

To: The Hon. Mr Lee Ka-chiu, HKSAR Chief Executive
From: Hong Kong Countryside Foundation
Date: 14 August 2025

**Inputs to the Policy Address:
Building Sustainable City and Quality Living Space**

In this submission, the Hong Kong Countryside Foundation (HKCF) first presents its observations about how national policies and international commitments bear on the planning for a sustainable city and for quality living space in Hong Kong, especially in respect of the Northern Metropolis. Related recommendations are then enumerated for the consideration of the HKSAR Government.

National Vision and Policy: Ecological Civilisation

1. The vision of **building China as an ECOLOGICAL CIVILISATION** is enshrined in the National Constitution. It serves as an overarching principle in our national development.
2. The CPG promulgated in 2025 the **Comprehensive Rural Revitalisation Plan (2024-2027)**¹. It requires *inter alia* the adherence to the integrated development of urban and rural areas, and to the harmonious coexistence of Man and nature. The intrinsic characteristics of rural areas in particular their ecology must be well conserved while improving the wellbeing of the rural population.
3. In the quest to deepen the integration of Hong Kong with the Mainland, the HKSAR Government must actively align its policies, strategies, programmes and projects with these national-level guiding principles.
4. The HKCF applauds the Government's vision set out in the **Northern Metropolis Development Strategy** ("NMDS") announced in 2021 viz. to create, for the first time in Hong Kong, a unique metropolitan landscape aiming for the co-existence of Development and Conservation. These principles, the Key Action Directions and Action Items in NMDS 2021 align perfectly with the national vision of ECOLOGICAL CIVILISATION and with the Comprehensive Rural Revitalisation Plan. Both Hong Kong SAR and China would be well served if NMDS 2021 is faithfully carried through.

Cross-boundary Cooperation

5. HKCF further applauds the establishment of joint Hong Kong - Shenzhen actions on ecological conservation viz.
 - a. the Shenzhen Bay (Deep Bay) Wetland Conservation Cooperation

Framework Arrangement signed in 2023, which promotes cross-boundary cooperation in conserving the Deep Bay wetland ecosystems.

- b. the Cooperative Framework Agreement for the Enhancement of Wutong Mountain (Shenzhen) - Robin's Nest (Hong Kong) Ecological Corridor signed in 2024.
6. Concrete actions by the HKSAR are required to fulfil these cross-boundary commitments in conserving Nature and in enhancing ecological value for the benefit of both cities.

International Commitments

7. The management of the Mai Po – Inner Deep Bay Ramsar Site (Mai Po Site) is subject to the Ramsar Convention, under which HKSAR is committed to protecting the ecological integrity of the Site. The wetlands in the NW New Territories provide feeding ground and roosting sites for the fauna making use of Ramsar Site and therefore constitute an integral part of its ecology. The corruption of these wetlands should therefore be avoided, in order to fulfil our international commitments.
8. The Government is currently updating the Biodiversity Strategy and Action Plan under the UN Convention on Biological Diversity. The opportunity should be taken to identify concrete action items and to mobilise commensurate resources for their implementation. Reference is made to the HKCF submission dated 10 July 2025.

Concerns

9. We are concerned that in the past couple years certain deviations from NMDS 2021 impacting on ecological conservation, such as the siting of a new proposed Innovation and Technology Park (IT Park) on the sensitive San Tin wetlands adjacent to the Mai Po Site. It will reduce the quality of life of Hong Kong citizens by the significant reduction of high-quality natural habitat as well as by impacting on the rural landscape. It is also against the national vision of Ecological Civilisation as well as the Comprehensive Rural Revitalisation Plan.
10. We are equally concerned that plans are going ahead to transform a significant amount of land in South Lantau and in Tsim Bei Tsui / Pak Nai into residential and commercial sites in the name of “eco-tourism”, that would seriously impact on the fragile and valuable habitats against the spirit of the BSAP and in contravention of eco-tourism principles delineated by the UN.

11. We are further concerned that on the very important subject of ecological civilization, there is no commensurate high-level governance structure nor compatible resource provision. This deficiency is particularly striking and disturbing when one notices that tens of billions of dollars are spent on individual engineering projects while nothing of this order of magnitude has ever been spent on any projects with an ecological objective.

Recommendations

12. On ecology in the context of NMDS, HKCF advocates that, in the spirit of contributing to national Ecological Civilisation and aligning with related national policies, the Government adhere to NMDS 2021 and those Action Items that would lead to the building of ecological capacity, the enhancement of cross-boundary ecological cooperation and the proactive resumption of land for conservation purposes. Our specific recommendations are as follows:

- a. **Study the expansion of the Robin's Nest Country Park**, potentially up to 1120 hectares, 95% of which is government land, to support and sustain the optimal functioning of the Wutong Mountain – Robin's Nest Ecological Corridor.
- b. Proceed swiftly to **resume the land designated for the named wetland conservation parks** ("WCP") set out in the NMDC 2021.
- c. Take urgent actions to **protect fishponds designated for inclusion in the Sam Po Shue wetland conservation park**, since this habitat accommodates more than 1% of the global population of the endangered species viz. Black-faced Spoonbill, which qualifies it as a **Ramsar wetland site of international importance**.
- d. **Incorporate the wetlands stretching from Fung Lok Wai, through Nam Sang Wai, Tai Sang Wai, San Tin, to Ho Hok Wai into the Mai Po Site**, as a long-term guarantee of its ecological integrity.
- e. Work towards the establishment of a **Greater Bay Area National Wetland Reserve** that encompasses all wetland habitats in the Deep Bay on both sides of the border, in collaboration with the Shenzhen authorities and in alignment with the 14th Five-year Plan (2021-2025).
- f. Accord further protection to both the proposed Greater Bay Area National Wetland Reserve and the Wutong Mountain - Robin's Nest Ecological Corridor by adopting **the Ecological Red Line concept under the national Ecological Civilisation framework**.
- g. The delineation and zoning of development areas in the Northern

Metropolis must **avoid disrupting the Comprehensive Ecological Habitat Network and the Urban-Rural Greenway** specified in the NMDC 2021.

- h. Re-provision the IT Park (under the 2023 plan) **away from the San Tin wetlands** since otherwise it would seriously conflict with the national priority to expand the area of protected wetlands under the 14th Five-year Plan (2021-2025) which makes specific reference to wetlands in the Greater Bay Area.
 - i. Actively consider **re-provisioning the IT Park to Tit Hang and Tse Koo Hang, south-east of the Loop**, where more than 200 hectares of government land is immediately available for development. (The elevated site will also be safer from the inevitable future sea-level rise caused by climate change.)
 - j. Existing, good quality agricultural land should be identified, zoned as **Agricultural Priority Areas** and included in the Comprehensive Ecological Habitat Network.
 - k. **Retain the Fanling Golf Course** in its entirety for eventual conversion into a multi-purpose **Central Park of the Northern Metropolis**, enabling at the same time international standard golf, recreation and conservation of its natural and cultural landscape of great value, thereby fulfilling Planning Principle 3 of the NMDS by providing a ready-made "High-Quality Outdoor Eco-recreation/tourism Outlet". Specifically, parts of the Central Park should be designated as **Conservation Areas** for species of key concern.
13. On ecology in the context of biodiversity and eco-tourism, HKCF has conveyed its views and recommendations to the Government in several submissions (South Lantau, dated 26 July 2024²; biodiversity, dated 10 July 2025³; **copies attached**). In addition to those points mentioned above, further recommendations are:
- a. **Strengthen the implementation of Area Based Conservation** and actively promote the concept of "Other Effective Area-Based Conservation Measures".
 - b. In the promotion of eco-tourism, **abide by the guidelines of UN Tourism** (previously UN World Tourism Organisation), which requires that nature-based tourism creates value for the natural and socio-cultural environment, and not to undermine it.
 - c. **Call a halt to the current invitations for Expressions of Interest in**

developing eco-tourism/recreation facilities bundled with residential development in South Lantau and in Tsim Bei Tsui / Pak Nai, pending the submission of comprehensive EIAs to assess the inevitable significant impacts on the existing fragile and precious ecosystems there, completely contrary to BSAP principles. (Reference: HKCF submission regarding South Lantau dated 26 July 2024²)

Ecology Governance and Resources

14. On ecology governance and resources, HKCF recommends the following:

- a. **Establish a statutory body, the Hong Kong Ecological Development Authority (HKEDA)**, with a status comparable to the Housing Authority, to promote Area-based Conservation, and to develop and manage protected areas at all levels and other categories of conservation areas.
- b. **Provide sufficient resources to the Agriculture, Fisheries and Conservation Department**, to plan, establish, monitor and operate various protected areas and conservation areas, in its role as the executive arm of the HKEDA.
- c. **Develop a funding model for the proposed HKEDA to enable long-term planning and execution**, options of which include (a) an initial Injection of 50 billion dollars (comparable to individual infrastructure projects) followed by occasional topping up in response to societal needs and (b) innovative funding through the wise use of Planning and Design Briefs applied to carefully selected land parcels.

By Order of the Board



Lam Chiu Ying

Notes

(1) 中央人民政府 2025 年 1 月 22 日：《乡村全面振兴规划(2024—2027)》

https://www.gov.cn/zhengce/202501/content_7000493.htm

(2) HKCF submission on South Lantau, 26 July 2024

(3) HKCF submission on Biodiversity Strategy and Action Plan, 10 July 2025

cc Mr Chan Kwok Ki, Chief Secretary for Administration
Mr Chan Mo Po, Financial Secretary
Mr Cheuk Wing Hing, Deputy Chief Secretary for Administration
Mr Wong Wai Lun, Deputy Financial Secretary
Ms Linn Hon Ho, Secretary for Development
Mr Tse Chin Wan, Secretary for Environment and Ecology
Ms Law Shuk Pui, Secretary for Culture, Sports and Tourism
Mr Lai Kin Ming, Director of Agriculture, Fisheries & Conservation
Dr Chui Ho Kwong, Director of Environmental Protection
Mr Loo Kam Wah, Director of Lands
Mr Yip Chi Kwai, Director of Planning