



BY EMAIL ONLY

16 June, 2017

Mr. Leung Chun-ying
Chief Executive
Chief Executive's Office
(Email: ceo@ceo.gov.hk)

Mrs. Carrie Lam
Chief Executive-elect
Office of the Chief Executive-elect
(Email: ceco@ce-elect-office.hk)

Mr. Cheung Kin-chung, Matthew
Chief Secretary for Administration
Chief Secretary for Administration's Private Office
(E-mail: cso@cso.gov.hk)

c.c.
Mr. Robin K. B. Lee
Civil Engineering and Development Department
(E-mail: robinkblee@cedd.gov.hk,
enquiry@lantau.gov.hk)

Mr. Ma Siu-cheung, Eric
Secretary for Development
Development Bureau
(E-mail: sdev@devb.gov.hk)

Mr. Wong Kam Sing
Secretary for Environment
Environment Bureau
(E-mail: sen@enb.gov.hk)

Professor Anthony Cheung
Secretary for Transport and Housing
Transport and Housing Bureau
(Email: sthoffice@thb.gov.hk)

Dear Mr. Leung, Mrs. Lam, Mr. Cheung, Mr. Ma, Mr. Wong and Prof. Cheung,

Green Groups' joint response to "Sustainable Lantau Blueprint"
released by the Government on 3 June 2017

1. The undersigned green groups are deeply concerned over the proposed "Sustainable Lantau Blueprint" (the Blueprint) released by the Government on 3 June, 2017. Although the Blueprint has a planning vision of *'balancing development and conservation'*, it seems to continue the approach of "Space for All" launched in January 2016 which is a development-orientated proposal. We regret that the Blueprint still fails to provide adequate protection and conservation of important sites and habitats on Lantau. We reiterate that conservation should be the planning premise for Lantau before any developments is proposed.
2. Green groups jointly criticized that the "unbalanced" urban development and lack of additional conservation measures would 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.'*
3. In order to effectively conserve the biodiversity of Lantau in a holistic manner, and achieve genuine sustainable development, green groups urge the Government to make wise decision and take prompt actions recommended by green groups stated in joint letter dated 8 April, 2016. Herein, we highlight the following conservation measures in response to the Blueprint:

Baseline Study to Set Up Inventory and Database

4. A "sustainable" Lantau is just empty words if environmental and biodiversity baseline is lacking and no carrying capacity assessment is conducted. Currently, the biodiversity and environmental status of Lantau are piecemeal and not comprehensive. A comprehensive, centralized and well organized baseline study should be conducted shortly to collect the environmental and biodiversity baseline status of Lantau to avoid loss of important habitats and species to developments.
5. In order to safeguard the living quality, public health and natural assets on Lantau, environmental and social carrying capacity assessments should be conducted, which should include different hierarchy assessments, i.e. holistically for whole Lantau, district-wide for North and South Lantau and community- or local-level for settlements (e.g. Mui Wo, Tung Chung) and habitats (e.g. Shui Hau). Baseline study is a pre-requisite for carrying capacity assessments which provides scientific and objective criteria to assess the effectiveness of proposed conservation initiatives and sustainability of development plans.

NO-GO Areas

6. Green groups stressed that all ecologically important sites on Lantau should be adequately protected with active management in place, including routine patrolling in particular. There should be no development or infrastructure, except for conservation, research and education, in these areas. Buffer areas should be established to avoid development encroaching on these ecologically sensitive areas.
7. In these sense, we agree with the Government's positions: *'Major development should be avoided at sites of conservation interest and their surrounding areas wherever possible. Development proposal in the vicinity should also be subject to impact assessment and feasibility study to ensure the project would not result in unacceptable impact on conservation value of the site. Major view corridors and natural coastline should also be duly respected'* (Section 3.3, the Blueprint). However, the impact assessment and feasibility study in this regard should be conducted for any developments and works in vicinity to ecologically sensitive areas, even not bound by existing legal and administrative requirements.
8. Also, an explicit list of such NO-GO areas should be drafted and supported with proper legal and administrative enforcement. Such NO-GO areas include but not limited to, proposed and existing Country Parks and Marine Parks, proposed and existing Sites of Special Scientific Interest, natural streams and watercourses with high ecological value, Ecological Important Streams, reservoirs, irrigation reservoirs, water gathering grounds, and identified ecological hot spots according to "Lantau-Hong Kong Jewel"¹. The list must be updated upon the availability of new findings.
9. Although the Government will *'expedite the process for offering better protection for 5 country park enclaves'* (Section 3.3.2, the Blueprint), there are more areas on Lantau without statutory and proper protection that urgently need protection against any undesirable ecological damage caused by the imminent development pressure. We propose to designate Yi O, Tai Ho, Sham Wat, Luk Wu, Keung Shan as Country Park; Po Chue Tam in Tai O as Site of Special Scientific Interest (SSSI) for significant geological features. Sunny Bay is one of the few recorded habitats for Pipefishes that statutory protection (e.g. Marine Park designation or "SSSI"/"Coastal Protection Area" zones in DPA) should be actively pursued.

Designation and Extension of Marine Parks

10. We are disappointed that no new measures are promulgated to provide adequate protection of marine ecology and habitats. We are gravely concerned about the connectivity of existing and planned Marine Parks around Lantau, especially in South Lantau. Offshore waters of Yi O and Tai O (offshore Western Lantau waters) is increasingly inhabited by Chinese White Dolphins where should be designated as West Lantau Marine Park to connect all the Marine Parks (The Brothers Marine Park, Sha Chau and Lung Kwu Chau Marine Park, Marine Park near the vicinity of the Third Runway and the Southwest Lantau Marine Park) in the western waters of Hong Kong.

¹ https://issuu.com/conservation_lantau/docs/lantau-hong_kong_s_jewel_publish

11. Furthermore, proposed Southwest Lantau Marine Park and Soko Islands Marine Park should be extended and merged together. This helps reduce the impacts from development projects on the dolphins by safeguarding the remaining important dolphin habitats and preserving their travelling corridors in Hong Kong.
12. On the other hand, the numbers and navigation speed of high speed vessels travelling in Marine Parks should be limited according to the Marine Parks Ordinance to avoid disturbance and collision with dolphins. Therefore stricter speed monitoring and enforcement, e.g. Vessel Monitoring System, should be employed to ensure vessels adhere to the speed limit. High speed vessels' and other shipping routes should be diverged if speed requirement within Marine Parks cannot be fulfilled. This will also help to reduce disturbance caused by marine vessels to the dolphins in the Marine Parks.

Conservation of Shui Hau Sandflat Habitat

13. No proper management and enforcement measures are proposed for Shui Hau, where the Blueprint suggests setting up a camp site. Inappropriate camp site locations, lack of management and enforcement measures will ruin the ecological values of Shui Hau which is an important breeding and spawning grounds for globally endangered Horseshoe Crabs. We recommend designate Shui Hau Wan and the feeding major streams as Marine Park and Ecologically Important Stream respectively.

Establish Nature Park to Conserve Ecologically Sensitive Sites

14. Pui O wetland has been accepted as "heritage and landscape as human values" by United Nations Educational, Scientific and Cultural Organization for harmonic human-bovid relationship. We recommend establish a "Nature Park" to cover Pui O wetland with reference to "Long Valley Nature Park" in Kwu Tung North New Development Area.

Resumption of Private Lands for Conservation

15. We propose to extend the Tung Chung River Park under Tung Chung New Town Extension (TCNTE) so that it covers both the eastern and western sections of the river, and the estuary. To implement this proposal, the Government is to resume the private land along the Tung Chung River and the estuary as part of the TCNTE development plan. The Government should schedule the timetable for early establishment of Tung Chung River Park, the associated polder scheme and Sustainable Urban Drainage Scheme before the commencement of development works to ensure Tung Chung River and the riparian habitats will not be affected during the construction of the new town extension.
16. Proactive options of conservation measures such as land resumption, land exchange and land swap should be considered by the Government to ultimately resolve the dilemma of conservation on privately-owned lands with high conservation values. Accordingly, the Government should also consider setting up a "Lantau Conservation Trust" to facilitate the land resumption/transaction for conservation on Lantau in the long run."

Rural Township Character of Mui Wo

17. We found that unauthorized developments, environmental vandalisms and Small House developments has rapidly increased in Mui Wo since 2013 after the Chief Executive had announced the East Lantau Metropolis (ELM) and Lantau development plan. At least 3 large-scale environmental vandalism cases involving tree felling, unauthorized paving and construction of roads have been reported in Mui Wo in the past few years. According to Lands Department figures, new Small House applications have been approved at a rate 4 times faster after 2013. Over 1500 additional residents will be introduced to this community when the new housing units become available under Government's Home Ownership Scheme. This vandalism, unauthorized development and proliferation of Small Houses are imposing adverse impacts on wetlands, farmland, buffalo and cattle habitats.
18. To preserve the rural township character of Mui Wo against increasing development pressure, we urge the Government to enhance enforcement and review the land use zoning in Mui Wu. We also request clarification of what is meant by "underutilised land" and where exactly this is situated. Certain large private land "owners" (i.e. lessees of agricultural lots) appear to have taken this statement as a green light to accelerate unauthorized industrial activities and convert large areas of the Mui Wo wetlands area into brownfield sites.
19. A long-term joint enforcement team including relevant personnel based in Lantau from Lands Department, Agriculture, Fisheries and Conservation Department, Environmental Protection Department and Planning Department should be set up with offices located on Lantau.
20. The Mui Wo Fringe Outline Zoning Plan (OZP) should be reviewed holistically. The Mui Wo Fringe OZP was published in 1995. However, the land use status and environmental conditions have enormously changed over the last 20 years. It is no longer able to protect habitats and sites of conservation importance and preserve the fundamental rural character of Mui Wo.
21. In this OZP, active farmland is zoned as "Residential (D)" and "Agriculture". The former zoning allows active farmland to be turned into residential development and Small Houses development is increasingly allowed for the latter. We oppose these trends.
 - (a) Active farmland currently zoned as "Residential(D) and "Agriculture" should be rezoned as "Agriculture(2)" that excludes New Territories Exempted House (NETH, Small House) development in Column 2.
 - (b) Valuable habitats, such as woodlands, marshes, roosting sites of egrets and herons, with inappropriate zoning (e.g. "Residential", "Recreation" and "Open Space") should be rezoned to conservation zoning such as "Green Belt" or "Conservation Area".
22. The areas from Butterfly Hill to Man Kok have not been covered by any Development Permission Area (DPA) plan or OZP plan yet. Two environmental vandalism cases were spotted on Butterfly Hill and the boundary of Mui Wo Fringe OZP. In order to limit the spill-over of environmental vandalism, the

Government should produce DPA plan(s) covering Wang Tong, Butterfly Hill and areas which have not covered by DPA plan yet to the North including Tung Wan Tau and Man Kok Tsui.

Amendment to Town Planning & Waste Disposal Ordinance

23. We are frustrated that rectification of loopholes in existing legislations that hinder effective enforcement and protection of ecologically important sites and habitats are still ignored in the Blueprint. These include, but not limited to, the formulation of Development Permission Area plans for rural areas already covered by OZPs, review Waste Disposal Ordinance (WDO) by requiring statutory permits which take into account of environmental protection and conservation values prior to allowing any construction and demolition waste disposed of on private or government land, categorizing land filling as unauthorized development under the Town Planning Ordinance, and deleting the exemption for inert waste under the WDO.

Green Transport and Traffic Strategy

24. 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, as proposed by green groups in their joint letter dated 31 August, 2016.

25. Any new roads should be well justified, 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 (i.e. sites stated in, but not limited to, “Lantau-Hong Kong Jewel”¹).

Maintain Stringent Road Restriction

26. Strict traffic restriction of closed roads on Lantau including South Lantau Road must be maintained as a proactive conservation measures for Lantau. Issue of car permits for closed road should be kept strict and be tightened in consideration of the road capacity, parking spaces and environmental impacts caused by traffic and transportation.

27. Traffic restrictions 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. Such restriction have to be well-planned and implemented before development works for Tung Chung New Town Extension which will generate huge amount of construction and demolish wastes. This will help ensure that the environmental carrying capacity of Lantau is not exceeded, prevent flytippings and fillings of farmlands, wetlands and natural shorelines, and also secure road safety.

Environmental-friendly, Smart Public Transport

28. The government should promote and improve public transportation on Lantau and a comprehensive public transportation plan should be drawn, not only for North Lantau where major developments are allocated but also for South Lantau to cope with the transportation need generated by expansion of rural population and tourists.

Flowers/Trees Appreciation

29. Regarding the Government's proposal to plant exotic cherry trees for development of blossoming tours in Lantau, we opine that only native species should be planted in country trails and ecologically sensitive area. Planting exotic species aiming at flower appreciation and attracting tour will introduce crowd that will likely caused serious disturbance to the sensitive habitats and bring about pollution. Very likely, the use of fertilizers, pesticides and gardening maintenance work will discharge pollutants to the habitat and threaten the survival of wildlife. Even though native species are going to be planted or planting is undergone in ecologically non-sensitive areas, any planting plans, tree felling and/or transplantation plans should be supported by impact assessment and feasibility study. The public and stakeholders should be engaged for consultation.

East Lantau Metropolis

30. The proposed East Lantau Metropolis (ELM) development should be rejected. Such large scale reclamation will further impact the marine ecology and water quality. So far 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. We are deeply concerned about both the direct and indirect impacts of the traffic and transport measures including the supporting facilities (e.g. bridges and tunnels) and associated footprints of works including slope works on the various habitats. We are also concerned over the increase of vessel traffic in the surrounding waters and the threat they pose to the fisheries resources, and cetaceans in the vicinity.

Sustainable Lantau Office

31. Green groups object to the establishment of Sustainable Lantau Office (SLO) as proposed because it will be incapable of implementing effective conservation measures for Lantau. We think that the SLO should be also for *pursuing conservation initiatives in Lantau* (Section 4, the Blueprint), we urge that SLO must be re-structured with clear mission recognized by the Government to implement conservation measures:

- (a) East Lantau Metropolis development should be excluded from SLO's jurisdiction.
- (b) SLO should take up the responsibility to plan and implement conservation measures, including those proposed by green groups.
- (c) Environment Bureau should directly supervise the conservation section of SLO, and oversee the planning and implementation of conservation measures for Lantau. Proper professional staff should be recruited/engaged in the SLO to implement the conservation measures on Lantau and responsible to Environment Bureau.
- (d) The operation and works of SLO should be transparent and accountable to general public, and corresponding mechanism should be in place when SLO is set up.
- (e) SLO should consult different stakeholders, including green groups, when implementing development and conservation measures.

Strategic Environmental Assessment

32. Strategic Environmental Assessment (SEA) should be carried out for the endorsement of all the proposed and planned developments on Lantau. All potential cumulative environmental and ecological impacts should be identified and assessed at an early planning stage to avoid adverse impacts on areas and species of conservation importance.

Conservation Fund

33. We seek the clarification of the Government whether the conservation fund is '*to further promote the revitalization of remote rural areas*' (Secion 3.3.2 (xiii)) will include nature conservation initiatives. We are also grateful for the details of the '*earmarked \$30 million Environment and Conservation Fund in 2017-18 for supporting nature conservation projects in South Lantau*'.

34. We urge the government to make a firm commitment to protect the land and waters of Lantau for their environmental, ecological, landscape, heritage, cultural and leisure values, and not to sacrifice these recklessly based on ad-hoc development plans. The government should abandon such a single-minded development mentality and formulate a novel and visionary plan for Lantau safeguarding the natural resources for future generations.

Thank you very much for your kind attention. We look forward to your wise decision and prompt action to safeguard the living quality on Lantau and conserve the rich biodiversity, tranquil environment and magnificent landscapes of Lantau.

For any enquiries, please contact Ms. Miffy Ng of Save Lantau Alliance (Email: savelantau@gmail.com)

Co-signatories:

Designing Hong Kong

Green Lantau Association

Green Power

Greeners Action

Hong Kong Bird Watching Society

Hong Kong Dolphin Conservation Society

Living Islands Movement

Save Lantau Alliance

Society of Hong Kong Nature Explorers

The Conservancy Association

WWF-Hong Kong