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Chairman  
Task Force on Land Supply  
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2 Tim Mei Avenue, Tamar, Hong Kong

3 September 2018  
(By post and e-mail [tfls@devb.gov.hk](mailto:tfls@devb.gov.hk))

Dear Mr. Wong,

**Re: Task Force on Land Supply Public Engagement Exercise**

The Task Force on Land Supply has launched a 5-month public engagement exercise (PE) on 26 April 2018. WWF believes a number of the suggested land supply options are unsuitable and, if adopted, would seriously sacrifice Hong Kong's biodiversity and natural resources and unavoidably damage our community and shared vision to be a liveable, competitive and sustainable city.

WWF has the following views and proposal which are submitted in full in the attached Appendix. These view in brief are: -

1. **Adopt an effective “brownfields first” development policy;**
2. **Reclamation should not be considered and marine spatial planning is needed;**
3. **Conserve and rehabilitate valuable agricultural lands in our community;**
4. **No development in our country parks**

WWF-Hong Kong believes that brownfield sites should be prioritized for housing development and the Government needs to face the challenge of freeing up brownfields to ease the housing shortage. The sea should be carefully managed to conserve biodiversity and reclamation should not be considered without first implementing marine spatial planning.

..1/2  
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贊助人：香港特別行政區行政長官  
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We would also support an approach to conserve and rehabilitate agricultural land to good quality to be productive in organic food and make Hong Kong more sustainable. Last we consider there should be no pilot proposal or development in country parks as these areas are crucial to Hong Kong's biodiversity and contribute to the physical and mental well-being of our otherwise crowded city.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Cornthwaite', with a stylized flourish at the end.

Peter Cornthwaite  
Chief Executive Officer  
WWF-Hong Kong

*Encl.*



## **Task Force on Land Supply Engagement Exercise Views of WWF-Hong Kong**

### **1. Adopt an effective “brownfields first” development policy**

Brownfields are abandoned agricultural or rural land that has already been occupied, legally or illegally, for haphazard use such as open storage, container yard and vehicular parking. According to the research done by the Liber Research Community<sup>1</sup>, Hong Kong now has almost 1,200 hectares of brownfield sites. The total area of the big clusters, outside the development areas promulgated by the government, is nearly 390 hectares, and four brownfield clusters have individual areas bigger than 30 hectares each. For example, the cluster in Wang Toi Shan in Pat Heung alone is 71 hectares. These brownfield sites are ready for development into residential use as they are relatively flat and accessible areas with transport facilities and supported by infrastructures, e.g. water and electricity supply. Moreover, many of these brownfield sites are inconsistent with the surrounding land use and this creates environmental problems. According to a study conducted by WWF-Hong Kong, over 78% of brownfield sites occupy land outside the “Open Storage” zone, deviating from the Outline Zoning Plans<sup>2</sup>. By developing brownfield sites with comprehensive planning local environmental conditions can be improved. As such, we believe that these brownfield sites should be prioritized for housing development. The government should face the challenge of housing shortage and any difficulties with ‘brownfield development implementation’ in a programmatic and tireless manner for the benefit of our community as a whole. The government should speed-up the resumption of these brownfield sites and devise a fair compensation mechanism in order to solve the short-term housing problem.

In order to prevent their further expansion of brownfield sites in the New Territories, the government should reject all applications for new brownfields and strengthen enforcement against all unauthorized brownfield sites. The long out-dated Town Planning Board Guideline No. 13E should be rescinded so that the Town Planning Board can properly exercise its role to avoid unsuitable brownfield applications. In the long-term, the government has to establish an

<sup>1</sup> The Liber Research Community (2018). “A Study on the Development Potential of Brownfield in the New Territories”

<sup>2</sup> WWF’s study on brownfield sites:

[https://d3q9070b7kewus.cloudfront.net/downloads/finalized\\_leaflet\\_72dpi\\_20161201.pdf](https://d3q9070b7kewus.cloudfront.net/downloads/finalized_leaflet_72dpi_20161201.pdf)



open and comprehensive land database to enhance transparency in decision-making process and facilitate holistic urban planning.

## **2. Reclamation should not be considered and marine spatial planning is needed**

The sea is an important and precious resource, and should be carefully managed to conserve biodiversity, support fisheries, businesses, recreation, and a high quality of life. A healthy sea provides a wealth of benefits to Hong Kong communities. WWF objects to the proposition of reclaiming the sea in order to build land reserves for housing needs without conducting any proper planning. WWF believes marine spatial planning needs to be conducted prior to any development with a reclamation plan.

### 2.1. The “5 plus 1” proposal

Lantau Island, especially in the vicinity of Lung Kwu Tan, is the habitat of the Chinese white dolphin. Due to a number of marine infrastructure projects and development pressures in the past, the number of dolphins has plummeted by 70% over last 10 years, and the rate of young dolphin sightings has hit a record low. If the reclamation project in Lung Kwu Tan goes ahead, the dolphins will be forced to Urmston Road which has frequent marine traffic and will greatly increase the risk of ship strikes. Lung Kwu Tan has a natural coastline and is a breeding ground for various fish species. Destroying natural habitats, such as Lung Kwu Tan, will have irreversible ecological impact. As such the Lung Kwu Tan reclamation plan should not be considered.

The 850-hectare Brothers Island Marine Park was designated as in 2016, aimed to protect and enhance the Chinese white dolphin habitat, as well as marine ecology and fisheries resources in North Lantau waters. Reclamation undertaken in Siu Ho Wan would impact this species with work being no more than 100 meters from the boundary of the marine park. In addition, due to the limited open sea space and various constraints such as close vicinity to the navigation channel, the numbers of work barges that may need to pass through or moor close to the marine park during the construction period will cause physical and underwater noise disturbance to the Chinese white dolphins inhabiting the area. Water pollution problems associated with reclamation work will also cause potential impact to the dolphins and other marine species and fisheries resources in the protected area. The potential impact incurred from reclamation will be in direct conflict with the conservation intent of establishing a marine park. The reclamation proposal at Siu Ho Wan has not been considered under any comprehensive plan to adequately address cumulative impacts from multiple developments.

An artificial island of 1,000 hectares is proposed to be reclaimed at the Central waters and would be the biggest reclamation project in Hong Kong's history. Reclamation may intensify disturbance to marine species by significantly shrinking the area of open sea for human activities, these becoming concentrated in the remaining sea area or pushed to impact on other conservation priority habitats. Modification of the coastline may also affect hydrology, coastal morphology, scenery, and water quality in the neighbouring areas, causing further negative impact to the environment. No detailed and robust survey on fisheries resources, corals and finless porpoise has been conducted at the proposed area. The change of hydrology from reclamation will disrupt the flow of current and flush rate, increase the retention rate of sediments and pollutants, and affect small marine organism like larvae, which could cause a knock-on effect to the marine food chain in the area, permanently affecting the health of our marine ecosystem in the area.

## 2.2. Affecting the recovery of fisheries resources

Since end of 2012, Hong Kong has passed legislation to ban all trawling in Hong Kong waters to rebuild our devastated marine ecosystem and to establish a sustainable fishery. The government is now planning to reclaim a sea area of over 1,500 hectares, which could affect recovery of fishery resources, affecting the livelihoods of fishermen and any transition to sustainable fisheries in Hong Kong. One of the reasons for the dwindling fishing industry is the unabated coastal development with natural coastlines destroyed and damaged to spawning, nursery and foraging grounds of many marine species. Reclamation is only going to worsen the situation and adversely impact the chance of recovery of fisheries resources. Artificial land is going to affect the current flow speed and hydrological conditions, contributing to the accumulation of sediments and pollutants that will have long-term impact on the marine environment.

## 2.3. Marine spatial planning is the solution

Seas are everyone's asset. If the sea is reclaimed without proper and holistic planning, it will lead to environmental problems such as water pollution, loss of habitat and damage fisheries resources. Currently there is no plan on how to utilize the marine resources strategically, leading to huge conflict between the priorities for conservation and development. In order to better conserve our valuable marine and seabed area and at the same time cater for growing needs of our city, the government should implement a coastal and marine spatial planning (MSP) exercise to strike a balance between planned development and effective conservation and restoration of the sea and marine species in Hong Kong. This type of planning usually involves a baseline assessment of

coastal and marine environment, which further helps determine what uses are compatible or incompatible with the environment and to define which areas are best suited for protection and which could be made available for development.

MSP is a great tool to help minimize the conflict between marine conservation and on-going city development. An effective MSP can facilitate the allocation of Hong Kong's marine resources in the most appropriate way and find synergies among sectors. Disputes have been escalating in recent years with numerous large-scale infrastructure projects that are either underway or in the planning process. Increased demand is being placed on the limited space and resources of the sea. It is time to end unplanned use of our sea resources, and to implement MSP, to allocate the spatial and temporal distribution of human activities in marine areas, and to achieve a mix of ecological, economic, and social objectives. The implementation of MSP can reduce the on-going cumulative impact and degradation of nature, reducing the fragmentation of marine habitats, and encouraging stakeholder participation during the planning process. WWF strongly urges the government to undertake MSP exercise prior to commencement of any reclamation plan.

### **3. Conserve and rehabilitate valuable agricultural lands in our community**

#### **3.1. Agricultural land's values and functions**

Agricultural land serves diverse values and functions that provide welfare benefits to society. Agricultural land supports over 4,000 local farmers including farmland workers' livelihoods. Additionally, agricultural land produces fresh food for local consumption, diversifies our food supply and reduces our reliance on food imports. Apart from these socioeconomic values, agricultural land with organic farming practices contribute to the enhancement of soil biodiversity and the reduction of soil erosion, contamination and compaction. Moreover, agricultural land functions as land carbon sinks in mitigating global climate change. From the viewpoint of nature conservation, agricultural land is of ecological importance. In the local context, agricultural land, including dry and wet farming has a characteristic bird community with some species more readily found in such areas than elsewhere. While agricultural land provides foraging resource for farmland birds, insect-eating birds benefit agriculture by preying on pest insects. As such, farmland loss may have a negative influence in the delivery of the natural services provided to our community by farmland birds.



### 3.2. Save remaining agricultural land

Agricultural land is being looked at as a resource as the government responds to community pressure for land for housing development. Its true value and function for our community with sustainable food is being neglected. The new town developments in Kwu Tung North / Fanling North, Hung Shui Kiu and Yuen Long have been built on over 100 hectares of agricultural land in those areas<sup>3</sup> and there will be another hundred hectares affected by the development proposals for New Territories North<sup>4</sup>. Hong Kong 2030 Planning Vision and Strategy notes “It is important to preserve active and good quality farmland where possible.”<sup>5</sup> WWF believes that existing agricultural land that is actively-cultivated and used organic farming should now be protected from any development. Agricultural land with high ecological value should also be conserved whether it is actively-managed or not. Fallow arable land with good potential for rehabilitation for organic cultivation and other agricultural use should be preserved. Agriculture, Fisheries and Conservation Department (AFCD) should engage with the community to look seriously at rehabilitation of agricultural land. Should agricultural land be identified for development, AFCD should have the responsibility to determine whether the land is of limited agricultural and ecological value. Government Planning should then designate an appropriate area for restoration to agricultural use. A swap system can help free up more developable areas and at the same time compensate and restore agricultural land, thereby shortening the period for new farmers waiting for land as part of the government’s Agricultural Land Rehabilitation Scheme.

## 4. No development in country parks

### 4.1. Developing any part of our country parks is a loss of their primary community function

Hong Kong’s country parks not only protect biodiversity in our city but also provide much needed recreational space, experiential education opportunities and support healthy ecosystems. Currently, there are 24 country parks and 22 special areas with a total area of about 44,300 hectares, covering about 40% of Hong Kong land<sup>6</sup>. Apart from supporting an exceptionally rich biodiversity, with some species unique to Hong Kong and those globally threatened, country parks also provide for recreational activities and a connection between

<sup>3</sup> Assistance and compensation for farmers affected by development plans. HKSAR Government press releases dated on January 24, 2018 <http://www.info.gov.hk/gia/general/201801/24/P2018012400384.htm>

<sup>4</sup> WWF’s estimation based on the information in the Hong Kong 2030+ “Preliminary concepts for the New Territories North Development”

<sup>5</sup> Planning for Agricultural Uses in Hong Kong [http://www.hk2030plus.hk/document/Planning%20for%20Agricultural%20Uses%20in%20Hong%20Kong\\_Eng.pdf](http://www.hk2030plus.hk/document/Planning%20for%20Agricultural%20Uses%20in%20Hong%20Kong_Eng.pdf)

<sup>6</sup> Hong Kong: The Facts – Country Parks and Conservation: [https://www.gov.hk/en/about/abouthk/factsheets/docs/country\\_parks.pdf](https://www.gov.hk/en/about/abouthk/factsheets/docs/country_parks.pdf) (Last access: 13 Aug 2018)

our community and nature. AFCD notes 13 million visitors to our country parks in 2017<sup>7</sup> which shows the extent of their popularity and the part country parks plays in contributing to the physical and mental well-being of our otherwise crowded city. Country parks provide for the important ecosystem services providing clean water and fresh air, regulating the climate and preventing soil erosion. WWF believes there should be no development in any part of our country parks. We strongly oppose misguided suggestions of “Developing two pilot areas on the periphery of our country parks”.

Any suggestion of development in country parks would need a decade or more of careful scrutiny and undergo various statutory processes with amendment to both on-going Country Parks Ordinance and Environmental Impact Assessment Ordinance processes. Any suggestion for development cannot be a sensible and realistic approach to ease the short-term housing problem.

WWF-Hong Kong considers it inappropriate to start to talk in an ambiguous way about “peripheral areas” or those of “low ecological value”. The Country Parks Ordinance for good reason does not distinguish “core” and “periphery” country parks which need to continue to be protected and for the benefit of all of our community.

### **Conclusion**

Chapter 2 of the Task Force’s public engagement booklet claims there is a 230 hectare overall housing land shortfall against the estimated long-term housing land requirement. Census and Statistics Department’s report *Hong Kong Domestic Household Projections up to 2051*, Hong Kong’s population will start declining by 2043 and the number of households will increase by 440,000 units up to 2051. But over 600,000 housing units are planned (Figure 1). It would seem land shortage in the longer term is being overstated. **For the near-term housing shortage problem, the government should prioritise and speed-up the development of brownfield sites located close to roads and developed areas across Hong Kong.**

In the *Hong Kong 2030+ - Towards a Planning Vision and Strategy Transcending 2030* study, the government has a stated vision to turn Hong Kong into a “liveable, competitive and

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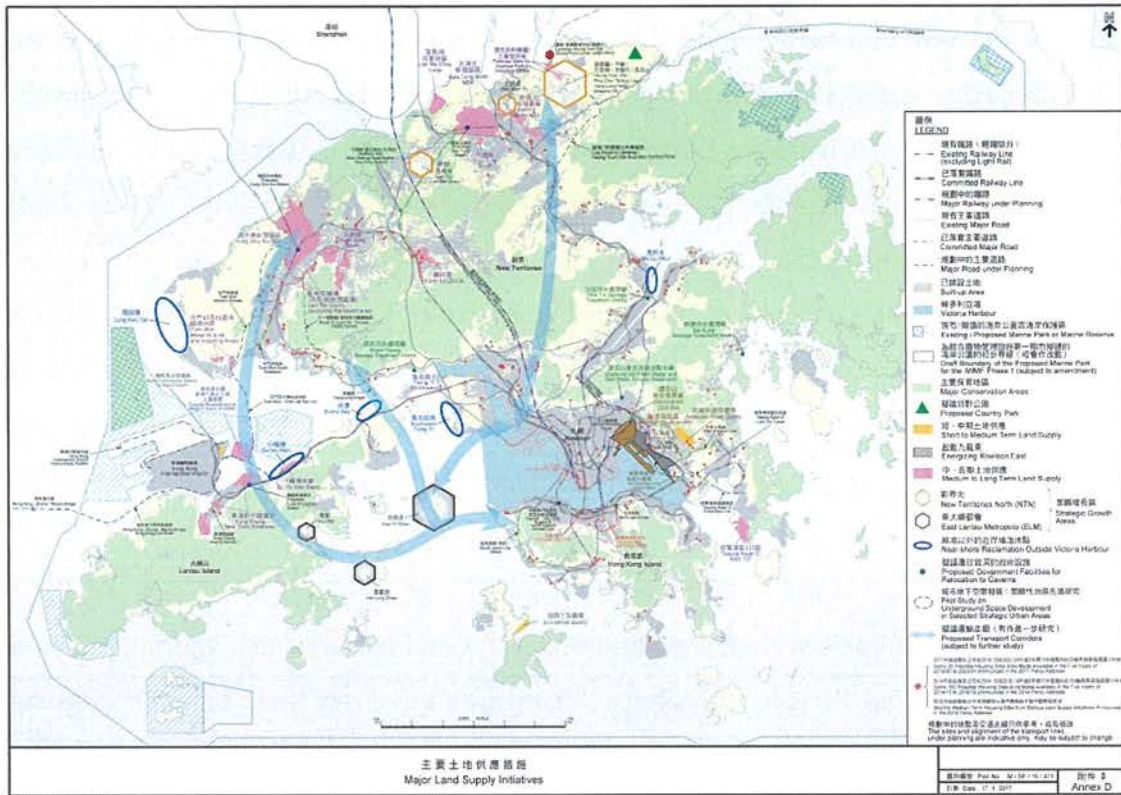
<sup>7</sup> Statistics available from AFCD website:  
[https://www.afcd.gov.hk/english/country/cou\\_lea/cou\\_lea\\_use/cou\\_lea\\_use.html](https://www.afcd.gov.hk/english/country/cou_lea/cou_lea_use/cou_lea_use.html) (Last access: 13 Aug 2018)



sustainable ‘Asia’s World City’ ” by championing sustainable development to fulfil Hong Kong’s present and future social, environmental and economic needs. Options of reclamation, use of country parks, and otherwise productive agricultural land in the Land Supply consultation expertise reflect a neglect in protecting nature for our community health. The development-oriented planning model in Hong Kong is outdated. Our city is living beyond our means and needs to rebalance development having assured environmental capacity, quality of life and ecosystem. WWF believes that the Land Supply consultation is a rare opportunity to turn Hong Kong into a smart and sustainable city and thereby make the planning vision of “Hong Kong 2030+” more than an empty promise. The Government and the Task Force should face any difficulties and developing a robust brownfield first policy for housing, whilst safeguarding our natural assets and farming resources for future generations to achieve “true” sustainable development.

Our planet is facing a crisis with degradation of species and habitats at an alarming rate. We face many environmental challenges with climate change, biodiversity loss, water shortage and need to redress the imbalance of our life styles and nature. The natural environment is the key to our life support system and let’s not compromises our planets’ future any further. There are many poorly-utilised brownfields in the New Territories and unoccupied facilities in and around our city. There is an obvious choice that does not need to compromise nature on land or sea. By adopting a brownfield first development policy, we can provide land in a timely manner to address our community housing and social needs.

**Fig. 1 Number of housing units to be supplied by future land supply plans<sup>8</sup>**



圖示 Legend	土地供應項目 Land Supply Plan	面積 (公頃) Area (ha)	可提供房屋單位 Housing Unit	
短中期 (2014年及以後) Short to Medium Term (From 2014 and after)	26幅具房屋發展潛力的用地 (PA2017)	約 ca. 100	> 60,000	
	150幅具房屋發展潛力的用地 (PA2014)	約 ca. 350	> 210,000	
	42幅具房屋發展潛力的用地 (PA2013)	約 ca. 50	40,000	
	啓德發展區	Kai Tak Development	320	50,000
	鑽石山綜合發展區	Diamond CDA Site	7.42	4,050
	前南丫石礦場	Ex-Lamma Quarry	20	1,900
—	已作實發展的鐵路發展項目	Railway Property	18	12,000
—	市建局的市區重建項目	Urban Redevelopment by URA	2.38	3,310
中長期 (2023年及以後) Medium to Long Term (From 2023 and after)	古洞北和粉嶺北新發展區	Kwu Tung North and Fanling North New Development Areas	320	60,000
	東涌新市鎮擴展	Tung Chung New Town Extension	196	49,400
	洪水橋新發展區	Hung Shui Kiu New Development Area	441	61,000
	元朗南發展	Yuen Long South Development	183	28,500
	將軍澳第137區	Tseung Kwan O Area 137	>80	?
—	中長期鐵路物業發展	Railway Property	54	21,000
長遠 Long Term	欣澳 (填海)	Sunny Bay (Reclamation)	60 - 100	
	龍鼓灘 (填海)	Lung Kwu Tan (Reclamation)	220 - 250	
	小蠔灣 (填海)	Siu Ho Wan (Reclamation)	60 - 80	?
	青衣西南 (填海)	Tsing Yi Southwest (Reclamation)	?	未有公布數字
	馬料水 (填海)	Ma Liu Shui (Reclamation)	60	No data
	中部水域人工島 (填海)	Artificial Islands in central waters (Reclamation)	?	
	岩洞及地下空間發展	Cavern and underground space	41	
	新界北	New Territories North (NTN)	720	
	東大嶼都會 (填海)	East Lantau Metropolis (ELM) (Reclamation)	1000	
	總計(未計長期項目)		約 2,142 公頃	最少 601,160 個單位
Total (Not including Long Term Plan)		ca. 2,142 ha	At least 601,160 units	

資料來源：發展局 (2017年9月)  
Data source: Development Bureau (September 2017)  
網址: [https://www.devb.gov.hk/filemanager/tc/content\\_1054/Paper\\_03\\_2017.pdf](https://www.devb.gov.hk/filemanager/tc/content_1054/Paper_03_2017.pdf)  
URL: [https://www.devb.gov.hk/filemanager/en/content\\_1054/Paper\\_03\\_2017.pdf](https://www.devb.gov.hk/filemanager/en/content_1054/Paper_03_2017.pdf)

<sup>8</sup> Data based on WWF's Response to the Chief Executive's Announcement Regarding Development in Hong Kong's Country Parks : [http://www.wwf.org.hk/news/press\\_release/?17720/Press-Release-rapid-response-WWF](http://www.wwf.org.hk/news/press_release/?17720/Press-Release-rapid-response-WWF) (Updated on 10 August 2018)