

Hong Kong Countryside Foundation

Submission on the Northern Metropolis Development Strategy

1. The Hong Kong Countryside Foundation (HKCF) invites the Administration to take note of its views about the Northern Metropolis Development Strategy (NMDS) and its recommendations. HKCF is a body corporate established to secure for the long-term public benefit conservation and restoration of the countryside, habitats, natural landscape and biological diversity of Hong Kong. Our interests cover both natural and cultural heritage which we recognise as important assets of Hong Kong. We have been a pioneer in the re-vitalisation of remote villages in Hong Kong through the execution of projects in Lai Chi Wo since 2013. We also offer views and recommendations regarding conservation matters to the Administration and other bodies from time to time. This is in line with our Objects, which enable us to be a Conservation Trust, together with specific objects to protect ecological networks and agriculture compatible with the natural environment.

Principles

2. The first three Planning Principles set out in NMDS give priority to (1) Urban – Rural Integration; (2) Proactive Conservation and (3) High-Quality Outdoor Eco-recreation/tourism Outlets (para. 32 of NMDS Report), with the vision to create, for the first time in Hong Kong, a unique metropolitan landscape aiming for the co-existence of Development and Conservation. The HKCF welcomes and supports this holistic approach to strategic planning which, if properly executed, will deliver a city good for people to live in, work and travel. In this connection, HKCF suggests that there be NGO participation in this process to harness the collective wisdom of the community and to assist in effective and transparent decision-making.

3. HKCF also welcomes the “paradigm shift in respect of mode of thinking for Hong Kong - Shenzhen co-operation, spatial concept, policy formulation and institutional establishment” (para 25) which underlies those Key Action Items that would lead to the creation of more environmental capacity, cross-boundary ecological corridors, resumption of land for conservation and effective and efficient execution of the strategy, which are essential for the realization of the priorities set out in the NMDS, in all of which the HKCF takes a strong interest.

4. In this context HKCF considers it appropriate to make reference to the “Framework Agreement on Deepening Guangdong-Hong Kong-Macao Cooperation in the Development of the Greater Bay Area” signed on 1st July 2017. In particular under *Principles of Cooperation* it was stated that we have “to prioritise ecology and pursue green development”, with “to strengthen the protection of the environment and the recovery of the ecosystem” as a focus.

5. HK has never attempted such a broad and ambitious plan as the NMDS. It is crucial to have a sufficiently empowered institutional structure to deliver the envisioned outcomes. While previous major infrastructure projects such as the New Towns and the New Airport were very much engineering-led, **the implementation of NMDS demands that conservation and quality of life elements be planned in from the start.** Their integration with the engineering elements such that the right physical infrastructures are built would require firm and highly skilful leadership capable of reconciling and resolving diverse and sometimes competing requirements. HKCF supports the concept of a dedicated high-level government institution to address this matter (Action Item 42)

Views and Recommendations

Shenzhen-HK Cooperation

6. Working together, and in collaboration with, the Shenzhen authorities, there is a magnificent opportunity to create the **Wutong Mountain/Robin's Nest/Pat Sin Leng Ecological Corridor** necessary to conserve and enhance the overall natural landscape, ecology and habitat resources (para. 51). HKCF and several environmental NGOs, in May 2019, produced the Robin's Nest Joint Statement and Plan, which proposed that the area of the Robin's Nest Country Park (RNCP) then under consideration be expanded with a boundary designed to ensure that RNCP would indeed deliver the essential functions of this Ecological Corridor. The area within the proposed boundary is 1120 hectares, 95% of which is government land. HKCF understands that other NGOs have supplied that document with relevant maps to the Administration. Accordingly, the details are not duplicated here.

7. No new Country Park has been gazetted since 2019. We urge the Administration, as Hong Kong's contribution to the establishment of this Ecological Corridor, to **immediately take forward the 2019 proposal and officially demarcate RNCP with the expanded boundary**. The wider area under AFCD management with a clear ecological objective under the Country Park Regulations will assure the proper functioning of the Ecological Corridor as well as expand the environmental capacity of RNCP, as a contribution to Proactive Conservation (para. 32). It will in particular give RNCP much better protection from the damage of hill fires which could irreparably devastate the natural habitats of the Country Park.

8. In this connection, it is noted that the number of applications for burials by indigenous villagers within the proposed enlarged RNCP currently runs at a modest 10 per annum. Applications for burial in the future can still be processed and approvals given subject to suitable conditions. It is recommended that **Home Affairs Bureau and the District Land Officer should proactively reassure indigenous villagers** in the area that their existing burial rights will not be taken away with Country Park designation and that such designation is required as part of Hong Kong – Shenzhen co-operation supported by the Central People's Government.

9. HKCF welcomes the **proactive approach to secure the future of the Deep Bay Wetlands by resumption of the land and designation of several contiguous wetland conservation parks** that will protect both the biodiversity and the traditional fishpond operation practice that has proven attractive to globally significant populations of wetland birds. Recognizing that the Deep Bay wetlands incorporate habitats on both sides of the border it is recommended that a **Greater Bay Area National Wetland Reserve** be established that encompasses all of the mudflat, fishpond, mangrove and interconnecting waters within the NMDS boundary in Hong Kong as well as their counterparts in Shenzhen.

10. We further recommend that **both the Greater Bay Area National Wetland Reserve and the Wutong Mountain/Robin's Nest/Pat Sin Leng Ecological Corridor be accorded further protection by adopting the Ecological Red Line concept within the Ecological Civilisation framework**. Protecting the ecologically most important cross-boundary habitats – both terrestrial and wetland - within the NMDS and adjacent Shenzhen would highlight how Hong Kong is contributing to the development of China's progressive thinking viz. Ecological Civilisation as a key objective of the 14th 5-year plan and as expressed in the National Biodiversity Strategy and Action Plan under the Convention on Biological Diversity.

Spatial Concept

11. **Eco-tourism Objectives, Controls, and Precautions:** Concerning NMDS Action Items 31 & 32, we recommend that **prudence and sensitivity to local circumstances, both culture and nature, must be duly exercised**, in order to conserve the fundamental characteristics of the region, especially where existing villages are involved. Care needs to be taken with regard to both the location and type of activity envisaged, in any new outdoor eco-recreational facility that may be

proposed. Inappropriate use and excessive tourist traffic could have huge negative impacts on local habitats and environment. For example, birds are well known to be sensitive to human activity hence the need for hides and controlled numbers visiting Mai Po. In another case the restoration of agricultural activity and the revitalisation of the community at Lai Chi Wo, spearheaded by HKCF, are proving to be extremely popular. But there will soon be a need to control the influx of tourists so as not to destroy the rural landscape and inherent cultural values, as well as not to overload the sewage and drainage systems which could result in the pollution of the pristine sea of Yan Chau Tong. This delicate balance needs to be properly understood before proceeding with any new facilities, in order to align with “Co-existence of Development and Conservation” under “Urban – Rural Integration” (para.32). In this regard we recommend that **carrying capacity studies be conducted** by professionals, so that any adverse impacts of overcrowding, disturbance or physical damage can be anticipated and avoided.

12. **Agricultural Priority Areas:** Agricultural land and countryside areas are listed as key elements of the unique metropolitan landscape of the future Northern Metropolis (para. 32). Some existing areas such as Long Valley are well known to be important ecological habitats while being also a platform for economic and cultural activities. HKCF recommends that **additional existing, good quality, agricultural lands be suitably identified for inclusion in the Comprehensive Ecological Habitat Network** (“Network”). These lands should be **zoned as *Agricultural Priority Areas (APAs)*** to ensure that they are properly conserved, to help create the unique mosaic landscape and vibrant communities desired in the NMDS. APAs were introduced in the 2017 Policy Address. This is now the perfect time to take this policy forward in a meaningful way.

13. **The Comprehensive Ecological Habitat Network** (para. 95) **and the Urban-Rural Greenway** (“Greenway”, para. 103) are strongly supported. They will together conserve and provide public access to areas from east to west across the Northern Metropolis for the wider benefit of the GBA. These visionary Key Action Directions are essential towards conserving and enhancing an attractive cultural and natural landscape which is agriculturally productive in places and provide eco-recreation space. HKCF recommends that the **delineation and zoning of development areas must avoid disrupting the Network and the Greenway**. Pollution (including noise and light) and other disturbances impacting on them should be strictly controlled.

14. **Fanling Golf Course:** The existing Fanling Golf Course (FGC) is seen to be an integral part of the Network and the Greenway. HKCF recommends **the retention of FGC in its entirety and its eventual transformation, with proper curation, into a multi-purpose *Central Park* of the Northern Metropolis**. No reputable metropolis should be deprived of a major public park. But there is now none in the Northern District. With its luxuriant green open spaces and mature woodlands, FGC has high landscape value and a long history of recreational functions ranging from a world-famous sports venue to programmes of local community engagement so that local residents and the public take up a significant percentage of the utilisation of the FGC space. This conceived *Central Park* should continue providing eco-recreation and education at an excellent existing location. **Parts of the *Central Park* should be designated as Conservation Areas**, to preserve rare mature forest habitats, including that of the critically endangered Chinese Swamp Cypress. It would be against the spirit of Proactive Conservation to destroy the valuable habitats at FGC first and then seek compensation elsewhere. The current management provides a reference model of balanced and wise use for recreation and conservation. Given that the NMDS envisages securing some 600 hectares of land for housing and economic activities without involving FGC, there is now no reason why any part of FGC should be taken away at the expense of its great value as a park for public enjoyment.

15. **Large-scale land resumption with timely re-provisioning as appropriate:** HKCF considers that the only way forward to deal with the multiple, complex land issues is for Government to undertake large-scale land resumption accompanied by re-provisioning of land to accommodate

existing uses as appropriate. It would indeed provide an opportunity to resolve the longstanding issue of haphazard, unplanned land use as container storage areas (CSAs), etc., now categorised as brownfield sites, which have blighted and polluted the New Territories landscape for decades. HKCF recommends that **planning proceed *expeditiously* to enable timely re-provisioning of land for brownfield operators** (Action Item 35). It will greatly facilitate and speed up land resumption, clearance and decontamination, which is critical to the successful implementation of NMDS.

Institutional Arrangements for Implementation of NMDS

16. The 'silo mentality' among policy bureaux has often been quoted as a shortcoming of local governance, which frustrates and delays the implementation of new policies. A new structure is needed to overcome this obstacle if the ambitious vision of the NMDS is to be delivered on time and within budget. A precedent for reference was the Airport Development Steering Committee (ADSCOM). The ten airport core projects constituted at the time the biggest infrastructure project in the world. In order to ensure that there would be no delays and that any departmental differences could be speedily resolved, the Chief Secretary (CS) personally chaired a weekly meeting of ADSCOM attended by all departmental and bureaux heads. Any disagreements or conflicts could be aired and discussed following which the CS would decide the way forward. This proved to be a very effective mechanism to keep all ten projects coordinated and on track.

17. HKCF recommends that **an ADSCOM-like body be established** for the delivery of the NMDS, and further that it be **headed by a Deputy Chief Executive position** with the necessary authority over all the contributing departments and bureaux would be necessary. It would enable effective decisions in spite of conflicts and disagreements so that the many component parts implementing the NMDS are properly coordinated. The Deputy CE would also have a critical role to play in the coordination and co-operation with Shenzhen authorities so that the plans and developments on both sides dovetail for synergy.

18. HKCF would be pleased to enter into a dialogue with the Administration as plans evolve. If the Administration is to establish any NMDS Task Force or Consultative Groups with NGO participation HKCF stands ready to participate and contribute.

By Order of the Board



Lam Chiu Ying
Chairman
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