



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](mailto:tpbpd@pland.gov.hk))

6 March 2021

Dear Sir / Madam,

**Green Power and Eco-Education & Resources Centre's Comments on  
Draft Sha Lo Wan and San Tau Development Permission Area (Plan No. DPA/I-SLW/1)**

1. Green Power (GP) and Eco-Education & Resources Centre (ERC) welcome the draft Development Permission Area (DPA) Plan for Sha Lo Wan and San Tau gazetted on 8<sup>th</sup> January 2021. However, we consider the present draft plan being insufficient for the conservation of the ecologically sensitive areas, 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 protect the ecologically sensitive areas (including San Tau Beach SSSI), to maintain the unique rural and natural character, landscape value and the cultural heritage of the Area, and to prevent it from encroachment by unauthorized development and from undesirable change of use." However, most of the DPA (except for San Tau Beach SSSI), despite being recognized as high in ecological value, has been zoned for "Unspecified Use", which provides inadequate protection against vandalism acts.
3. The distribution of seagrasses at San Tau Beach may have expanded over time. We opine that a review of the current distribution of sea grasses at the beach is needed, and the boundary of San Tau Beach SSSI shall be enlarged if the expansion is confirmed to conserve the entire seagrass bed.
4. The coastline of the Area is an integral part of the North Lantau coastal system which links up ecological hotspots including bays at Tung Chung, San Tau, Hau Hok Wan, Sha Lo Wan and Sham Wat. Apart from its important seagrass bed, the mangrove stand at San Tau Beach SSSI has also been listed as a "Very Important Stand" to be conserved (Tam & Wong 2000). Two species of horseshoe crabs, *Carcinoscorpius rotundicauda* and the endangered *Tachypleus tridentatus* (Laurie et al., 2019), coexist in San Tau (Shin et al., 2014), while juveniles of Seaweed Pipefish (*Syngnathus schlegelii*) have been recorded at Sha Lo Wan (GP & ERC 2012), suggesting these sites as part of the North Lantau coast are important habitats and nursery grounds of these species.
5. The need of conserving various coastal habitats as part of an integrated system in the Area is undeniable. **Continuous and sufficiently broad CPA, which covers habitats including mudflats, estuaries, mangrove stands, rocky shores and backshore vegetations should be established.**

6. Freshwater and terrestrial habitats in the Area also accommodate rich biodiversity. Apart from important species listed in the *Explanatory Statement* (sections 5.2 & 5.3), odonate species of conservation interests, including the highly globally restricted Guangdong Hooktail (*Melligomphus guangdongensis*) and Short-winged Shadowdamsel (*Protosticta beaumonti*), have been recorded in streams of Sha Lo Wan and San Tau, including those draining areas nearby existing village settlements (Green Power, 2021a). San Tau is also a butterfly hotspot, with more than 160 species of butterflies (>60% of local species total), including 43 very rare or rare species such as Southern Chinese Peacock (*Papilio dialis*) and Common Leopard (*Phalanta phalantha*), recorded by Green Power between 2008-2020 (Green Power, 2021b). Fung Shui woods adjoining existing villages in Sha Lo Wan and San Tau also require protection.
7. We opine that any water bodies, including streams, marshes and their riparia (~30m), as well as terrestrial habitats of high ecological value including Fung Shui Woods and mature secondary woodlands, should be conserved and protected by more stringent land use zonings (i.e. Conservation Area or more stringent land use categories).
8. As stated in the *Explanatory Statement* (section 7.5.3), there is no existing or planned public sewer for the Area, and the village houses are served by their own STS system. Higher chances of leakage of STS and other non-point source pollution, as well as illegal and / or uncontrollable sewage discharge into water sensitive receivers (including streams, marshes, estuaries and bays) associated with further development, will undoubtedly intensify environmental 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 small 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, 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  
Assistant Education & Conservation Manager  
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]
- Green Power & Eco-Education & Resources Centre. 2012. Hong Kong's First Systematic Survey of Pipefish and Seahorses - Press Release.
- Laurie, K., Chen, C., P., Cheung, S. G., Do, V., Hsieh, H., John, A., Mohamad, F., Seino, S., Nishida, S., Shin, P., & Yang, M. 2019. *Tachypleus tridentatus* (errata version published in 2019). *The IUCN Red List of Threatened Species*. <https://doi.org/10.2305/IUCN.UK.2019-1.RLTS.T21309A149768986.en>
- Shin, P., Cheung, S. G., & Laurie, K. 2014. Status, Trends and Recommendations on Protection of Selected Marine Invertebrates—Hong Kong's "Living Fossils." *Marine Living Fossils Report*.
- Tam N. F. Y. & Wong Y. S. 2000. *Hong Kong Mangroves*. City University of Hong Kong Press, Hong Kong.