



長春社 Since1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期
13 樓 1305-6 室

Address: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port
Road, Kwai Chung, New Territories, H.K.

網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

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 Sham Wat and San Shek Wan
Development Permission Area (DPA) Plan No. DPA/I-SW/1

The Conservancy Association is writing to submit our representations relating to the Draft Sham Wat and San Shek Wan DPA Plan No. DPA/I-SW/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 “*to protect the ecologically sensitive areas (including the San Chau SSSI and the EISI), to maintain the unique rural and natural character and the cultural heritage of the Area, and to prevent it from encroachment by unauthorized development and from undesirable change of use*”¹. Besides, as the Plan Area is bounded by the Lantau North and the Lantau North (Extension) Country Park, the planning intention should also ensure no degradation of its landscape value as well. 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.

¹ Please refer to Section 7.2 General Planning Intention
https://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/DPA_I-SLW_1_e.pdf



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

1. Protecting natural coastline

The coastline along the northern part of the Plan Area is still in natural condition without human disturbance (Figure 1). Except part of the natural coastline is covered by San Chau SSSI, 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 natural stream

The portion of Ngong Sham Stream has long been identified as Ecologically Important Stream (EIS) by AFCD. Even though its upstream is not EIS, the section is still ecologically linked to the EIS. With high diversity of freshwater and brackish fish and herpetofauna, both the EIS, its riparian zone and upstream area should be zoned as Conservation Area (CA) zone.

3. Protecting woodland

Mature secondary woodland adjacent to village areas are closely linked to woodland and vegetation at the adjacent Lantau North Country Park and Lantau North (Extension) Country Park. They should receive better protection by conservation-related zones such as CA zone.

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

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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conservation-related zones such as CA zone.

4. 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 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 and 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 along the northern part of the Plan Area is still in natural condition without human disturbance

