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The Conservancy Association

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31st March 2023

Ms. LINN Hon Ho, Bernadette, JP
Secretary for Development
Development Bureau
Email: devbenq@devb.gov.hk, tko137@cedd.gov.hk

Dear Ms. Linn,

Comments on Tseung Kwan O Area 137 and related near shore reclamations – Preliminary Outline Development Plan

Regarding the captioned plan, The Conservancy Association (CA) notes that a land of about 25 ha would be created off Tseung Kwan O Area 132 to cater various facilities. We have the following environmental concerns:

1. Contradictory to the result of Increasing Land Supply by Reclamation and Rock Cavern Development cum Public Engagement – Feasibility Study

Referring to the previous Feasibility Study of Increasing Land Supply by Reclamation and Rock Cavern Development, Tseung Kwan O Area 131 has once shortlisted for one of the potential sites. The proposed reclamation area in Area 132 indeed overlaps the previous reclamation site in Area 131 (Figure 1).

The final report once mentioned the following environmental consideration when proposing reclamation there:

“Potential Impact on Environment and Local Community

- *The proposed reclamation may impact on the existing natural coastline with additional impact potentially caused by future connection options.*
- *Impact on the visual amenity of the existing residents at Heng Fa Chuen.*
- *Critical environmental impact: air quality, water quality, ecology, landscape and visual.”*

“Other Potential Constraints

- *General public expectation that there will be no further reclamation in Tseung*



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Kwan O given the decision to take forward the "no further reclamation" option in the Feasibility Study for Further Development of Tseung Kwan O, although the then "considered further reclamation option" actually meant further reclamation in TKO South up to the proposed Cross-bay Link.

- *No existing road link is available, therefore the site will require the construction of a tunnel or a coastal road circumference.*
- *The existing coastline is currently occupied by a number of burial grounds and ruins which may be perceived as NIMBY by the future users of the reclamation.*
- *Smoke and odour emission from the Junk Bay Chinese Permanent Cemetery and Columbarium, and vehicular emission from the TKO-Lam Tin Tunnel and ventilation buildings.*
- *Noise pollution from the planned TKO-Lam Tin Tunnel and fixed plants noise from ventilation buildings for TKO-Lam Tin Tunnel.”¹*

Based upon the site shortlisting exercise, Tseung Kwan O Area 131 was not been taken forward for more detailed study. As mentioned above, the previous reclamation site in 131 overlaps the current one in Area 132. We would expect the above environmental constraints are still valid. Further details are necessary to justify that the above environmental constraints could be overcome and tackled in proper.

2. Potential ecological impact on fish of conservation importance

According to the EIA report of Further Development of Tseung Kwan O Feasibility Study, fish of conservation interest, such as *Stiphodon atropurpureus*, was recorded in a natural stream. The location of that stream is very close to eastern periphery of the current proposed reclamation area.

The EIA report mentioned that the construction of previous Western Coast Road (WCR) would cause disturbance on the natural stream and that fish of conservation interest:

“The proposed construction of the WCR has the potential to affect populations of Philippine Neon Goby (Stiphodon atropurpureus) recorded in the E-WCR Stream. Although the proposed works would not directly impact areas of the

¹ Increasing Land Supply by Reclamation and Rock Cavern Development cum Public Engagement – Feasibility Study (Final Report – Reclamation Site)
https://www.cedd.gov.hk/filemanager/eng/content_961/4/ELSS%20Final%20Report_Reclamation.pdf



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stream where adult Gobies were recorded, there would be disturbance to coastal areas close to where the E-WCR Stream discharges into Junk Bay. These impacts are of concern because juvenile Gobies are thought to utilise coastal waters close to the streams where the adults are found. During the construction phase, coastal waters would be subjected to high levels of disturbance resulting from engineering works, the loss of natural seabed and water quality impacts.”²

“During the operation phase, there would be further potential impacts to the Philippine Neon Goby population in the E-WCR Stream. Local marine habitats close to the discharge point of the stream would be permanently impacted due to reclamation works, thereby affecting potential habitats for juvenile fish. Reclamation works would also impede the passage of larvae/juveniles to and from marine habitats.”³

According to the EIA report of Tseung Kwan O – Lam Tin Tunnel and Associated Works – Investigation, efforts have been made by Civil Engineering and Development Department (CEDD) to avoid adverse ecological impacts on *Stiphodon atropurpureus*.

“The selected alignment option would avoid the direct impact and disturbance to the natural habitats (rocky shore and stream) along the coastline of Chiu Keng Wan where fish of conservation interest (Philippine Neon Goby and Grass Puffer Fish) were previously recorded. With the natural coastline along Chiu Keng Wan preserved, there would be no blockage to the passage between the stream habitat and coastal water where potential migration of Philippine Neon Goby may occur.”⁴

Here are brief information of *Stiphodon atropurpureus* summarized by Kadoorie

² Section 7.6.5, Further Development of Tseung Kwan O Feasibility Study EIA Report
https://www.epd.gov.hk/eia/register/report/eiareport/eia_1112005/HTML/EIA/HTML/Volume%201/Section_7%20Terrestrial%20Ecology_V3.htm

³ Section 7.6.11, Further Development of Tseung Kwan O Feasibility Study EIA Report
https://www.epd.gov.hk/eia/register/report/eiareport/eia_1112005/HTML/EIA/HTML/Volume%201/Section_7%20Terrestrial%20Ecology_V3.htm

⁴ Section 1.2.2, Tseung Kwan O – Lam Tin Tunnel and Associated Works – Investigation EIA Report – Executive Summary
https://www.epd.gov.hk/eia/register/report/eiareport/eia_2102013/ES/ES_eng.htm#_Toc352144639



Farm and Botanic Garden⁵:

“This is an amphidromous species: adults live and breed in freshwater streams, hatched larvae drift downstream passively into the sea and live in the marine environment. They actively return to freshwater streams when they reach juvenile age. The species requires rapid flowing, clean stream sections for the adult and juvenile habitats.”

“This species has been considered to be of global conservation concern by Fellowes et al. (2002). It is also considered to be a freshwater fish species of conservation concern in Hong Kong by the AFCD (http://www.epd.gov.hk/epd/english/boards/advisory_council/files/ncsc_paper01_2011.pdf). This species is also considered to be Near Threatened in Taiwan (Chen et al. 2012) and Critically Endangered in Japan (http://jpnrdp.com/search.php?mode=map&q=0503170_260351)”

From the above case, we opine that there should be alternatives to avoid disturbance on fish of conservation interest. However, under the current proposed reclamation, all the stream mouth/estuary area would be blocked, causing direct loss of the potential habitats of *Stiphodon atropurpureus* and habitat fragmentation would be resulted. In this early planning stage, we do not think any attempts have been taken to critically evaluate such ecological impact, and how it can be avoided.

3. Disturbance on coastal environment

The coastal landscape near Area 132, comprising sandy shore, sea cliffs, wave-cut platform, etc., is one of the remaining natural coastlines in Tseung Kwan O after reclamation works associated with Tseung Kwan O new town development. Meanwhile, both the Feasibility Study of Increasing Land Supply by Reclamation and Rock Cavern Development (Figure 2) and the EIA report of Tseung Kwan O – Lam Tin Tunnel and Associated Work – Investigation (Figure 3) have mentioned that coral communities were recorded along the coastline of Area 132.

⁵ Kadoorie Farm and Botanic Garden. 2019. Native Fish of Conservation Concern in Hong Kong (Part 3). Kadoorie Farm and Botanic Garden, Hong Kong Special Administrative Region. 43 pp.
[https://www.kfbg.org/images/download/nat%20fish%20cons%20concern%20hk%20\(part%203\).pdf](https://www.kfbg.org/images/download/nat%20fish%20cons%20concern%20hk%20(part%203).pdf)



We all understand that finally Tsueng Kwan O – Lam Tin Tunnel has avoided disturbance on coastal environment in Area 132:

“Potential direct impacts on significant ecological resources of conservation importance (e.g. natural coastline along Chiu Keng Wan, natural coral communities with moderate to high ecological value on western coast of Junk Bay, ...) has been largely avoided or minimized in the alignment option selection process.”⁶

Similar to the approach to handle the issue of fish of conservation of interest, exploring alternatives to avoid associated environmental disturbance on coastal environment is still feasible. Particularly in such early planning stage, there should be greater flexibility for the project proponent to explore alternatives to avoid further loss in natural coastline. The option of reclamation should only be considered as a last resort.

4. Environmental disturbance on existing local residential and village settlement

We have received enquiries from various local communities in Tsueng Kwan O to express grave concerns on environmental disturbance due to reclamation off Area 132. Here are some of them:

- It seems that the village On Luen Village (安聯村) is not identified as one of the sensitive receivers, as the village is often regarded as “abandoned”. Human settlement can still be found in the area.
- Some locals close to the alignment of Tseung Lam Highway claimed that no proper noise mitigation measures have been implemented in Tseung Lam Highway. Noise disturbance may be further deteriorated due to increasing traffic flow generated from the proposed reclamation. Cumulative noise impact has to be assessed carefully.
- There are concerns that similar odour nuisance along Wan Po Road would be resulted again in residential areas in Tsueng Kwan O due to the proposed refuse transfer station.

⁶ Section 3.4.2, Tseung Kwan O – Lam Tin Tunnel and Associated Works – Investigation EIA Report – Executive Summary
https://www.epd.gov.hk/eia/register/report/eiareport/eia_2102013/ES/ES_eng.htm#_Toc352144639



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While we opine that all sensitive receivers should be identified in full, measures should be further explored to avoid/minimize/mitigate potential environmental disturbance.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

cc.

Civil Engineering and Development Department

Planning Department

Figure 1 Referring to the previous Feasibility Study of Increasing Land Supply by Reclamation and Rock Cavern Development, Tseung Kwan O Area 131 has once shortlisted for one of the potential sites. The proposed reclamation area in Area 132 indeed overlaps (marked in black) the previous reclamation site in Area 131(shaded in yellow, marked 36)

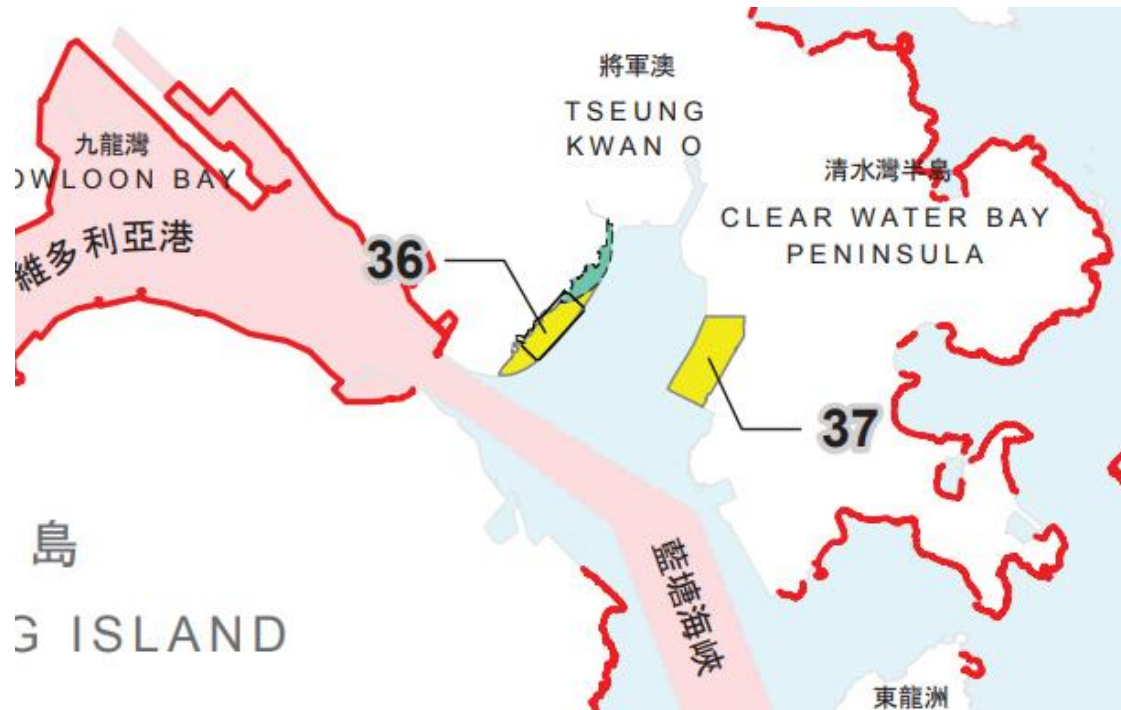
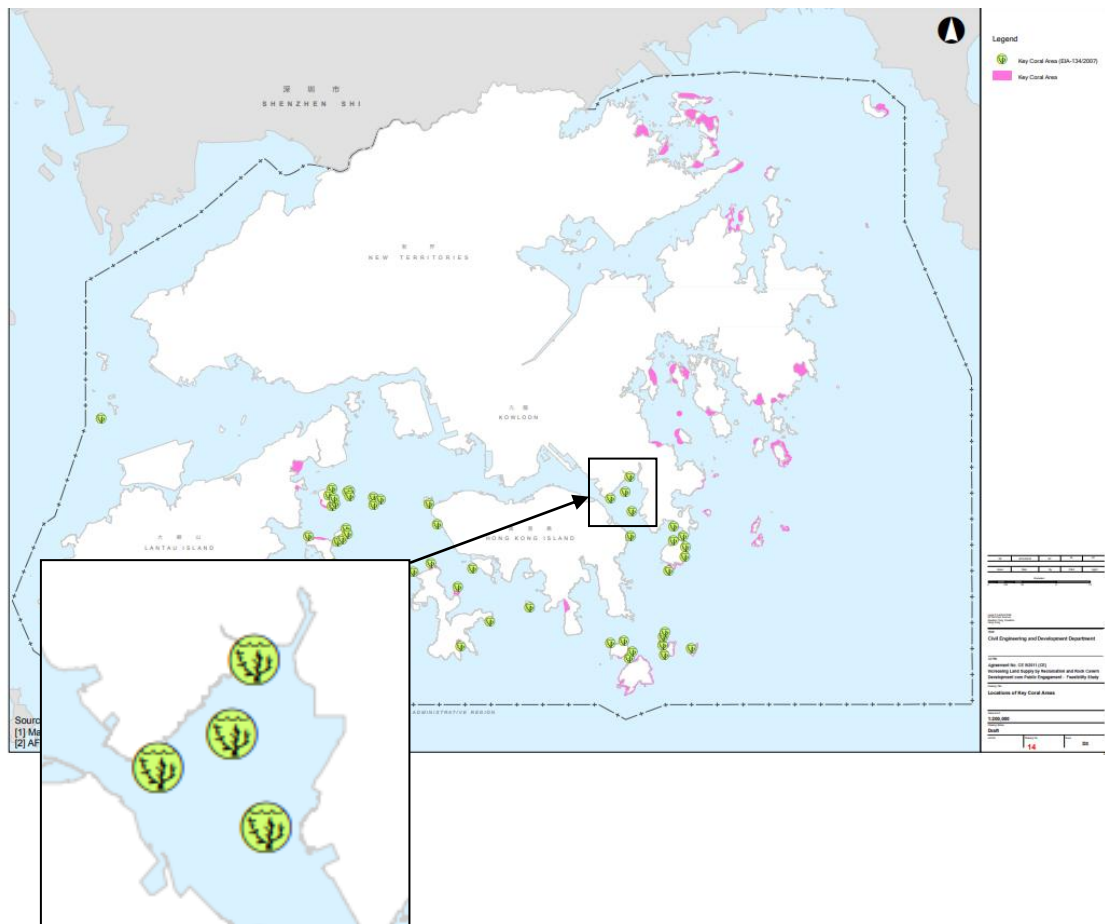


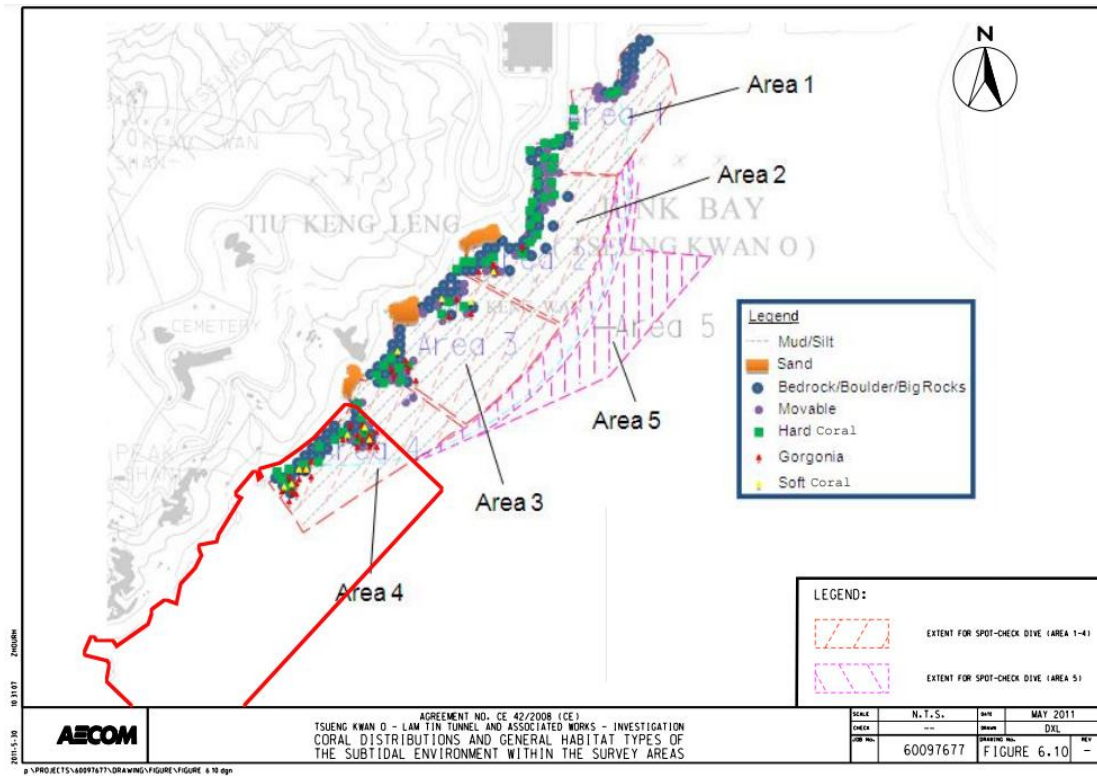
Figure 2 Location of Key Coral Area (marked in black) according to the Increasing Land Supply by Reclamation and Rock Cavern Development cum Public Engagement – Feasibility Study⁷



⁷ Drawing No. 14, Location of Key Coral Area

https://www.cedd.gov.hk/filemanager/eng/content_961/4/ELSS%20Final%20Report_Reclamation.pdf

Figure 3 Coral distributions and general habitat types of the subtidal environment⁸ and the proposed reclamation area (marked in red)



⁸ Figure 6.10, Tseung Kwan O – Lam Tin Tunnel and Associated Works – Investigation EIA Report
https://www.epd.gov.hk/eia/register/report/eiareport/eia_2102013/EIA/figures/Figure%206.10.pdf