世界自然基金會
香港分會

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Dr. CHUI Ho Kwong, Samuel, JP
Director of Environmental Protection
16/F, East Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(Email: eiaocomment@epd.gov.hk)

By email only

Dear Dr. Chui,

RE: Reclamation at Lung Kwu Tan
(EIA-319/2025)

WWF would like to provide the following comments and recommendations to the captioned EIA report (hereafter referred to as the EIA Report) on the reclamation at Lung Kwu Tan (the Project).

Terrestrial At-risk Species and Relevant Mitigation Measures

WWF is pleased to see that the at-risk species assessment of the "State of Hong Kong Biodiversity 2025"[1] Report has been referenced in this EIA Report for presentation of the ecological baseline conditions and evaluation of the species' conservation importance. As reflected by the EIA's literature review and field surveys, the Lung Kwu Tan area supports a good diversity of locally at-risk species, especially birds and butterflies, that are dependent on open-country habitats such as grassland and shrubland. Some of these species are even considered to be of High Risk of local extinction.

However, in the EIA Report, we feel that the potential impacts to these at-risk species and their associated habitats have not been thoroughly addressed, and that very little has been proposed to mitigate these impacts. Although the direct impact of habitat loss (~0.7ha of grassland/shrubland) may be low as assessed in the EIA Report, the overall changes in landscape character and disturbance regime arising from the large-scale reclamation and the future operations of the industries there may induce a larger indirect impact that extends beyond the Project Site.

[1] https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/

During the detail design stage, we recommend the Project Proponent to take into considerations of these open country at-risk species when planning and designing for urban green spaces in the new development area. To address the habitat requirement for these species, an open, unobstructed green landscape should be designed and managed, serving as alternative habitats for this at-risk wildlife, and creating open areas for human users. This approach is also in line with the “Single Site, Multiple Use" model that is being mainstreamed in new developments.

The environmental impacts of the proposed sea-crossing bridge should be assessed in the Report

The Project Proponent proposes constructing a new sea-crossing bridge to connect the Lung Kwu Tan reclamation area (LKTRA) with Lung Mun Road to accommodate future traffic demand. However, we consider that the potential hydrological and hydraulic impacts—such as obstruction of natural water flow, disruption of tidal circulation, alteration of wave dynamics, and the resulting issues including beach erosion/narrowing, sedimentation/siltation, shoreline retreating—will affect not only the LKTRA but the entire Lung Kwu Tan coastline during both construction and operation. Even the bridge needs to go through the EIA process in future, we view that proceeding with the EIA in a piece-meal fashion, as currently adopted by the Project Proponent, is undesirable, risking severe underestimation of the cumulative impacts of the Project as a whole.

Impact to the Chinese White Dolphin (CWD)

The vessel-based line-transect surveys compare sightings near LKTRA with Tai O and the Southwest Lantau Marine Park and conclude that the Project Site is of “low ecological value”. This conclusion overlooks the broader life cycle needs of CWD and the significance of even low-density habitats for a rapidly declining dolphin population.

According to the latest AFCD’s Marine Mammal Monitoring in Hong Kong Waters[2], CWD abundance has dropped by more than 70% over the past 20 years. In this context, the EIA’s record of five sightings involving ten individuals near LKTRA demonstrates that the area still plays a role for the remnant population. For a species under such severe decline, all areas used by CWD warrants careful conservation and cannot reasonably be categorised as having “low ecological value”.

The Project Site also lies close to key CWD habitats and marine parks—most notably the Sha Chau and Lung Kwu Chau Marine Park, only 1.6 km away. The EIA assumes that dolphins will “avoid and return” after disturbance, referencing the 2014 Three-Runway System EIA. However, AFCD’s latest monitoring shows a sharp decrease in CWD occurrence in adjacent waters following major development activities, contradicting assumptions of temporary displacement and indicating potential long-term habitat loss.

Given this evidence, we feel the current EIA does not adequately evaluate the direct, indirect and cumulative impacts of construction and operation in the area—such as

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2 https://www.afcd.gov.hk/english/conservation/con_mar/con_mar_chi/con_mar_chi_chi/files/FinalReport2023-24(MM).pdf

increased vessel traffic, underwater noise, turbidity and prey-related changes. Further degradation of dolphin habitat within an already fragmented seascape would exacerbate the vulnerability of the remaining CWD population.

Mitigation measures to minimise adverse impacts on the migratory birds during construction phase

Since Lung Kwu Tan is considered an important site for migratory birds, the Project Proponent must implement mitigation measures to address potential ecological impacts on migratory birds during construction phase. These include, but are not limited to, installing noise barriers and minimising nighttime light pollution. along the construction site boundaries and scheduling works in phases to avoid peak periods for migratory birds as far as practicable. These measures are supported by corresponding environmental monitoring requirements to further minimize ecological impacts to the migratory birds throughout the construction phase. To prevent bird-window collisions, appropriate measures must be implemented to minimize risk of bird collisions.

Propose Green Channels

We welcome the Project Proponent's initiative to preserve two green channels between the LKTRA and the natural rocky shores along Black Point and Lung Kwu Tan. We believe that the Green Channels should include eco-friendly designs to maximise conservation gain. We recommend the Project Proponent to engage relevant green groups and ecological experts as early as possible to help guide the design.

Framework Requirements for Managing Residual Landscape and Visual Effects

Considering the scale and nature of the Project, it will inevitably result in certain levels of residual landscape and visual impacts in relation to the loss of water body and natural shorelines. Key planning, urban design and landscape design frameworks have to be developed and proposed in Recommended Outline Development Plan, Master Urban Design Plan and Landscape Master Plan. With these guiding principles set out in an early stage, mitigation measures during construction stage could be optimised by avoidance of significant change in the existing landscape and visual context, creating visual outlook and landscape characters of the Project, ensuring ample green space and initiative are considered during the design stage.

Regulating and monitoring disposal operations against eco-vandalism

The Project site is in the vicinity of butterfly and bird hotspots, and the fact that the Lung Kwu Tan area has never been covered by any statutory plans on land use control, this planning loophole has allowed undesirable and incompatible developments to persist, resulting in long-term and significant ecological damage. In order to protect further loss of wildlife habitats in Lung Kwu Tan, we recommend that areas adjacent to the Project site boundary to be designated with entry restrictions for all dump trucks involved in waste transportation and disposal under the Project, minimizing incidents of illegal dumping and the filling of construction and demolition materials. An automated alarm system should be installed to detect and immediately alert the Proponent if any dump truck enters these restricted areas. Additionally, all dump trucks should be equipped with a Global Navigation Satellite System (GNSS), such as the Global Positioning System or an equivalent automatic identification system, to enable real-time tracking and monitoring of their routes and locations.

Thank you very much for your kind attention and consideration.

Kind regards,

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