

Submission Number:

TPB/R/S/YL-NTM/15-S12

城市規劃委員會
秘書處:

有關土地徵用組元朗工程項目小組
(收回土地以便進行牛潭尾新發展區發展計劃)
墳墓/甕盎(金塔)編號 : G32
檔號 : LD YLPT/YRN/5/2024G (G32)

就有關政府計劃將墳墓/甕盎(金塔)編號 G32 的土地納入牛潭尾新發展區發展計劃的收地範圍。我們於 2025 年 10 月 22 日去信地政總署提出強烈反對收回上述墓地，隨後，地政總署聯同土拓署及屏山鄉委會於 2025 年 11 月 27 日舉行會議討論有關事宜。會議中，土拓署提到政府於去年 11 月就牛潭尾土地用途建議開展為期兩個月公眾諮詢，並於今年 10 月初徵詢元朗區議會及新田鄉委會的意見，同時於今年 10 月中開展城規會程序，作為期兩個月的公眾諮詢。我們在會議中提出一致堅決反對政府收回吳屋村墓地(G32)，並提出對於上述政府的諮詢工作感到質疑，為何從未有向吳屋村及屏山鄉委會徵詢意見，直至我們近日收到地政總署的收地通告才得悉此事。我們對此表示非常不滿和驚訝，認為政府漠視我們吳屋村的傳統權益。

我們現特函向 貴委員會提出反對政府收回上述墓地(G32)，因為該墓地是吳屋村原居民的祖墳，已有超過一百四十年歷史(見附圖)，極具價值，亦是吳屋村的風水寶地，讓先人入土後庇佑後人身心健康，興旺家族，而上述收地計劃將必然會破壞吳屋村的「風水」及我們祖先的安寧，影響極為深遠。因此，我們強烈要求 貴委員會撤回有關收地計劃，認真處理作出修改，以保留吳屋村的祖墳。

屏山鄉吳屋村村代表

Representation Number:

TPB/R/S/YL-NTM/15-R7

吳日章, JP

Representation Number:

TPB/R/S/YL-NTM/15-R8

吳燦輝

Representation Number:

TPB/R/S/YL-NTM/15-R9

吳業能

附圖：受影響吳屋村墓地(G32)圖片

附件：吳屋村村代表及村民聯署反對名單

副本送：地政總署高級地政主任/元朗工程項目3 楊文豪先生
土木工程拓展署工程師/24 (西) 蔡志偉先生
元朗民政事務處元朗事務專員 胡天祐先生 JP



2025 年 11 月 28 日



屏山鄉鄉事委員會

第二十二屆


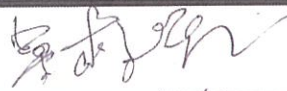

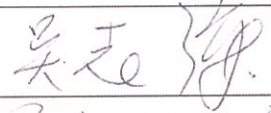

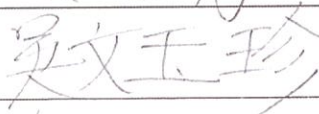
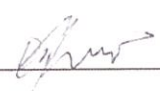
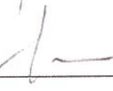
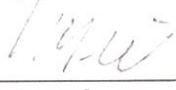
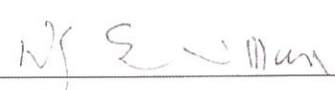


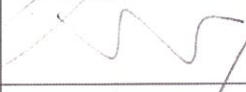
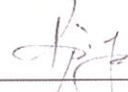
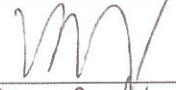

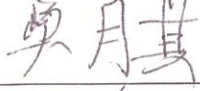

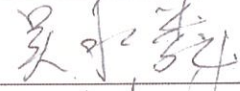
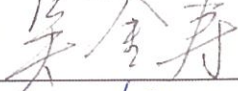
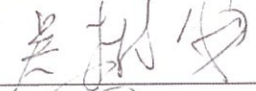
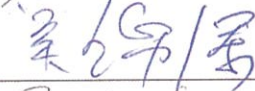

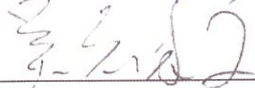
牛潭尾發展區發展計劃影響吳屋村墓地

特別會議

簽到

日期：二零二五年十一月二十七日(星期四)
 時間：下午二時三十分
 地點：本會會議廳
 出席：

吳屋村村代表及村民：

姓名	簽名	姓名	簽名
吳標輝		吳桂如	
吳日章		吳志遠	
吳日昌		吳文玉珍	
吳鎮春		吳侯禮奇	
吳廣梅		吳水文	
吳鎮源		吳善堂	
吳春芳		吳輝華	
吳易		吳子康	
吳月其		吳浩賢	
吳永新		吳桂淋	
吳村安		吳永生	
吳永吉		吳志好	

公諱毓其廼派廷公之三子也
祖母威氏合葬于南堂唐地形龜地
坐長向戌兼巽流西辰甲戌合食之
卜葬之役永垂不朽云
次子興文
十二世祖妣孺人威氏之墓
十五世祖考毓其吳公之墓

光緒三年季秋立
奉祀孫

民國己亥年仲春吉旦



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Representation Number:
TPB/R/S/YL-NTM/15-R10

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2025年12月29日星期一 12:14
收件者: tpbpd/PLAND
主旨: Representation relating to Ngau Tam Mei Outline Zoning Plan (OZP) (No. S/YL-NTM/15)
附件: TPB20251229(NTM).pdf
類別: Internet Email

Submission Number:
TPB/R/S/YL-NTM/15-S3

Dear Sir/Madam,

Please refer to the attachment for the captioned.

To comply with the requirement of TPB, here are the full name and first four alphanumeric characters of HKID card number.

Full name: NG HEI MAN
[REDACTED]

Yours faithfully,
Ng Hei Man (Mr.)
Campaign Manager
The Conservancy Association
[REDACTED]

Registered Name 註冊名稱 : The Conservancy Association 長春社
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

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長春社

Since 1968

The Conservancy Association

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29th December 2025

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Representation relating to Ngau Tam Mei Outline Zoning Plan (OZP) (No. S/YL-NTM/15)

The Conservancy Association (CA) appreciates that the EIA report of Ngau Tam Mei Development has mentioned the establishment of Environmental Committee (EC) to engage green groups for the detailed design work on various matters, including the preparation of the Habitat Creation and Management Plan and Implementation Plan for Ecological Enhancement Features Design. We hope that such EC would be established as soon as possible to keep communication with green groups and serve constructive platform to address environmental and conservation related concerns. Here we would reiterate and highlight some of the concerns related to the Ngau Tam Mei development project.

Item A1

1. Blue-green elements in the proposed UniTown

It is noted that Urban Design Framework has been included in the Explanatory Statement. While most of the blue-green elements are currently indicated in the east of the development site, it is suggested that sufficient blue-green elements could be incorporated within the proposed UniTown in future. We do understand the need to provide flexibility for the planning and design of the UniTown with reference to different implementation scenarios, but viewing that the project is still in early planning stage, at least some guiding principles, concepts or directions through various forms of design guidelines could be suggested to facilitate planning works in the next detailed design



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stage.

To maximize the potential to increase urban biodiversity in Ngau Tam Mei, we reiterate that short- and long-term landscape strategies and actions could be proposed to build a functional ecological network linking the future UniTown and adjacent habitats in Lam Tsuen Country Park and Conservation Area. For example, Study on Urban Biodiversity enhancement has already been conducted for Tung Chung New Town Extension¹ to identify existing and newly planned urban landscape assets and adjoining natural habitats, then propose short- and long-term landscape strategies and actions to build a functional ecological network for urban biodiversity. Measures can be implementing enrichment planting, planting host plants of target butterflies, creating tree clusters (the concept of “urban mini-forest” promoted by The Hong Kong Institute of Landscape Architect²), etc.. It is suggested that similar study could be conducted in Ngau Tam Mei as well.

2. Interface issue

It is necessary to ensure a smooth transition between the future development area and rural countryside in Ngau Tam Mei.

Regarding the adjacent area along the Blue-Green Spine, it is appreciated that non-building areas have been set along the section in the proposed UniTown. To foster gradual and visually more pleasing transition towards rural countryside area, additional measures, such as low-rise profile, stepped building height profile, building setback, sensitive building design and layout, etc., could be incorporated in future development area.

The above can also be adopted in the interface between the proposed eastern and northern periphery of UniTown and Green Belt (Figure 1 and 2).

3. Agriculture

Ngau Tam Mei has long been one of the largest agricultural areas in New Territories. Despite land use changes in non-agricultural uses, some of the agricultural land in Ngau Tam Mei is generally in low degree of fragmentation. We opine that proper protection of

¹ Study on urban biodiversity enhancement for Tung Chung New Town

<https://bhecweb.wixsite.com/restorationecologyhk/tung-chung-new-town-project>

² 都市微森林種植日 Mini-forest Planting Day <https://www.facebook.com/share/p/15PvbKLUTi>



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agricultural features can be another showcase of rural-urban integration in Hong Kong.

Currently open space comprising riverside park, plaza area, station plaza etc., would be proposed along the Multi-functional Blue-green Spine. It is recommended that instead of no mitigation measures proposed for agricultural land, agricultural land (with soil-based cultivation) could be integrated in the proposed open space to foster rural-urban integration and, at the same time, enhance urban biodiversity through planting food crops.

4. Cultural heritage

Although no declared monuments and graded historical buildings are recorded in the study area, there are indeed various historical structures and features within the area that worth further study and evaluation. We wish to reiterate several guiding principles regarding the conservation of cultural heritage in Ngau Tam Mei area:

- The territory-wide survey of historical structures and features should be considered in the desktop research stage of the Cultural Heritage Impact Assessment.
- Direct and indirect impacts on these heritage items should be identified.
- Alternatives should be further explored to avoid/minimize direct loss on the above heritage items in both construction and operation phase
- Contingency measures should be prepared in case items of historical or archaeological importance can be spotted within the development area during construction phase.

On top of the above, here are some of our initial observation and comments on the part of cultural heritage conservation:

Wai Cheung Ancestral Hall (維祥公祠)

We appreciate the effort to preserve the Ancestral Hall in-situ allowing flexibility for future adaptive use within a planned open space. Close liaison with the land owner, occupiers or persons responsible for relevant matters is necessary in future so that an more appropriate conservation management plan could be devised.

Former Yau Tam Mei Primary School (攸潭尾學校)

We also appreciate the intention to preserve the former Yau Tam Mei Primary School subject to the detailed design in later stage. We look forward to see how appropriate



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planning design can be incorporated to promote adaptive reuse of the school.

Temple of Saint Yiu (姚聖母廟) (Figure 3)

The temple is located within the proposed UniTown. Saint Yiu is only worshipped in three of the temples in Hong Kong. Another 2 temples are now situated in Fu Yung Shan (芙蓉山) and Ha Fa Shan (下花山) in Tsuen Wan. During 16th October of the Lunar Calender, locals and worshippers would come all the way to the temple to celebrate the birthday of Saint Yiu (姚大聖母誕). The tradition, with celebrating activities such as unicorn dance, drum and cymbal beating, banquets, etc., has been kept alive even now.

It is suggested to include Temple of Saint Yiu in the baseline of cultural heritage assessment in this stage and evaluate its conservation strategy.

Ma Kung Pavilion (馬公亭) (Figure 3)

This historical pavilion is located at the junction of Chuk Yau Road and San Tam Road. Various sections in the EIA report of Ngau Tam Mei development has stated that upgrading works of San Tam Road and Chuk Yau Road would be proposed. Likewise, we suggest to evaluate its associated conservation strategy, such as setting up cultural heritage trail to link various historical and cultural resources.

A grave in D.D.104 Lot 2439 (許岐山墓) (Figure 3)

The grave is located at the north of Chuk Yau Road. Currently it is proposed to be zoned "Open Space". While provision of open space for recreational uses serving needs for residents or general public is fully supported, we suggest to include the grave in the baseline of cultural heritage assessment in this stage, and liaise with the relevant parties on the matter.

Yours faithfully,

The Conservancy Association



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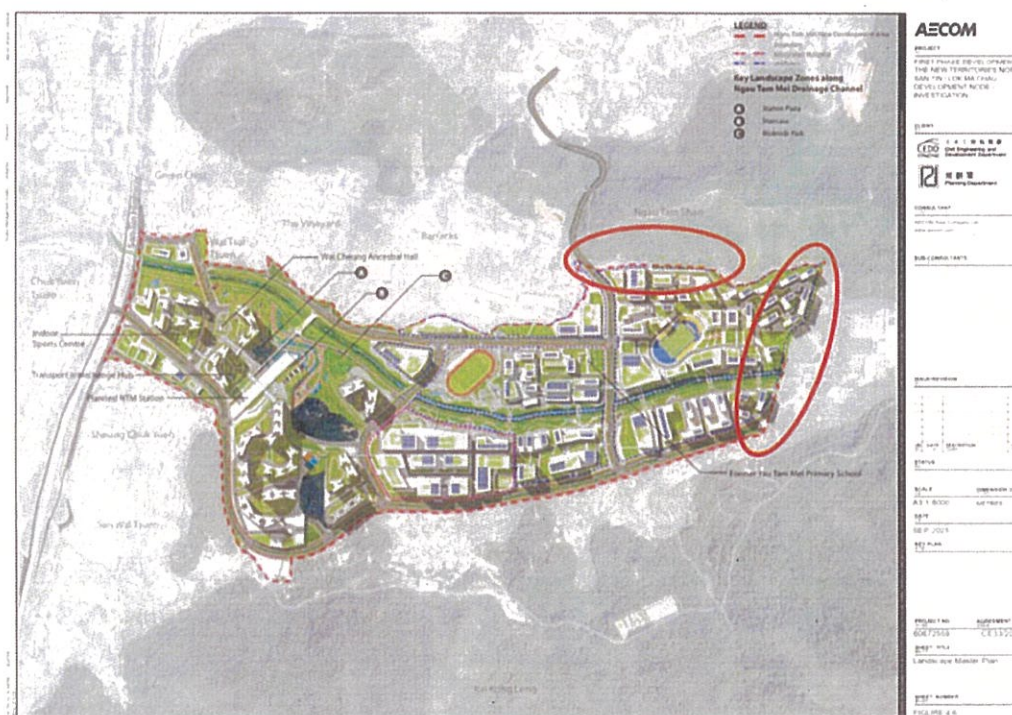
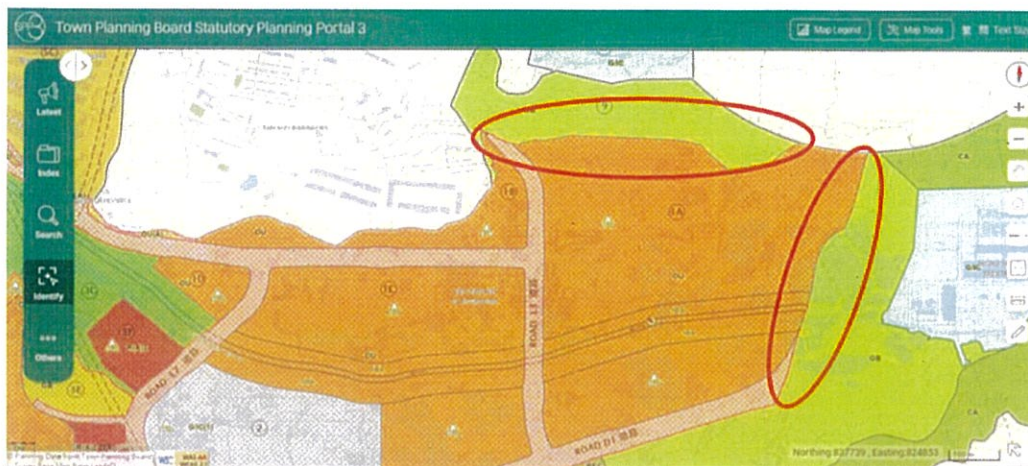
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Figure 1 and 2 The interface between the proposed eastern and northern periphery of UniTown and Green Belt (circled in red). According to the preliminary Landscape Master Plan, buildings are proposed very close to the periphery of the Green Belt (circled in red). Measures such as Non-building Area, buffers, building setbacks, etc., can be considered





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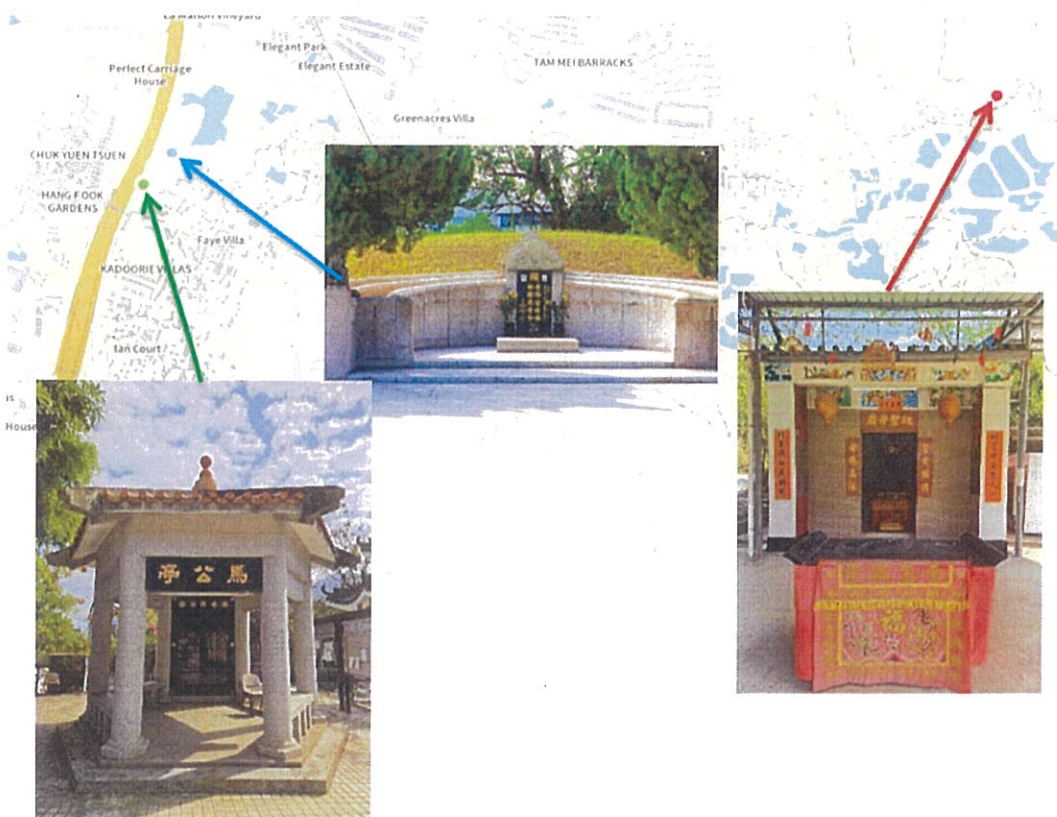
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Figure 3 The location of Saint Yiu Temple (marked in red), Ma Kung Pavilion (marked in green) and the grave (許岐山墓) (marked in blue)
(Link: www.map.gov.hk/gm/s/d/Z5Y9nYpo)



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Representation Number:
TPB/R/S/YL-NTM/15-R11

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2025年12月29日星期一 21:18
收件者: tpbpd/PLAND
主旨: KFBG's representation relating to draft plan S/YL-NTM/15
附件: 251229 KFBG's representation relating to draft plan S_YL-NTM_15.pdf
類別: Internet Email

Submission Number:
TPB/R/S/YL-NTM/15-S5

Dear Sir/ Madam,

Attached please see KFBG's representation relating to draft plan S/YL-NTM/15.

Representer: Kadoorie Farm and Botanic Garden
Representer's representative: Mr. NIP Hin Ming
[REDACTED]

Please do not disclose the above personal particulars to irrelevant persons.

Please do not disclose our email address.

Thank You and Best Regards,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

The Secretary,
Town Planning Board,
15/F, North Point Government Offices,
333, Java Road, North Point,
Hong Kong.
(Email: tpbpd@pland.gov.hk)

29th December, 2025.

By email only

Dear Sir/ Madam,

KFBG's representation relating to draft plan S/YL-NTM/15

1. We refer to the captioned.

Concerns regarding the protection of watercourses

2. Unlike several government projects (e.g., Yuen Long South¹, Ma Tso Lung², San Tin Technopole³, Lung Kwu Sheung Tan⁴) that have proposed to preserve many stream habitats, we cannot comprehend how adequate protection can be provided under the current plan for the numerous lowland watercourses within the plan area. We recommend following the approach proposed/ illustrated in the aforementioned projects – designating specific zones to safeguard lowland watercourses and excluding them from development zoning(s).

Farmland

3. To enhance both ecological and community value, agricultural elements can be incorporated along both sides of the revitalised Ngau Tam Mei channel. Soil-based community farms can be established along the channel corridor and in designated open space zones. These farmlands will not only support local food production but also serve as wind corridors, landscape buffers, amenity spaces and wildlife habitats. Furthermore, they offer recreational

¹ https://yls.hk/static/upload/misc/Revised_RODP.pdf

² <https://nm-mtl.hk/en/index.html?tab=nav-session-2>

³ <https://nm-santintech.hk/en/key-features/bgn/>

⁴ <https://www.lkt-tmw.hk/en/Proposal/>

opportunities for future residents, fostering a sense of community and connection to nature.

4. This initiative aligns with the government's recent policy to promote urban farming in parks and outdoor public spaces, including those within New Development Areas⁵. In addition, these farmlands can be designed as floodable zones, contributing to the sponge city, blue-green infrastructure and nature-based solution concepts advocated by the government – enhancing climate resilience and ecological integration^{6, 7}.

Greenway Network

5. The Northern Metropolis Development Strategy (NMDS) Report⁸ introduces the 'New Territories North (NTN) Urban-Rural Greenway' policy, which we strongly support. We envision this Greenway being further extended into a strategic connector that links ecological, agricultural, cultural and recreational assets across the Northern Metropolis (NM) – from Sha Tau Kok in the east to Pak Nai in the west.

6. Indeed, the Central River Valley and DJW Greenway were proposed as part of the New Territories North development⁹. A "Green and Natural Spine" was also envisioned along the stream system in Ma Tso Lung². Similar blue-green concepts have been introduced in San Tin Technopole³ and Pak Nai¹⁰ (the Coastal Protection Park and Waterfront Open Space). We recommend that these initiatives be integrated with the blue-green elements in Ngau Tam Mei to form a cohesive 'Greenway Network'. A conceptual illustration of this network is provided in **Figure 1** for reference. While this proposed network may fall outside the scope of the captioned plan, we strongly urge the authorities to consider its potential and begin formulating a framework for its realisation.

7. The NM already hosts a rich 'Ecological Habitat Network', including wetlands, streams, woodlands and active farmlands. These landscapes serve as a vital 'green lung' for both Hong Kong and Shenzhen. By integrating the Greenway with existing ecological corridors,

⁵ <https://www.info.gov.hk/gia/general/202407/10/P2024071000315.htm>

⁶ <https://www.devb.gov.hk/filemanager/technicalcirculars/en/upload/377/1/C-2020-09-01.pdf>

⁷ <https://www.legco.gov.hk/yr2025/english/panels/ea/papers/ea20250526cb1-794-3-e.pdf>

⁸ <https://www.policyaddress.gov.hk/2021/eng/pdf/publications/Northern/Northern-Metropolis-Development-Strategy-Report.pdf>

⁹ <https://nm-ntnorth.hk/en/index.html>

¹⁰ <https://nm-lfs.hk/en/>



嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

conservation zones, related facilities like cycle tracks and hiking trails, and development fringes, we can enhance biodiversity, support eco-tourism, and contribute to the National Development Goal – Construction of Ecological Civilisation.

8. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

Figure 1. KFBG's proposed Greenway Network.



Representation Number:
TPB/R/S/YL-NTM/15-R12

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Submission Number:
TPB/R/S/YL-NTM/15-S6

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2025年12月30日星期二 10:39
收件者: tpbpd/PLAND
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主旨: Representation from WWF Hong Kong on the Draft Ngau Tam Mei Outline Zoning Plan No. S/YL-NTM/15
附件: 20251230_WWF HK_Representation for the Draft NTM OZP No S_YL-NTM_15.pdf; NTM.pdf
類別: Internet Email

Dear Sir/Madam,

Attached please find the representation from WWF Hong Kong on the Draft Ngau Tam Mei Outline Zoning Plan No. S/YL-NTM/15.

Thank you.

Best Regards,
Tommy Hui

[REDACTED]
WWF-Hong Kong 世界自然基金會香港分會



Registered Name 註冊名稱: World Wide Fund For Nature Hong Kong 世界自然(香港)基金會 (Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司). This email (including any attachments) is intended for the use of the designated recipient(s) only, which may contain confidential, non-public, proprietary information, and/or be protected by the attorney-client or other privilege. Any unauthorized reading, distribution, copying, or other use of this communication is strictly prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be deemed a waiver of any privilege or protection. If you are not the intended recipient or believe you have received this email in error, please notify the sender immediately and delete this email from your computer system. This email and any attachments are checked for viruses and other malicious software ("malware"). However, the sender does not warrant, represent, or guarantee in any way that this communication is free from malware or potentially damaging defects. The sender disclaims all liability for any errors, omissions, or damages arising out of or in connection with the use or reliance on the information contained in this email.



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31 December 2025

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point, Hong Kong
(Email: tpbpd@pland.gov.hk)

By E-mail ONLY

Dear Chairman and Board Members,

**Comments and Recommendations on the
Draft Ngau Tam Mei Outline Zoning Plan (OZP) No. S/YL-NTM/15**

WWF Hong Kong (hereinafter WWF) would like to submit our representation on the captioned Plan and provide our recommended amendments.

With joint effort from the Hong Kong Institute of Landscape Architects (HKILA), WWF hereby provide comments and recommendations to improve the Draft NTM OZP. Our ultimate vision is to drive the Ngau Tam Mei (NTM) New Town and other New Development Areas (NDAs) in the Northern Metropolis (NM), particularly those near the Mai Po and Inner Deep Bay Ramsar Site, towards the direction of Ramsar-accredited Wetland City, in which the wise use, conservation and restoration of (peri-)urban wetlands are integrated into the development and management plans for the benefits of human and nature.

Our key guiding principles in this exercise are as follows:

- To create a liveable new town highlighting human well-being
- To strive for human-nature harmony in the new town
- To solve societal challenges in the new town with Nature-based Solutions (NbS)
- To achieve urban-rural integration
- To minimise biodiversity loss brought by the proposed development
- To mainstream urban biodiversity in the new town design

Our detailed recommendations and proposed amendments to the draft OZP are detailed in the below sections.

together possible™

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註冊慈善機構

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(Incorporated With Limited Liability)

註冊名稱 Registered Name: 世界自然基金會 World Wide Fund For Nature Hong Kong

1. Creating Thematic Parks under the “Single Site, Multiple Use” principle

A relatively large and intact wetland cluster (approximately 7ha in size) comprised mainly of active fishponds is located immediately west of the Ngau Tam Mei Water Treatment Works (NTMWTW) (see **Figure 1**). Under the current Draft NTM OZP, this wetland cluster will be sandwiched between the proposed UniTown and the existing NTMWTW, with part of the wetlands in the east to be lost to the development. Based on our site survey records, these ponds are regularly used by waterbirds, including iconic wetland species like Pied Kingfisher, egrets and waders. Ponds of this wetland cluster are unique in Hong Kong, in which fish species being raised is prized koi carp. Furthermore, during our on-site interview with the pond operator in this location, he confirmed seeing a Eurasian Otter occurring in these ponds in recent years. As such, we believe that this wetland cluster is of certain cultural, heritage and ecological value and should be preserved.



Figure 1. Aerial photograph of the wetland cluster west of the NTM Water Treatment Works (left) and the proposed zonings of the area under the Draft NTM OZP No. S/YL-NTM/15 (right)

The proposed Station Plaza and Riverside Park located in Area 3G is the largest open space to be provided in the NTM New Town. These will be connected to the Wai Cheung Ancestral Hall, which would be preserved in situ, via a 20m-wide Non-built Area (NBA). Altogether these will cover an area of approximately 12ha. Currently, this area is mostly comprised of farmland and fishponds.

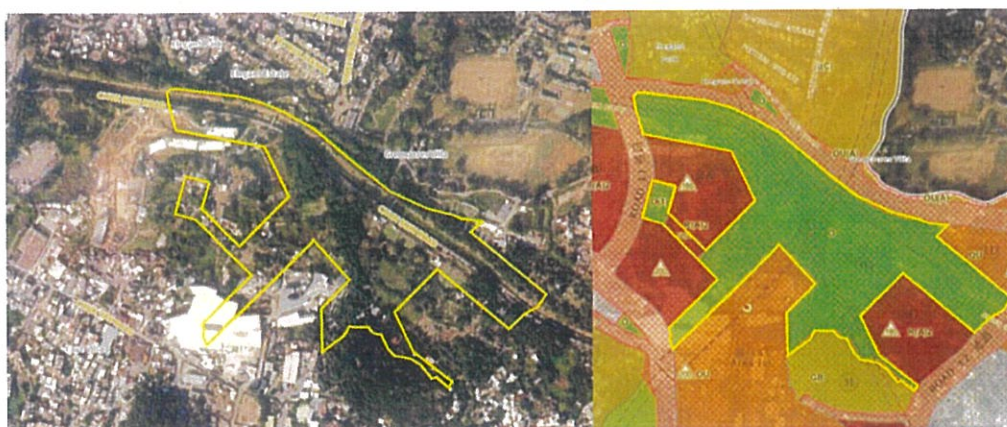


Figure 2. Aerial photograph of the mosaic of farmlands and ponds near the future MTR station (left) and the proposed zonings of the area under the Draft NTM OZP No. S/YL-NTM/15 (right)

Our proposal is to design two iconic parks with special themes (特色公園), by preserve the existing landscape features of these two distinct areas as far as possible. Together these two parks will cover a total size of 19ha, which is comparable to new town parks such as Tuen Mun Park, North District Park, and Tai Po Waterfront Park. The two parks will also be integral parts of the proposed Blue-green Spine that serves as a backbone of the town. It is envisioned that the parks will be planned and designed under the “Single Site, Multiple Use” principle, to serve multiple purposes, including public enjoyment, recreation, flood retention, run-off capture and treatment, provision of wildlife habitats, and urban green lungs for the NTM new town. This type of multifunctional urban wetland park has a

proven track record as urban Nature-based Solutions (NbS) that benefit both human and wildlife; the Benjakitti Forest Park in Bangkok and the Haizhu National Wetland Park in Guangzhou are successful examples.

For the pond clusters between the UniTown and the NTMWTW, a small extension of the NBA from the Blue-green Spine (covering only about 0.75ha) will be sufficient to preserve the wetland areas that fall into the UniTown (see **Figure 3** below). As this strip of wetland is located on the planned breezeway, there should not be any significant impacts to the planning and design of the overall layout of the UniTown. It could also be functionally linked with the planned view corridor and focal point in the UniTown for synergistic effects, creating a stronger visual anchor.

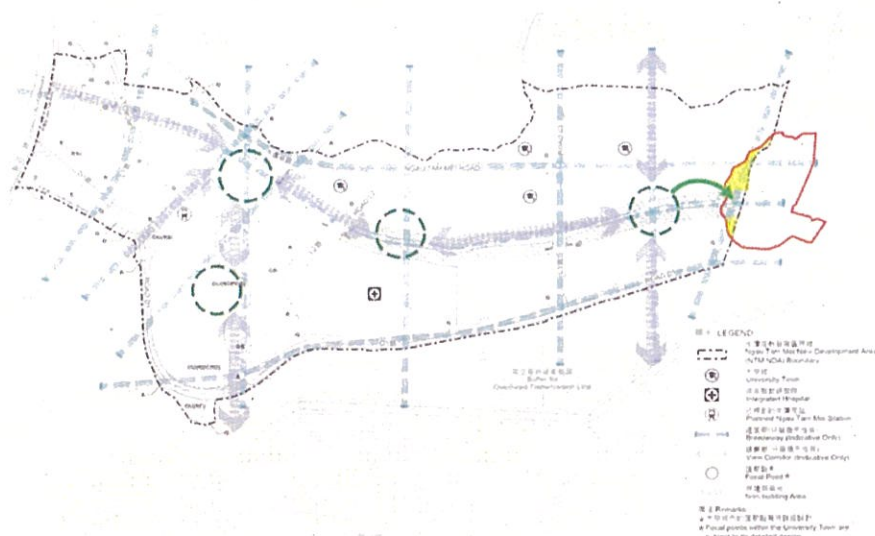


Figure 3. Location of the proposed park (highlighted in red) between the UniTown and the NTMWTW, and layout of the planned view corridors, breezeways and focal points; the yellow-shaded area indicates our proposed additional NBA

Furthermore, the establishment of these thematic parks, coupled with the preservation and revitalisation of the preserved historic buildings, would reflect the existing rural culture and history, enhancing rural-urban integration and symbiosis in the New Town. This initiative is in line with the “Development Blueprint for Hong Kong’s Tourism Industry 2.0”, which proposes to unleash the cultural heritage and local village history in the NM as potential tourism resources; as well as the 2025 Policy Address, which actively pushes for “Local Thematic Immersive Tours”.

2. Blue-green Spine as the Backbone of NTM

We welcome the Government’s proposal to revitalise the concrete-lined NTM Main Channel and convert it to the Blue-green Spine that would serve as the backbone of the NTM New Town. If well designed and managed, it would serve as physical and ecological connection to other open spaces and the NBAs, providing ample open space for the residents and also creating synergistic ecological gains. Again, the design of the Blue-green Spine should also follow the “Single Site, Multiple Use” principle, where various functions such as public amenity for leisure, recreation and nature appreciation of nature, as well as wildlife habitats, are integrated into one.

Due to its proximity to the Mai Po wetlands, the fully-concreted NTM Main Channel attracts typical riverine wildlife, with records of rarer bird species such as Eurasian Teal and Plumbeous Redstart. The NTM Blue-green Spine should be designed with a wide riparian zone that is floodable. Under normal circumstances, the floodable riparian zones could be used for various recreational activities such as hobby farming, picnicking, walking, jogging, etc. However, in extreme weather events with flood risk, the floodway could delay flow peaks by accommodating excessive flood water, and creates sufficient freeboard for the Main Channel. To re-establish a healthy aquatic ecosystem, the channel’s concrete bottom must be restored to natural material with provision of deeper pools. A successful example of such eco-friendly river park is the Bishan-Ang Mo Kio Park in Singapore, which has been globally recognised as an urban NbS attractive to both residents and biodiversity.

According to our calculation, a total of 3.5ha of farmland and 2.6ha of fishpond are located within the boundary of the proposed Blue-green Spine (see **Figure 4**). Albeit relatively small and isolated, they still provide certain ecological functions to various lowland wildlife species occurring along the main channel. We urge the Government to consider preserving these habitats in situ as far as possible, and incorporate them into the widened floodable open space, enhancing the flood capacity, landscape and biodiversity values of the Blue-green Spine. It would also help mitigate for the ecological impacts of the Ngam Tam Mei development by retention of existing habitats.

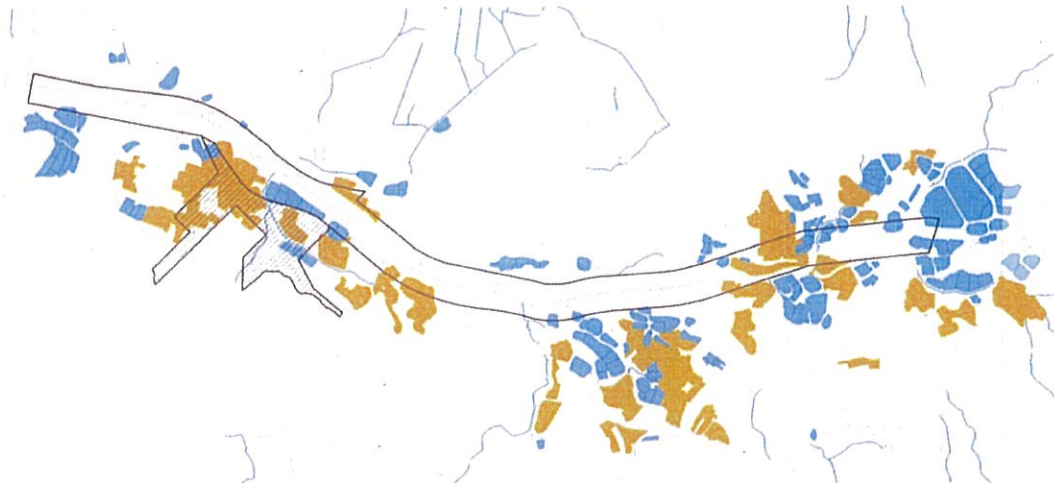


Figure 4. Distribution of existing farmland (ochre-shaded area) and ponds (blue-shaded area) within the NTM area; the black-lined area covers the proposed Blue-green Spine, and the hatched area comprises the Station Plaza and Riverside Park

We note from the previous relevant TPB meeting that, for the NTM Main Channel, the width of its wet channel would be expanded from the present 15m - 25m to about 26m - 40m to increase the hydraulic capacity. From an ecological perspective, over-widening of a river channel is undesirable, as water becomes shallow to the detriment of many aquatic species, and the stream may cease to flow during the dry season.

3. Connection and Synergy with the Sam Po Shue Wetland Conservation Park

Historically, the NTM river was hydrologically and ecologically linked to the Mai Po marshes (see **Figure 5** below). The subsequent developments in the rural landscape and the construction of the NTM Main Channel have weakened that connection, but waterbirds and even Eurasian Otter still visit this valley due to its proximity. We believe there is huge potential to reconnect the ecological linkage between the future NTM New Town to Sam Po Shue Wetland Conservation Park (SPSWCP) (see **Figure 6**).

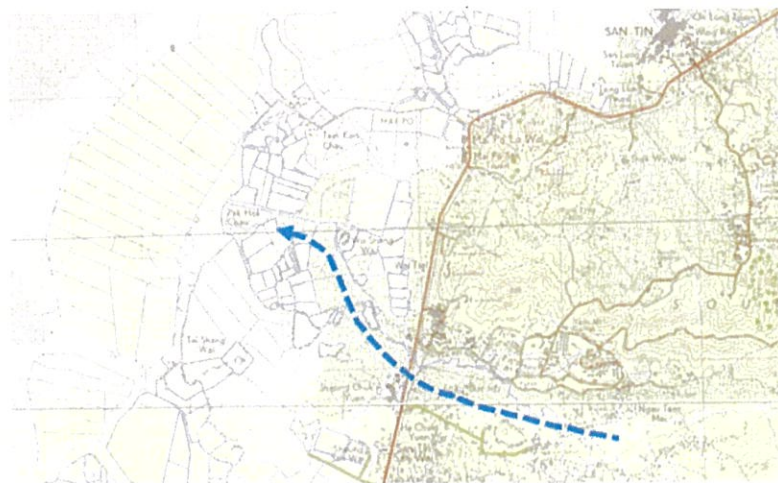


Figure 5. A map dated 1970 showing the hydrological conditions of the NTM and Mai Po areas



Figure 6. Location of the NTM New Town and other wetland areas in the Deep Bay wetland ecosystem

From a planning perspective, we recommend the Board to review whether it is possible to amend the zonings of the NTM Main Channel section under the Approved Mai Po and Fairview Park OZP No. S/YL-MP/8 from "REC" and "OS" to "O", to align with the Blue-green Spine in NTM, as indicated below in **Figure 7**. We believe this approach will enable the development of a more holistic river corridor and increase the ecological integrity, thus boosting the connectivity of the NTM Main Channel and the future SPSWCP.

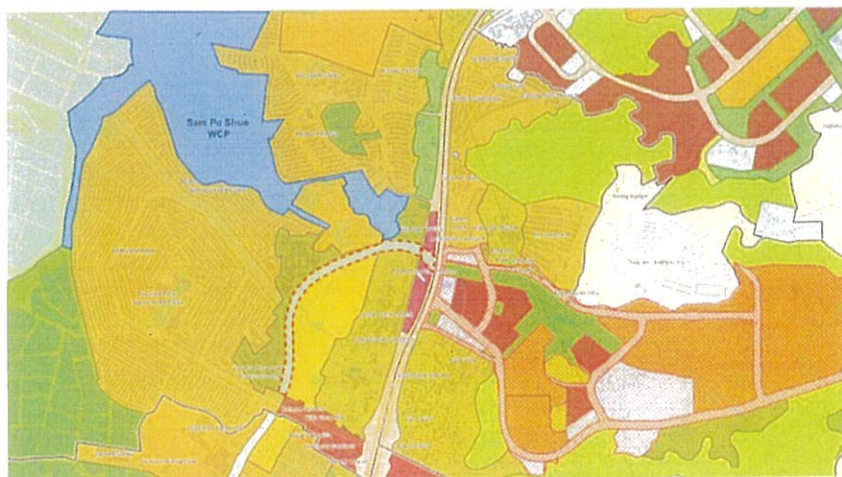


Figure 7. Proposed amendments for the red-dashed areas to be rezoned from "REC" and "OS" to "O" to align with the zoning for the proposed Blue-green Spine in the NTM OZP

To further strengthen the ecological connectivity, CEDD, DSD, together with AFCD, should also look into the feasibility of restoring the hydrological flow from NTM to the Mai Po Nature Reserve (MPNR) via the southeastern corner of SPSWCP sandwiched between Palm Springs and Fairview Park. A drainage bypass could be constructed to feed part of the water flow from the NTM Main Channel into this wetland strip, creating reliable source of fresh water for MPNR which is in short supply. This could also help alleviate the potential flood risk in the New Town by increasing the drainage capacity, especially when tidal backflow occurs at the lower reach of NTM Main Channel.

In addition, it is noted that the permitted building height at Areas 4A, B and C will be at +180m to +200mPD. These areas are located besides the proposed Blue-green Spine, and is only approximately 360m away from the proposed SPSWCP (see **Figure 8**). Considering that the vicinity comprises of village houses and low-rise residential villas with buildings height no more than +20mPD, the high-rise clusters at Areas 4A-C is incompatible with the surrounding rural character and visually intrusive to the general low-lying landscape. The landscape impacts would in turn alter the perception of wild birds to the area, deterring them from entering and utilising the NTM Main Channel.

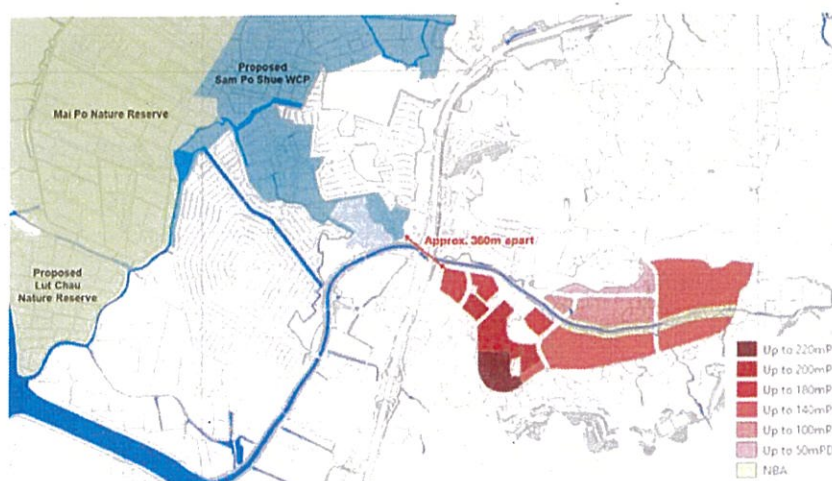


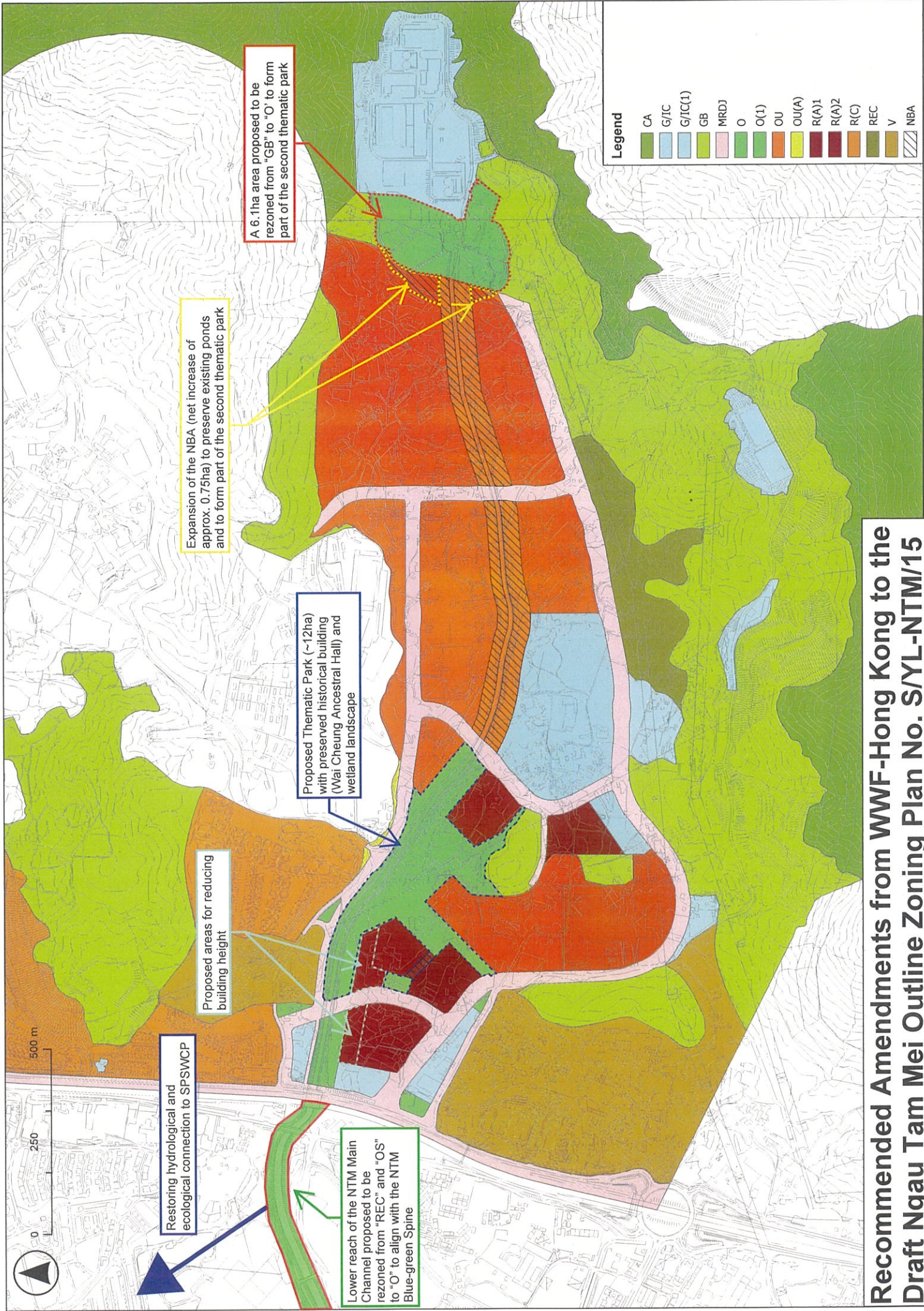
Figure 8. Permitted building height in the NTM New Town

For comparison, the roof level of the Tin Heng and Tin Chak Estates are at below +120mPD. These two Estates are located next to the Tin Shui Wai Main Channel, where migratory waterbirds including Black-faced Spoonbills, ducks and other shorebirds are regularly recorded. In view of that, we believe the Government should look into reducing the permitted building height in Areas 4A-C to create a more stepped height profile along the interface between the residential area and the Blue-green Spine. We also note that the proposed Roads L1, L2 and L3 will span across the Blue-green Spine. From a design perspective, we wish to advise the government to leave appropriate headroom between the bottom of the flyovers or crossings and the channel bed. This approach will create sufficient space for wildlife movements, especially flying birds.

An alternative NTM OZP with our recommendations incorporated is attached with this representation paper for the Board's and relevant departments' considerations. To conclude, WWF Hong Kong is committed to supporting the government in developing a Northern Metropolis where people live in harmony with nature. To that end, we would be pleased to elaborate on the details of any of our comments and suggestions. Thank you for your kind attention.

Yours sincerely,

Dr. Bosco Chan Pui Lok
Director, Conservation
WWF Hong Kong



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Representation Number:
TPB/R/S/YL-NTM/15-R13

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寄件者: [REDACTED]
寄件日期: 2025年12月31日星期三 11:56
收件者: tpbpd/PLAND
副本: [REDACTED]
主旨: HKILA's Recommendations on the Draft Ngau Tam Mei Outline Zoning Plan (OZP) No. S/YL-NTM/15
附件: HKILA's Recommendations on the Draft Ngau Tam Mei Outline Zoning Plan.pdf
類別: Internet Email

Submission Number:
TPB/R/S/YL-NTM/15-S9

Dear Town Planning Board Secretariat,

On behalf of The Hong Kong Institute of Landscape Architects (HKILA), I am pleased to submit our formal representation regarding the **Draft Ngau Tam Mei Outline Zoning Plan (OZP) No. S/YL-NTM/15**, along with our recommendations.

My full name is WAN Pik Wan [REDACTED] The detailed submission is attached for your consideration.

Thank you for your attention to this matter.

Regards,

Allison Wan

Head of Secretariat

The Hong Kong Institute of Landscape Architects

香港園境師學會



THE HONG KONG INSTITUTE OF LANDSCAPE ARCHITECTS

香 港 園 境 師 學 會

31 December 2025

Town Planning Board Secretariat
15/F North Point Government Offices
333 Java Road, North Point, Hong Kong
(By email: tpbpd@pland.gov.hk)

Dear Chairperson and Members of the Town Planning Board,

**HKILA's Recommendations on the Draft Ngau Tam Mei
Outline Zoning Plan (OZP) No. S/YL-NTM/15**

The Hong Kong Institute of Landscape Architects (HKILA) has closely reviewed the Draft Ngau Tam Mei Outline Zoning Plan (OZP) No. S/YL-NTM/15 and would like to submit our recommendations on how we can maximise the Draft OZP's sustainability targets and environmental values, especially in light of NTM-NDA's key planning features of creating a "self-sustained neighbourhood", "blue-green communal space network", and the major urban design concepts of creating a "multi-functional riverside park", "resilient and sustainable urban future", and "urban-rural integration".

Working closely with the scientific opinions of WWF-Hong Kong and other environmental scientists including ecologists and hydrologists, our recommendations are intended to enhance the vision for Ngau Tam Mei (NTM) to become a pilot New Development Area (NDA) that is a *hydrophilic city* (water-friendly city) within the Northern Metropolis (NM). This vision seeks to harmonize urban development with the area's rich ecology, heritage, and cultural landscape. The larger vision is to turn the north-western part of NM into a world-class Wetland City.

Ngau Tam Mei is a hidden treasure of a rural township rich in history and culture, situated near the vital wetland habitats of the Deep Bay watershed area. This once-flourishing site for ornamental fish aquaculture played a significant role in Hong Kong's history. Historically, Hong Kong ranked as one of the top-five global exporters in the late 1980s and early 1990s, generating an impressive annual export value of HKD \$10 million. Today, Ngau Tam Mei remains a key location for koi fish farming, still standing witness to the area's past glory. In addition to their economic and cultural values, ecologically the koi farms also support otter habitats and various migratory bird species. The area's diverse landscapes and thriving ecosystems offer captivating natural beauty, inviting exploration and

appreciation, making it adept for the development of deep cultural and ecological tourism in parallel to the development of a great University Town.

In line with the hydrophilic city principles, we think that the development should, from the larger planning scale to the executive of design details, fully adopt Nature-base Solutions (NbS) that is well integrated with the existing site conditions. Ultimately, by intertwining urban infrastructure with natural elements, Ngau Tam Mei can exemplify a new town paradigm that prioritizes sustainability, community, and ecological preservation.

The following summarizes our five major recommendations of enhancement from the landscape ecology perspective:

1. Restoring the NTM channel as the backbone of the new town
2. Transforming the existing pond cluster into Hong Kong's first Koi Park
3. Retaining the historical and cultural characteristics in the University Town
4. Setting back and controlling the height of high-rise residential building blocks near the ecological corridors
5. Enhancing NTM's flood and ecological resilience through sponge city and NbS approaches

1. Restoring the NTM channel as the backbone of the new town

According to the Draft OZP, the NTM channel will serve as the blue-green spine of the NTM NDA. To maximise the hydrological and ecological benefits, we strongly recommend to restore and naturalise the concrete channel back into a river course. We believe that this approach following the principles of sponge cities and NbS allows for multiple hydrological and ecological benefits without compromising the river's drainage capacity. The naturalised approach allows for an integration of drainage, ecological, and recreational functions rather than treating them as contradictory. We recommend to strategically provide additional setbacks of buildings and other infrastructural needs (including unnecessary access roads) along the riverside, therefore allowing a variety of river edge treatments that can fulfil the said integrated hydrological, ecological, and recreational functions.

To further attain the objective of blue-green spine as the backbone of the development, we recommend forming the NTM Central Town Park of approximately 12ha as its heart, proposing the location of the green area next to the Ngau Tam Mei station in Area 3G. Situated atop existing ponds and fallow fields, this park should effectively incorporate both the blue-green ecological functions and the site-specific characteristics to create a themed iconic landmark that embodies an immersive ecological, aquaculture, and agricultural atmosphere.

Situating the MTR station and residential buildings near a revitalized river can foster a vibrant community hub, while integrating town parks into the natural landscape will provide recreational spaces that encourage social interaction and well-being. This initiative aligns with the "Development Blueprint for Hong Kong's Tourism Industry 2.0," which aims to promote cultural heritage and local village history in the New Territories as valuable tourism assets. It also supports the 2025 Policy Address, which encourages the creation of "Local Thematic Immersive Tours."

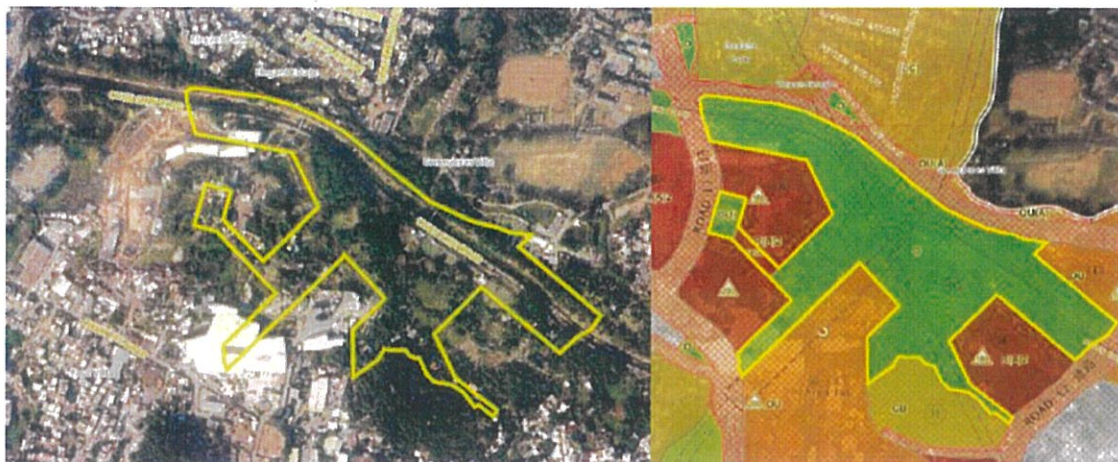


Figure 1. Aerial photograph of the mosaic of farmlands and ponds near the future MTR station (left) and the proposed zonings of the area under the Draft NTM OZP No. S/YL-NTM/15 (right)

The NTM river system was historically connected hydrologically and ecologically to the Mai Po marshes (Figure 2). Although later rural development and the construction of the NTM Main Channel have degraded these connections, the valley's proximity continues to attract waterbirds and occasional Eurasian Otter visits. We see significant potential to re-establish a stronger ecological corridor linking the future NTM New Town with the Sam Po Shue Wetland Conservation Park.

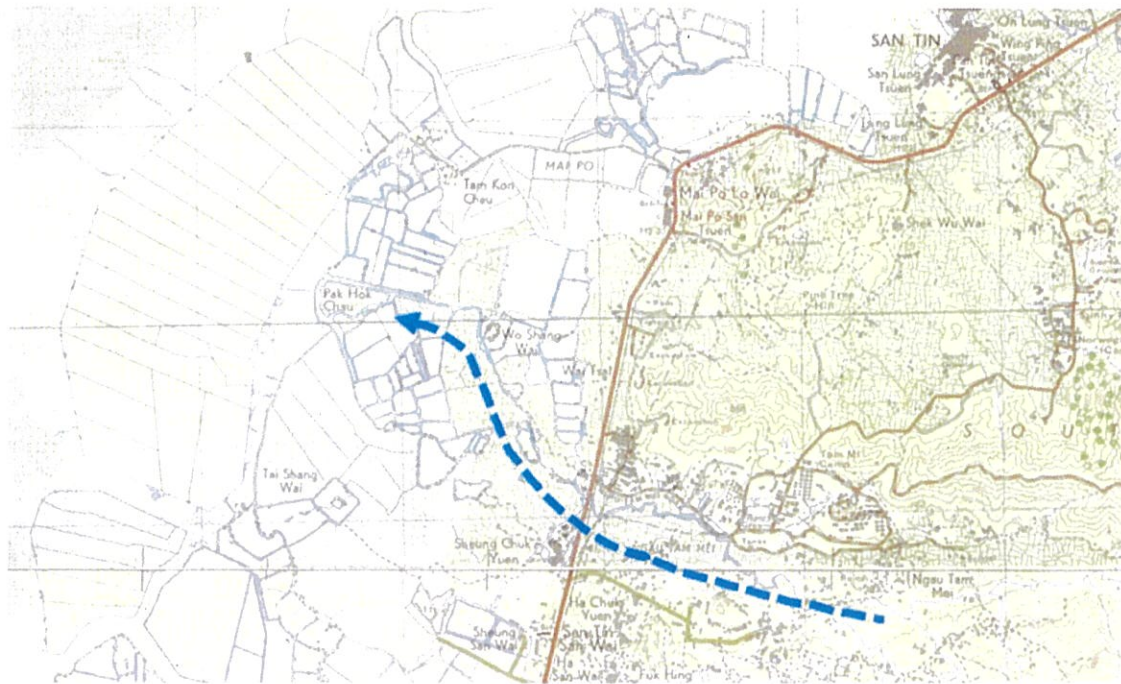


Figure 2. A map dated 1970 showing the hydrological conditions of the NTM and Mai Po areas

Further exploring on a broader geographical scale, the length of NTM Channel within the OZP is approximately 2.2km from our calculation. This presents a valuable opportunity to adopt a ridge-to-reef approach, securing the upstream water source from Ngau Tam Shan on the east, to the downstream area on the west where the Mai Po Nature Reserve lies, while also considering a connection to the San Po Shue Wetland Conservation Park. We therefore recommend that the Board consider amending the zoning of the NTM Main Channel section under the Approved Mai Po and Fairview Park OZP No. S/YL-MP/8—from "REC" and "OS" to "O"—to bring it into alignment with the blue-green spine in NTM (see Figure 4). By integrating these water sources, we could establish a comprehensive riparian network with a total length of approximately 5.5 km, which would significantly enhance both hydrological and ecological connectivity. Such a strategy will not only support effective water management and conservation efforts but also promote biodiversity in the region, contributing to a healthier ecosystem overall.

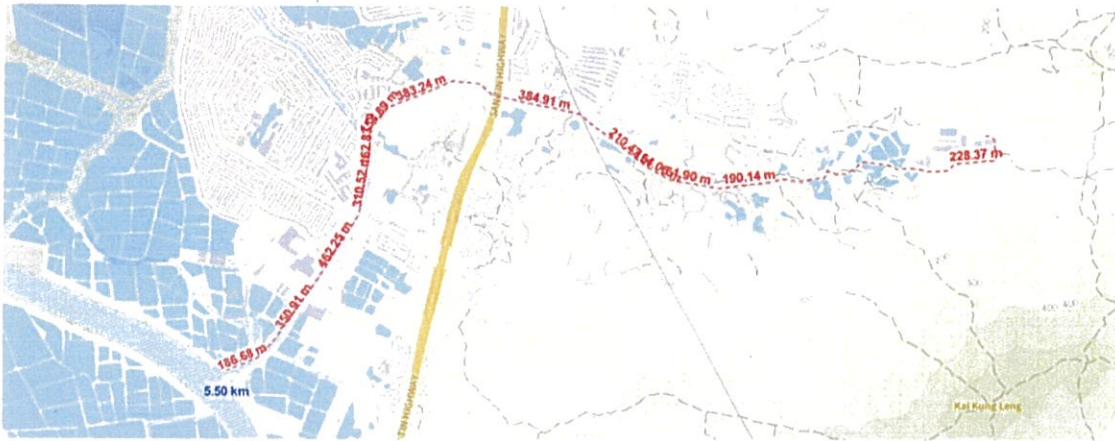


Figure 3. Proposed complete riparian network that expands from NTM NDA to its neighbouring areas that greatly fosters hydrological and ecological connectivity

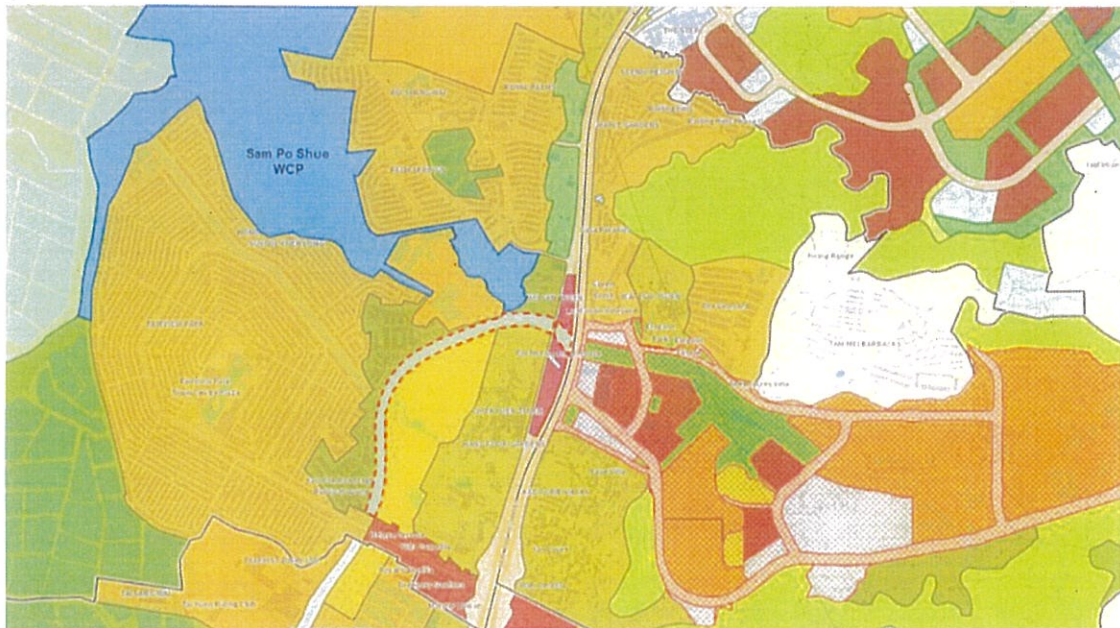


Figure 4. Proposed amendments for the red-dashed areas to be rezoned from "REC" and "OS" to "O" to align with the zoning for the proposed blue-green spine in the NTM OZP

There are great examples locally and from around the world in how revitalising and naturalising rivers can generate huge economic, social, and environmental benefits. They are greatly workable as we can see from local examples such as the Tung Chung River, or other international renowned examples such as the Los Angeles River. These examples also illustrate the benefits of creating

effective and meaningful public, private, and non-governmental partnerships. In the Tung Chung River example, WWF has been actively worked together with the planning and engineering teams to work out the best solutions for the revitalisation schemes.

2. Transforming the pond cluster into Hong Kong's first Koi Park

Koi cultivation and breeding are unique local characteristics of Ngau Tam Mei, regarded as distinctive at the regional level. It is an important cultural heritage that ties the NTM landscape to Chinese culture and can effectively help NTM establish a cultural and landscape identity that is distinctly tied to the area's Lingnan heritage. These koi fishpond clusters, approximately 6.85ha, are primarily located on the eastern side of the NTM NDA, overlapping with the edge of the blue-green spine development area. Given the valuable (but somewhat forgotten) history of the koi farm as an award-winning cultivation site, we highly recommend preserving the koi fishponds as a form of cultural inheritance. This can be achieved by integrating them into the open spaces of the restored NTM. Transforming the largest pond cluster into Hong Kong's first Koi Park, which would commemorate the history of ornamental fish aquaculture, has the potential to serve as a significant tourism hotspot as well.

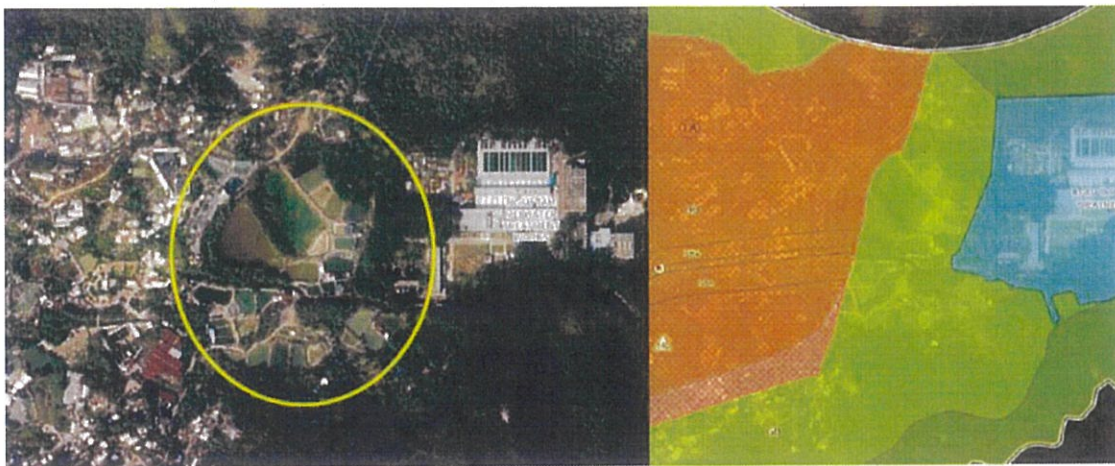


Figure 5. Location of the proposed Koi Farm at the edge of the NTM NDA, potentially act as a natural edge treatment to achieve urban-rural integration

A recommendation of a small expansion of the NBA from the blue-green spine—covering roughly 0.75 hectares—will be enough to protect the wetland areas within the University Town that are situated between it and the NTMWTW (refer to Figure 6). Since this narrow wetland strip lies along the intended breezeway, it should not greatly affect the overall planning and design of University Town's layout. Beyond the boundary of the NTM NDA, we suggest the connected 6.1ha area to be

rezoned from "GB" to "O" to be retained and complete the formation of the proposed Koi Park. Additionally, it can be integrated with the planned view corridor and focal point in University Town to enhance synergy, forming a more prominent visual landmark.

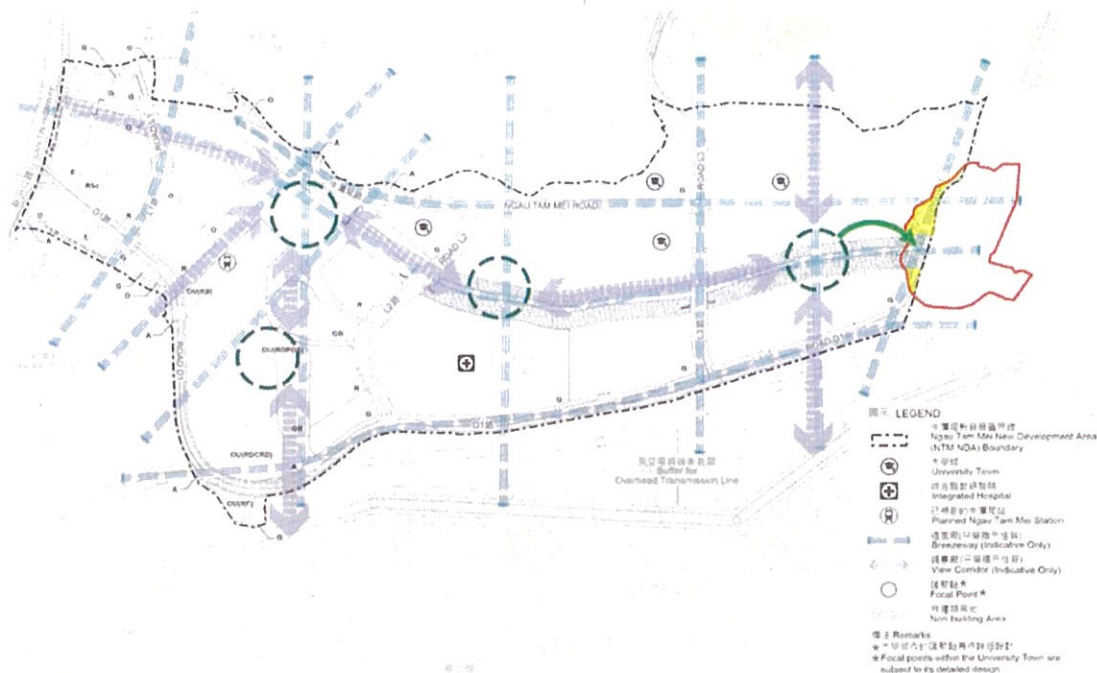


Figure 6. Location of the proposed Koi Park (highlighted in red) at the edge of the NTM NDA, potentially act as a natural edge treatment to achieve urban-rural integration, and layout of the planned view corridors, breezeways and focal points; the yellow-shaded area indicates our proposed additional NBA

Retaining the fishponds will not only strengthen the development of local ecotourism by integrating agricultural landscapes to the NTM NDA, but also can act as a natural edge treatment to fulfil the desired planning principle of urban-rural integration and cultural conservation through respecting distinct rural characteristics. Hence, we recommend to seize the opportunity, utilize the existing koi fishpond clusters as a connecting approach of the NTM NDA with the neighbouring sites in future development, rather than destroying these natural habitats. The development of the elevated Highway at the eastern edge is therefore emphasized to minimize the adverse impacts that would potentially bring to the fishponds during construction.

3. Retaining the historical and cultural characteristics within the University Town

According to the current development proposal, the former Yau Tam Mei Primary School is designated as a site of historical interest and will be preserved in its original location for future adaptive reuse. Extending from this concept, we recommend to retain the scattered spaces with local character in NTM, including primary school, villages, and other historical relics, by connecting them to the blue-green spine. Incorporating historical elements into the fabric of the University Town can foster a deep sense of community identity and pride, creating a vibrant place where history and modern living coexist. This approach does not only preserve local heritage but can also serve as a backdrop for educational programs, cultural events, and artistic expressions that engage both residents and visitors.

Furthermore, we suggest integrating koi farm culture throughout the University Town zone, as the NTM River runs across the area, splitting it in half. Koi farming, a practice rich in cultural significance, can enhance the natural beauty of the region while promoting sustainable agricultural practices. These farms can serve as educational hubs, where students and the community can learn about ecology, aquaculture, and biodiversity. In addition to retaining the farmlands and fishponds along the proposed blue-green spine area, we believe that preserving the farmlands and fishponds in the green areas of the University Town zone has a high potential for implementation.

4. Setting back and controlling the height of high-rise residential building blocks near the ecological corridors

At the west of the Northern Territories (NTM) New Development Area (NDA), we recommend setbacks for the high-rise residential buildings and reduction of building heights to create a harmonious transition between urban development and the natural environment. The integration of Sam Po Shue Wetland Conservation Park (SPSWCP) with the surrounding high-rise residential developments requires careful planning to balance urban growth with ecological preservation. Located only approximately 360 meters from the proposed blue-green spine, the areas in question (4A, B, and C) provide a vital opportunity to enhance ecological preservation while accommodating urban growth. By implementing setbacks and lowering the permitted building heights from the current +180m to +200mPD, we can establish a stepped profile that minimizes impact on the nearby wetlands.

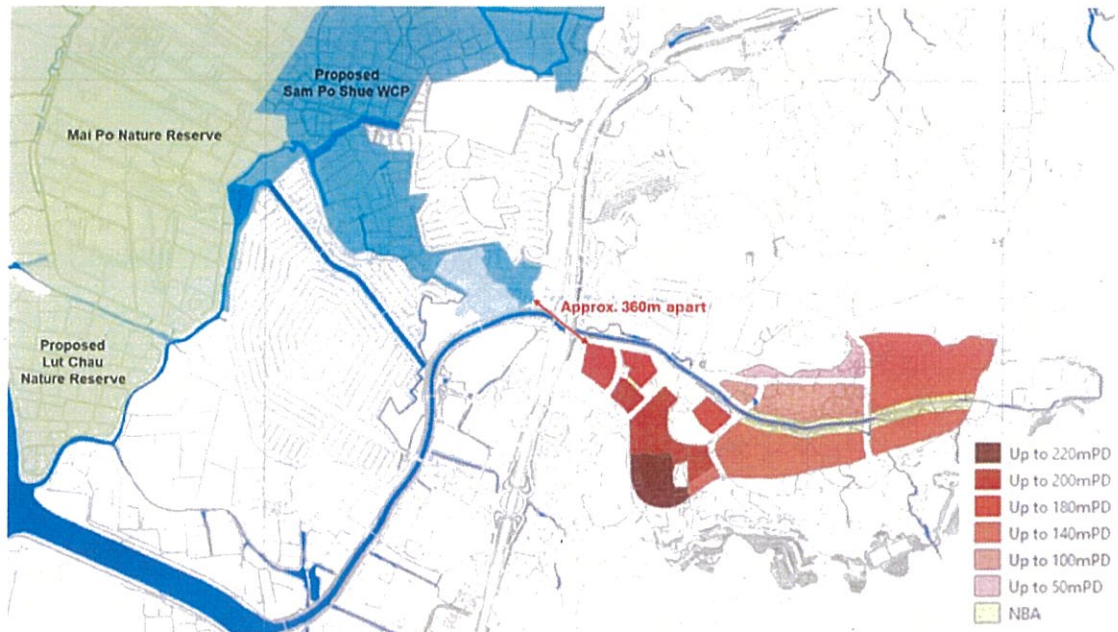


Figure 6. Permitted building height in the NTM New Town

This approach is particularly crucial given the proximity to the Tin Shui Wai Main Channel, where various migratory waterbirds, including Black-faced Spoonbills and shorebirds, are frequently observed. The existing heights of nearby estates, such as Tin Heng and Tin Chak, which sit below +120mPD, underscore the necessity of reducing new building heights to mitigate light pollution and habitat disruption. By prioritizing the ecological integrity of the SPSWCP and the blue-green spine, these recommendations aim to foster sustainable development that enhances residential living while protecting local biodiversity, thereby creating a thriving community that coexists with nature.



Figure 7. Location of the NTM New Town, Sam Po Shue WCP, and other wetland areas in the Deep Bay wetland ecosystem

5. Enhancing NTM's flood and ecological resilience through sponge city and NbS approaches

According to our measurements, an approximate 3.5ha of farmland and 2.6ha of fishpond are scattered within the boundary of the proposed blue-green spine. Abandoned old meanders are also discovered along the NTM channel. An integration of these lands and meanders are therefore suggested to enhance the natural agricultural landscape, respecting the unique local context. Most importantly, these existing farmlands and fishponds are part of the resilient riparian landscape and can definitely act as a vital measure of natural flood mitigation without the need of further design and creation. These schemes can be based on sponge city and NbS approaches that are widely tested and implemented nationally and internationally and are largely supported by both the national and HKSAR government.

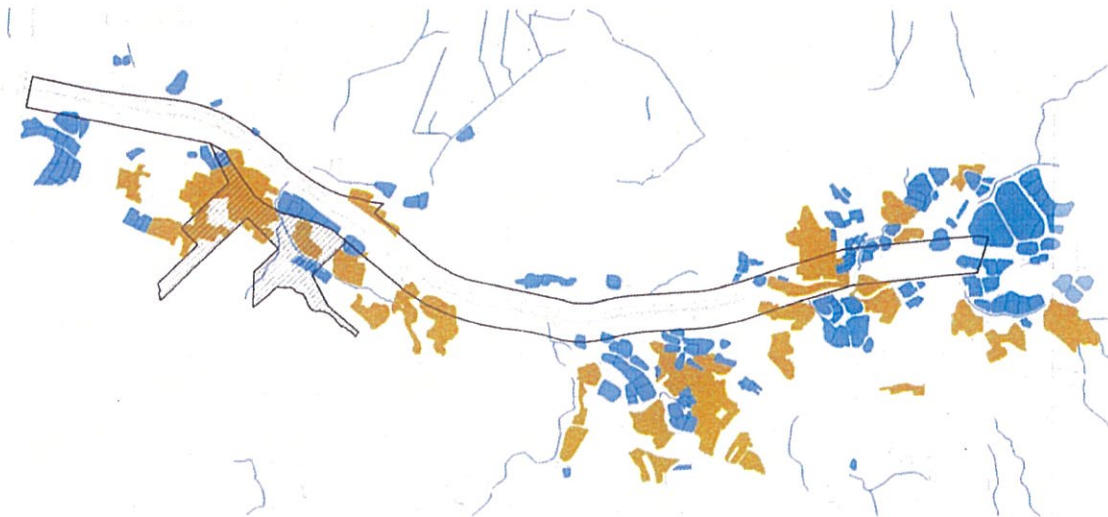


Figure 8. Distribution of existing farmland (ochre-shaded area) and ponds (blue-shaded area) within the NTM area; the black-lined area covers the proposed blue-green spine, and the hatched area comprises the Station Plaza and Riverside Park

We also recommend naturalize the river and riverside buffer, which is currently concretised, into permeable area. This can further raise the flood resilience of the area. A key reference is the Los Angeles River where they focus on transforming its concrete channel into a green, accessible river corridor with restored habitats and recreational spaces, treating it as a valuable asset rather than just a storm drain.

Furthermore, adopting existing water bodies in future urban developments—especially those connected to the NTM channel—will enhance city flood resilience and promote biodiversity. Integrating these water bodies into urban planning not only aids in flood management but also provides ecological corridors that support wildlife and improve water quality.

Conclusion

In light of the five key recommendations outlined above, we conclude that by making full use of the existing cultural and ecological resources and strategically and effectively integrating them with the future development functions, and by fully embracing the principles of sponge cities and Nature-based Solutions, we can successfully transform NTM into demonstration hydrophilic city for Hong Kong. This transformation will feature strong place identity for both cultural and ecotourism, highlighted by water and open space systems that create scenic areas deriving from the area's strong koi farming and other cultural heritage. HKILA is committed to supporting this endeavour and



THE HONG KONG INSTITUTE OF LANDSCAPE ARCHITECTS

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looks forward to further collaboration with the government and stakeholders to realise a Northern Metropolis where communities thrive in harmony with nature. We are pleased to elaborate on any of the recommendations herein.

Yours sincerely,

Paul YK Chan

President

The Hong Kong Institute of Landscape Architects

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Representation Number:
TPB/R/S/YL-NTM/15-R14

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寄件者: [REDACTED]
寄件日期: 2025年12月31日星期三 11:40
收件者: tpbpd/PLAND
副本: [REDACTED]
主旨: HKBWS's representation in respect of the draft Ngau Tam Mei Outline Zoning Plan (No. S/YL-NTM/15)
附件: 20251231_NTM_OZP_HKBWS.pdf
類別: Internet Email

Submission Number:
TPB/R/S/YL-NTM/15-S10

Dear Sir/Madam,

The Hong Kong Bird Watching Society's comments on the Proposed Amendments to the Approved Ngau Tam Mei Outline Zoning Plan No.S/YL-NTM/14 are attached.

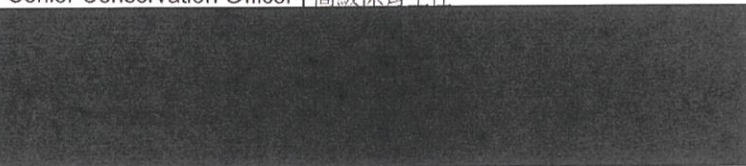
My personal information will be provided in the next email.

Thank you.

Best Regards,

Wong Suet Mei | 黃雪媚

Senior Conservation Officer | 高級保育主任



Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
(E-mail: tpbpd@pland.gov.hk)

By email only

31 December 2025

Dear Sir/Madam,

Representation in respect of the draft Ngau Tam Mei Outline Zoning Plan
(No. S/YL-NTM/15)

The Hong Kong Bird Watching Society (HKBWS) would like to express the following planning and ecological concerns in relation to the Proposed Amendments to The Approved Ngau Tam Mei Outline Zoning Plan (NTM OZP) No. S/YL-NTM/14 and the draft NTM OZP.

1 Valuable ecological features should be integrated and protected in the zoning plan

Farmlands and ponds within Area 1A and 1C

- 1.1 The wet and dry agricultural lands and ponds form a suitable habitat for open country and wetland bird species. According to our bird records, open country species of conservation concern recorded in these habitats includes **Grey Bush Chat** with High Local Extinction Risk¹ and Local Concern, **Chinese Grosbeak** of Local Concern, Class II national protected animal **Siberian Rubythroat** with Moderate Local Extinction Risk, the globally Vulnerable **Collared Crow**, **Red-throated Pipit** with Moderate Local Extinction Risk, etc. Wetland-associated bird species includes **Great Cormorant**, **Black-winged Stilt**, **Little Egret** and **Chinese Pond Heron**. We consider these valuable habitats should be strategically zoned as Agriculture zone, Green Belt zone

¹ Or, C.K.M. & Chan, B.P.L. (Eds.) (2025) The State of Hong Kong's Biodiversity 2025. WWF-Hong Kong. 65pp.

or other non-development zonings that have an intention to **promote preservation or re-provision of farmlands and ponds** (Figure 1).

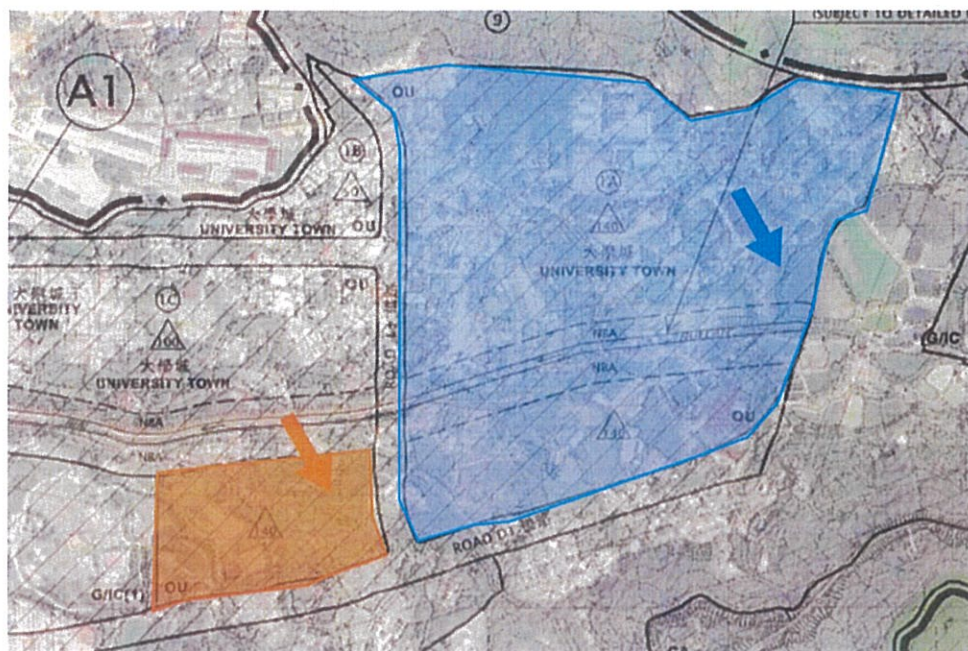


Figure 1. The existing farmlands (indicated by orange arrow) at southern portion of Area 1C (filled with orange color) are valuable habitats for open country birds, while the eastern part of Area 1A (filled with blue color) is distributed with ponds (indicated by blue arrow) that are connected to nearby wetlands and river channel. These areas should be zoned to promote provision/re-provision of similar habitats.

Woodland and Orchard at Area 1A

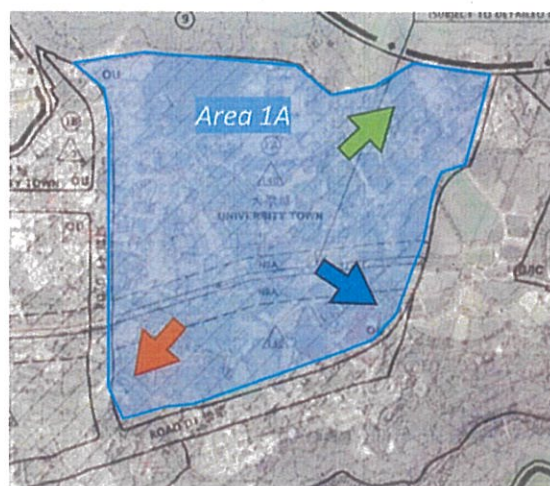
- 1.2 According to the Ecological Impact Assessment (EcoIA) Report submitted for the Environmental Impact Assessment (EIA) Ordinance, the habitat of Village/Orchard was recorded with **58** bird species and **38** butterfly species while a total of 19 species of conservation importance were recorded within these habitats within the Project Site. It is noted that **Asian Barred Owlet**, **Besra** and **Collared Scops Owl** were found in the Orchard at the northeastern edge of Area 1A, as illustrated in the habitat map of the EIA

report. Moreover, **Slaty-legged Crane**, a species that prefers streams, wet areas in woodland and wetlands, are recorded in the riparian woodland patch of watercourse W9 at the southern portion of Area 1A. Besides, **Chinese Sparrowhawk**, **Asian Barred Owlet** and **Rufous-capped babbler** were also recorded in this riparian woodland/orchard, indicating the ecological linkage to the streams and woodlands outside the project site. The presence of these raptors species also highlights the Orchard has formed an ecosystem that could support different predatory birds which are at the top of the food pyramid. We consider the woodlands and orchards that are ecologically connected to the river system and the woodlands in Country Park should be retained by appropriate zoning(s) (Figure 2).

Semi-natural watercourse

- 1.3 A total of **13 odonate species** and **Small Snakehead** which is a freshwater fish of **Moderate Local Extinction Risk** were recorded in Semi-natural watercourse (Watercourse W8b) according to the EcoIA report submitted under the EIA process. Moreover, as explained in Section 1.2, watercourse W9 and its riparian zones are forming an ecosystem and worth retaining to promote biodiversity. We consider the semi-natural watercourses should be carefully zoned as conservation zoning(s) or zoning(s) with intention of retaining the existing river and avoiding river diversion (Figure 2).

Figure 2. In Area 1A (filled with blue), conservation zoning(s) or other effective zonings should be considered especially for the Orchard at the northeastern edge (marked with green arrow), the watercourse W9 and its riparian woodlands (marked with orange arrow) and watercourse W8b near the southeastern edge (marked with blue arrow).



2 NBA and Stepped Building Height

The building heights of the residential and UniTown developments along the sides of NTMDC range from 100mPD to 180mPD (refer to the layout plan below) while the Non-building Area (NBA) only provides 20-30m buffers to the channel, we are concerned that the distribution and allowed heights of the buildings adjacent to NTMDC may lead to severe disturbance effect on the preserved bird corridors along NTMDC. We consider mitigation measures to minimize such impacts must be provided with reference to Shenzhen's latest Bird-friendly urban planning and design guidelines². Measures include 50m NBA, building restrictions and Stepped Height Design, etc.

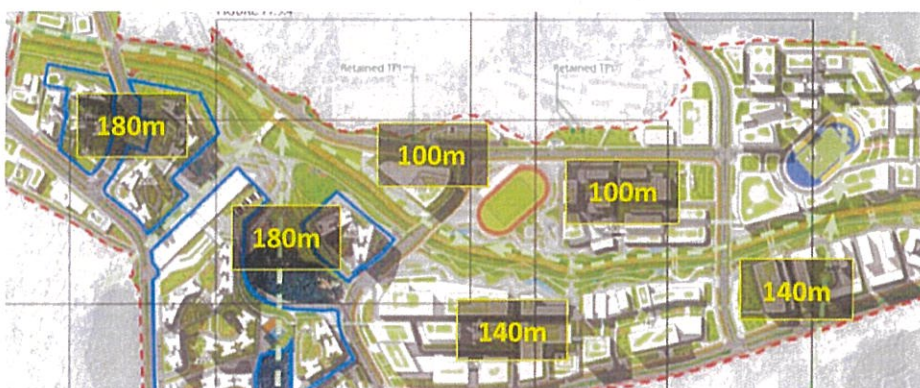


Figure 3. Insufficient NBA and absence of stepped building heights design for the residential and UniTown developments along both sides of NTMDC.

A 50m wide NBA should be provided statutorily for both sides of the river channel to hopefully maintain the wild bird movement corridor. For the areas further away from NBA, Stepped Building Height design should be required to soften the landscape and hopefully reducing the impacts of obstructing bird's flight movements.

² 广东深圳正式发布全国首个《鸟类友好城市规划与设计指引》，该《指引》适用于指导福田红树林自然保护区周边区域开展鸟类友好城区建设，其他鸟类栖息地外围开展城市建设时参照执行，涉及鸟类友好空间格局控制与项目高度管控等要求。

3 Bird-window collision risk and roadkill risk

From the photomontages provided by the Planning Department, glass facades or glass features are extensively applied in residential development and UniTown, raising concerns over the bird-window collision risk. Though submission of bird-friendly guideline is one of the approval conditions of the EIA report, we are concerned that the implementation of measures to minimize the bird collision risk remains uncertain, due to the non-compulsory nature of the recommendations listed out in the guidelines. Therefore, we emphasize that **statutory requirements for anti-collision measures must be applied across all land use zones** for any structure featuring glass, including building facades, windows, railings, bridges, and noise barriers.

Thank you for your kind attention and we hope that the TPB will take our comments into consideration.

Yours faithfully,

The Hong Kong Bird Watching Society