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The Conservancy Association

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31st December 2014

Ms. Wong Sean Yee, Anissa
Director of Environmental Protection
Environmental Protection Department
Environmental Impact Assessment Ordinance Register Office

By E-mail: reo@epd.gov.hk

Dear Ms. Wong

Re: Tung Chung New Town Development Extension Project Profile

The Conservancy Association (CA) would like to submit comments on the captioned project.

1. The proposed polder scheme along Tung Chung River

According to Tung Chung New Town Extension Study Stage 3 Public Engagement Digest, polders are proposed in various sections along Tung Chung River. CA is gravely concerned about the implication on ecological condition of Tung Chung River, as building a concrete polder would be no differences in a channelized work and cause potential ecological fragmentation in Tung Chung River. We also worry that the polders would disturb the proposed riparian zone zoned as “Conservation Area” according to the Draft Recommended Outline Development Plan (RODP). We therefore opine that the proposed polder scheme should be critically evaluated.

Despite flood prevention, the project proponent should further justify the need to build polders close to Tung Chung River, as in this stage, we still believe that flood control can also be achieved though other alternatives, such as shifting residential away from Tung Chung West. Another point is to justify how the polder scheme would keep maintaining the existing ecological linkage between Tung Chung River and its riparian zone.

2. Restoration work at channelized section of Tung Chung River

Section 1.4.3 mentioned that de-channelization works along the channelized section of Tung Chung stream for environmental enhancement and amenity uses (e.g river park) would be included in Tung Chung New Town Extension Study. Restoration work at Tung Chung River would improve the existing ecological condition, but CA requires careful assessment on the river park proposal in affecting ecological and water quality of Tung Chung River and Tung Chung Bay.

3. Woodland

Largely covered by Fung-shui woodland and mature secondary woodland, Tung Chung

Valley are good in quality and are used by many fauna species. For Fung-shui woodland, combination of species, such as Incense Tree (*Aquilaria sinensis*), Hong Kong Pavetta (*Pavetta hongkongensis*), Red Sandalwood (*Adenanthera microsperma*), Chinese Laurel (*Antidesma bunius*) are common according to our observation (Figure 1). Among these, *Aquilaria sinensis* is Class II State Protected Species in China and scheduled under the Protection of Endangered Species of Animals and Plants Ordinance (Cap. 586) while *Pavetta hongkongensis* is scheduled under the Forestry Regulations (Cap.96). In short, Fung-shui woodland is of conservation interest and should be recognized in the environmental assessment process.

We have also noted that some trees are in mature condition and form (Figure 2) and might even fulfill the criteria of OVT, such as large size, particularly old age, outstanding tree form, and so on. Its landscape and probably ecological value should be recognized in tree survey and ecological assessment respectively.

4. Impact on the proposed Brothers Island Marine Park

In Tung Chung east, we are concerned about the ecological impacts on the adjacent Brothers Island Marine Park (BIMP) in both construction and operation phase.

The construction work of Hong Kong-Zhuhai-Macau Bridge Boundary Crossing Facility has already proved that Chinese White Dolphin (CWD) close to water in the Brothers Island has recorded a decrease in number. Similar condition such as increasing number of work barges and vessels next to BIMP would be highly anticipated during reclamation work in Tung Chung east. Impacts on CWD during construction phase, such as mooring vessels close to the waters of Brothers Islands, underwater noise from additional work barges and vessels, increased risk of vessel collision to dolphin, should be critically assessed.

We are doubtful if the proposed new marina with 95 berths would secure no habitat loss in marine water in BIMP in operation phase, as increasing marine traffic and associated underwater noise would definitely cause disturbance on CWD. More importantly, we cannot see any justifications for a new marina in Tung Chung east. This new marina plan should be dropped off if habitat loss on CWD becomes inevitable according to detailed assessment.

Yours sincerely
Ng Hei Man
Assistant Campaign Manager

Figure 1 Fung-shui Woodland



Figure 2 *Litchi chinensis* (back) in good condition.

