

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
(E-mail: tpbpd@pland.gov.hk)



By email only

香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

6 May 2016

Since 1957 成立

Dear Sir/Madam,

Objection to the planning application for Proposed 5 Houses (New Territories Exempted Houses – Small Houses) at Ham Tin, Tai Long Wan, Sai Kung (A/SK-TLW/6)

The Hong Kong Bird Watching Society (HKBWS) would like to raise an objection to the planning application A/SK-TLW/6 under Section 16.

1. Adverse sewerage impact from the proposed NTEHs

With reference to the Guidance Notes on Discharges from Village Houses published by the Environmental Protection Department¹, a Septic Tank System (STS) “*can only perform well if it has been properly sited, designed, constructed, used, desludged and repaired when necessary....overflow from septic tank or soakaway pit, or direct discharge without passing through a soakaway system, is polluting and should not be permitted*”. Since there are no public sewer for Ham Tin and desludging trucks cannot access the area, we are concerned the septic tanks cannot be properly maintained, and hence the STS itself would become a source of pollution. We are concerned the addition of the proposed five small houses in the area may exceed the natural treatment capacity of the area, thus causing water pollution problem to the nearby wetlands and streams.

The Drainage Services Department already recognized the environmental and hygiene problem of STS in various publications^{2,3,4}. The stream adjacent to the village flows into a lagoon before reaching Ham Tin Wan. We are concerned the water pollution problem generated from the village development in Ham Tin would increase the nutrient level of the water (i.e., nitrogen and phosphorus) in the

¹ http://www.epd.gov.hk/epd/english/environmentinhk/water/guide_ref/files/guide_wpc_dv.pdf

² http://www.dsd.gov.hk/SC/Files/publications_publicity/publicity_materials/leaflets_booklets_factsheets/Village%20Sewerage.pdf

³ http://www.dsd.gov.hk/EN/Files/OpenDay2012/PDF/Sewage_Treatment_07.pdf

⁴ <http://www.legco.gov.hk/yr13-14/english/fc/pwsc/papers/p14-20e.pdf>



sheltered lagoon and Ham Tin Wan, leading to algal bloom which is harmful or even lethal to many aquatic and marine organisms.

2. Set an undesirable precedent for future similar cases

The approval of the current application would also set an undesirable precedent to future similar case. We are concerned the increase in numbers of STS would exceed the natural treatment capacity of the area, thus would lead to water pollution in the stream, lagoon and Ham Tin Wan. The construction of the small houses would generate construction wastes and waste water, which may be dumped inappropriately leading to land filling and water contamination. The increase in number of houses (even the small houses are with Hakka appearance) would affect the rural character and village setting of Ham Tin. We urge the Town Planning Board (TPB) to consider the cumulative impacts caused by the approval of the current application.

3. Not in line with the general planning intention of the approved Tai Long Wan Outline Zoning Plan (OZP)

The general planning intention of the Tai Long Wan OZP is “*primarily to conserve the scenic and unspoiled natural environment by protecting features of ecological significance, the natural landscape and the rural character*”. We are concerned the approval of the proposed small houses would lead to environmental degradation and adversely affecting Ham Tin’s rural character and village setting. We consider that the proposed small house development is not in line with the OZP’s general planning intention.

4. Justifications for the decision and comments made by Government departments and the Town Planning Board (TPB)

According to the Hong Kong Planning Standards and Guidelines (HKPSG), Chapter 10, Section 2.1 (iii), the TPB has the responsibility to, “control adjoining uses to minimise adverse impacts on conservation zones and optimise their conservation value”⁵. We note that all other Government bureaux/departments are also bound to the HKPSG, the Agriculture, Fisheries and Conservation Department (AFCD), Drainage Services Department (DSD), Environmental Protection Department (EPD) and the Planning Department (PlanD) have the responsibility to advise the TPB on the ecological, sewerage, environmental and planning aspects in particular⁶. Given ecological and environmental impacts caused by the proposed small house development, and the

⁵ Hong Kong Town Planning Standards and Guidelines – Chapter 10 Conservation. Section 2.1 (ii).

⁶ AFCD Role of Department. Available at: http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html

fact that village area is completely encircled by “Conservation Area” zoning, HKBWS would also expect AFCD, DSD, EPD, PlanD and TPB to object to this application. Should the Departments or the Board feels otherwise, we urge that appropriate justifications are provided.

The HKBWS respectfully requests the Town Planning Board to take our comments into consideration and **reject** the current application.

Thank you for your kind attention and consideration.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Woo Ming Chuan', written in a cursive style.

Woo Ming Chuan
Conservation Officer
Hong Kong Bird Watching Society

cc.

The Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
WWF – Hong Kong