



**BY EMAIL AND FAX**

**Miss LAW Shuk-pui, Rosanna, JP**

**Commissioner for Transport**

16/F, South Tower, West Kowloon Government Offices  
11 Hoi Ting Road, Yau Ma Tei, Kowloon  
(E-mail: [comr@td.gov.hk](mailto:comr@td.gov.hk))

**Mr. FONG Hok Shing, Michael, JP**

**Head of the Sustainable Lantau Office**

13th Floor, North Point Govt Offices,  
333 Java Rd, North Point, Hong Kong  
(E-mail: [michaelfong@cedd.gov.hk](mailto:michaelfong@cedd.gov.hk))

**Transport Operations (NT) Division**

**Transport Department**

7/F, Mongkok Government Offices, Mongkok, Kowloon  
(Fax: 2381 3799)

cc.

**Mr. YU Hon-kwan, Randy, MH, JP**

**Chairman of Islands District Council**

20/F., Harbour Building, 38 Pier Road, Central, Hong Kong  
(E-mail: [isdadm@isd.had.gov.hk](mailto:isdadm@isd.had.gov.hk))

**Mr. WONG Wai Lun, Michael, JP**

**Secretary for Development**

18/F, West Wing, Central Government Offices,  
2 Tim Mei Avenue, Tamar, Hong Kong  
(E-mail: [devbenq@devb.gov.hk](mailto:devbenq@devb.gov.hk), [plbenq@devb.gov.hk](mailto:plbenq@devb.gov.hk))

**Mr. WONG Kam Sing, GBS, JP**

**Secretary for the Environment**

16/F, East Wing, Central Government Offices,  
2 Tim Mei Avenue, Tamar, Hong Kong  
(E-mail: [enquiry@epd.gov.hk](mailto:enquiry@epd.gov.hk))

25 November 2020

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, would like to express our concerns and views on the consultation document entitled *Review on Driving on Lantau Island Scheme and Issuance of Lantau Closed Road Permits* (T&TC 48/220, referred hereafter as “the Review”).

**Conservation-oriented planning strategy for South Lantau**

2. The ecological and cultural values of South Lantau, and the priority of conserving these invaluable elements when formulating management plans for the area are well acknowledged. This planning principle was also emphasized in government public consultation documents, including the *Revised Concept Plan for Lantau* released in 2007, and the controversial *Sustainable Lantau Blueprint* released in 2017. We would like to stress this can only be achieved through a conservation-oriented, rather than demand-oriented, planning strategy for South Lantau. 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.

3. Transport and traffic strategy is of ultimate importance to safeguard the pristine environment and landscape, as well as fragile and unique ecology of Lantau. A joint green group letter of comments and recommendations previously submitted to various government bureaux and departments is enclosed as Appendix 1.

#### **Objection to relaxation of closed road system on Lantau**

4. The transport and traffic strategy for Lantau shall 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. This is especially important when current traffic and human flows have already caused considerable threats to wildlife (e.g. road accidents involving bovinds, trash problems) and nuisance to local residents (e.g. illegal parking) in various areas linked by the closed roads of Lantau. Flow of visitors is expected to be even higher when low-cost commute via Tuen Mun Chek Lap Kok Tunnel Road and Lantau Link is available in the near future. This would in turn increase the burden of the existing traffic load, and thus the closed road system on Lantau.
5. Although the Review claimed that recent number of vehicles using closed roads in South Lantau did not reach the designed capacity of these roads and no obvious increase in traffic accidents since the introduction of the first phase of Driving on Lantau Island Scheme (DLS), no estimates of future traffic flow, potential risks associated with traffic increase, information regarding the number of accidents involving animals (e.g. bovinds) nor criteria used to determine the appropriate number of quotas were provided. 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.
6. In addition to hampering environmental and residents’ living qualities, promoting traffic growth, especially with drivers unfamiliar with precarious conditions (i.e. steep terrain, narrow roads with frequent bends and presence of bovinds) of these closed roads, would impose higher risks to pedestrians, bikers and animals of the area. In fact, the introduction of DLS lacked a solid rationale 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 current public bus and ferry services.
7. We do agree with the initiative that “green transport will be encouraged for sustaining low-carbon footprint...with a view to enhancing the environment of Lantau” mentioned in the *Sustainable Lantau Blueprint*. The Administration should endeavor to transform the traffic and transport system on Lantau into a low-impact and sustainable green transport system. Encouraging more drivers (especially those of private cars and motorcycles as suggested in the Review) to use the closed roads for recreational purpose not only increases burden on the existing road system and nuisance to local residents and environment, but is also against the above initiative and the basic principle of conserving South Lantau as a whole.
8. We therefore strongly oppose 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.

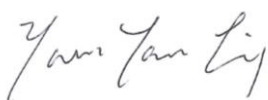
## **Improvement of surveillance and enforcement against vandalism**

9. The tranquil rural and natural areas linked by closed roads in South Lantau is preserved by the closed road system through the issuance of Lantau Closed Road Permits (LCRP). However, with the deficiency of existing legislation framework, as well as inadequate surveillance and enforcement actions from the Administration, such sensitive areas have been under continuous threats posed by vandalism, particularly land filling and development activities associated with unmonitored vehicles entering the closed road system. A classic example is Pui O, with its wetlands being highly ecologically diverse and one of the last remaining habitats for buffalo in the territory, but continuously trashed by land filling activities.
10. While review and strengthening of existing legal framework are of absolute importance, implementation of adequate surveillance and control measures through the closed road system is also indispensable for the protection of sensitive areas in South Lantau. Although we welcome tightening application criteria of LCRP as suggested by the Transport Department in the Review, the proposed criteria remain inadequate in controlling vehicle-related vandalism activities. Additional measures should be considered, including:
  - i. application of effective surveillance measures (e.g. mandatory trip-ticket AND GPS / RFID monitoring systems) and deterrent penalty on offenders while imposing 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 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.
11. To safeguard the valuable and sensitive areas linked by the closed road system of Lantau, we would like to iterate the following requests:
  - i. The planning principle for Lantau should be conservation-oriented, not demand-oriented.
  - ii. The transport and traffic strategy of Lantau should be formulated strategically in conjunction with other policies, and accurate assessment of cumulative impacts of various projects / measures based on comprehensive information, which should also be made transparent and readily available to the public.
  - iii. The closed road system on Lantau should not be relaxed, and DLS should be terminated.
  - iv. Any loopholes in legislation, surveillance and enforcement regarding environmental vandalism should be filled.
  - v. More stringent surveillance and proactive control of vehicles via the closed road system should be applied.

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,

YUEN Yan Ling, Elaine



Assistant Education & Conservation Manager  
Green Power