



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 Sham Wat and San Shek Wan Development Permission Area (Plan No. DPA/I-SW/1)**

1. Green Power (GP) and Eco-Education & Resources Centre (ERC) welcome the draft Development Permission Area (DPA) Plans for Mui Wo North, Pui O Au, Sha Lo Wan and San Tau, as well as Sham Wat and San Shek Wan gazetted on 8th January 2021. However, we consider the present draft plans being insufficient for the conservation of these ecologically sensitive areas, with detailed comments on each plan 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 the San Chau SSSI and the EIS), to maintain the unique rural and natural character 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 Chau SSSI), despite being recognized as high in ecological value, has been zoned for "Unspecified Use" , which provides inadequate protection against vandalism acts.
3. 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. Two species of horseshoe crabs, *Carcinoscorpius rotundicauda* and the endangered *Tachypleus tridentatus* (Laurie et al., 2019) coexist in Sham Wat (Shin et al., 2014). Juveniles of the latter, together with the Beccari's Seagrass (*Halophila beccarii*), which is rare along the North Lantau coast, have been recorded by ERC during intertidal surveys from 2015 to 2021 (ERC, unpublished data).
4. 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.**
5. 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 three species of Shadowdamsels (*Drepanosticta hongkongensis*, *Protosticta beaumonti* and *Sinosticta ogata*), have been recorded in Sham Wat Stream (Yip & Noffke, 2014). The locally uncommon Black-tipped Percher (*Diplacodes nebulosa*) has also been recorded in the Area (Chan & Lau, 2001).

6. We opine that any water bodies, including streams, marshes and their riparia (~30m), as well as terrestrial habitats of high ecological value including mature secondary woodlands, should be conserved and protected by more stringent land use zonings (i.e. Conservation Area or more stringent land use categories).
7. 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.
8. 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.
9. 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.
10. 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,



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Green Power

On behalf of
Green Power
Eco-Education & Resources Centre

References

- Chan, B., & Lau, M. 2001. Notes on the ecological value of Sham Wat Stream and its valley. *Porcupine!*, 22, 17–18.
- 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*.
- Yip, P., & Noffke, C. 2014. *Lantau—Hong Kong’ s Jewel. A Biodiversity Study of Lantau*.
[Online]https://issuu.com/conservation_lantau/docs/lantau-hong_kong_s_jewel_publish