



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)

Mr. WU Kwok Yuen, Jacky, JP
Head of the Sustainable Lantau Office
Civil Engineering and Development Department
13/F, North Point Government Offices,
333 Java Rd, North Point, Hong Kong
cc. (Email: jackykywu@cedd.gov.hk)

17 October 2022

Dear Sir / Madam,

Green Power's comments on the proposed rezoning of a reforested site in the Northeast of Wo Tin, Mui Wo from Green Belt to Conservation Area (Y/I-MWN/1)

1. Green Power would like to support the above amendment of Mui Wo North Outline Zoning Plan (S/I-MWN/2) to enhance the protection of a reforested site of unique ecological significance by rezoning it from Green Belt to Conservation Area for the following reasons.

Intrinsic Conservation Value

2. The recovery of forest diversity, structure and function through advanced succession observed in the application site is rare in the territory, as it is a result of locally uncommon combination of intensive effort made and site-specific favourable conditions which overcome barriers of forest restoration in Hong Kong. Provision of tree guards against seedling predation from herbivores, maintenance of vegetation structure via appropriate pruning, manual weeding and watering, together with the presence of a fire break protecting the site, all contribute to the high survival rate of the native seedlings requiring specific growing conditions, and thus the resulting structural and species diversity observed today. This would not be possible through plantation with less maintenance effort or natural succession on such a degraded and highly disturbed landscape, which is common throughout Hong Kong.
3. This living example not only serves as an essential reference for future forest restoration practice in Hong Kong and the South China region. The observed healthy development of trees, especially those of conservation concern, indicates the site would be an indispensable seed source of important native plant species for adjacent areas as well as other areas within the territory which require similar restoration interventions. The parent trees could only be safeguarded if the application site receives enhanced protection.
4. The fact that “the site represents one of just a few known locations for many rare species”, some of which cannot be planted or self-sustained easily in other sites, requires particular consideration. We support the notion that “the coexistence of multiple species of high conservation value adds to the site’s unique ecological value, both on Lantau Island itself and throughout Hong Kong.” (section 8.8, Planning Statement), and thus further protection of the site.

Benefits to Butterfly Diversity

5. Green Power has been conducting butterfly surveys in Mui Wo, including Wo Tin and its nearby areas since 2014, with a total of 154 species of butterflies (>57% of HK species total) recorded. The high butterfly diversity is likely a result of the diverse plant community in Mui Wo, as butterflies are specific in their larval diets, and for some species also in their adult diets. The availability of different larval food plants and adult nectar plants helps enhance the butterfly diversity in the area.
6. The application site constitutes an important part of the woodlands in Mui Wo, and may serve as a reserve for a number of butterfly-beneficial plants. According to Appendix A of the Planning Statement submitted by the Applicant, a total of 86 tree or shrub species have been recorded at the site. Among them are at least 30 butterfly larval food plants (e.g. the rare *Cyclobalanopsis edithiae* as the food plant of Burmese Bush Blue *Arhopala birmana*, *Castanopsis fissa* as the food plant of the locally uncommon Hooked Oak Blue *Arhopala paramuta*, both of which are planted species at the site). According to Green Power's surveys, 35 of the butterfly species recorded (e.g. the locally uncommon Orange Punch *Dodona egeon* and Malayan *Megisba malaya*) are species which may rely on 23 of these food plants during their larval stages. There are also 20 nectar plants, with six of them able to attract 21 - 51 species of butterflies when they flower (Green Power, unpublished data). The potential value of this piece of woodland in supporting the butterfly fauna in addition to other taxa, such as birds and mammals in Mui Wo, needs to be acknowledged.

Conclusion

7. Given its unusual features and values in the conservation of local biodiversity, the application site deserves a higher degree of statutory protection. Upgrading the site from Green Belt to Conservation Area implements more stringent control on its land use under the Town Planning Ordinance (Cap. 131) and compulsory procedures at the site and adjacent areas under the Environmental Impact Assessment Ordinance (Cap. 499).
8. Not only would this enhance the protection of the site, the adjoining country park and nearby areas, but also accord with the planning intention of Mui Wo North Area and the plenary principle of 'Development in the North; Conservation for the South' upheld in the 2017 Sustainable Lantau Blueprint. We sincerely hope the amendment could be adopted to preserve the natural treasure built on the hard work of frontline conservationists in Hong Kong.

Thank you for your kind attention and we look forward to your favourable decision.

Yours sincerely,



YUEN Yan Ling, Elaine
Conservation & Research Manager
Green Power