



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))

27 October 2021

Dear Sir / Madam,

**Green Power and Eco-Education & Resources Centre's Comments on  
Draft Mui Wo North Outline Zoning Plan (Plan No. S/I-MWN/1)**

1. Green Power (GP) and Eco-Education & Resources Centre (ERC) welcome the draft Outline Zoning Plan (OZP) for Mui Wo North gazetted on 27<sup>th</sup> August 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*, that “the Area is to conserve its landscape and ecological values in safeguarding the natural habitats and to maintain the unique natural and rural character and cultural heritage of the Area” (section 8.1) and “due consideration should be given to the conservation of ecologically and environmentally sensitive areas when development in or near the Area is proposed.” (Section 8.2).
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 2014-2021, Green Power has recorded 150 species of butterflies (>56% of local species total), including 36 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. We support the destination of a “Coastal Protection Area” (CPA) along the coastal area stretching from the Tung Wan Tau to Man Kok Tsui to protect the natural coastline.
7. As stated in the *Explanatory Statement* (section 11.2), 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.
8. We request **any “Village Type Development”(V) zones in the draft OZP 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.
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, 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.
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,



Lo Wing Fung  
Senior Education & Conservation Officer  
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).