

Hong Kong, 13 April 2016

Chairman and members of the Panel on Development  
Legislative Council Secretariat,  
Legislative Council Complex,  
1 Legislative Council Road,  
Central, Hong Kong  
Email: panel\_dev@legco.gov.hk

Dear Sir/Madam,

Green Groups' joint request for substantiation of the conservation plan for Lantau

The undersigned green groups are deeply concerned over the proposed development plan (the Plan) for Lantau launched by the Administration in January 2016.

The plan appears to be a development-orientated proposal which fails to provide adequate protection and conservation of important sites and habitats on Lantau. We believe that conservation should be the planning premise for Lantau before any developments is proposed.

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. Geographically, the island is situated at the periphery of the Pearl River Estuary and the coastline is subject to both marine and brackish environments. Such unique settings have resulted in a wide range of natural habitats - 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 Chinese White Dolphin (*Sousa chinensis*), Finless porpoise (*Neophocaena phocaenoides*), 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*)<sup>1</sup> and Brown Fish Owl (*Ketupa zeylonensis*)<sup>2</sup>.

Besides a diverse ecological system, there is also a rich cultural heritage on the island with an abundance of religious retreats and facilities of different denominations. 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. Undoubtedly, Lantau is a great treasure of Hong Kong.

However, the deficiency in enforcement capabilities due to loopholes in existing legislation has rendered Lantau vulnerable to environmental vandalism. The Planning Department is unable to enforce land use control in much of Lantau's rural areas due to lack of Development Permission Area (DPA) plans. For example, the South Lantau

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<sup>1</sup> Listed as "Near Threatened" in the IUCN Red List.

<sup>2</sup> Class II protect animal of the PRC & regional concern [Fellowes et al. (2002)]

Coast Outline Zoning Plan (OZP) was first published in 1980<sup>3</sup> and had not been covered by a DPA plan. As a result, eco-vandalism has been proliferating with impunity on private land, including ecologically important wetlands in Pui O. With such a loophole in statutory control under the Town Planning Ordinance, the future economic activities stimulated by the proposed developments and the ease of access caused by the relaxation of closed roads would lead to uncontrollable eco-vandalisms and further encroachment on unspoiled natural habitats. This will degrade the living and environmental quality, the tranquility, the magnificent landscape and the fragile ecological integrity of Lantau.

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.”*

In order to effectively conserve the biodiversity of Lantau in a holistic manner, and achieve more sustainable development, green groups request the government to take the following measures:

- a. Areas without statutory protection (e.g. northwest coast of Lantau) should be designated with Development Permission Area (DPA) plans or incorporated into the Country Park system without delay to avoid any undesirable ecological damage caused by the imminent development pressure. DPA plans are also urgently needed for rural areas already covered by OZPs.
- b. Offshore waters of Yi O and Tai O (offshore western waters) 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. 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.
- c. All ecologically important sites on Lantau should be adequately protected with active management in place. 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. Such NO-GO areas include Country Parks, proposed and existing 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” (Refer to Appendix I). Any eco-tourism should contribute to conserving the local ecological, cultural and landscape characteristics.
- d. 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

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<sup>3</sup> South Lantau Coast Outline Zoning Plan No. S/SLC/19 Explanatory Statement, [http://www2.ozp.tpb.gov.hk/plan/ozp\\_plan\\_notes/en/S\\_SLC\\_19\\_e.pdf](http://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_SLC_19_e.pdf) p.19

and the Tung Chung Valley and Bay areas is vital to prevent large-scale waste and debris dumping. This will help ensure that the environmental carrying capacity is not exceeded, and also improve road safety.

- e. Maintain the strict traffic restriction of closed roads on Lantau including South Lantau Road. Public and environmental-friendly, smart, public transportation should be encouraged as the priority to deal with any transport needs on Lantau. 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, Appendix I).
- f. Any development plans on Lantau should be included in the on-going “Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030” study. Strategic Environmental Assessment (SEA) should be carried out for 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.
- g. Loopholes in existing legislations that hinder effective enforcement and protection of ecologically important sites and habitats should be resolved. This includes, but not limited to, the formulation of DPA plans for rural areas already covered by OZPs, categorizing land filling as unauthorized development under the Town Planning Ordinance, and deleting the exemption for inert waste under the Waste Disposal Ordinance.
- h. The proposed East Lantau Metropolis 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.

We 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 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.

Appendix 1 - Key species/habitats of conservation concern in different areas of Lantau

**Joint-organizers:**

Designing Hong Kong

Green Power

Hong Kong Bird Watching Society

The Conservancy Association

WWF Hong Kong

**Co-signatories:**

Ark Eden

Association for Geoconservation, Hong Kong

Christian Concern for Earth

Environmental Life Science Society .SS .HKUSU

Friends of the Earth (HK)

Friends of Hoi Ha

Greeners action

Greenpeace East Asia - Hong Kong

Green Lantau Association

Green Sense

HKWildlife.net

Hong Kong Dolphin Conservation Society

Hong Kong Outdoors

Lantau Buffalo Association

Living Islands Movement

South Lantau Concerning Group

Tai O Culture Workshop

Tai O Sustainable Development Education Workshop

The Green Earth

TrailWatch