



生態教育及資源中心
Eco-Education & Resources Centre



BY EMAIL

The Secretary,
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20th August 2019

Dear Sir/Madam

**ECO-EDUCATION & RESOURCES CENTRE AND GREEN POWER AND'S JOINT
COMMENTS ON THE PROPOSED AMENDMENT ITEMS ON THE DRAFT OUTLAND
ZONING PLAN NO. S/SK-HH/7**

1. Regarding to the above-captioned draft plan, Eco-Education & Resources Centre and Green Power would like to express our concerns on rezoning of Green Belt (GB) to Residential (Group C) 5 (RC 5) and the potential environmental impacts to the Conservation Area (CA) and the Coastal Protection Area (CPA).
2. According to the OZP, the planning intention of the Green Belt is “primarily for defining the limits of urban and sub-urban development areas by natural features”. With the proposed amendment items, i.e. rezoning of GB area into the RC 5, it would vague the boundary between the urban and sub-urban area that may promote the further development of sub-urban or even natural area in the future and that would clearly violate the original planning intention. In addition, GB also functions as the buffer area between the Residential Area and the ecological sensitive area, i.e. Conservation Area (CA); with proposed rezoning, no buffer zone would be available between RC and CA. Any impacts generated from the construction and operation of the Residential Area would directly affect the CA.
3. Ecological surveys were conducted at terrestrial and coastal area of Nam Wai and Heung Chung since June 2019. 96 butterfly species are recorded within the survey area and that would account for 40% of total number of species recorded in Hong Kong and 3 “Rare” species and 3 “Very Rare”

species are included. With the high number of species recorded. Nam Wai and Heung Chung are certainly a hotspot for butterflies. A summary of butterfly species mentioned is enclosed in the appendix. With the proposed amendment items on the zoning plan, numerous food plants for diverse butterfly species would be eliminated, thus destroying the feeding and breeding habitat of diverse butterfly species.

4. A total of 33 species of bird are recorded in the survey area including 2 rare species, Striated Heron, *Butorides striata*, and Greater Sand Plover, *Charadrius leschenaultia*. Both of them are recorded in the coastal area of Nam Wai. In addition, nesting of Black-crowned Night Heron, *Nycticorax nycticorax*, a species of conservation concern is observed in Nam Wai area, indicating the mangrove and the soft shore of Nam Wai not only provides important feeding ground for water birds including rare species, it also serves as breeding ground for species of conservation important species.
5. Four species of damselfly and dragonfly are recorded during the survey including Mangrove Slimmer (*Orthetrum poecilops*), a species of conservation concern, is recorded during the survey. Mangrove Skimmer is listed as vulnerable in the IUCN red list. As the distribution of Mangrove Skimmer is limited to estuary area, the mangrove of Nam Wai is an important habitat for this species of conservation concern.
6. In addition to the species aforementioned, 13 species of crab and 8 species of fish are recorded in the survey area. All 8 fish species recorded are juveniles and large number of crab and shrimp larvae are also recorded in the plankton sampling in the survey area, This indicates the mangrove of Nam Wai is an important nursery ground for various marine species which indeed nourishing the surrounding species and species of conservation concern.
7. Thought the proposed amendment items for zoning does not affect the mangrove of Nam Wai directly, as the mangrove locates at the downstream of the proposed zoning amendment area, sewage or any disturbance created during the construction and operation of the Residential Area would be easily washed off to the downstream area without proper management. As the larvae and juveniles of are sensitive to the pollution or disturbance, these potential pollutions would pose a serious threat to them and which would definitely damage the ecology of the mangrove area of Nam Wai.
8. The biodiversity of Nam Wai and Heung Chung is rich in both terrestrial and coastal area, but both of these ecosystems can easily be damaged by human disturbance. We urge the government to reconsider the amendment of the zoning in area and to impose suitable management to the environment in order to further protect the area.

Summary of survey findings listed as follows:

Table 1: Summary of ecological survey of Nam Wai and Heung Chung between since June 2019

Taxa	Number of species recorded
Butterflies	96
Birds	33
Odonates	4
Crabs	13
Fish	8

Should you have any inquiries or need further information, please contact the undersigned at Eco-Education & Resources Centre (T & Fax: 2697 2029, Email: michelle@erc.org.hk).

Thank you for your kind attention.

Eco-Education & Resources Centre
Green Power