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The Conservancy Association

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27th April 2015

The Secretary

Town Planning Board

E-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Comments on Draft Po Toi Islands Outline Zoning Plan (No. S/I-PTI/1)

The Conservancy Association (CA) would OBJECT to the captioned OZP.

Po Toi has a very high conservation value

Po Toi Island is unique for its location in HK and provides a resting and foraging habitat for migratory birds of East Asia-Australian Flyway. 328 bird species have been recorded at Po Toi Islands¹, with 11 species on the IUCN Red List. It requires more efforts in planning control similar to other bird hotspots such as Mai Po and Long Valley.

This ecological treasure trove also contains more than birds. The endemic Romer's Tree Frog (*Liuixalus romeri*), despite its narrow distribution, could also be spotted in various locations such as Lau Shui Hang in Po Toi Island². Some rare floral species including Water Fern *Ceratopteris thalictroides*³, listed as Wild plant under State protection (Category II), and some rare Hong Kong Cyperaceae⁴ have once been discovered. Marine water between Po Toi and Beaufort Island contains various types of soft corals, gorgonians and black corals⁵. According to South West New Territories

¹ Please refer to Hong Kong Bird Watching Society

<http://www.hkbws.org.hk/BBS/viewthread.php?tid=23166&extra=page%3D1>

² AFCD (2005). S.K.F. Chan, K.S. Cheung, C.Y. Ho, F.N. Lam & W.S. Tang (2005). Endemic Species Highlights - Romer's Tree Frog. Hong Kong Biodiversity.

³ CLP Power Hong Kong Limited (2001). Ecological Impact Assessment. EIA Report on 132 KV Supply Circuit from Pui O via Chi Ma Wan Peninsula via Sea Crossing towards Cheung Chau.

⁴ Shaw, J (1999). The conservation status of Cyperaceae in Hong Kong. Porcupine! 20.

⁵ WWF (2012). WWF's Response to 25 Possible Reclamation Sites – Posing Threats to Important species Such as Finless Porpoise and Romer's Tree Frog.

Development Strategy Review in 2001, Po Toi Islands had been initially confirmed the potential to be designated as Country Park. To better conserve the ecological integrity and landscape character, this suggestion should be considered in deep. To reflect both ecological and scientific value of Po Toi Islands, CA would also stick to our previous suggestion to propose Po Toi Islands as Site of Special Scientific Interest.

Ecologically important mature woodlands in the proposed V-zone and R (D) zone

A previous HKBWS study⁶ once noted that the number of bird species at Fung Shui tree and woodland scrub habitats was found to be doubled of that found at bush scrub and grassland habitat (119 bird species compared to 55 bird species). These habitats can be spotted at the the proposed V-zone and R(D) zone. We opine that mature woodland in proposed V-zone and R(D) zone are very ecologically important and the current arrangement is not satisfactory.

Irrational R(D) zone threatens mature woodland

There is only a very small area of building lots and small number of inhabitants in the R(D) zone, but the zone covering 0.48 ha is unreasonably large and with no justifications (Figure 1). This would produce a false hope for redevelopment and low-rise residential development in future. CA would like to highlight that any loss of the existing mature woodland (Figure 2) and large trees would result in the loss of roosting and foraging site for migratory birds in Po Toi. The proposed R(D) zone should therefore be designated with “Conservation Area” (“CA”) zone instead.

The proposed V-zone lacks justification

We remain objection in the proposed V-zone as it still covered areas with large trees. It even extends to woodland previously not included in V-zone (Figure 3).

More importantly, we are concerned about the justification of the proposed V-zone. There is no indigenous village representative from Po Toi Village over the past 10 years and even after village representative election 2015. Without the information and approval of village representative, CA has high reservation on how the small house demand is estimated to justify numbers of indigenous villagers of Po Toi Village eligible for small house application under Small House Policy. We are in extreme worries that inappropriate planning on V-zone would even attract cross-village

⁶ HKBWS (2007). Preliminary Study on Bird Migration on Po Toi Island
http://www.hkbws.org.hk/web/chi/documents/report/HKBWS_Po_Toi_bird_Survey_Final_Report.pdf

application from Southern Lamma Island in future and create potential burden on Po Toi Islands. Planning Department should further clarify on this issue or no V-zone should be provided on Po Toi Islands.

Support appropriate zoning to avoid columbarium development

The suspected illegal development of columbarium in 2012 has resulted in massive areas of vegetation clearance in south-west of Po Toi. CA highlights that any attempts of “destroy first, build later” should not be tolerated as it would set an undesirable precedent in future.

Yours faithfully,
Leung Tak Ming
Campaign Officer

Figure 1 Red line is the boundary of R(D) zone of draft OZP and areas marked with 1, 2, 3 & 4 are places of existing inhabitants

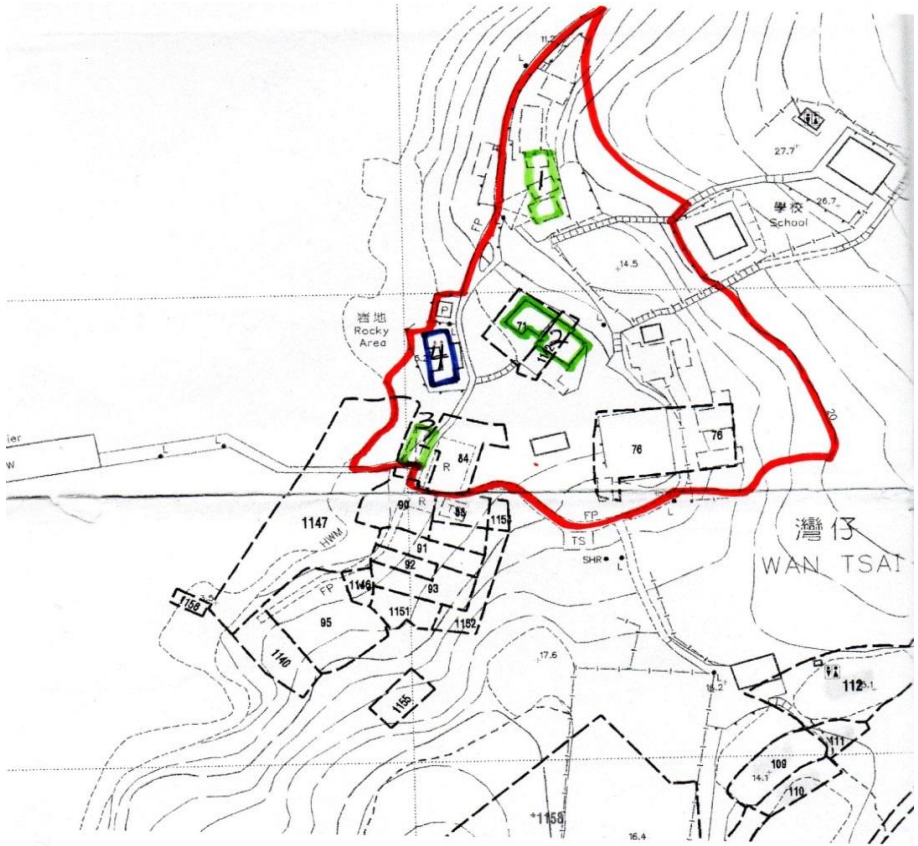


Figure 2 A mature *Ficus microcarpa* can be spotted in an abandoned house near the pier in R(D) zone . Some more large trees indeed scatter in a few abandoned houses in adjacent



Figure 3 The proposed V-zone covers woodland which is previously not included in the Draft OZP (approximate location marked in red).

