



長春社 Since 1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期
13 樓 1305-6 室

Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port
Road, Kwai Chung, New Territories, H.K.

網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

9th September 2022

Environmental Impact Assessment Ordinance Register Office
Environmental Protection Department

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

Dear Sir/Madam,

Comment on Improvement of Lion Rock Tunnel EIA Report

The Conservancy Association (CA) would like to express concerns on the captioned.

1. Compensation for woodland in Lion Rock Country Park (LRCP)

We note that compensation for direct loss of woodland within LRCP would be dealt as followed:

“Compensatory planting works were proposed on areas that are considered suitable for woodland reprovion, such as hillside shrubland, plantation, grassland and engineered slope. For this project, to mitigate the permanent loss of woodlands within LRCP, compensatory planting of a ratio not less than 1:1 in terms of area (i.e. about 0.16 ha) would be provided.” (Section 8.10.35)

“However, given the limited space within the Project site, on-site woodland compensation is considered not practicable.” (Section 8.10.35)

“After considering various requirements (such as the existing vegetation coverage, accessibility for planting, future maintenance, and etc.), the provision of compensatory planting area of at least 0.25 ha is recommended. An agricultural land west to STSFWSR and near the Project boundary, of size approximately 0.3 ha, relatively flat and with good soil condition is preliminarily identified as a potential compensatory planting area.” (Section 8.10.36)

Since direct loss of woodland are within LRCP, we are concerned if such loss of ecological function can be compensated by identifying potential compensatory planting



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area within rather than outside LRCP. Habitats suitable for woodland re-provision, such as hillside shrubland, plantation, grassland and engineered slope, can also be identified in LRCP. By regenerating woodland within LRCP, this would compensate or even further enhance ecological value of woodland.

For the proposed agricultural land, while it might be relatively flat and easily accessible, it is located outside LRCP and its ecological linkage with LRCP has to be further examined.

2. Conservation of non-graded buildings and structures

The part of Cultural Heritage mentioned the following:

“It is suggested that fonts on both sides of the portals of the two tunnels should be kept or replicated and placed on similar position as the current setting. Colour scheme of the associated buildings of the tunnels is suggested to be adopted to the new administrative buildings. Moreover, the two commemorative plaques marking the opening ceremony of the tunnel should be kept at prominent position at the new administrative buildings visible to all guests. Detailed cartographic and photographic recording on the Lion Rock Tunnel and its associated buildings (both exterior and interior) should be conducted before any works to commence.”
(Section 9.9.3)

We understand that buildings and structures near to two Lion Rock Tunnels are non-graded and there were no formal mechanism to ensure their proper conservation/protection. However, all two tunnels, buildings and structures are indeed inter-connected and possess group value. Apart from keeping the fonts on both sides of the portals of the two tunnels, and the two commemorative plaques, we hope that there could be more initiative to conserve those non-graded buildings and structures as far as practicable, such as retaining few toll booths in the toll plaza.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association