



長春社 Since1968

The Conservancy Association

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27th October 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 Outline Zoning Plan (OZP)
No. S/I-MWN/1

The Conservancy Association is writing to submit our representations relating to the Draft Mui Wo North OZP No. S/I-MWN/1.

We agree that the general planning intention of the Plan Area is “*to conserve its landscape and ecological values in safeguarding the natural habitats and to maintain the unique natural and rural character and cultural heritage of the Area*”, and “*Due consideration should be given to the conservation of ecologically and environmentally sensitive areas when development in or near the Area is proposed*”¹. 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 would highlight the following items:

1. Protecting natural coastline

We welcome the suggestion to cover the natural coastline from Tung Wan Tau to

¹ Please refer to Section 8 General Planning Intention
https://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_I-MWN_1_e.pdf



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Man Kok Tsui by Coastal Protection Area (CPA) zone. However, the section of coastline in Tung Wan Tau currently covered by Open Space (O) zone is still in natural condition without human disturbance (Figure 1). It is different from the adjacent gazette public bathing beach which is covered by O zone as well.

The planning intention of CPA zone 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”, while the planning intention of O zone is “intended primarily for the provision of outdoor open-air public space for active and/or passive recreational uses serving the needs of local residents as well as the general public”. To better reflect the existing condition of the natural coastline in Tung Wan Tau, we suggest that it should be rezoned from O zone to CPA zone.

2. Protecting Butterfly Hill from further environmental damage

It should be reminded that slope cutting works and vegetation clearance were once spotted in Butterfly Hill before the implementation of Development Permission Area (DPA) Plan. The previous and existing condition of Butterfly Hill have been recorded in the TPB Paper No. 10751 (Figure 2).

The Planning Report on Mui Wo North has already mentioned the following:

“Human disturbance such as severe land excavation and tree felling previously found in the woodlands at Butterfly Hill and Tung Wan Tau has adversely affected the natural and rural character of the Area. Complaints from the locals and green groups have been received. Enforcement actions on the unauthorized developments on government land have been undertaken by LandsD. There is an imminent need to provide planning guidance and control for future development in the Area despite gradual recovery of vegetation observed in some damaged areas” (Section 3.5.3 of the Planning Report on Mui Wo North)

We have long been warned that this kind of activities in rural countryside might be an attempt of “destroy first, build later”. Any attempts of “destroy first, build later”



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should not be tolerated as it would set undesirable precedent for similar case in future. Therefore, no development proposals and other incompatible land uses should be encouraged by any development-related zones in Butterfly Hill.

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, 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...”²

“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”³

² Please refer to Section 4

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

³ Please refer to footnote 1

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



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“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”⁴

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. 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 3-4). These habitats are largely in natural condition without human disturbance. We reiterate that 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

⁴ 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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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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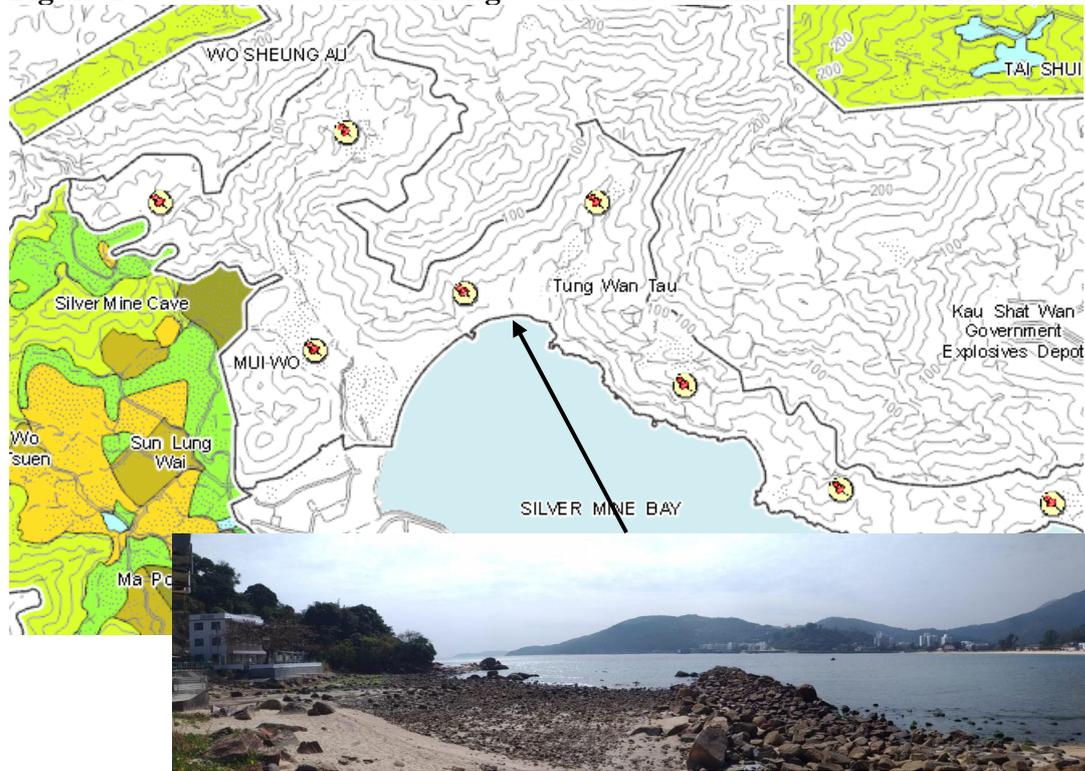
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Figure 1 The coastline in Tung Wan Tau is still in natural condition





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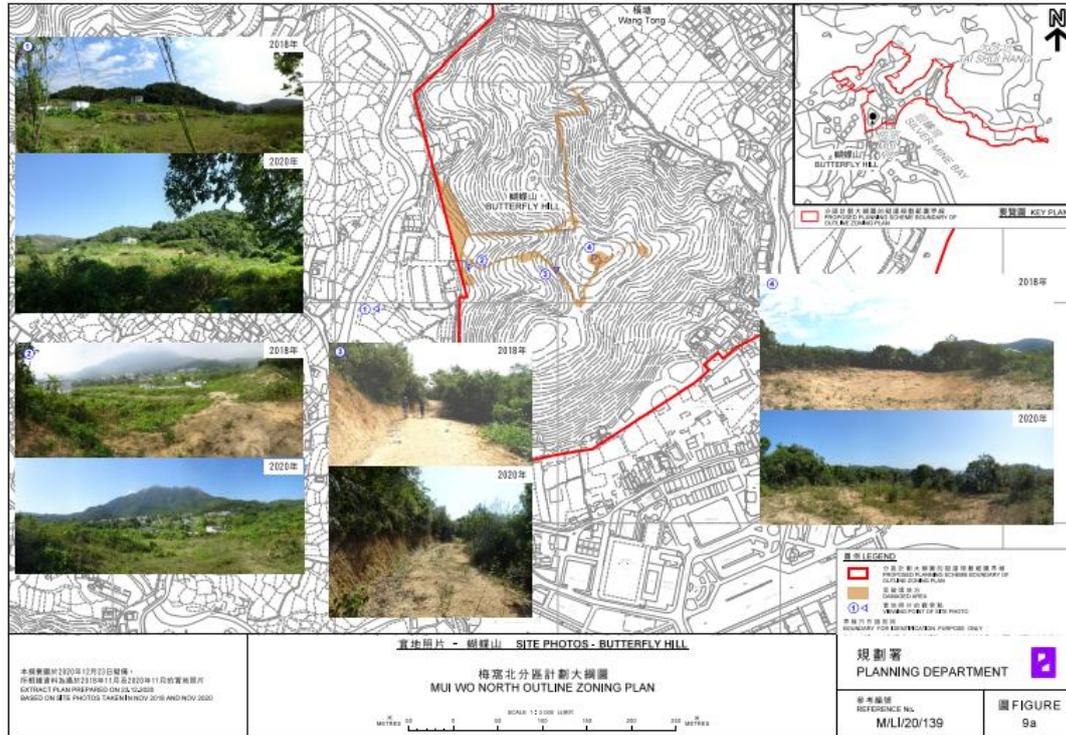
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Figure 2 Environmental damage in Butterfly Hill





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Figure 3 Marsh in Wan Tong



Figure 4 Mangrove near the estuary of Wang Tong River

