



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

BY EMAIL ONLY

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

6 March 2021

Dear Sir / Madam,

**Green Power and Eco-Education & Resources Centre's Comments on
Draft Mui Wo North Development Permission Area (Plan No. DPA/I-MWN/1)**

1. Green Power (GP) and Eco-Education & Resources Centre (ERC) welcome the draft Development Permission Area (DPA) Plan for Mui Wo North gazetted on 8th January 2021. However, we consider the present draft plan being insufficient for the conservation of the ecologically sensitive Area, with detailed comments as follows.
2. We agree with the general planning intention as stated in the *Explanatory Statement* (section 7.2), that "the Area is to conserve its landscape and ecological values in safeguarding the natural habitats, to maintain the unique rural and natural character and cultural heritage of the Area, and to prevent it from encroachment by unauthorized development and from undesirable change of use." However, the entire DPA has been zoned for "Unspecified Use", which provides inadequate protection against vandalism acts.
3. Area delineated by the plan, particularly water bodies such as Wang Tong River, stream at Tung Wan Tau, as well as two large pieces of marsh to the northeast and east of Butterfly Hill, harbors rich biodiversity. In addition to the species of conservation concern mentioned in the *Explanatory Statement*, over 40 species of odonates (>30% of local species total), including the locally uncommon Black Riverdarter (*Onychothemis tonkinensis*) and Hainan Hooktail (*Lamelligomphus hainanensis*), the latter being globally restricted to southeastern China, have been recorded by Green Power in the Area since 2015 (Green Power, 2021a). The marshes and woodlands in the valley also act as important habitats for birds, including roosting Night Heron and Egrets (HKBWS, 1999). The Hong Kong Bird Watching Society also identified an active ardeid night roost near the estuary of Wang Tong River (HKBWS, 2021).
4. Terrestrial habitats in the Area, especially woodlands and open farmlands, also accommodate rich butterfly biodiversity. Between 2014-2020, Green Power has recorded 148 species of butterflies (>55% of local species total), including 35 very rare or rare species such as Malayan (*Megisba malaya*) and Plain Banded Awl (*Hasora vitta*), around the Area (Green Power, 2021b).
5. We opine that water bodies and their riparia (~30m), as well as terrestrial habitats of high ecological value, should be conserved and protected by more stringent land use zonings (i.e. Conservation Area or more stringent land use categories).

6. Coastal area stretching from the eastern edge of the gazetted Silver Mine Bay Beach to the beach on the eastern side of Man Kok Tsui should be continuously zoned as "Coastal Protection Area" (CPA), with habitats including rocky / sandy shores and backshore vegetation covered to protect the natural coastline as a whole.
7. This is in line with the statement "the predominant part of Lantau would be conserved for its natural and cultural resources" (*Explanatory Statement* section 6.2), and the planning intention of the nearby South Lantau Coast, where the majority of coastline not covered by Lantau South Country Park has been zoned as CPA to "conserve, protect and retain the natural coastlines and the sensitive coastal natural environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological value, with a minimum of built development. It is also intended to safeguard the beaches and their immediate hinterland and to prevent haphazard ribbon development" (South Lantau Coast Outline Zoning Plan, S/SLC/21).
8. As stated in the *Explanatory Statement* (section 7.5.2), the Area is mainly served by septic tank and soakaway (STS) system, and the existing sewage treatment network will not have extra capacity to tackle sewage produced from more developments. In addition, existing village environs in Mang Tong, Tung Wan Tau and Man Kok Tsui are in proximity to water sensitive receivers, including the aforementioned freshwater bodies and the gazetted bathing beach in Silver Mine Bay. Higher chances of leakage of STS and other non-point source pollution, as well as illegal and / or uncontrollable sewage discharge into these sensitive receivers associated with further development, will undoubtedly intensify environmental and public health risks.
9. We request any "Village Type Development" (V) zones in the future Outline Zoning Plan should be delineated according to genuine needs of indigenous villagers, which should in turn be assessed base on reliable information, including land ownership and entitlement, as well as actual rather than speculated number of village house applications.
10. Without such proof, any V zones should be delineated with strict accordance to the current boundary of village houses. Areas with natural vegetation including woodlands, as well as active or abandoned farmlands in these largely rural and natural areas, in particular Man Kok Tsui and Tung Wan Tau, should be zoned to preclude possibility of building new New Territories Exempted Houses (NTEH) from both Columns 1 and 2, in order to eliminate development pressure from these areas.
11. Green Power and Eco-Education & Resource Centre hope that the Town Planning Board could address our environmental concerns stated above, and formulate statutory plans for thorough protection of our natural and cultural heritage in a prudent manner.

Yours faithfully,



Yuen Yan Ling
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Green Power

On behalf of
Green Power
Eco-Education & Resources Centre

References

Green Power. 2021a. Draft "Development Permission Area Plans" Released for 4 Lantau Localities Green Power Urges the Establishment of Conservation Area after Discovery of 52 Dragonfly and Damselfly Species - Press Release (Chinese version only).

Green Power. 2021b. *Hong Kong Butterfly Inventory*. Green Power Website. [Online]: <https://www.greenpower.org.hk/butterfly/eng/inventory.shtml> [Accessed: Jan 2021]

The Hong Kong Bird Watching Society (HKBWS). 1999. Conservation News – South West New Territories. *Bulletin* 173: 8.

The Hong Kong Bird Watching Society (HKBWS). 2021. Comments on the Project Profile for Desilting Works at River Silver Mui Wo (DIR-281/2021).