



Clerk to Panel
Legislative Council Secretariat
(Attn: Ms Christina SHIU)
(email: panel_dev@legco.gov.hk)

26 November 2012

By email only

Dear Sir/ Madam,

North East New Territories New Development Areas
Planning and Engineering Study

We would like to express our concern, regarding both the ecological and agricultural viewpoints, of the captioned.

Ecological concerns

Kwu Tung North New Development Area

2. Among the three New Development Areas (NDAs), Kwu Tung North receives the most noted attention, regarding its ecological value, as it contains the largest piece of active wet agricultural land in Hong Kong and many fish ponds – Long Valley and Ho Sheung Heung.

3. The importance of Long Valley and Ho Sheung Heung, as habitats for waterbirds, cannot be disputed, and thus we will not go into detail here. Because of this internationally well-recognized bird area, the present project proponent (CEDD and PlanD) recommends to zone the core area of Long Valley as a “Nature Park” (NP), and the surrounding areas (Ho Sheung Heung and the southern and southwestern parts of Long Valley) are recommended to be zoned as “Agriculture” (AGR) and “Open Space” (O). We object to these zonings.

4. During a meeting with senior officials from relevant government departments, Environmental NGOs have enquired how the zone “NP” would be defined (as this is a completely new zoning) and what kind of activities would be allowed in this zone. The officials did not provide any concrete answers and it seemed that they simply had no idea what activities should or should not be allowed in such an ecologically sensitive area. We are concerned that if this zone is managed in a similar manner to the Wetland Park at Tin Shui Wai, the holding capacity of the area would not be enough to accommodate the greatly increased

human population that will be present in Kwu Tung North in the future (i.e. future nearby residents may treat this NP as a recreational park/ back garden), and the ecological integrity of the whole area would be destroyed. We consider that no active recreational activities should be allowed in Long Valley (thus O is not an appropriate zoning), and the best way to protect Long Valley is to maintain the existing land use (active wet agriculture); we do not understand why some existing zoning categories for conservation like “Conservation Area” (CA) are not considered. Indeed, in view of the ecological importance of Long Valley, we suggest the whole area can even be zoned as a “Site of Special Scientific Interest” (SSSI).

5. In addition, we would like to reiterate that buffer zones should be present for the core area of Long Valley. We do not agree that areas zoned as AGR and O can provide a buffering function. The planning intentions of AGR and O are NOT for conservation. Based on definitions by PlanD, CA and “Green Belt” (GB) are in general for conservation and thus usually no development would be allowed in these zones. One may argue that the AGR zoning is to “safeguard the existing active agricultural land” and thus it is appropriate. But we would like to mention that under the GB/ CA zone, agricultural use is usually “always permitted” (i.e. in Column 1) and thus there should be no conflict with the existing land use even though the active agricultural lands are covered with a conservation zoning.

6. In order to protect the ecological integrity of Long Valley, we recommend that the core area (now zoned as NP) and the surrounding areas (now zoned as AGR) should be zoned as CA and GB, respectively; no new zonings with ambiguous intentions should be introduced.

7. Besides Long Valley, there are other important ecological habitats within this NDA – the streams and associated riparian zones at Ma Tso Lung. Although certain parts of this stream have been modified, its bottom is still largely natural and thus supports diverse wildlife (**Figure 1**). A globally critically endangered herpetofauna species has been found in the mid-stream section of Ma Tso Lung Stream and a crab considered to be globally endangered, *Somanniathelphusa zanklon*, also inhabits the whole watercourse. The riparian zones (i.e. the woody areas in the mid-stream part and the marshy area in the lower section) of this stream also provide habitats for these species. Although part of this stream has been zoned as GB, certain parts of it are now proposed to be covered with “Other Specified Uses (Research & Development in Support of Lok Ma Chau Loop Development)” (R&D), “Government (Recreation)” (Gr), “Government” (G) and “Other Specified Use (Sewage Pumping Station)” (SPS) (**Figure 2**). These are not zonings for conservation and under these zonings many sections of the stream and the riparian zones are likely to be destroyed.

8. The streams and the riparian zones should not be covered with non-conservation zonings because habitats for globally endangered/ critically endangered species should be protected. We recommend that the whole Ma Tso Lung Stream system (including its tributaries) and its riparian zones should be covered by conservation zonings like CA/ GB.

Fanling North New Development Area

9. A natural stream near Siu Hang San Tsuen is of conservation interest (**Figure 3**). This stream is largely natural and supports many native fish species. The water quality of this stream is also good. The lower section, however, based on the proposal, will be covered with O zone and the Fanling Bypass. We would like to urge the project proponent to exclude this stream and its riparian zone from these zonings, and we consider these habitats should be zoned under CA/ GB.

10. The seasonally wet grassland and agricultural land (active and abandoned) within this area in general supports a diverse amphibian community. And Chinese Bull Frog, a State II Protected Species in China, has been recorded from the location. We urge that compensatory wetland should be present in the area in order to mitigate the impact of wetland loss. We do not agree that wetland loss in Fanling North could be compensated by re-provision of wetland in Kwu Tung North. If the project is to go ahead, we strongly advise that the recreated wetland within Fanling North should be connected with other green areas in the region.

Ping Che/ Ta Kwu Ling New Development Area

11. A stream of conservation interest at Ha Shan Kai Wat is now designated “Rural Residential Zone” (RR) (**Figure 4**). Under this proposed zoning, this stream would be completely trashed and we object to this proposal. The aforementioned endangered crab species inhabits this stream. The surrounding woodland is also largely natural.

12. The Ping Yuen River sections now passing through this area are largely natural, although they are polluted by domestic sewerage and sewerage from adjoining facilities. However, given that these pollution sources can be removed, the water quality would be largely improved and species once inhabiting this kind of lowland stream can recolonize or be reintroduced. Nevertheless, from the figure provided for the development, it seems that these sections would be channelized. Although the channelization may not be under the present proposal, it is likely that it would be proposed to facilitate the development of Ping Che/ Ta Kwu Ling NDA. We

would like to point out that the majority of local lowland rivers have been destroyed by channelization; channelization would completely alter the structure and vegetation of the stream and thus would result in a complete loss of native species. The lowland streams in Ping Che may be the last few in Hong Kong with a relatively natural status. We therefore urge that these stream sections should not be channelized.

13. The seasonally wet grassland and agricultural land (active and abandoned) within this area in general supports a diverse amphibian community. And Chinese Bull Frog, a State II Protected Species in China, also inhabits the area. We urge that compensatory wetland should be present in the area in order to mitigate the impact of wetland loss. We do not agree that wetland loss in Ping Che/ Ta Kwu Ling could be compensated by re-provision of wetland in Kwu Tung North. If the project is to go ahead, we strongly advise that the recreated wetland within Ping Che/ Ta Kwu Ling should be connected with other green areas in the region.

Importance of maintaining local agriculture

Loss of agriculture and agricultural landscape in Hong Kong

14. The proposed NENT NDAs plan will result in the loss of 246 ha, that is exceeding 80% of the agricultural land located within the boundaries of the three NDAs. Among the agricultural land proposed to be lost by the NDA plan, over 40% is currently active.

15. The Ping Che/ Ta Kwu Ling NDA plan proposes to destroy all of the AGR land (about 120 ha) within its boundary. 78% of the AGR land (about 31 ha) located within the Fanling North NDA is proposed to be lost. In Kwu Tung North NDA, 68% of the AGR land (about 95 ha) is proposed to be converted to other uses.

16. Apart from producing considerable amounts of quality fresh food for local consumption, the agricultural landscapes at the proposed NDAs have been serving as the base for thousands of villagers and farmers to preserve the rural living culture while at the same time offering countless experiential learning, environmental education and recreational opportunities to Hong Kong citizens (see below).

17. Also, farmers have reflected that after previous massive construction works across rural land and channelization of the river, the water table was badly disturbed and has posed an impact on water supply for farmland irrigation – this is also likely to be a consequence of the

proposed NDAs plan, thus compromising the existing active agricultural land that is not to be covered by concrete in the scheme.

Agriculture land at the NDAs is of public interest

18. The absence of an agricultural policy in Hong Kong, together with the influx of cheap food produce from Mainland China in the past decades, has led to the drastic decline of self-sufficiency in food supply in Hong Kong.

19. The escalating public concern regarding food safety of imports has driven community support and created new hope for the local agricultural movement in recent years. However, the reasons for the fast-growing community support and dynamic rejuvenation of local agriculture go far beyond the demand for high quality food – the trend is supported by an increasing awareness of the existing and potential contributions of local agriculture in education, recreation, employment, community integration, organic waste recovery, conservation, climate regulation and other ecosystem benefits to Hong Kong’s environment and citizens.

Agriculture should play strategic roles in the NDA plan

20. According to the Stage 3 Public Engagement Digest, the strategic role of the NDAs is to “reserve land in the NDAs for special industries and the industries where Hong Kong enjoys clear advantages in support of regional development and integration with the Pearl River Delta to promote the economic development of Hong Kong.” We would like to point out that this does NOT reflect the expectation of most Hong Kong citizens. As reflected from several recent public forums related to the present NDA proposal, there are strong doubts regarding whether or not Hong Kong citizens can really “enjoy” the “clear advantages” of a conventional economic-led development approach and the integration to the Pearl River Delta. On the contrary, there is also a strong call for government policies to address food waste, air pollution, environmental conservation, recreational and open space, as well as food safety and supply problems in Hong Kong – these are areas which agriculture land in the NDAs could make a strong contribution in Hong Kong at large. The existing agriculture land in the proposed NDAs should play a strategic role in the plan.

Agriculture cultivates people-oriented communities in the NDAs

21. Organic farms of various scales have been established in the past decade by charitable

organizations, environmental groups, religious organizations, social enterprises, schools, social sector, farmers and private individuals to realize visions on community integration, social-aid, local and alternate employment, life-education, therapeutic and other people-oriented socio-economic initiatives. There is a strong need for creative and wise-use of the existing agriculture resources in the NDAs to extend their contributions to wider communities of Hong Kong. The proposed irreversible loss of the valuable agricultural resources in the NDAs totally undermines the multiple benefits of agricultural activities and agricultural land, and the plan will eradicate the existing establishment of good will.

Agriculture is the foundation for sustainable living in the NDAs

22. The NENT NDAs plan, which proposes the loss of over 80% of the existing agricultural land in the three NDAs, completely fails to fulfill its own statement for a sustainable living environment, that is, “*respect, preserve and optimize the use of the existing valuable natural and cultural resource as well as adopt green and energy-saving initiatives.*” The carbon reduction strategies proposed in the planning concepts of the NDAs are conventional, piece-meal, short of creativity and disconnected from the global trends for sustainable living. Food supply and food production always play a key role in the leading models for developing a sustainable living environment such as the One Planet Living principles pioneered by ‘Bioregional’ and the widely spreading “transition town” and ‘Permaculture’ initiatives all over the world. Agriculture land in the NDAs should be treated as a valuable resource and it should play a core role in carbon reduction strategies in bringing about direct carbon reduction, waste recovery, waterway conservation and water recycling, healthy food supply, community integration, greenery and habitats for wildlife, recreation, and educational benefits for sustainable living.

Our Agricultural land should not be further reduced

23. Hong Kong is currently dangerously unprepared for the effects of Climate Change and Peak Oil which are intensifying. Peak Oil is the peaking of global oil production which will be followed by an ever-decreasing flow of supply and ever-increasing price hikes, leading to economic and social instability; and is felt by leading analysts to have already arrived. Climate scientists in Hong Kong, Mainland China and elsewhere predict food shortages in the coming years due to climate change in China. “Food security” is a very serious issue and the Government should take all possible steps to protect Hong Kong’s active, abandoned, and illegally covered agricultural lands so that there is a chance of Hong Kong having increased

resilience in the future. In order to safeguard this important public interest (food supply), the area of agricultural land in Hong Kong should not be further reduced; indeed the HK Government would be wise to incentivize the bringing of all possible appropriate rural and urban land and spaces into agricultural production as quickly as possible.

Serious housing shortage?

24. We dispute the Government's claim that they need to build this proposed development to meet a serious housing shortage. A wiser tactic would be to look at every other possibility first, such as imposing a large monthly tax on undeveloped development land owned by developers, payable for as long as the land is not developed and occupied by residents; placing a similar tax on private flats that are not occupied (left idle); developing brown field sites and industrial sites. The need for housing can also be reduced by strictly limiting the numbers of new immigrants into Hong Kong, which is already very crowded, polluted and very far beyond the land carrying capacity for human life. We actually need a lot less people, a lot less buildings and a lot less economic activity. Hong Kong is well beyond its limits to growth and must contract to fulfill its obligations to humanity to make a serious contribution towards reversing climate change which is threatening the very survival of the human species.

Conclusion

25. Taking account of all the above, we consider that the present NENT NDAs proposal contains many discrepancies and shortcomings. We urge the project proponent to rethink the whole plan. We do not consider that the present plan is acceptable, in terms of protecting Hong Kong's biodiversity, safeguarding Hong Kong's food supply and preserving Hong Kong's agricultural culture.

26. We would also like to point out that The Convention on Biological Diversity has been extended to Hong Kong. The contracting parties of this international convention should strive to protect their own biodiversities. We urge the government to follow the guidance of this convention.

27. Hong Kong needs Climate Change Policy part of which should be an Agriculture Policy and an Energy Reduction Policy which would urgently face up to the realities of Climate Change, greenhouse gas emissions, Peak Oil, over population, food security and the need for gradual economic decline, so that we can transition in an orderly way to a changed and at least



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more sustainable city.

28. Only officials, planners and engineers who apparently do not have a basic understanding of sustainable earth functions would advocate such a plan, and other similar plans which lack vision and a comprehension of the real needs of future society, with extreme climatic and resource issues looming. We urge the Government to not allow people in these key positions to design anything or approve any more large scale projects until they have received and passed courses researched, designed and delivered by relevant Government staff and that are something along the lines of an Operating Manual for Planet Earth. Consultation with local academics and NGOs would also add value to the training. Once they know the full picture we are confident they will put their skills, leadership and passion towards projects that truly help Hong Kong and the earth's future.

Yours faithfully,

Andy Brown
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Figure 1. Ma Tso Lung Stream is largely natural



Figure 2. Ma Tso Lung Stream system (blue line in the upper figure) and proposed zonings (bottom figure); red circles show where the stream will be affected by the zonings not for nature conservation

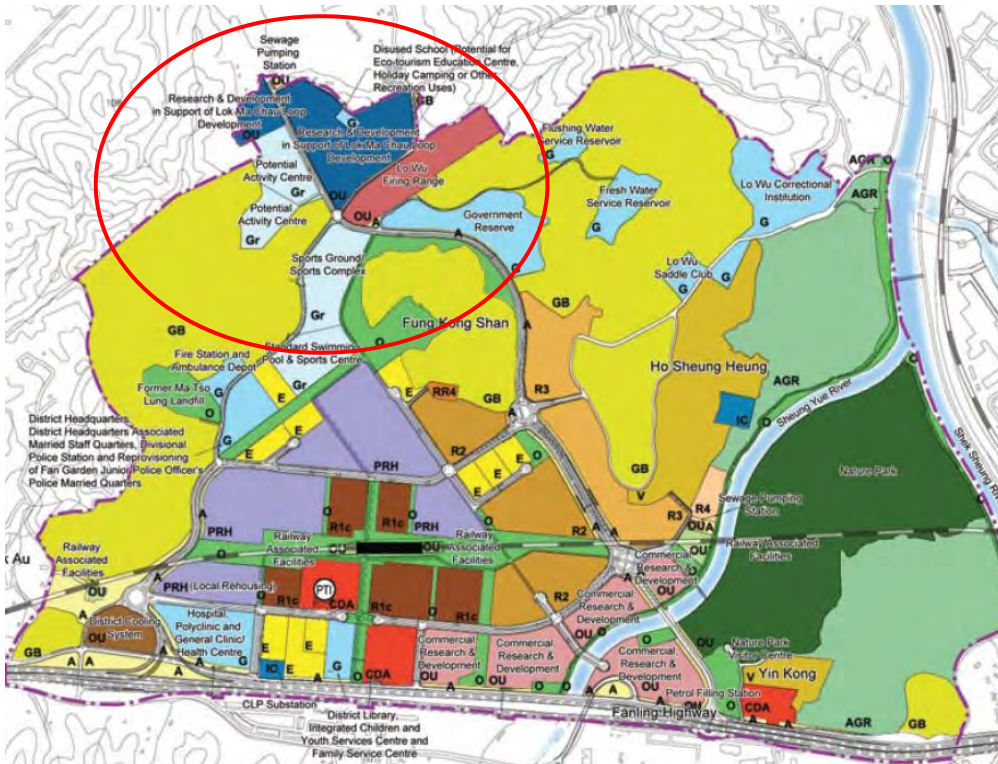


Figure 3. Siu Hang San Tsuen Stream

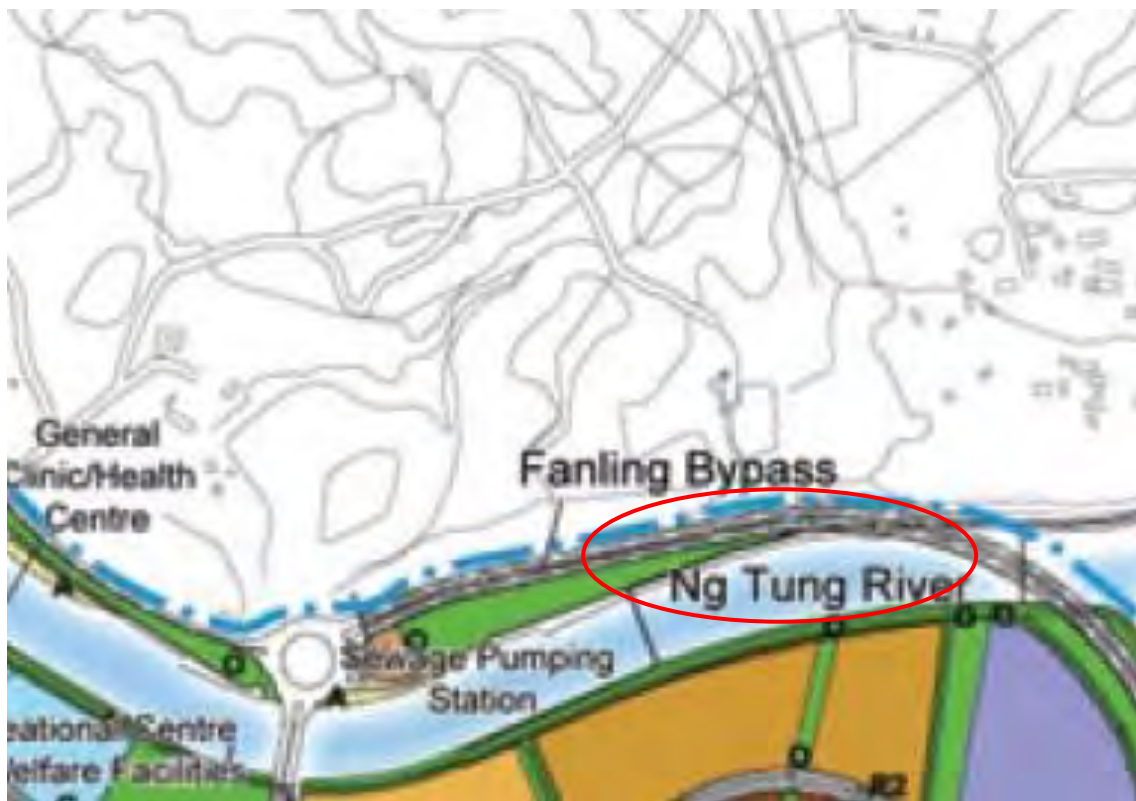


Figure 4. Ha Shan Kai Wat Stream

