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11 November 2014

**By Email & Fax**

Dear Sir/ Madam,

**Re: Proposed Development in Ta Tit Yan (Application No.: A/TP/569)**

1. Green Power would like to object to the planning application of the proposed 19 houses built on 2,517 sq. metre government and private lands in Ta Tit Yan (Application No.: A/TP/569), which are currently zoned as “Green Belt”. The reasons for our objection are as follows:

**Polluting Water Gathering Ground**

2. The proposed development area is located within Water Supplies Department’s water gathering ground. In addition, the proposed development area adjoins a main tributary of Tai Po River which is natural and with “Excellent” Water Quality Index ranked by EPD. The construction site adjoining the stream will



pollute the water gathering ground and Tai Po River. The proposed residential development with paved surface will generate polluted surface runoff which will be directly discharged to Tai Po River and exacerbate water pollution.

3. The proposed development includes a sewage treatment plant serving all the 19 houses. Except the sewage treatment plant, no optional sewerage can support the houses. Any incidents of breakdown of the sewage treatment plant, power failure or overflow of sewage may lead to discharge of large amount of untreated domestic sewage to Tai Po River metres away from the proposed development area. On the other hand, the sewage treatment plant will be operated privately of which stability and efficiency are still in doubt. Moreover, in view of the ineffective enforcement of illegal discharge of livestock wastes to local rivers, existing enforcement cannot prevent the operator of sewage treatment plant from intentionally discarding sewage to Tai Po River.

#### Flood Risk

4. We are concerned that such massive construction works of the proposed development will cause soil erosion and downstream of Tai Po River will be more vulnerable to flooding. The authority should note that a fatal flood accident occurred in Sha Po Tsai, downstream of Ta Tit Yan in 2012. Any major developments in upper course of Tai Po River should not pose substantial flood risk downstream.
5. Some tiny and/ or ephemeral streams are penetrating the proposed development area. The proposed development works will inevitably result in stream reclamation and in turn increase the flooding risk of the application site which will very likely require further stream training works. However, no drainage impact assessment was conducted for the proposed development which neglects the potential environmental destruction resulting from stream training or flood prevention works.

#### Ecological Destruction

6. Ta Tit Yan possesses rich butterfly biodiversity. It is one of the recognized butterfly hotspots in Hong Kong. Green Power has been conducting butterfly surveys in Ta Tit Yan and Yuen Tun Ha since 2010. A total of 154 butterfly species have been recorded there, which account for nearly 60% of local species in Hong Kong (refer to Appendix I for the inventory of butterflies



recorded from 2010 to now). Among the 154 butterfly species, there are 26 rare species and 15 very rare species. They constitute near 40% of all rare and very rare butterflies in Hong Kong. The high proportion of rare and very rare butterfly species recorded indicates Ta Tit Yan should be a pristine site that preserves diverse native vegetation. As many similar sites in the territory have been disturbed such as Fung Yuen, any developments substantially encroaching undisturbed areas in Ta Tit Yan should be avoided as far as possible.

#### Setting a Bad Precedent

7. In fact, this is an imminent case of "Destroy First, Build Later". Before the captioned application, massive environmental vandalism was disclosed in the application site on 26 Jan 2013 by Green Power and the case was reported to Lands Department and various departments on 1 Feb 2013. The vandalism involved over 8,000 square meters of excavation and vegetation clearance. Large scale excavation work and site formation in Ta Tit Yan (Refer to Appendix II for the location of vandalism) were found and two pieces of shrub land near the access road had been cleared (Refer to Appendix III for the related photos). All trees and shrubs within the excavation area were erased. Moreover, a tributary stream within the application site was reclaimed completely.
  
8. These actions disrupted the ecology and altered the original landscape of the application site that may mislead the authority to approve the application due to its disturbed status. However, we urge the authority to reject the application in order not to set bad precedent and to discourage this deceptive trick of "Destroy First, Build Later".

#### Incompatible Land Use

9. According to the approved Tai Po Outline Zoning Plan (No. S/TP/25), the proposed development area is zoned as Green Belt. Referring to the Explanatory Statement of this OZP, the planning intention of Green Belt is for defining urban and sub-urban development areas. And there is a general presumption against development within this zone. For now, this proposed development project definitely contrasts to government's planning intention.

Should you have any inquiries or need additional information, please contact me at 3961 0202 or via email [matthews@greenpower.org.hk](mailto:matthews@greenpower.org.hk).



Thank you for your attention.

Yours faithfully,  
SIN Kar Wah  
Senior Environmental Affairs Manager  
Green Power

Attachment – Appendices

Appendix I – Butterfly inventory in Ta Tit Yan & Yuen Tun Ha

Appendix II – Location map showing the vandalized site in Ta Tit Yan

Appendix III – Photos showing vandalism at Ta Tit Yan



## Appendix I Butterfly Inventory in Ta Tit Yan & Yuen Tuen Ha, Tai Po

(Data collected between 2010 to September 2014 by Green Power)

Chinese Common Name	Scientific Name	English Common Name	Status*
蛇目褐蛭蝶	<i>Abisara echerius</i>	Plum Judy	VC
白弄蝶	<i>Abraximorpha davidii</i>	Magpie Flat	R
苧麻珍蝶	<i>Acraea issoria</i>	Yellow Coster	R
鈕灰蝶	<i>Acytolepis puspa</i>	Common Hedge Blue	C
寬鏢弄蝶	<i>Aeromachus jhora</i>	Jhora Scrub Hopper	R
黃斑弄蝶	<i>Ampittia dioscorides</i>	Bush Hopper	UC
斐豹蛭蝶	<i>Argyreus hyperbius</i>	Indian Fritillary	C
緬甸嬌灰蝶	<i>Arhopala birmana</i>	Burmese Bush Blue	VR
銀鏈嬌灰蝶	<i>Arhopala pseudocentaurus</i>	Centaur Oak Blue	VR
波蛭蝶	<i>Ariadne ariadne</i>	Angled Castor	C
掩翅弄蝶	<i>Astictopterus jama</i>	Forest Hopper	C
相思帶蛭蝶	<i>Athyma nefte</i>	Colour Sergeant	C
玄珠帶蛭蝶	<i>Athyma perius</i>	Common Sergeant	UC
離斑帶蛭蝶	<i>Athyma ranga</i>	Blackvein Sergeant	UC
新月帶蛭蝶	<i>Athyma selenophora</i>	Staff Sergeant	C
黑斑傘弄蝶	<i>Bibasis oedipodea</i>	Orange Awlet	VR
杣弄蝶	<i>Borbo cinnara</i>	Formosan Swift	C
咖灰蝶	<i>Catochrysops strabo</i>	Forget-me-not	VR
遷粉蝶	<i>Catopsilia pomona</i>	Lemon Emigrant	C
梨花遷粉蝶	<i>Catopsilia pyranthe</i>	Mottled Emigrant	VC
白觸星弄蝶	<i>Celaenorrhinus leucocera</i>	Common Spotted Flat	VR
金斑弄蝶	<i>Cephrenes acalle</i>	Plain Palm Dart	VR
黑脈園粉蝶	<i>Cepora nerissa</i>	Common Gull	C
白帶螯蛭蝶	<i>Charaxes bernardus</i>	Tawny Rajah	C
螯蛭蝶	<i>Charaxes marmax</i>	Yellow Rajah	UC
曲紋紫灰蝶	<i>Chilades pandava</i>	Plains Cupid	UC
斑鳳蝶	<i>Chilasa clytia</i>	Common Mine	C
黃襟蛭蝶	<i>Cupha erymanthis</i>	Rustic	VC
尖翅銀灰蝶	<i>Curetis dentata</i>	Toothed Sunbeam	UC
網絲蛭蝶	<i>Cyrestis thyodamas</i>	Common Mapwing	C
金斑蝶	<i>Danaus chrysippus</i>	Plain Tiger	UC
虎斑蝶	<i>Danaus genyita</i>	Common Tiger	C

Chinese Common Name	Scientific Name	English Common Name	Status*
優越斑粉蝶	<i>Delias hyparete</i>	Painted Jezebel	UC
報喜斑粉蝶	<i>Delias pasithoe</i>	Red-base Jezebel	VC
檀方粉蝶	<i>Dercas verhuelli</i>	Tailed Sulphur	R
玳灰蝶	<i>Deudorix epijarbas</i>	Cornelian	R
電蛺蝶	<i>Dichorragia nesimachus</i>	Constable	R
鳳眼方環蝶	<i>Discophora sondaica</i>	Common Duffer	UC
大斑尾蛺蝶	<i>Dodona egeon</i>	Orange Punch	R
翠袖鋸眼蝶	<i>Elymnias hypermnestra</i>	Common Palmfly	C
黃斑蕉弄蝶	<i>Erionota torus</i>	Banana Skipper	UC
棕灰蝶	<i>Euchrysops cnejus</i>	Gram Blue	UC
幻紫斑蝶	<i>Euploea core</i>	Common Indian Crow	C
藍點紫斑蝶	<i>Euploea midamus</i>	Blue-spotted Crow	VC
異型紫斑蝶	<i>Euploea mulciber</i>	Striped Blue Crow	UC
槲黃粉蝶	<i>Eurema blanda</i>	Three-spot Grass Yellow	C
無標黃粉蝶	<i>Eurema brigitta</i>	Small Grass Yellow	R
寬邊黃粉蝶	<i>Eurema hecabe</i>	Common Grass Yellow	VC
矛翠蛺蝶	<i>Euthalia aconthea</i>	Baron	UC
紅斑翠蛺蝶	<i>Euthalia lubentina</i>	Gaudy Baron	UC
尖翅翠蛺蝶	<i>Euthalia phemius</i>	White-edged Blue Baron	C
長尾藍灰蝶	<i>Everes lacturmus</i>	Tailed Cupid	C
串珠環蝶	<i>Faunis eumeus</i>	Large Faun	C
匪夷捷弄蝶	<i>Gerosis phisara</i>	White-banded Flat	R
統帥青鳳蝶	<i>Graphium agamemnon</i>	Tailed Jay	C
寬帶青鳳蝶	<i>Graphium cloanthus</i>	Glassy Bluebottle	UC
木蘭青鳳蝶	<i>Graphium doson</i>	Common Jay	C
青鳳蝶	<i>Graphium sarpedon</i>	Common Bluebottle	VC
雙子酣弄蝶	<i>Halpe porus</i>	Dark Brown Ace	VR
緯帶趾弄蝶	<i>Hasora vitta</i>	Plain Banded Awl	VR
鶴頂粉蝶	<i>Hebomoia glaucippe</i>	Great Orange Tip	C
斜斑彩灰蝶	<i>Heliophorus epicles</i>	Purple Sapphire	C
黑脈蛺蝶	<i>Hestina assimilis</i>	Red Ring Skirt	C
希弄蝶	<i>Hyarotis adrastus</i>	Tree Flitter	UC
幻紫斑蛺蝶	<i>Hypolimnas bolina</i>	Great Egg-fly	C
雅弄蝶	<i>Iambrix salsala</i>	Chestnut Bob	UC
擬旖斑蝶	<i>Ideopsis similis</i>	Ceylon Blue Glassy Tiger	VC

Chinese Common Name	Scientific Name	English Common Name	Status*
鐵木菜異灰蝶	<i>Iraota timoleon</i>	Silver Streak Blue	UC
橙粉蝶	<i>Ixias pyrene</i>	Yellow Orange Tip	UC
素雅灰蝶	<i>Jamides alecto</i>	Metallic Cerulean	VR
雅灰蝶	<i>Jamides bochus</i>	Dark Cerulean	C
美眼蛺蝶	<i>Junonia almana</i>	Peacock Pansy	C
鈎翅眼蛺蝶	<i>Junonia iphita</i>	Chocolate Pansy	C
蛇眼蛺蝶	<i>Junonia lemonias</i>	Lemon Pansy	C
琉璃蛺蝶	<i>Kaniska canace</i>	Blue Admiral	C
亮灰蝶	<i>Lampides boeticus</i>	Long-tailed Blue, Pea Blue	C
曲紋黛眼蝶	<i>Lethe chandica</i>	Angled Red Forester	N/A
白帶黛眼蝶	<i>Lethe confusa</i>	Banded Tree Brown	C
長紋黛眼蝶	<i>Lethe europa</i>	Bamboo Tree Brown	UC
波紋黛眼蝶	<i>Lethe rohria</i>	Common Tree Brown	UC
瑪弄蝶	<i>Matapa aria</i>	Common Redeye	UC
暮眼蝶	<i>Melanitis leda</i>	Common Evening Brown	C
睇暮眼蝶	<i>Melanitis phedima</i>	Dark Evening Brown	UC
小眉眼蝶	<i>Mycalesis mineus</i>	Dark-brand Bush Brown	VC
平頂眉眼蝶	<i>Mycalesis zonata</i>	South China Bush Brown	C
古樓娜灰蝶	<i>Nacaduba kurava</i>	Transparent 6-line Blue	C
蒙鏈蔭眼蝶	<i>Neope muirheadii</i>	Muirhead's Labyrinth	UC
一點灰蝶	<i>Neopithecops zalmora</i>	Quaker	UC
珂環蛺蝶	<i>Neptis clinia</i>	Southern Sullied Sailer	C
中環蛺蝶	<i>Neptis hylas</i>	Common Sailer	VC
姿環蛺蝶	<i>Neptis soma</i>	Sullied Sailer	VR
曲紋袖弄蝶	<i>Notocrypta curvifascia</i>	Restricted Demon	UC
角翅弄蝶	<i>Odontoptilum angulatum</i>	Chestnut Angle	C
金蟠蛺蝶	<i>Pantoporia hordonia</i>	Common Lascar	UC
碧鳳蝶	<i>Papilio bianor</i>	Chinese Peacock	C
玉斑鳳蝶	<i>Papilio helenus</i>	Red Helen	VC
美鳳蝶	<i>Papilio memnon</i>	Great Mormon	VC
巴黎翠鳳蝶	<i>Papilio paris</i>	Paris Peacock	VC
玉帶鳳蝶	<i>Papilio polytes</i>	Common Mormon	VC
藍鳳蝶	<i>Papilio protenor</i>	Spangle	VC
柑橘鳳蝶	<i>Papilio xuthus</i>	Swallowtail	R
絹斑蝶	<i>Parantica aglea</i>	Glassy Tiger	C

Chinese Common Name	Scientific Name	English Common Name	Status*
史氏絹斑蝶	<i>Parantica swinhoei</i>	Chocolate Tiger	VR
丫紋俳蛺蝶	<i>Parasarpa dudu</i>	White Commodore	C
殘鏢線蛺蝶	<i>Parathyma sulphitia</i>	Five-dot Sergeant	C
么紋稻弄蝶	<i>Parnara bada</i>	Oriental Straight Swift	R
曲紋稻弄蝶	<i>Parnara ganga</i>	Rare Swift	UC
直紋稻弄蝶	<i>Parnara guttata</i>	Common Straight Swift	C
綠鳳蝶	<i>Pathysa antiphates</i>	Five-bar Swordtail	C
南亞穀弄蝶	<i>Pelopidas agna</i>	Little Branded Swift	UC
印度穀弄蝶	<i>Pelopidas assamensis</i>	Great Swift	R
古銅穀弄蝶	<i>Pelopidas conjunctus</i>	Conjoined Swift	R
隱紋穀弄蝶	<i>Pelopidas mathias</i>	Small Branded Swift	UC
菜粉蝶	<i>Peris rapae</i>	Small Cabbage White	R
柱菲蛺蝶	<i>Phaedyra columella</i>	Short-banded Sailer	C
東方菜粉蝶	<i>Pieris canidia</i>	Indian Cabbage White	VC
黃紋孔弄蝶	<i>Polytremis lubricans</i>	Contiguous Swift	C
窄斑鳳尾蛺蝶	<i>Polyura athamas</i>	Common Nawab	UC
忘憂尾蛺蝶	<i>Polyura nepenthes</i>	Shan Nawab	UC
孔子黃室弄蝶	<i>Potanthus confucius</i>	Chinese Dart	UC
寬紋黃室弄蝶	<i>Potanthus pava</i>	Yellow Band Dart	VR
木黃室弄蝶	<i>Potanthus pseudomaesa</i>	Common Dart	R
斷紋黃室弄蝶	<i>Potanthus trachala</i>	Lesser Band Dart	R
燕灰蝶	<i>Rapala manea</i>	Slate Flash	C
羅蛺蝶	<i>Rohana parisatis</i>	Black Prince	C
生灰蝶	<i>Sinthusia chandrana</i>	Broad Spark	R
銀線灰蝶	<i>Spindasis lohita</i>	Long-banded Silverline	C
豆粒銀線灰蝶	<i>Spindasis syama</i>	Club Silverline	UC
素弄蝶	<i>Suastus gremius</i>	Indian Palm Bob	UC
散紋盛蛺蝶	<i>Symbrenthia lilaea</i>	Common Jester	C
沾邊裙弄蝶	<i>Tagiades litigious</i>	Water Snow Flat	C
黑邊裙弄蝶	<i>Tagiades menaka</i>	Dark Edged Snow Flat	UC
雙尾灰蝶	<i>Tajuria cippus</i>	Peacock Royal	R
豹斑雙尾灰蝶	<i>Tajuria maculata</i>	Spotted Royal	VR
草黃弄蝶	<i>Taractrocera ceramas</i>	Tamil Grass Dart	R
蚬灰蝶	<i>Taraka hamada</i>	Lesser Forest Blue	R
紅翅長標弄蝶	<i>Telicota ancilla</i>	Greenish Palm Dart	UC

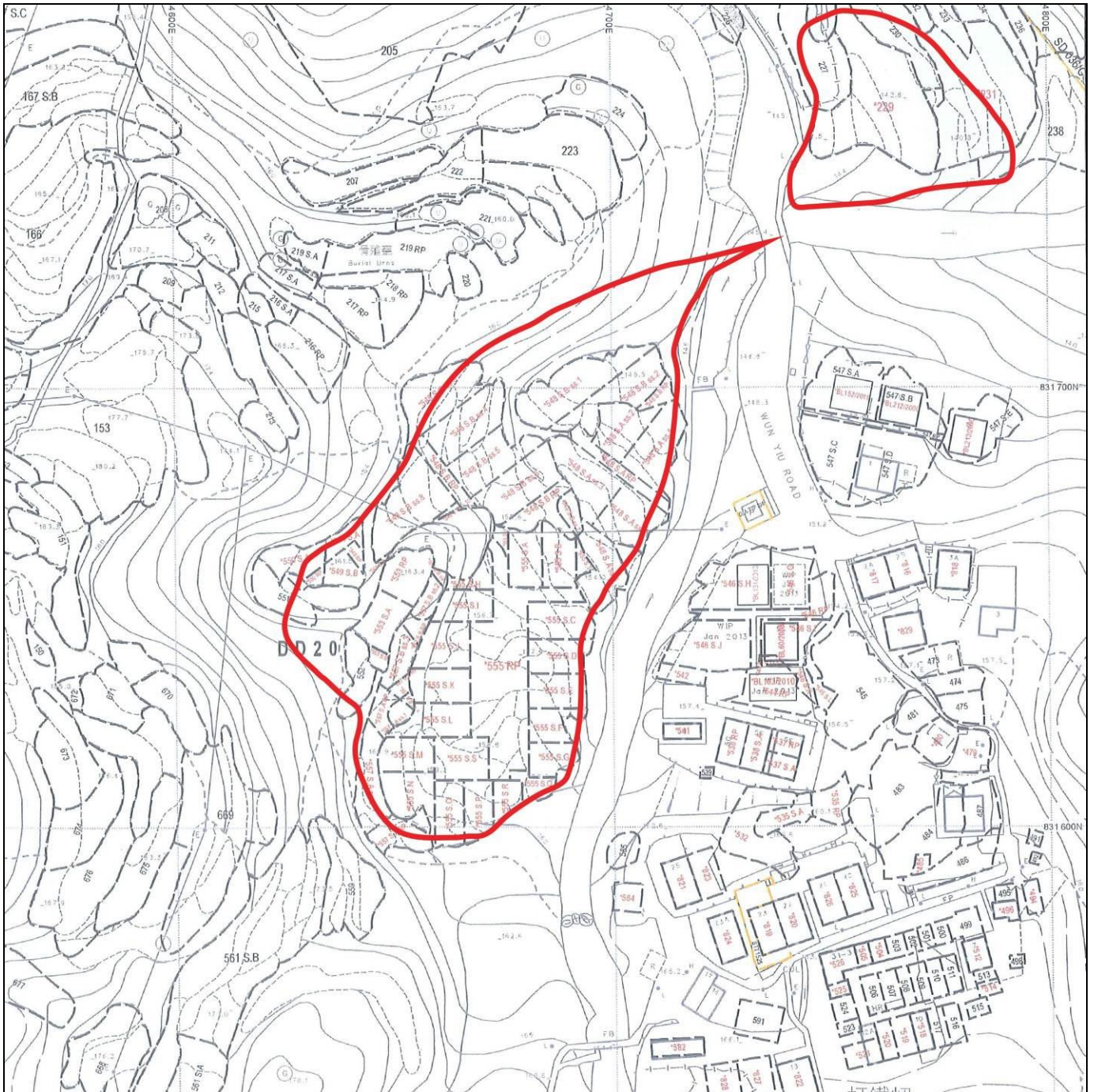


Chinese Common Name	Scientific Name	English Common Name	Status*
黑脈長標弄蝶	<i>Telicota besta</i>	Hainan Palm Dart	VR
長標弄蝶	<i>Telicota colon</i>	Pale Palm Dart	R
黃紋長標弄蝶	<i>Telicota ohara</i>	Dark Palm Dart	R
青斑蝶	<i>Tirumala limniace</i>	Blue Tiger	C
金裳鳳蝶	<i>Troides aeacus</i>	Golden Birdwing	R
裳鳳蝶	<i>Troides helena</i>	Common Birdwing	UC
薑弄蝶	<i>Udaspes folus</i>	Grass Demon	R
小紅蛺蝶	<i>Vanessa cardui</i>	Painted Lady	R
大紅蛺蝶	<i>Vanessa indica</i>	Indian Red Admiral	UC
矍眼蝶	<i>Ypthima baldus</i>	Common Five-ring	VC
黎桑矍眼蝶	<i>Ypthima lisandra</i>	Straight Five-ring	C
波蛺蝶	<i>Zemeros flegyas</i>	Punchinello	C
吉灰蝶	<i>Zizeeria karsandra</i>	Dark Grass Blue	UC
酢醬灰蝶	<i>Zizeeria maha</i>	Pale Grass Blue	VC
毛眼灰蝶	<i>Zizina otis</i>	Lesser Grass Blue	C
長腹灰蝶	<i>Zizula hylax</i>	Tiny Grass Blue	VR
黃裳腫脈弄蝶	<i>Zographetus satwa</i>	Purple and Gold Flitter	R

#### Summary of number of butterfly species of different status\*

Status*	No. of species
VC	18
C	54
UC	40
R	26
VR	15
N/A	1
<b>TOTAL NO.</b>	<b>154</b>

**Appendix II Location map showing the vandalized site in Ta Tit Yan discovered in Jan 2013**



**Appendix III Photos showing vandalism at Ta Tit Yan  
(photos taken on 26 & 31 January 2013)**

