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8 November 2021

Dear Sirs and Madam,

Re: Review on Driving on Lantau Island Scheme and Issuance of Lantau Closed Road Permits

1. Green Power, as a charitable local green group, appreciates that Transport Department has adopted parts of our comments and recommendations in the document entitled *Review on Driving on Lantau Island Scheme and Issuance of Lantau Closed Road Permits* (TD NR 146/169-4, dated 19th October, 2021, referred hereafter as “the Review”). Transport and traffic strategy is of ultimate importance to safeguard the pristine environment and landscape, as well as the fragile and unique ecology of South Lantau. We would like to reiterate that the protection of Lantau’s natural resources can only be achieved through a conservation-oriented, rather than a demand-oriented strategy, and hence would like to further express our views and concerns on the related issues.

Revision of Lantau Closed Road Permits issuance arrangements

2. The tranquil rural and natural areas linked by closed roads in South Lantau is currently preserved by transport restriction through the Lantau Closed Road Permits (LCRP) issuance system. We agree and support the tightening of LCRP issuance criteria with the principle of only approving application with genuine needs.

3. We support the mandatory provision of valid proof from applicants to verify their relationships with owners of registered vehicles or addresses on Lantau and cancellation of renewal arrangement for temporary LCRPs. While we highly welcome limiting the movement of construction vehicles to designated routes, which should be implemented through inclusion of the requirements in the terms of approved temporary LCRPs, we strongly recommend such arrangements to be extended to vehicles used in private projects as soon as possible.

Improvement of surveillance and enforcement against vandalism

4. While the review and strengthening of existing legal framework are of absolute importance, we would also like to emphasize the urgent need to implement concrete additional measures to monitor and control vehicle-related vandalism activities. However, the measures used to “*closely monitor the traffic conditions*” and “*step up enforcement to ensure the plan in the Review are implemented smoothly*” have not been specified. Some measures have been proposed for your consideration, including:
 - i. application of effective surveillance measures (e.g. mandatory trip-ticket AND GPS / RFID monitoring systems) and deterrent penalty on offenders in addition to restriction of routes / road sections for vehicles involved in construction projects, particularly for vehicle types potentially used in vandalism activities (e.g. light good vehicles, dump trucks and heavy machineries);
 - ii. cooperation with the Hong Kong Police Force (HKPF) for allocation of sufficient enforcement personnel for regular daily patrol along the closed roads and
 - iii. installation of traffic surveillance devices (including CCTV) at vital checkpoints along the closed roads.

Relaxation of closed road system on Lantau

5. Policies ensuring safety and avoiding disturbance on local communities and ecosystems, pollution, dumping and incompatible developments on Lantau should be in place prior to any relaxation of traffic and transport restrictions on Lantau. The transport and traffic strategy for Lantau shall also be designated and justified based on sound and thorough information, including carrying capacities (environmental, visitor-receiving and road capacities) and assessment of cumulative impacts received by this vulnerable area, rather than on fragmented information and largely on demand from the public.
6. The Review did not provide any data on number of applications exceeding the current quotas, estimates of future traffic flow, potential risks associated with traffic increase, information regarding the number of accidents involving animals (e.g. bovids) nor criteria used to determine the appropriate number of quotas. At least two studies, namely “Ecological Study for Pui O, Shui Hau, Tai O and Neighbouring Areas” and “Study on Traffic, Transport and Capacity to Receive Visitors for Lantau”, are being undertaken by the Administration, but their results have yet to be released and reviewed by the public, let alone being considered during the review of DLS.
7. We would like to stress that the introduction of DLS lacked a solid rationale (except for the disabled) in the first place as visitors touring on weekdays should be absorbed by the existing public transport system, rather than increasing number of vehicles on Lantau. The need of visitors during weekdays should be entertained by the current public bus and ferry services.

8. Although the Review mentioned catering the needs of additional vehicles through provision of additional parking spaces, increasing the number of vehicles allowed in the close road system highly likely provides incentives for conversion of natural habitats (e.g. vegetated areas, wetlands) on private or occupied government lands into parking spaces, which is very difficult to control under the current legal framework, especially for areas in South Lantau.

9. In view that neither proper environmental impact assessment nor mitigation measures related to vehicular transport and traffic are conducted and implemented, we strongly oppose further relaxation of the closed road system on Lantau, and opine that DLS should be terminated. Any genuine transportation needs of stakeholders of Lantau should be carefully assessed, and be catered through enhancing the current public transport system as much as possible.

Thank you very much for your attention. We look forward to your favorable decision to protect our natural and cultural treasures on Lantau.

Yours sincerely,

A handwritten signature in cursive script, appearing to read "Yuen Yan Ling".

YUEN Yan Ling, Elaine
Assistant Education & Conservation Manager
Green Power