



長春社 Since1968

The Conservancy Association

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8th March 2021

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,

RE: Representations relating to the Draft Mui Wo North Development Permission Area (DPA) Plan No. DPA/I-MWN/1

The Conservancy Association is writing to submit our representations relating to the Draft Mui Wo North DPA Plan No. DPA/I-MWN/1. We support that introducing planning control through DPA Plan is necessary to provide planning guidance and impose planning enforcement against various forms of devastation in this area.

We agree that the general planning intention of the Plan Area is “*conserve its landscape and ecological values in safeguarding the natural habitats, to maintain the unique rural and natural character and cultural heritage of the Area, and to prevent it from encroachment by unauthorized development and from undesirable change of use¹*”. Areas of high conservation and landscape value should therefore be protected from encroachment by development, unauthorized work and incompatible use with conservation-related zones which put conservation as the over-riding planning intention.

For specific concerns, we initially would highlight the following items:

1. Protecting natural coastline

¹ Please refer to Section 7.2 General Planning Intention
https://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/DPA_I-MWN_1_e.pdf



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The coastline from the eastern edge of Silver Mine Bay Beach to the beach in Man Kok Tsui is still in natural condition without human disturbance (Figure 1). ALL natural coastline should be covered by Coastal Protection Area (CPA) zone. This is to conserve, protect and retain the natural coastlines and the sensitive coastal natural environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological value.

2. Protecting woodland

Mature secondary woodland adjacent to village areas are closely linked to woodland and vegetation at the adjacent Lantau North (Extension) Country Park. They should receive better protection conservation-related zones such as Conservation Area (CA) zone. Additional effort to survey in these village areas is also necessary to ensure that species of conservation interest could be protected.

Lantau is an important site for Romer's Tree Frog (*Liuixalus romeri*)². The endemic Romer's Tree Frog is protected under Cap. 170, ranked as "endangered" in IUCN Red List and considered of "potential global concern"³. Since well-wooded areas adjacent to small stream or other water course would be favourable breeding site for Romer's Tree Frog, we suggests that these areas should be protected with conservation-related zones such as CA zone.

3. Protecting natural stream from water pollution

According to the "Guidance Notes on Discharges from Village Houses" by Environmental Protection Department, a septic tank and soakaway (STS) system "*can only perform well if it has been properly site, designed, constructed, used, desludged and repaired when necessary...overflow from septic tank or soakaway pit, or direct discharge without passing through a soakaway system, it polluting and should not be permitted*". Currently there are no public sewerage system and standard road access in the Plan Area. With inadequate maintenance and increasing number of septic tanks,

² Simon K.F. Chan, Ka-shing Cheung, Ching-ye Ho, Fung-ngai Lam & Wing-sze Tang (2005). *Endemic Species Highlights – Romer's Tree Frog*. Hong Kong Biodiversity Issue 8.

http://www.afcd.gov.hk/english/publications/publications_con/files/hkbonewsletter8.pdf

³ Fellowes, J.R., Lau, M.W.N., Dudgeon, D., Reels, G.T., Ades, G.W.J., Carey, G.J., Chan, B.P.L., Kendrick, R.C., Lee, K.S., Leven, M.R., Wilson, K.D.P. and Yu, Y.T. (2002). Wild animals to watch: terrestrial and freshwater fauna of conservation concern in Hong Kong. *Memoirs of the Hong Kong Natural History Society* 25, 123-159.



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we worry that the STS system cannot remove pollutant and cause water pollution to natural streams nearby.

Even the Government had expressed similar concerns on STS system in the past Legco meeting:

“At present, sewage from a number of village areas in Yuen Long and Kam Tin is often treated and disposed of by means of private on-site treatment facilities (such as septic tanks and soakaway (STS) systems). Such facilities might however become ineffective due to their proximity to watercourses or inadequate maintenance...”⁴

“STS systems operate by allowing the effluent to percolate through gravels whereby pollutants are removed in a natural manner. However, if a STS system is located in an area where the ground water table is high, such as an area in proximity to watercourses, it will not function properly due to ineffective percolation”⁵

“The pollution problems of the rivers and streams in that region have accordingly improved considerably in the past decade. However, as the base flow of local rivers and streams is generally small, their assimilative capacity is therefore low. This, coupled with the continued development and hence population growth in the river catchments, as well as the lack of maintenance of many private septic tank systems, has caused the water quality of some rivers and streams in the Northwest New Territories to remain unsatisfactory”⁶

Simply relying on compliance with relevant standards and regulations, such as EPD's Practice Note for Professional Person (ProPECC PN) 5/93 “Drainage Plans subject to Comment by the Environmental Protection Department”, is not solving problems.

⁴ Please refer to Section 4

<https://www.legco.gov.hk/yr11-12/english/panels/ea/papers/ea0528cb1-1949-3-e.pdf>

⁵ Please refer to footnote 1

<https://www.legco.gov.hk/yr11-12/english/panels/ea/papers/ea0528cb1-1949-3-e.pdf>

⁶ Please refer to the Section Pollution of Streams

<https://www.legco.gov.hk/yr04-05/english/counmtg/hansard/cm0126ti-translate-e.pdf>



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While we suggest that all natural streams and their tributaries should be protected by conservation-related zones such as GB(1) or CA zone, designating buffer area for their riparian zone with conservation-related zones is necessary to ensure stringent protection from impacts such as sedimentation, non-point source runoff and domestic effluent. Small house development should be confined to existing village settlement rather than buffer area for natural streams. Building small house away from natural stream is also important to prevent locals from potential flood risk.

4. Protecting marsh and mangrove

Two marshes can be spotted in Tai Wai Yuen and Wang Tong, while mangrove can be spotted near the estuary of Wang Tong River (Figure 2 and 3). These habitats are largely in natural condition without human disturbance. They should be protected by conservation-related zones such as GB(1) or CA zone.

5. Treating genuine need for small house in proper

Over the past few years, we have argued the justification for designating a large size of Village Type Development (V) zone in rural areas as we see no initiatives from any departments to evaluate the validity of forecast on Small House demand. The Plan Area currently lacks proper vehicular access and public sewerage system. Putting tremendous village population in such an isolated site would create disastrous impact to the environment. With diverse natural habitats supporting rare or uncommon flora and fauna, any activities, including Small House need careful assessment and planning or it would destroy the natural system of the Plan Area itself and the adjoining Lantau North (Extension) Country Park.

We see no urgent needs to reserve excessive land for Small House in the Plan Area. All V zones in future, if any, should be first confined within the existing village settlement and in accordance with genuine need of small house.

Yours faithfully,

Ng Hei Man

Campaign Manager

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Figure 1 The coastline from the eastern edge of Silver Mine Bay Beach to the beach in Man Kok Tsui is still in natural condition





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Figure 2 Marsh in Wan Tong



Figure 3 Mangrove near the estuary of Wang Tong River

