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Submission to Subcommittee on Country Parks
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**Incorporation of Country Park Enclaves of Tai Long Sai Wan, Kam Shan & Yuen Tun
into the SKECP, the KSCP & the TLCP respectively**

WWF would like to lodge our strong support to the Amendment Order which proposes to incorporate country park enclaves of Tai Long Sai Wan (TLSW), Kam Shan & Yuen Tun into the Sai Kung East Country Park (SKECP), the Kam Shan Country Park (KSCP) and the Tai Lam Country Park (TLCP) respectively.

1. Conservation importance of enclaves

The country park enclaves are sites surrounded by or adjacent to the existing country parks but not within the country parks boundary. Many of them are in lowland valleys where many years ago villagers had settled and cleared the flat land for farming. Although on paper there is a clear boundary between the two, but physically and ecologically these enclaves are connected to the country parks and form one entity. For example, in TLSW *“the wooded area by the hillsides form a continuous stretch of well-established vegetation with those located at the adjacent Sai Kung East Country Park”*¹ and wildlife freely move between them and depend on both to survive. The country park enclaves also contain special lowland habitats such as freshwater marshes and small rivers and support wildlife that are rarely present inside the existing country parks. Hence, many of them are of high conservation importance.

The spectacular scenic value of the Sai Kung East Country Park is due to the entire landscape - the steep hills in the country park rising from the flat land and meandering small rivers in the enclaves and the adjacent sandy beaches. TLSW is a famous natural scenic spot and is ranked top of the Hong Kong Best Ten Scenic Sites in a public campaign organized by the Friends of the Country Parks in 2006². **Therefore, WWF believes that, in terms of high**

¹ Refer to Paragraph 5.4 of the Explanatory Statement of the Tai Long Sai Wan DPA Plan

² Refer to Paragraph 14 of the Legislative Council paper (CB(1)2656/09-10(01))

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landscape value and complementing the existing country parks, these three sites, in particular TLSW, should be incorporated into country parks. Only through this measure can these enclaves and the integrity of the adjacent country parks be adequately conserved under the proper legislation and the management of AFCD.

2. Preventing development threats in enclaves

The Tai Long Sai Wan incident in 2010 showed that uncontrolled development inside country park enclave could result in irreversible environmental destruction to this area of high conservation and landscape value (Fig. 1). Also, the incident indicated that Government departments such as AFCD, Lands Department and Planning Department cannot take any enforcement action to regulate destructive development works if the enclaves have no statutory protection. Other remote enclaves such as So Lo Pun and Pak Lap, even though without vehicular access, have also suffered from destructive activities with their naturalness and scenic value heavily undermined. **To prevent incompatible developments and activities which reduce the naturalness of these enclaves and the surrounding country parks, WWF considers that TLSW, Kam Shan and Yuen Tun should be incorporated into country parks.**

3. Incorporating enclaves into country park rather than OZP to achieve regular patrolling & active management

Considering the naturalness and high landscape value of TLSW as mentioned in the previous paragraphs, WWF considers that active patrolling and management approach is essential to safeguard the conservation and landscape value against any incompatible developments. In addition, the recreational and educational value can be improved by enhancing the village and countryside environment through better facilities. These can be achieved by incorporating TLSW into Sai Kung East Country Park to allow patrolling, management and even enforcement when required by AFCD. **Although landuse can be controlled by covering the enclaves with Outline Zoning Plan (OZP), active management to conserve the ecological and landscape value of the enclaves are not empowered by the Town Planning Ordinance.. Therefore, WWF believes that to properly protect highly valuable sites such as TLSW, incorporating them into country park is the only option. This will have the additional benefits of enhancing its multitude values through active conservation management.**

Moreover, the recently released draft OZPs for 3 enclaves (Hoi Ha, So Lo Pun and Pak

Lap) all include very large ‘Village’ zone, some even in areas that have been deliberately degraded beforehand. If approved, these OZP will essentially give green light to disproportionately large-scale housing development in small-sized enclaves. Hence, we do not think that OZP will be able to give adequate protection to important enclaves such as TLSW.

4. In line with the 2010-11 Policy Address

In response to the huge public concerns on the development in TLSW in 2010, the Chief Executive stated in the 2010-11 Policy Address that “*to meet conservation and social development needs, we will either include enclaves into country parks, or determine their proper uses through statutory planning.*”³ **WWF is of the view that the incorporation of TLSW, Kam Shan and Yuen Tun into country parks is meeting the above promise in the 2010-11 Policy Address. This Amendment Order captures the general public expectation to conserve these valuable sites from any incompatible and destructive developments.** We therefore sincerely ask the Legislative Council to pass this Amendment Order as soon as possible.

³ Refer to Para. 123 of the 2010-11 Policy Address <http://www.policyaddress.gov.hk/10-11/eng/p122.html>



Figure 1 Excavation work in Tai Long Sai Wan in 2010 (Photo taken on Jun 2010)