



長春社 Since1968

The Conservancy Association

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19<sup>th</sup> August 2022

Miss Tse Siu Wa, Janice, JP  
Director of Environmental Protection  
Environmental Protection Department  
Environmental Impact Assessment Ordinance Register Office

By E-mail: [eiaocomment@epd.gov.hk](mailto:eiaocomment@epd.gov.hk)

Dear Miss Tse,

Comments on Expansion of Aberdeen Shelter Project Profile

The Conservancy Association (CA) would like to express our grave concern on the captioned.

**1. Impact on the tombolo between Yuk Kwai Shan and Ap Lei Pai**

From Section 1.4.2, we note that the proposed expansion of Aberdeen Shelter would include the following works:

- (a) new breakwaters of about 350 m and 280 m in length to the south of the existing ATS and the associated seabed stabilization works for the new breakwaters;*
- (b) wave wall of about 40 m in length between Yuk Kwai Shan and Ap Lei Pai;*
- (c) access including potential marine access and land access to existing breakwaters, proposed new breakwaters and wave wall along the rocky shoreline within the Project boundary and other associated works, as appropriate*

We are very concerned that all these proposed works would be very close to the tombolo, a unique geological feature, between Yuk Kwai Shan and Ap Lei Pai (Figure 1-2). Based on the information in the Project Profile, we do not believe that current arrangement is trying very best to avoid or minimize potential environmental impacts.

A report from Planning Department once included tombolo as “*some key landscape*”



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*features in the outlying islands landscape”:*

*“Where two islands are located in close proximity to each other, they may act so as to bend the incoming current around them so that their energy sweeps sand onto the gap between them. This then forms a sand bar, known as a 'tombolo'. The overall result is a distinctive 'dumb-bell'-shaped island with a low narrow central part and larger higher ends”<sup>1</sup>*

We would suggest the following:

- i. The project proponent should further explore alternatives to avoid/minimize the adverse impacts on the tombolo.
- ii. The tombolo which is not currently covered by Aberdeen Outline Zoning Plan should be identified as one of the landscape and visual sensitive receivers
- iii. Possible impacts should include, but not limited to, changes in water flow, sediment erosion and deposition pattern, water and sediment quality, etc..

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association

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<sup>1</sup> Section 5.4.85, Landscape Value Mapping of Hong Kong Technical Report  
[https://www.pland.gov.hk/pland\\_en/p\\_study/prog\\_s/landscape/tech\\_report/ch5.htm](https://www.pland.gov.hk/pland_en/p_study/prog_s/landscape/tech_report/ch5.htm)



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Figure 1-2 The tombolo (circled in red) between Yuk Kwai Shan and Ap Lei Pai





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