



BY EMAIL ONLY

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31 August, 2016

Dear Mr. Chan

Joint Green Groups' Appeals for a Green Transport and Traffic Strategy on Lantau

1. The Development Bureau launched a public consultation titled "Space for All" of Lantau Development which had been proposed by the Lantau Development Advisory Committee in January 2016. In response to this consultation, undersigned green groups jointly submitted our views and comments to the Administration requesting for substantiation of the conservation plan for Lantau.
2. Supplementary to our request for a comprehensive conservation plan for Lantau, green groups are gravely concerned about the impacts of "Strategic Traffic and Transport Infrastructure" proposal mentioned in *Lantau Development Public Engagement Digest* (the Digest) of this consultation on the residents, road safety, water supplies, environment, ecology and tourist assets on Lantau Island.
3. Lantau has preserved irreplaceable natural, cultural and historical heritage that deserves responsible and well-thought planning in which the public will be properly consulted. This will help avoid repeating the past adverse development modes that resulted in pollution, environmental vandalism and deteriorating living quality.
4. The "Strategic Traffic and Transport Infrastructure" proposal in "Space for All" appears to be development-orientated which neglects the potential and associated impacts to the ecologically important sites and habitats on Lantau, and the living quality of residents. We believe that conservation should be the planning premise for Lantau before any traffic and transport infrastructure is proposed.

Transport plan crucial to conservation of natural and tourist assets

5. Lantau has unique characteristics including invaluable natural landscapes, rich ecological resources and cultural heritage. Lantau is our largest island with Hong Kong's second and third highest peaks. Over 70% of the land is still in its natural state, partly as development is difficult on the hilly topography.
6. Such unique settings have preserved a wide range of natural habitats and a diverse ecological system - from low-lying wetlands to montane grasslands, from freshwater streams to soft coral marine habitats - creating an exceptionally rich biodiversity with many rare and endangered species recorded. For example, Horseshoe Crab (*Tachypleus tridentatus*), Oval Halophila

(*Halophila ovalis*), Romer's Tree Frog (*Liuixalus romeri*), Bogadek's Legless Lizard (*Dibamus bogadeki*), Common Birdwing (*Troides helena*), Grass Jewel (*Chilades trochylus*), Chinese Grassbird (*Graminicola striatus*) and Brown Fish Owl (*Ketupa zeylonensis*), Lantau Star-anise (*Illicium angustisepalum*) and Hong Kong Asarum (*Asarum hongkongense*).

7. Beside the rich biodiversity, Lantau Peak, Sunset Peak and other similarly gorgeous hills attract hikers from all places. There is also a rich cultural heritage on the island with many religious retreats—including the “Five Major Buddhist Woodlands”—where visitors can pay homage or find peace of mind.
8. Pui O wetland has been accepted as “heritage and landscape as human values” by International Council on Monuments and Sites for harmonic human-bovid relationship. There are also rural villages and markets full of character, making Lantau a top choice to spend the holidays among local people and visitors. Undoubtedly, Lantau is a great treasure of Hong Kong.
9. Following the development of the airport and Tung Chung New Town, there are now roads and railway connecting North Lantau and the city. According to Environmental Protection Department's yearly average Air Quality and Health Index (AQHI) data of 2014-2015 (Appendix 1), Tung Chung, located in North Lantau, 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. After the construction of the Hong Kong-Zhuhai-Macau Bridge and Tuen Mun-Chek Lap Kok Link, the traffic flow to and from Lantau would be further increased and air pollution on Lantau, especially North Lantau, would be further deteriorated, making Lantau a non-liveable place.
10. Fortunately, most of the roads in Lantau are still Closed Roads, where vehicles are restricted. These include Tung Chung Road—the main road linking South and North Lantau; South Lantau Road—the main road connecting east and west; and roads connecting to places such as Ngong Ping, Sham Wat and Chi Ma Wan. In addition, to protect water gathering grounds, roads along the catchwater channels are also restricted. However, air pollution will spread to other parts of Lantau if the restriction of these Closed Roads is lifted or more new roads are built on Lantau.
11. As pointed out in the Digest, Lantau has high-quality landscape and ecologically sensitive natural environment which should be preserved for nature conservation and sustainable recreational and visitor uses. Therefore, strict and restrictive measures regarding transport and traffic should be included together with the principal planning intention for preserving Lantau as a conservation area and for ecotourism.

Lesson learnt from opening of FCA and brownfields throughout the NT

12. In Hong Kong, restriction of vehicles access to roads is one of the most effective measures to preserve the high-quality landscape and ecologically sensitive natural environment. For example, stringent control of vehicle access to High Island Reservoir area along Tai Mong Tsai Road helps protect the tourist spots and water gathering ground in Sai Kung East and West Country Park.

13. Sha Tau Kok serves as a vivid example of how opening up Closed Roads will lead to environmental destruction. Sha Tau Kok was a Frontier Closed Area, where only vehicles and persons with permits could enter. After the opening of the area in 2012, Sha Tau Kok became a tourist hotspot and many of the previously green areas were converted into car parks. In addition, large areas of freshwater wetlands were reclaimed and levelled by landowners with the expectation that property values would rise in future. Not only were these former farmland areas damaged, mangrove forests along the coast were also threatened. Comparing aerial photos of the Frontier Closed Area in 2006 and 2012, we can see a 50% increase in levelled land in Sheung Tam Shui Hang, and a 20% increase in Ha Tam Shui Hang. Although ordinances are currently in place aiming at prevention of environmental vandalisms, they are in many cases ineffective or difficult to enforce, resulting in uncontrollable and non-enforceable environmental vandalism and nuisance that leads to irreversible loss of valuable natural and tourist resources to pollution, illegal dumping, visual blight and incompatible developments in Sha Tau Kok.

14. Same situation has also happened in Tung Chung. In the past, the Transport Department set up a checkpoint at Tung Chung Road to prohibit outside vehicles from entering areas other than Tung Chung New Town. However, in 2007, the checkpoint was relocated to Shek Mun Kap. Afterwards, Tung Chung Valley saw obvious environmental changes. Comparing aerial photos in 2007 and 2015 (Appendix 2), about 8 hectares of land in Tung Chung Valley were non-green, mostly village houses, in 2007, whereas by 2015, the non-green area jumped to 25 hectares, particularly in Shek Mun Kap and Shek Lau Po, where construction waste filled up many previously green areas.

15. The future economic activities stimulated by the proposed developments and the ease of access caused by the relaxation of closed roads on Lantau would lead to uncontrollable eco-vandalisms and further encroachment on unspoiled natural habitats, especially some of the regions in Lantau have no Development Permission Area Plans so that Planning Department cannot take any enforcement actions. This will degrade the living and environmental quality, the tranquility, the magnificent landscape and the fragile ecological integrity of Lantau.

Redefining a low-carbon and sustainable transport strategy for Lantau

16. It is contradictory and extremely dangerous for the Digest to push *traffic and transport* as *priority consideration for the implementation of various developments* but ignore the associated

adverse impacts on the natural environment, heritage and livelihood. In fact, it acts in contrary to the planning principle *to strengthen preservation of sites of conservation value*, and to *develop the island into a vibrant community for living and leisure*. (p.5 and 6, Major Planning Principles, the Digest)

17. Therefore, the functions and constraints of transport strategy for Lantau should be clearly defined taking into account of its rich natural and cultural heritage, and possible adverse impacts on the biodiversity, living quality and ecotourism.
18. Green groups opine that the traffic and transport strategy for Lantau
 - (a) should provide environmental-friendly passenger and freight commutation for local residents and visitors, while protecting the natural environment and heritage but not facilitating incompatible developments on Lantau,
 - (b) should not exceed the environmental and social carrying capacity of habitats on Lantau that includes, but not limited to, air quality, river, marine and bathing beach water quality, noise level, vehicle-to-road ratio and parking spaces, disturbance to local community,
 - (c) should not exacerbate air pollution and flytipping, and degrade the ecology and landscape,
 - (d) should not encroach sites of conservation value which include, but not limited to, existing, proposed and potential country and marine parks, water gathering grounds, reservoirs and irrigation reservoirs, existing, proposed and potential “Sites of Special Scientific Interest”, “Coastal Protection Area”, “Conservation Area”, natural streams and watercourses with high ecological value, Ecological Important Streams, natural shorelines, active and fallow agricultural lands, monuments and identified ecological hot spots according to “Lantau-Hong Kong Jewel”
(https://issuu.com/conservation_lantau/docs/lantau-hong_kong_s_jewel_publish).

Proposal of a green transport and traffic strategy for Lantau

(A) Maintain stringent road restrictions on Lantau

19. Large-scale environmental vandalisms have been happening and expanding in Tung Chung River valley on Lantau, mostly in Shek Lau Po and Shek Mun Kap, since the relaxation of traffic restriction of Tung Chung Road. Although such cases have been reported to the Administration, minimal enforcement actions were taken and the vandalized sites are hard to restore.
20. Green groups opines all roads in South Lantau and Tung Chung Road south of Shek Mun Kap should be maintained as Closed Roads in order to protect the ecology, natural, cultural and tourist resources. If environmental vandalisms on Lantau persists or exacerbates, the Closed Road measures should be extended and tightened.
21. The criteria to issue Lantau Closed Road Permit should be publicly consulted with stakeholders,

including green groups, cycling and hiking associations.

(B) Road safety

22. Lantau Closed Road Permits should be strictly enforced. Vehicles permitted to use all roads in South Lantau & Tung Chung Road west of Ma Wan New Village should be tightly controlled, especially for heavy vehicles, construction trucks and machineries, to safeguard bikers and pedestrians, and lower the risks of fly-tippings and incompatible developments.
23. Green groups are concerned about the road safety of bikers, pedestrians, buffaloes and cattle using roads in South Lantau and Tung Chung Road. We urge that the driving speed of all vehicles must be limited to a safe speed and measures in place to enforce that.

(C) Environmental and social impacts

24. Daily quota for tour coaches and private cars to access all roads in South Lantau and Tung Chung Road should not cause unfavourable environmental impacts e.g. air and water pollution, noise nuisance, disturbance to local community, etc. While the “Driving on Lantau Island” Scheme should be cancelled, no additional quota should be given to private cars to access all roads in South Lantau and Tung Chung Road on Saturdays, Sundays and public holidays. The vehicular access to obsolete sections of old Tung Chung Road should be strictly controlled to prevent fly-tipping.

(D) Protection of potable water

25. Many roads sections on Lantau run through the water gathering grounds of reservoirs. Any flytippings, most likely in remote road sections, will pollute the potable water source. Existing restriction measures of vehicular access on Lantau are effective and efficient to protect water quality of reservoir in view of the remote and extensive water gathering grounds. Such measures should be maintained.

(E) Green transport

26. Environmental-friendly (such as electric vehicle, cycling), smart, public transportation should be encouraged as the priority to deal with any transport needs on Lantau. Ferries and trans-district buses and coaches can be considered to improve the public transport to and from Lantau, especially on public holidays.

(F) Effective enforcement

27. In order to enforce traffic restriction measures effectively and for the sake of road safety and fly-tipping, a comprehensive surveillance system must be in place that includes
- (a) control of vehicle number on Lantau Closed Roads according to environmental, social and transport carrying capacity and road safety,

- (b) allocating sufficient enforcement personnel, and conducting regular daily patrol of Closed Roads,
- (c) installation of traffic surveillance CCTV and automated vehicular speed detection devices on Closed Roads on Lantau,
- (d) manned road gates,
- (e) application of appropriate technology and devices to monitor and trace the movement of vehicles and vessels carrying construction and municipal wastes, soil and debris, such as GPS, RFID, reversing video device and sensor technology.

(G) New road planning

28. Any new roads should be well justified, properly assessed (in the context of environmental impacts and cost effectiveness) and publicly consulted. Green Groups opine that no new roads should be planned in Country Parks, South Lantau and Tung Chung Bay, and near or in other ecological important sites.
29. All potential cumulative environmental, ecological and social impacts should be identified and assessed at an early planning stage to avoid adverse impacts on areas and species of conservation importance.

Green groups' objection

30. Green groups object to the development-orientated planning for traffic and transport infrastructure network proposed in the Digest which jeopardizes the major planning principle to promote nature and heritage conservation.
31. We are greatly concerned about both the direct and indirect impacts of the traffic and transport infrastructures including the supporting facilities (e.g. bridges and tunnels) and associated footprints of works including slope works on the various habitats.
32. The proposed East Lantau Metropolis and associated transport infrastructure development should be rejected as there has been little supporting information produced to justify the need. The population estimates are not justified, and there is no substantive traffic and transport plan.

Concluding Remarks

33. The "unbalanced" urban development and lack of additional conservation measures will fail to achieve the planning vision stated by the Lantau Development Advisory Committee in the public consultation document "*Space for All - Lantau Development Public Engagement*": "balancing and enhancing development and conservation". It will also contradict "the due consideration to preserve the rural characteristics and to protect the ecological environment."
34. A comprehensive transport and traffic strategy aiming to avoid air pollution, uncontrolled

dumping and incompatible development on Lantau should be formulated and be put in place prior to any proposed developments. Traffic restrictions (permit system) on construction trucks and machinery for South Lantau and the Tung Chung Valley and Bay areas are vital to prevent large-scale waste and debris dumping.

35. Green groups urge the government to commit itself to protecting the land and waters of Lantau for their environmental, ecological, landscape and heritage values, and not to sacrifice these as a result of the development-orientated “Strategic Traffic and Transport Infrastructure” plans. The government should abandon such development biased mentality and formulate a novel and visionary transport and traffic plan for Lantau safeguarding the natural resources for future generations.

Thank you for your kind attention. We look forward to a green transport and traffic strategy on Lantau. For any inquiries, please contact the undersigned (T: 3961 0200, F: 2314 2661, Email: lkcheng@greenpower.org.hk)

Yours faithfully,



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On behalf of:

Clean Air Network

Designing Hong Kong

Eco-Education and Resources Centre

Green Lantau Association

Greenpeace East Asia

Green Power

Greeners Action

Hong Kong Outdoors

Lantau Buffalo Association

Living Islands Movement

Save Lantau Alliance

Society of Hong Kong Nature Explorers

The Conservancy Association

The Green Earth

The Hong Kong Bird Watching Society

WWF-Hong Kong

Appendix 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.

Appendix 2

