptible to destructive pond filling activities¹ (Photo 3) which seriously undermine the wetland conservation function.

¹ Inner Deep Bay Unauthorized Development Report (2017) WWF-Hong Kong, Hong Kong.

In the outer Wetland Buffer Area (WBA), there are about 80 ha already approved for low density development (some with plot ratio as low as 0.2 or 0.4) and the land formation has started at Wo Shang Wai. In line with the TPB Guidelines and to protect the Deep Bay wetland ecosystem, there is a condition of wetland mitigation/compensation attached to the approval of many of these developments. As a result, increasing number of small wetland reserves will be established next to or even surrounded by developments across the WBA. These small, piecemeal wetlands will each have their own management plan and management team. This arrangement suffers from not efficient in resource use and not effective in realizing the conservation potential when compared with large continuous managed wetlands.

There is an additional 160 ha under development zoning such as Residential (R), Industrial (I), Comprehensive Development Area (CDA), Open Storage (OS), Recreation (REC), Other Specified Uses annotated Comprehensive Development to include Wetland Restoration Area OU(CDWRA) and OU(CDWEA) in the WBA. On top of these, there are also over 15 ha of open storage and workshops, i.e. brownfield sites, the development of which is deemed the first priority by Green Groups and is one of land supply option (Option 5.1).

The above situation is not ideal for the long-term conservation of the globally important Deep Bay wetlands ecosystem and will get worse if left to continue its present course. For instance, a lot of fish pond farmers are over 60 years old and very few young people are willing to join the industry², casting uncertainty on the long-term sustainability of fish pond cultivation. Hence, we would like to make recommendations to improve the PPP scheme that will not only unlock private farmland to build more housing, but also to greatly enhance the conservation and management of the Deep Bay wetlands. We believe this improved PPP scheme will become a triple-win mechanism and will be supported by the society.

Recommendation 1

Substantially increase the plot ratio of the developable land in WBA and use part of the revenue to support the active conservation management of the abandoned and/or degraded fish ponds in WCA as mitigation/compensation.

² Mai Po Inner Deep Bay Ramsar Site Management Plan (2011) Agriculture, Fisheries and Conservation Department, HKSAR Government, Hong Kong.

This will not only increase the supply of both private and affordable housing to help alleviate the housing shortage, it will also contribute to Hong Kong Biodiversity Strategy & Action Plan (BSAP) Action 2 to conserve the ecologically important habitats outside existing protected areas³ and help fulfill the planning intention of TPB Guidelines on development within Deep Bay.

Active conservation management of wetlands in Hong Kong and other places have been shown to be successful in increasing the biodiversity. Notable examples in Deep Bay are the management of Mai Po Nature Reserve, the Hong Kong Wetland Park and the Lok Ma Chau Spur Line mitigated wetlands. Hence, there is little doubt that the proper management of much larger areas of fish ponds in WCA as outlined above will more than compensate the negative ecological impacts from developments in WBA.

Recommendation 2

Transfer the development from the OU(CDWEA) zoned private fish ponds in WCA to the developable land in WBA and neighbouring areas, suitably increase the plot ratio, and use part of the revenue to support the active conservation management of fish ponds concerned as mitigation/compensation.

This will ensure large areas of fish ponds in WCA under active conservation management and free up the development potential of the OU(CDWEA) fish ponds in producing housing in nearby land of low ecological value in a timely manner. Again this will contribute to BSAP and fulfill the planning intention of TPB Guidelines on Deep Bay.

Recommendation 3

Formulate a holistic management plan for Deep Bay wetlands and set up an independent, statutory Conservation Trust into which land and funds made available to manage the wetlands can be vested.

With a holistic conservation and management plan for Deep Bay wetlands, its biodiversity value can be further enhanced. The future ownership of the PPP private fish ponds needs to be resolved and the administer of the funding and the

³ Hong Kong Biodiversity Strategy and Action Plan, 2016-2021 (2016) Environment Bureau, HK SAR Government, Hong Kong

management actions also need to be overseen by an institution. Examples from overseas can be drawn in which an independent, statutory trust is established specifically for these purposes.

We believe the above recommendations will give the PPP scheme clear and significant economic, social and environmental benefits. They will also help address the environmental concerns raised during the public engagement and the society will be more willing to embrace it.

Similarly, when unlocking private farmland, a compensatory mechanism should be established to conserve good-quality private agricultural land and ecologically important sites while the plot ratio is increased in unimportant sites. This will contribute towards the goals of the New Agricultural Policy and BSAP and will likely generate more support from the society.

Medium-long term and conceptual options

The above options together with those current land supply strategy and ongoing initiatives outlined in the document will considerably increase the land supply and additional housing units. In fact, the Hong Kong Government has been putting a lot of effort in providing new flats and the number of units being built and planned amount to over 600,000, without counting the new land supply. This is nearly 25% more than the over 480,000 new households by 2049 forecasted by the Census and Statistics Department. Moreover, the population is projected to decline gradually after 2043. Hence, the development of our Country Parks should not a medium-to-long term or conceptual options (Options 5.8 and 5.12).

Reclamations will cause irreversible damage to our marine environment, the biodiversity and the fishery resources. Hence, these should only be carried out in sites with low ecological value and when the need is strong and clear. For the five near-shore sites listed, Siu Ho Wan and Lung Kwu Tan are close to known Chinese White Dolphin hotspot⁴ and probably of quite high ecological value. For the proposed East Lantau Metropolis, the need has to made clear and fully justified for such a big reclamation which will be completed around the time that the population starts to decline.

We hope our views will be carefully considered by the Task Force and

⁴ https://www.epd.gov.hk/.../advisory_council/files/ACE_Paper_3_2015.pdf

recommendations will be made to the Hong Kong Government to ensure a sustainable future for Hong Kong.

Best regards,

A handwritten signature in blue ink, appearing to read 'Michael Lau', with a stylized, flowing script.

Michael Lau (Dr.)

Chairman, Hong Kong Wetlands Conservation Association

Photo 1. Abandoned fish pond overgrown with the exotic weed *Typha angustifolia*.



Photo 2. Vegetation and trees growing in abandoned fish ponds within WCA between Fairview Park and Palm Springs.



Photo 3. Suspected pond filling within WCA near Lok Ma Chau.

