



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)

27 October 2021

Dear Sir / Madam,

Green Power and Eco-Education & Resources Centre's Comments on Draft Sham Wat and San Shek Wan Outline Zoning Plan (Plan No. S/I-SW/1)

- 1. Green Power (GP) and Eco-Education & Resources Centre (ERC) welcome the draft Outline Zoning Plan (OZP) for Sham Wat and San Shek Wan gazetted on 27th 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 habitat and rural character 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. 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which is rare along the North Lantau coast, have been recorded by ERC during intertidal surveys from 2015 to 2021 (ERC, unpublished data).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 ogatai*), 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 <u>water bodies</u>, 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 7.2.6), 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 the 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 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. We opine that Closed Road System should be maintained under "Development in the North, Conservation for the South" strategy for Lantau. Therefore, <u>vehicular access control to Sham</u> Wat should be maintained and strictly enforced.
- 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,

Lo Wing Fung

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Green Power

(On behalf of Green Power Eco-Education & Resources Centre)

References

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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

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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