



BY FAX AND E-MAIL

The Secretariat,
Lantau Development Advisory Committee
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29 April 2016

Dear Sir/Madam,

**Green Power's Response to Lantau Development Public Engagement Digest
Launched in January 2016**

1. Green Power, a local charitable green group, regularly visit and conduct ecological surveys throughout the territory including Lantau Island to monitor the environmental and ecological status of various ecologically sensitive sites and collect relevant baseline information.
2. On Lantau, we have been monitoring the air quality of Tung Chung, major natural rivers/streams, butterfly hot spots and wintering sites, dragonfly and damselfly hot spots and seahorse and pipefish habitats.
3. Based on our vision to conserve the natural assets and protect the environmental quality to provide living, work, business, leisure and study space for all Hong Kong people, we would like to draw your kind attention to our views, remarks and interpretation of the above-captioned digest (the Digest).

Misconception

4. The foreword statement "*Balancing and enhancing development and conservation, with a view to developing Lantau into a smart and low-carbon community for living, work, business, leisure and study*" reveals the misconceptions of Lantau Development Advisory Committee (LanDAC) towards "sustainable development".
5. The Sustainable Development Council of Environment bureau states that "*the concept of sustainable development requires a change of mindset to bring about full integration of*

the needs for economic and social development with that to conserve the environment.”¹
Need to conserve the environment should be fully integrated with, rather than balanced, those for economic and social development.

6. Though “Balancing development and conservation” is apparently a fair and logically act to execute sustainable development, its local application is mostly arbitrary and unscientific that violently sacrifices the integrity and intrinsic functions of ecosystem, therefore breaches the concept of sustainable development.
7. Under the shelter of this misconception, “environmental-friendly” railway fragmented the habitats and segregated the rural community, and constitutes a major constraint for future development in Kam Tim Valley. The channelization of natural rivers running through all new towns for flood regulation generates water pollution, odour nuisance and hygiene problems to citizens.
8. If such misconception is applied to develop Lantau, the consequence is disastrous.
9. We have to also clarify that though a low-carbon community can save a variety of resources and greenhouse gas emission, it should not be built at the expense of important habitats, or it cannot be treated as an adequate compensation of irreversible loss of ecological resources.

Unbalanced Proposed Lantau Development

10. No explicit plans and/or actions to “*strengthen preservation of sites of conservation value*” are proposed in the Digest. On the contrary, many development proposals in the Digest encroach valueable *sites with nature ecology*, e.g. Soko Islands and Mui Wo, that is contradictory to claim that “*major developments at these sites and their surrounding areas should be avoided*”², and “*due consideration should be made to preserve the rural characteristics and to protect the ecological environment*”³.
11. Water around Soko Islands is a proposed Marine Park⁴. Green Power found that Mui Wo is a butterfly hotspot.⁵ From 2014 to 2015, 122 species of butterflies were recorded in Mui Wo which are almost half of the total number of species in Hong Kong. Among these 122 species, 4 and 12 species are ranked as “Very Rare” and “Rare” respectively

¹ Sustainable Development Council: <http://www.enb.gov.hk/en/susdev/sd/index.htm>

² p.6, Nature and Heritage Conservation, Major Planning Principles, the Digest.

³ p.18, Point 20. Catering for the Needs of Rural and Remot Areas in Lantau, Group 5: Social Development, Major Proposal, the Digest.

⁴ p.15, Map “Planning Framework for Recreation and Tourism”, Group 4: Recreation and Tourism, Major Proposal, the Digest.

⁵ Green Power: http://www.greenpower.org.hk/html/chi/job_butterfly_30.shtml

including Forget-me-not (咖灰蝶 *Catochrysops strabo*) and White Dragontail (燕鳳蝶 *Lamproptera curius*).

12. In view that the development proposals will cause loss and/or degradation of terrestrial habitats on Lantau due to construction works or increase in human activities, no designation or extension of statutory protection areas such as country parks are planned⁶ as mitigation measures.
13. Proposed Marine Parks mentioned in the Digest⁷ have been launched for other purposes rather than the proposals of LanDAC on Lantau development. In view that these development proposals will cause loss and/or degradation of marine habitats in Lantau water due to construction works or increase in human activities, no additional designation or extension of statutory protection areas such as marine parks are planned as mitigation measures.
14. Furthermore the proposed Marine Parks mentioned in the Digest fail to connect the core habitats of Chinese White Dolphins in Western Lantau to provide a continuous sanctuary.
15. We are highly concerned that Soko Islands are suggested to be turned into a “*relaxation area*” to allocate *spa, resort and extreme sports*.⁸ These developments may bring about adverse impacts including sewage, waste and thermal pollution, and intensive marine traffic to Chinese White Dolphins and Finless Porpoises as water of Soko Islands is important habitat for both species.
16. Allocating spa and resort on Soko Islands also sets a bad precedent to permit commercial and polluting activities operating in Marine Parks.
17. Other proposed recreation and tourism areas in the Digest also encroach ecologically sensitive areas including Sunny Bay, Mui Wo, Pui O, Shui Hau,⁹ Sunset Peak and Tai Ho Wan.¹⁰
18. The Digest obviously ignore on-going and foreseeable environmental destruction, i.e. air

⁶ p.9, Point 4. Predominant Part of Lantau for Conservation, Leisure, Cultural and Green Tourism, Major Proposal, the Digest.

⁷ p.12, Point 7. Better Utilisation of Natural Resources, Group 2: Conservation, Major Proposal, the Digest

⁸ p.16, Point 17. Relaxation, Group 4: Recreation and Tourism, Major Proposal, the Digest.

⁹ p.16, Point 13. Recreation and Outdoor Activities, Group 4: Recreation and Tourism, Major Proposal, the Digest.

¹⁰ p.16, Point 15. Recreation and Outdoor Activities, Group 4: Recreation and Tourism, Major Proposal, the Digest.

noise and water pollution, flytipping, traffic congestion, exceedance of environmental and social carrying capacity brought about by the proposed development on Lantau. The Digest has no intention to terminate and prevent the environmental degradation and vandalism, and reinstate the damaged habitats and landscape.

19. In view that the proposed developments on Lantau and associated increase in economic activities provide incentives for unauthorized land uses, no statutory and enforceable land use measures are promulgated
- (a) to ensure the proposed land uses can be implemented;
 - (b) to ensure control over incompatible and/or unauthorized developments,
 - (c) to terminate existing vandalism and to stem potential vandalism on Lantau; and
 - (d) to protect the environment, ecology and living quality on Lantau, the major planning principle of proposed Lantau development.
20. We object to the direction of transport planning and development proposed in the Digest as new roads, whatever the scale, and uplift of traffic restriction (e.g. that for Tung Chung Road) will ruin any effort paid to conserve Lantau.
- (a) We disagree that “*comprehensive traffic and transport infrastructure network*”¹¹ should be the priority consideration for the implementation of various development. Instead, prevention of eco-vandalism triggered by road access is crucial for preserving Lantau’s “*rich assets for recreation and tourism purposes*”.¹²
 - (b) Enhancing “*Lantau’s internal road arrangements and traffic*” and “*further relaxation of the closed roads in Lantau and the arrangements of issuing closed road permits*”¹³ will only lead to uncontrollable traffic load and exceedance of environmental and social carrying capacity of Lantau’s recreation and tourism spots, which then triggered vicious cycle of further road network extension and further exceedance of carrying capacity. On the contrary, number of vehicles access to closed road, and even Lantau, must be limited. Strict control should be imposed on heavy vehicles especially construction trucks and container trucks.
 - (c) The proposal that “*the East Lantau Metropolis (ELM) can be connected to the northern shore of Lantau via Mui Wo*”¹⁴ contradicts and jeopardize the another proposal that “*the area surrounding south Lantau will become an ‘eco-conservation, recreation and green tourism belt’promoting south Lantau as a destination desirable for recreation and green tourism*”¹⁵ by deteriorating the air quality,

¹¹ p.6, Traffic and Transport, Major Planning Principles, the Digest.

¹² p.6, Recreation and Tourism, Major Planning Principles, the Digest.

¹³ p.14, Point 11. Other Road Arrangement and Traffic and Transport Facilities, Group 3:Transport Infrastructure, Major Proposal, the Digest.

¹⁴ p.14, Point 9. Strategic Road System, Group 3: Strategic Traffic and Transport Infrastructure, Major Proposal, the Digest.

¹⁵ p.12, Point 7. Better Utilisation of Natural Resources, Group 2: Conservation, Major Proposal, the

facilitating flytippings and encouraging unplanned, chaotic and incompatible developments.

Unjustified Development

21. The need of ELM¹⁶ is questionable without sound and convincing justification in the context of territorial population and land use projection.
22. The reclamation work, New Development Area and transport infrastructure associated with ELM have not undergone any feasibility study, environmental and ecological impact assessment to demonstrate its feasibility, effectiveness and sustainability.
23. According to Environmental Protection Department's yearly average Air Quality and Health Index (AQHI) data of 2014-2015 (Table 1), Tung Chung ranked amongst the most polluting districts in terms of number of hours with AQHI ≥ 7 and days with daily maximum AQHI ≥ 7 . If only daily maximum AQHIs reaching 10 and 10+ in 2015 are taken for analysis, Tung Chung had the greatest number of days. This indicates that people staying in Tung Chung ran higher health risk due to air pollution.
24. The situation is anticipated to worsen with additional emission sources will come into operation in the near future, including: Expansion of Hong Kong International Airport into a Three-Runway System, Hong Kong-Zhuhai-Macao Bridge and Boundary Crossing Facilities and Tuen Mun-Chek Lap Kok Link. However, the Digest has totally neglected the anticipated air pollution in Lantau Development.

Overall Deficiency of the Digest

25. The drafting of the Digest is seemingly based on misinterpreted concept of sustainable development that leads to self-contradictory proposals. The ambitious proposals are derived from ambiguous needs. The Digest also ignores and tries to remove the existing favourable administrative measures and land use setting that maintain the pristine environmental quality and landscape of Lantau.
26. Although "nature and heritage conservation" is one of the major planning principles, the Digest proposes no explicit measures and actions to upgrade, enhance or preserve the nature and heritage resources on Lantau, Instead, it follows the tradition development concept that will convert Lantau to another messy, unpleasant and uncontrollable brown field.

Digest.

¹⁶ p.9, Point 3. East Lantau Metropolis as Long-Term Strategic Growth Area, Group 1: Spatial Planning and Landuse, Major Proposal, the Digest.

Recommendations

27. Lantau Island should act as an “Urban Sanctuary” for Hong Kong People. Co-existence of nature and well-being of human should be the basic principle to shape the functions and development of Lantau.
28. Under the principle of coexistence of nature and well-being of human, perpetuation of nature and heritage resources on Lantau should be identified as a public interest and accorded a high priority in decision making of any policies, administration and work projects.
29. Some of the guiding principles for Lantau, the Urban Sanctuary, may include:
- (a) Preservation the ecological services to human, e.g. clean air, tranquility, unpolluted river water and beaches.
 - (b) Preservation of natural landscape and heritage character.
 - (c) No exceedance of the environmental and social carrying capacity.
 - (d) Be aware of and to eradicate any incentives alluring eco-vandalism.
30. To response to the Digest, we recommend, in prior to further proceeding, to
- (a) formulate a novel environment-caring transport strategy on Lantau aiming to avoid air pollution, traffic congestion, waste dumping and other deterioration of living quality.
 - (b) identify "no-go areas" on Lantau which include, but not limited to, statutory protected, with well-preserved natural characters, and ecological or environmental sensitive (such as natural streams). These areas should be protected strictly with additional legal and/or administrative measures. The usual strike-the-balance principle should NOT be applied to these areas.
 - (c) The Administration should commence a study to investigate the air pollution problems of the western territory and Lantau and provide effective policies, measures and proper transport strategy and town planning, before settling people in the likely most polluting areas in Hong Kong.
 - (d) conduct Environmental Impact Assessment and Strategic Environmental Assessment in process to propose any land uses or projects, NOT the vice versa.
 - (e) impose statutory landuse control after (b), i.e. statutory Development Permission Area Plan under the Town Planning Ordinance.

For any queries, please contact the undersigned at Green Power (T: 3961 0200, Fax: 2314 2661, Email: lkcheng@greenpower.org.hk)

Thank you very much for your kind attention. We look forward to your responsible decision.

Yours faithfully,



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Table 1: The statistics of AQHI of General Air Monitoring Station (1 Jan 2014 to 31 Dec 2015)

	Central/ Western	Eastern District	Kwun Tong	Sham Shui Po	Kwai Chung	Tsuen Wan	Yuen Long	Tuen Mun	Tung Chung	Tai Po	Sha Tin	Tap Mun
Total hours of HHR (AQHI \geq 7, 1 Jan to 31 Dec 2015)	281	213	344	308	337	286	339	416	346	224	238	226
Total hours of HHR (AQHI \geq 7, 1 Jan to 31 Dec 2014)	251	164	390	326	378	318	499	519	454	209	286	322
Total hours of HHR in yearly average (AQHI \geq 7, 1 Jan 2014 to 31 Dec 2015)	266	189	367	317	358	302	419	468	400	217	262	274
Total days of HHR (AQHI \geq 7, 1 Jan to 31 Dec 2015)	42	32	46	46	50	47	58	64	60	39	39	37
Total days of HHR (AQHI \geq 7, 1 Jan 2014 to 31 Dec 2014)	39	26	50	46	59	56	73	70	75	38	42	43
Total days of HHR in yearly average (AQHI \geq 7, 1 Jan 2014 to 31 Dec 2015)	41	29	48	46	55	52	66	67	68	39	41	40
No of <u>hours</u> with AQHI =10 or 10+ from 1 Jan to 31 Dec 2015	32	21	48	26	26	21	31	40	47	17	19	9
No of <u>days</u> with AQHI =10 or 10+ from 1 Jan to 31 Dec 2015	9	6	10	6	5	6	8	9	16	5	4	3

Figures in red, orange and yellow box are the first, second and third highest across the row.