



長春社 Since1968

## The Conservancy Association

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24<sup>th</sup> March 2023

Town Planning Board  
15/F North Point Government Offices  
333 Java Road  
North Point  
Hong Kong

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Comments on the representations relating to the draft Kwai Tsing Outline Zoning Plan (OZP) No. S/KC/31

The Conservancy Association (CA) has the following concerns for the captioned.

### 1. Support R7, R10-12, R15

CA SUPPORTS representations submitted by green groups. Green groups' views are valid as the proposed Green Belt (GB) sites for rezoning (i.e. Item A1-3) are still performing good buffer function of GB. The site is not fragmented habitat and has close linkages with adjacent habitats.

### 2. Comments on R10 and R14

CA notes that both representations mentioned that a record of Danaid butterflies in Kam Shan Country Park close to the proposed Green Belt (GB) site for housing development. According to the research team of Global Change and Tropical Conservation Lab, University of Hong Kong, considerable numbers of *Euploea* spp. were found clustering in the fringe of Kam Shan Country Park and nectaring from flowering *Schefflera heptaphylla* in November 2022<sup>1</sup>. This site is just 150m away from the GB, and to our understanding, it lies within the 500m-ecological study

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<sup>1</sup> Please refer to *Euploea* valley at Kam Shan Country Park, Danaid Butterfly Research HK  
<https://www.instagram.com/p/CnbSIPnvmEx>



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boundary. We are concerned that the site may serve as a potential important site for overwintering Danaid butterflies.

As mentioned in our previous representation, both the ecological survey and verification survey did not cover dry season. Potential ecological impact brought by the housing development remains unknown, and worse still, may be under-estimated. Without a comprehensive ecological assessment to identify overwintering behavior of Danaid butterflies, evaluate impact severity and avoid potential disturbance of Danaid butterflies, the housing development proposal should not be approved.

We have to reiterate that the proposed amendments Item A1-3 are not compatible with the surrounding environment, particularly the adjoining Kam Shan Country Park. Approving the proposed amendments would set an undesirable precedent for similar amendments in future.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association