



世界自然基金會
香港分會

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11 June 2026

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 Sir/Madame,

Lung Kwu Tan Development and Road Infrastructural Works
(PP-701/2026)

WWF would like to provide the following comments and recommendations to the captioned Project Profile (PP) on the proposed “Lung Kwu Tan Development and Road Infrastructural Works” (hereafter referred to as the Project).

Impacts to recognised biodiversity hotspot and associated at-risk species

The Project is adjacent to the Lung Kwu Tan Valley Site of Special Scientific Interest (SSSI) which is only approximately 600m away. The SSSI Register¹ states that “*the Site is widely recognised as one of the most important butterfly habitats in Hong Kong with a high diversity of butterfly species recorded*”, and that “*development within or in the vicinity of the Site may pose threats to the butterfly populations breeding at the Site*”.

In addition, WWF-Hong Kong, in association with a group of local experts (e.g. the Hong Kong Bird Watching Society, Kadoorie Farm and Botanic Garden, and local researchers), published a report titled “**The State of Hong Kong Biodiversity 2025**” in March 2025, together with the “**Hong Kong Terrestrial Biodiversity Hotspot Map 2025**”². The study concluded that 26% (232 out of 886) of the assessed terrestrial and freshwater species in Hong Kong are at risk of local extinction. The study also identified a total of 27 biodiversity hotspots in Hong Kong, including the Lung Kwu Tan area. Data and information from our expert group have shown that the “Lung Kwu Tan” hotspot support at least **54 species of High or Moderate Risk** of local extinction, including more than 150 species of butterflies, which accounts for over 60% of the total in Hong Kong.

¹ <https://www.pland.gov.hk/file/resources/sssi/pdf/plan71.pdf>

² <https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/>

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We, therefore, recommend that the Project Proponent should pay due attention to the identified hotspot and the at-risk species present in the area during the course of the EIA. Encroachment and disturbance (particularly during the operation phase of the Project) to these important habitats and species should be avoided as much as possible.

Potential acoustic barrier effects of bored piling on Chinese White Dolphin movement

According to Section 1.4.6 of the PP, the sea crossing bridge foundation works will be conducted using bored piling. Although bored piling generates lower-frequency noise, its continuous acoustic output may act as an invisible barrier. This noise pollution can sever travel corridors between the waters around Sha Chau, Lung Kwu Chau and North Lantau waters, further isolating already dwindling dolphin groups. Alternatives to bored piling should therefore be explored and proposed in the EIA study, which can substantially lower underwater noise levels. Where piling is unavoidable, lower-noise methods should be considered. Such measures are particularly important given that even continuous low-frequency noise may create acoustic barriers that disrupt dolphin movement between the waters.

Mitigation measures for White-bellied Sea Eagle (WBSE)

To minimise disturbance to breeding WBSE, noisy construction works (e.g. bored piling) shall be scheduled outside the breeding season (December to May). Quieter construction methods and plant shall be adopted. Vessel access near the nest shall be restricted via designated routes, with avoidance of identified foraging grounds. If avoidance of foraging ground is not feasible, vessel frequency and speed within their foraging ground near the construction area should be reduced to minimize any potential impacts. A WBSE monitoring programme covering pre-construction, construction, and operation phases shall be implemented. To reduce glare disturbance, unnecessary lighting shall be avoided, and directional lighting shall be used.

Mitigation of water quality impacts

Potential water quality impacts associated with marine-based construction works e.g. pier foundations of the sea-crossing bridge, piers/abutments, jetty construction and submarine pipeline installation can be effectively mitigated through, including but not limited to the use of low-impact construction methods, sediment containment measures (e.g. double silt curtains), robust site management practices, and real-time monitoring. With proper implementation, any residual impacts are expected to be localized, temporary, and within acceptable Water Quality Objectives.

Construction scheduling considerations

Given the presence of commercial fisheries resources in North Lantau waters and the Government tenancy area supporting oyster farming in Deep Bay, construction activities should be scheduled to avoid key spawning seasons. In addition, the Project Proponent should refrain from undertaking works during periods of strong currents or adverse

weather conditions, as strong currents and wave action can rapidly disperse suspended sediments, thus reducing the effectiveness of mitigation measures such as silt curtains and potentially leading to the uncontrolled release and wider spread of sediments.

Ecological risks from temporary works areas

Temporary works areas required for the Project are of substantial ecological concern and cannot be regarded as minor or short-term impact. Their establishment and operation will cause direct seabed disturbance and degrade benthic habitats, while increased vessel traffic, construction activity, and noise will intensify cumulative disturbance to Chinese White Dolphins. These pressures are likely to exacerbate habitat fragmentation and disrupt key movement corridors between Sha Chau, Lung Kwu Chau and North Lantau waters. Associated risks to water quality from sediment resuspension and potential spills may further affect prey availability. It is therefore essential to strictly minimise the footprint, duration and number of temporary works areas, avoid ecologically sensitive zones and dolphin corridors, and implement robust, enforceable mitigation measures to prevent unacceptable ecological impacts.

Smart lighting controls

To protect both birds including the White-Bellied Sea Eagle and overwintering butterflies, the project shall minimize nighttime light pollution through the implementation of smart lighting controls. The Project Proponent shall adopt measures to reduce artificial light at night and limit ecological disturbance. During the operational phase, all lighting must be fully shielded, downward-directed, and restricted to the minimum necessary intensity and duration, with warm colour temperatures applied. For the construction phase, lighting must also be shielded and oriented downward to avoid disorienting butterflies or disrupting their roosting behaviour. Night-time works should be minimised wherever practicable. These measures will help reduce disorientation of migratory birds and disturbance to overwintering butterflies and other nocturnal fauna, ensuring that residual ecological impacts remain minor and acceptable.

Regulating and monitoring disposal operations against eco-vandalism

Given most areas adjoining the Project are rural or not covered by statutory zoning plans, fly-tipping of solid waste and construction and demolition (C&D) materials generated by the Project would be difficult to control and may not be readily legally enforceable. It is recommended that clearly defined “no-go” areas of high ecological importance—particularly those outside the Project boundary—be established with strict access restrictions for all dump trucks involved in waste transport and disposal. This measure aims to safeguard sensitive habitats from illegal dumping. An automated alarm system should be installed to promptly alert the Project Proponent if any dump truck enters these restricted areas. In addition, all dump trucks should be equipped with a Global Navigation Satellite System (GNSS), such as Global Positioning System (GPS) or an equivalent tracking system, to enable real-time monitoring of routes and locations.

Thank you very much for your kind attention and consideration.

Kind regards,

A handwritten signature in black ink, appearing to read 'Tobi Lau'. The signature is written in a cursive style with a large initial 'T'.

Mr. Tobi Lau
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WWF Hong Kong
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