

27 October 2021

Chairman and Members
Town Planning Board
15/F, North Point Government Offices
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Hong Kong
Fax: 2877 0245;
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Re: Draft Sha Lo Wan and San Tau Outline Zoning Plan No. S/I-SLW/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 Sha Lo Wan and San Tau, and protects the rural and natural character with conservation value of the area.

However, we have further comments on the Draft Sha Lo Wan and San Tau Outline Zoning Plan as follows:

- San Tau Beach was designated as SSSI in 1994. The area of SSSI in this plan does not include the seagrass beds below the high watermark. To have better protection and avoid human destruction to the area, we urge the Board to modify the boundary of the zoning to cover the whole SSSI designated by the Agriculture, Fisheries and Conservation Department.
- The river in San Tau flows to the SSSI. The area along the stream should have better protection by zoning for conservation uses. Two sides of the river bank should also be zoned for conservation 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. There is no existing or planned public sewer for the Area. Government has expressed concerns that the STS system may become ineffective and cause water pollution due to the proximity to watercourses or inadequate maintenance. We concur, 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 causing harm to the natural environment in the area.
- The majority of the coastal area is natural with limited human intervention. We urge the government to zone the entire coastal area with high conservation values such as Coastal

Protection Area (CPA), instead of a discontinuous zoning as shown in the Plan, to reflect its environmental value and prevent potential damage.

- There is no justification for designating a large area of Village Type Development (V) in the plan. It has been discussed numerous times at the Town Planning Board meeting that no department can ensure the validity of the forecast on Small House Development. Due to the limited vehicular access and lack of public sewerage system, and as the area is embraced by the Lantau North (Extension) Country Park, the area may not have enough capacity for 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.
- 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 unauthorized road widening and slope cutting were found and land has been transformed as parking space in Sha Lo Wan. We are deeply concerned that these would be regarded as “Existing Uses” under the Town Planning Ordinance and that this loophole will be abused.
- 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