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By E-mail & Fax

Dear Sir/ Madam,

**Tung Chung New Town Extension Study –
Stage 2 Public Engagement Digest May 2013**

1. Under the captioned revised proposals the environmental protection of Tung Chung West remains inadequate and requires immediate strengthening. Further to our previous submission, the *“Joint Green Groups’ Statement on Protection and Conservation of Tung Chung River, Estuary, Coastal Areas and Associated Habitats”* dated 19 June 2012 and joint request for *Formulating a Development Permission Area (DPA) Plan in Tung Chung River Valley and Coast* dated 3 May 2012, the undersigned green groups submit the following comments:

Preserving Tung Chung River Valley and Tung Chung Bay

2. We would like to re-iterate that Tung Chung River, its estuary, Tung Chung Bay are of high ecological, landscape, hydrological and cultural values that have been verified by updated studies by green groups and the Administration. Thus, we call for a sustainable and holistic planning so as to preserve the rich natural resources there for nature conservation, community use and enjoyment, and fisheries.

3. As stated in our previous joint statement, the high connectivity and continuity along Tung Chung River's whole length from the mountain area to estuary make it exceptionally rich in its aquatic and coastal biodiversity, including many rare and endangered species, for example, Beijiang Thick-lipped Barb (*Acrossocheilus beijiangensis*), Romer's Tree Frog (*Philautus romeri*), Hong Kong Newt (*Paramesotriton hongkongensis*), Tri-spine Horseshoe Crab (*Tachypleus tridentatus*), Mangrove Horseshoe Crab (*Carcinoscorpius rotundicauda*), Alligator Pipefish (*Syngnathoides biaculeatus*) and Pacific Seaweed Pipefish (*Syngnathus schlegeli*) and so on. More species of high conservation concern were discovered in the recent studies conducted by green groups and the Administration, including *Hippocampus kuda* and Elusive Adjutant (*Aethriamanta brevipennis*).

Gazetting DPA for Tung Chung West

4. The Convention on Biological Diversity (CBD) has been extended to Hong Kong since May 2011. Hong Kong SAR Government thus has to take responsibility to take guidance from this convention wherever biodiversity is under threat. Therefore, proper statutory land use plans should be drafted to protect locations containing valuable species and important habitats, such as Tung Chung River Valley and Tung Chung Bay, against development.

5. We strongly urge the government to immediately gazette a DPA plan for Tung Chung area currently outside the country park and not being covered by statutory plans. The captioned study has already tempted incompatible developments such as open storage, filling of farmlands and site formation in Tung Chung River Valley. Without an imminent DPA plan for Tung Chung west, these uncontrollable developments and unenforceable vandalism will further accelerate and proliferate in Tung Chung River Valley and destroy the valuable ecology, land use and hydrology.

Land Resumption for Conservation as Public Interest

6. In addition to the DPA we advise the Government to seriously consider resuming the private lands in the Tung Chung River Valley that are necessary to conserve and enhance the ecological value and functions of the area, and to achieve a sustainable planning in Tung Chung West. In fact, the government can consider the Long Valley's model in the North East New Territories New Development Areas Planning and Engineering Study (Stage 3 Public Engagement) in which Long Valley is designated as "Other Specified Uses (Nature Park)" to enhance and conserve the existing ecological value and functions of Long Valley. Similarly, Tung Chung River Valley can be considered as a biodiversity hotspot for Hong Kong as well as a "green lung" for the Tung Chung residents. Designation of Tung Chung River Valley as a Nature Park can be implemented by the Government as part of the Tung Chung New Town Extension project.

Flooding Risk and Water Pollution

7. We are highly concerned that the low rise residential development (plot ratio 0.75 near the Tung Chung River estuary and plot ratio 1.5 near the village clusters) would affect the natural landscape, hydrology and ecology of Tung Chung River and threaten the inhabited wildlife. The proposed residential development in Tung Chung River Valley would turn a large area of vegetated river basin into impermeable surface. The resulting surface runoff generated by rainstorm will increase the flooding risk of Tung Chung River Valley and deteriorate the water quality of Tung Chung River.
8. Sewage or storm water of developed areas would also be possibly drained into Tung Chung River and Tung Chung Bay, thus further decline the water quality of Tung Chung River and Tung Chung Bay.
9. A Drainage Impact Assessment should be conducted at the early stage of the captioned study for planning and implementing an ecologically and environmentally friendly drainage system for New Town Extension. Tung Chung River and Estuary must be left intact for nature conservation while drainage improvement and/or channelization works should be avoided.

Land use Zoning and Reclamation

10. In view of the high ecological importance of the whole Tung Chung River, the Tung Chung River and its riparian zone should be zoned as "Site of Special Scientific Interest" (SSSI) as advised in the joint green groups' recommended DPA

plan. In order to preserve the intricate and interconnected ecology and hydrology of all segments of Tung Chung River, the channelised downstream section of Tung Chung River near Shek Lau Po should be restored to natural state. This river section should thus be zoned as SSSI to ensure the long-term protection and conservation of the entire lengths of Tung Chung River.

11. CA should also be extended to cover the wooded areas and fung shui woods in Tung Chung River Valley which are in good quality and located near the existing villages of Ngau Au, Lam Che, Nim Yuen, Mok Ka and Shek Mun Kap.
12. Although the proposed reclamation area in Tung Chung West is limited to 14 ha near Ma Wan Chung, we are still concerned that the water current and hydrodynamics of Tung Chung Bay will be adversely altered. The government should detailedly assess the hydrological impacts on Tung Chung Bay due to the proposed reclamation before making the final decision on the scale of reclamation in Tung Chung West.

Wise and Sustainable Planning

13. The government should protect and conserve the natural resources in Tung Chung River Valley for compatible community use and enjoyment. Like the case of Long Valley, a visitor centre can be provided in the non-sensitive part of Tung Chung Valley to help the public to admire the ecological importance of Tung Chung River-cum-Bay system, and facilitate hikers and stream trekkers.
14. Moreover, the government should make use of the existing Tung Chung River landscape and cultural heritage to enhance the tourist appeals of Tung Chung River Valley and promote passive recreational activities (e.g., provide eco-trails linking to the surrounding country parks)
15. The countryside areas or agricultural lands in the Tung Chung River Valley will most likely be used for stockpiling or as back-up sites during the construction phase of the future development of Tung Chung New Town Extension. These areas will be also highly vulnerable to dumping of construction and demolition waste generated in future development in Tung Chung. Such activities would destroy the natural habitats in Tung Chung River Valley. Appropriate enforcement measures, such as mandatory collection of C&D wastes and provision of transportation of C&D wastes to other proper locations & facilities, should be in place to deal with such damaging and incompatible land use activities in Tung

Chung River Valley.

16. We hope that the government could address green groups' concerns stated above and take the captioned study to demonstrate that Hong Kong, as one of the top world-class cities, wisely and sustainably protect our remnants of natural heritage and incorporate these resources into development of city.

If you have any questions, please do not hesitate to contact me (T: 3961 0223; F: 2314 2661; E-mail: lkcheng@greenpower.org.hk).

Thank you for your attention.

Yours faithfully,



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On behalf of:

Designing Hong Kong
Eco-Education & Resources Centre
Green Lantau Association
Green Power
Hong Kong Bird Watching Society
The Conservancy Association
WWF-Hong Kong