

27 October 2021

Chairman and Members
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
Hong Kong
Fax: 2877 0245;
Email: tpbpd@pland.gov.hk

Re: Draft Mui Wo North Outline Zoning Plan No. S/I-MWN/1

Dear Chairman and Members,

Designing Hong Kong **supports** the captioned draft Outline Zoning Plan as it ensures the greatest possible planning and development control in Mui Wo North and protects the rural and natural character with conservation value of the area.

However, we have further comments on the Draft Mui Wo Outline Zoning Plan as follows:

- We welcome the proposed revision for the natural coastline between Tung Wan Tau and Man Kok to be zoned as Coastal Protection Area (CPA). We believe the zoning can reflect its environmental value and prevent potential damage. However, we recommend the CPA zone should also include the entire coastal area, except the section of the gazetted beach, to ensure sufficient protection to the existing coastline.
- The marshes near Tai Wai Yuen and Wang Tong and the mangrove near Wang Tong River are important habitats for various animals. Zoning with conservation intention such as Conservation Area (CA) should be the priority for these areas to provide sufficient protection of the landscape and ecology.
- There are two largely natural streams at Wang Tong and Tung Wan Tau. The area along the streams should have better protection by zoning these for conservation uses in order to protect the natural streams and avoid pollution from human activities. Two sides of the river bank should also be zoned as conservation zoning such as Green Belt (GB) or Conservation Area (CA) to act as a buffer zone to minimize pollution and human disturbance to the largely natural streams.
- It is noted that on-site treatment systems such as septic tanks and soakaway pits are generally used in the Village within the Plan. We agree with government's concerns over the STS system which may become ineffective and cause water pollution due to the proximity to watercourses or inadequate maintenance. Therefore, small house development should be prohibited within

the buffer area of the river or any other sensitive location to prevent pollution from the small houses to harm the natural environment in the area.

- There is no justification for designating a large area of Village Type Development (V) in the plan. It had been discussed numerous times at the Town Planning Board meeting that the relevant departments are unable to ensure the validity of the forecast on Small House Development. Due to the limited vehicular access and lack of public sewerage system, the area may not have enough capacity for a large population intake. We suggest to confine the V zone to the existing village settlement to control human development and to minimize human disturbance to the nature.
- The majority of the land in Man Kok is currently owned by a single developer. We urge the Board to consider the zoning and to ensure strict controls against any further human development. Base on the example of other enclaves such as Pak Lap, it is obvious that Agriculture (AGR) zone cannot protect the landscape but thus encourage different recreational development which degrade the natural environment. We encourage the Board to adopt a stricter conservation zoning or revising the items within the Columns 1 and 2 in order to prevent potential large-scale environmental destruction in the village.
- In the notes of the plan, it is stated that *no action is required to make the use of any land or building which was in existence immediately before the first publication in the Gazette of the notice of the draft development permission area plan conform to this Plan, provided such use has continued since it came into existence.* It is noted that human disturbance and destruction was previously found at Butterfly Hill and Tung Wan Tau. We are deeply concerned that these would be regarded as “Existing Uses” under the Town Planning Ordinance and that this loophole will be abused. Please rectify.
- We plea for the Board to review the definition of existing uses and to take a proactive approach to stop any “Destroy first, develop later” activity.

Here we submit our concerns for your consideration.

Yours,

Designing Hong Kong Limited