

The Secretariat
Lantau Development Advisory Committee
17/F., East Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

(Email: landac@devb.gov.hk)

29th April, 2016.

By email only

Dear Sir/ Madam,

Lantau Development Public Engagement

1. We refer to the captioned, the Public Engagement Digest (the Digest) and the First-term Work Report (the Report) of the Lantau Development Advisory Committee (LanDAC).

Sustainable Development, Low-carbon and Conservation – Does LanDAC really understand the meaning of these words?

2. First of all, we would like to elaborate upon the three central terms which are used, repeatedly, in the Report/ the Digest: ‘sustainable development’, ‘low-carbon’ and ‘conservation’.

3. According to the Environment Bureau of the Government of the Hong Kong SAR, ‘sustainable development for Hong Kong’ means:

- *finding ways to increase prosperity and improve the quality of life while reducing overall pollution and waste;*
- *meeting our own needs and aspirations without doing damage to the prospects of future generations; and*
- *reducing the environmental burden we put on our neighbours and helping to*

preserve common resources. (“1999 Policy Address”) ¹

4. From a global perspective, the concept of sustainable development is, generally, similar to the above but expressed in a more forthright manner:

- “Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs ^{2, 3}. It contains within it two key concepts³:
 - the concept of **needs**..... **in particular the essential needs of the world's poor, to which overriding priority should be given**; and
 - the idea of **limitations** imposed by the state of technology and social organization on the environment’s ability to meet present and future needs.”

5. ‘Low carbon’ in general means reduction in carbon emissions (e.g., through the burning of fossil fuels). The meaning as stated by the United Nations is: “Low carbon development is now generally expressed using the term low-emission development strategies (LEDS - also known as low-carbon development strategies, or low-carbon growth plans). Though no formally agreed definition exists, LEDS are generally used to describe **forward-looking national economic development plans or strategies that encompass low-emission and/or climate-resilient economic growth.**”⁴

6. The meaning of (nature) conservation is also very simple and straightforward. According to the Cambridge Dictionary, it simply means the protection of animals and plants, and, natural areas⁵. Since the Convention on Biological Diversity (CBD) was extended to Hong Kong in May 2011, nature conservation for Hong Kong also means that the Government of the Hong Kong SAR has the responsibility to halt the loss of biodiversity.

7. We would like to mention that, what the LanDAC is now proposing and what the Report/

¹ <http://www.enb.gov.hk/en/susdev/sd/index.htm>

² <http://www.iisd.org/topic/sustainable-development>

³ <http://www.worldbank.org/depweb/english/sd.html>

⁴ <https://sustainabledevelopment.un.org/index.php?menu=1448>

⁵ <http://dictionary.cambridge.org/dictionary/english/conservation>

the Digest are promoting DOES NOT by any means whatsoever concur with, nor is it synchronous with, the cosmopolitan accepted concepts or meanings associated with these three terms. Although they have been used repeatedly in the documents, we consider that the LanDAC may have mis-understood and mis-used these terms. Simply stated, the overall development plan proposed by the LanDAC is far from ‘sustainable’ or ‘low-carbon’, AND, there are also ZERO conservation measures proposed by the LanDAC. Actually, what is being proposed by LanDAC is relentless development for Hong Kong.

8. We are highly disturbed and disappointed, but not surprised as the LanDAC is primarily comprised of many members from the commercial or business sector, some with vested interests^{6, 7}, and only a few members from the conservation or environmental protection sector. This biased arrangement of the LanDAC implies that the Government, particularly the Development Bureau believe that there is no need for an equal balance between development and conservation. This gives the unmistakable impression that this is a one-sided arrangement, whereby, development is emphasised and takes precedence in the proposed broad-brushed concept plan for Lantau

9. Our views are further elaborated below:

Reclamation is NOT sustainable development

10. The only thing that reclamation sustains is development; it is not ‘Sustainable Development’. In the Report, some reclamation proposals have been mentioned (e.g., the East Lantau Metropolis (ELM), the reclamation at Yam O (Sunny Bay) and Siu Ho Wan). Indeed, in our numerous submissions for reclamation proposals by the Government (e.g., Enhancing Land Supply Strategy and the Tung Chung East reclamation), we have already urged the Government to stop any further reclamation in Hong Kong and abort these proposals. There should be a moratorium on the continuous destruction of our natural coastlines and the coastal areas of Hong Kong.

11. In our first submission for the Enhancing Land Supply Strategy consultation, we mentioned that: ‘Sustainable development does not call for adequate usable land created by

⁶ <http://hk.apple.nextmedia.com/news/art/20140421/18695811>

⁷ <https://www.facebook.com/hk.nextmedia/photos/a.170516952447.149676.105259197447/10152439281137448/?type=1&theater>

reclamation. It calls for the sustainable use of our existing resources, providing for future generations and not the irreversible loss and damage of our key natural resources.' Indeed, as repeatedly stated by us and many other groups, there are many brownfield sites in Hong Kong and, also, many alternative options, e.g., urban renewal, redevelopment, land resumption, re-zoning to enhance land supply. We do not consider that reclamation is the only resort for increasing land supply for 'development'.

12. On the Mainland, the Head of the State Oceanic Administration has already stated that, in order to sustain the eco-system services provided by shallow in-shore and coastal waters (e.g., fish nursery and spawning grounds), China's coastal eco-system has to be urgently restored⁸. An article published on 31st May, 2011 on the website of the Ministry of Land and Resources, The People's Republic of China, has also urged that reclamation projects should be supported by scientific feasibility studies, and, due consideration should be given to the associated environmental impacts⁹. The above already shows that there are alternative voices even within the Government of The People's Republic China that call for a 'slow-down' regarding coastal development. This is in contradiction to the claim in the Report that '*the rapid trend of development in adjacent regions is irreversible*'. Indeed, the necessity for incessant development is now being critically reviewed and seriously challenged at a high level on the Mainland.

13. What we really need to do is to optimise the use of our current land resources rather than enhance land supply by reclamation. There is an actual need for a transition and mindset change from a scenario of unlimited economic and population growth to REAL sustainable development. This includes:

- Restoring degraded ecosystems
- Restoring degraded agricultural lands
- Population control (e.g. review and rationalisation of the immigration policy)
- Reducing carbon footprint
- Reducing eco-footprint and,
- Reducing waste production.

14. The present reclamation proposals, however, reflect that the Hong Kong Government and

⁸ http://www.gov.cn/gzdt/2013-06/03/content_2417721.htm

⁹ http://www.mlr.gov.cn/xwdt/xwpl/201105/t20110531_872583.htm

the LanDAC has taken an extremely narrow and uninformed view. They have given very limited consideration to alternative options of land supply, of the urgent need for transition to low-carbon living and to the irreversible consequences of land reclamation. **While these projects may improve the quality of life of the future generations of those people on LanDAC with vested interests and conflicts of interest, who may become wealthy on the back of the projects, they will not improve the quality of life for future generations of the general public of Hong Kong. For most people the projects will reduce their opportunities to enjoy and benefit from the natural environment.**

15. The reasons provided by the Hong Kong Government and the LanDAC for enhancing land supply through land reclamation are well meaning but are, unfortunately, misguided and have far-reaching and irreversible consequences for the natural environment. We fully agree with the Head of the State Oceanic Administration's view that China's coastline should be restored urgently rather than be further developed or reduced. Therefore, frankly, our response to those reclamation proposals, such as the ELM, is clearly a very definite "NO".

Low-carbon development/ community – The fallacy of reclamation, more vehicular road networks and further relaxation of closed roads

16. The sub-title of this section is already a *non-sequitur* but unfortunately this is what is being proposed in the Report. We do not see how introducing more traffic/ vehicles into Lantau is by any means promoting low-carbon development and a low-carbon life style. Is the Government and LanDAC aware that most vehicles, whether conventional or electric require fossil fuels to be burned to make them move? Low-carbon generally means putting LESS carbon into the atmosphere, much less than today, not MORE. So, it means less cars on Lantau, less pumping of fossil fuels into the gas tanks, less emissions of air pollution from vehicle exhausts, less buildings, less pouring of concrete on Lantau than today. However, the LanDAC is promoting the exact opposite and reversing the accepted understanding of the concept of low-carbon development in an attempt to persuade the Hong Kong public into support their development plans: more road networks connecting Hong Kong Island and the New Territories with Lantau, additional road links from Lantau to Tuen Mun (despite the fact that there is already a planned underwater tunnel link), allowing more private vehicles and shuttle buses onto South Lantau, etc. All this would just allow **more and more carbon** to be cumulatively emitted into the air of Lantau, and into the atmosphere. This simply reflects the superficial understanding of LanDAC regarding the notion of low-carbon development.

17. There are already comprehensive local, regional and international transportation systems: commuter railway, cable-car system, highway, public bus services, public ferry services, a regional road (the Hong Kong-Zhuhai-Macau bridge), an underwater tunnel system, an inter-city high-speed ferry terminal and even an International Airport serving the region and the world – on Lantau. There is only two reasons why the LanDAC is recommending so many unnecessary and superfluous transportation proposals: MONEY and ECONOMIC GROWTH. If developing Lantau into a *low-carbon community for living* is REALLY the ‘planning vision’ or intention adopted by the LanDAC as stated in the Report, they would be proposing less roads and less vehicular access. What we need to improve is the existing public transportation system; for instance, enhancing the existing bus, ferry and taxi services, and to promote zero-carbon emission transportation (e.g., cycling). For instance, in Taiwan, both forest walks and cycling trips (e.g., YouBike¹⁰) are very popular tourist activities, and, cycle tracks and parking spaces for bicycles are incorporated as a basic feature into the planning of the cities⁸. But in the present Report, the concept of promoting zero-carbon emission transportation is just briefly mentioned and there is no solid plan at all.

Implications and consequences of more development, more vehicular roads and further relaxation of closed roads

18. There have been no Development Permission Area (DPA) Plans gazetted for areas along the coast of South Lantau (and also part of the North Lantau). This simply means that the Planning Department has NO ENFORCEMENT POWER to deal with the haphazard dumping of construction materials (e.g. construction and demolition waste (C&D waste))/ haphazard development that frequently take place in these areas (see **Figures 1, 2 and 3**). Besides the Planning Department, we have, on innumerable occasions, contacted other Government Departments including the Lands Department, Environmental Protection Department, Agriculture, Fisheries and Conservation Department, Drainage Services Department, Water Services Department and Home Affairs Department regarding tackling these issues on Lantau. So far, no positive result has been achieved by any of these Departments. They are all powerless in this respect. The haphazard dumping issue has also been repeatedly discussed between the Legislative Council and the Government for more than ten years; but, again, no solid solution has arisen through the discussions. Simply speaking, these environmental issues CANNOT be stopped or curtailed by any of these Departments, the existing Laws nor the Government of the Hong Kong SAR.

¹⁰ <https://www.youbike.com.tw/>

19. The flagrant and haphazard dumping of construction materials/ haphazard development causes a direct impact on natural habitats. Important natural habitats such as the wetlands at Pui O are already diminishing and disappearing before our eyes (see **Figures 1**). It can be easily envisaged that, with the relaxation of restrictions of the ‘restricted access’ roads, and more road connections with more development proposals in South Lantau, the only thing that will happen is a worsening scenario of widespread dumping of construction materials and haphazard development. Given that there is no improvement in the land use planning and/ or the environmental protection systems expected, more concrete-paved car parking areas and site formation to accommodate recreational facilities and other associated structures (e.g. containers) to cater for the expected increase in tourist numbers, especially in areas with no DPA plans such as the entire of South Lantau (like those shown in **Figures 1, 2 and 3**) can be expected.

20. In a recent meeting with the Development Bureau for the Lantau Development Public Engagement exercise, we have already expressed our concerns that, under the above circumstances, more development (i.e., more C&D waste) and a more flexible transportation system (e.g. relaxation of road restrictions or more road connections) on Lantau would simply induce more flagrant dumping cases. During the meeting, the Deputy Secretary for Development and the representatives from other Governments Departments could not provide us and the general public of Hong Kong any solutions or any answers to show that the Government will whole-heartedly handle and deal with this pressing issue.

21. IF the Government does not have any solid solutions or real answers to deter or resolve the environmental problems caused by haphazard dumping of C&D waste and haphazard development on important habitats, that are already happening on Lantau right now and for many years up to now, THEN we simply urge that there should be NO MORE roads, NO MORE further relaxation of the road restrictions and NO FURTHER development on Lantau.

22. As reflected above, IF the Government accepts the proposals as stated in the Report, this simply shows that the Government is actually trying to turn a blind eye to the reality, or pretending to be unaware of the serious environmental consequences caused by the lack of a DPA Plan and the lack of an appropriate environmental protection system to deal with the dumping of C&D waste. This is not what a responsible government should do. **In the future, if there are more development projects, more cars and more roads on and connecting with South Lantau, we can foresee that the entire South Lantau coast will become an**

open dumping megasite.

Balancing development and conservation – There is no consideration for conservation, at all. There are only development proposals that will seriously threaten pristine landscapes, biodiversity and natural habitats

23. According to the Report, the planning vision for the developments on Lantau is to **balance and enhance development and conservation**. While we can see many solid proposals in the Report to enhance **development** (as mentioned above and listed in the table below), we do not see any kind of newly-proposed initiatives and solid plans outlined by the LanDAC to significantly and practically preserve and enhance those existing areas of high conservation value or to better sustain those which are currently without any protective status at all, on Lantau. Indeed, the Report only emphasises how to enhance heritage and landscape conservation. **It completely omits to elaborate upon how to enhance ‘nature conservation’.**

24. The proposed Marine Parks and River Park mentioned in the Report/ Digest are not a new initiative proposed by the LanDAC. These are on-going projects previously planned and initiated **to compensate and mitigate** for the environmental impacts caused by **previously approved large-scale infrastructure projects** around Lantau. **These are works-in-progress.** Similarly, the Country Parks have been in existence since the 1970s. So too, have the numerous hiking trails on Lantau or the walking routes and monasteries from past centuries. All of these already exist for Hong Kong people to enjoy because of the foresight and vision of those people who set-up or founded these institutions or lived in these places in the past. They are not there because of the LanDAC. It seems that the Report/ the LanDAC has proposed many significant ‘measures’ relating to nature conservation (i.e., Marine Parks, River Park) but the reality is NOT so as **none of these measures are new** or originally proposed by the LanDAC.

25. Furthermore, there are even **development proposals** recommended by the LanDAC for some **ecological hotspots**. In the eyes of the LanDAC, some of these proposals are considered to be promoting ‘green tourism’ but we would like to point out that these proposals are neither environmentally-friendly nor ‘green’ and that tourism is not the same thing as nature conservation.

26. While the proposed star-gazing facility at Sunset Park has already been severely criticised by the public (which also clearly reflects that the LanDAC have their heads in the clouds,

thinking perhaps of other things), there are also many other proposals by the LanDAC that would pour more concrete and cause intensive human disturbance to many identified/ well-known ecological hotspots. We strongly object to these proposals as listed below:

Location	Species/ habitats of conservation importance recorded	Facilities/ activities proposed in the LanDAC Report/ Digest	Foreseeable potential impacts
Mui Wo	<ul style="list-style-type: none"> - Freshwater and brackish marshes - Mangroves and estuaries - Watercourses - Woodlands - Important bird breeding site (the marshes) - Amphibian hotspot (recognised by AFCD) - Butterfly hotspot - Bat hotspot 	<ul style="list-style-type: none"> - Adventure park (e.g., war games facility) - Aqua park - Segway 	<ul style="list-style-type: none"> - The proposed development would bring in more visitors, which would seriously threaten those bird and bat species sensitive to human disturbance. - The proposed facilities need land for development, and thus, the proposals would cause direct and irreversible habitat loss; associated impacts (e.g., haphazard dumping of C&D waste, construction runoff) would also significantly threaten the surrounding habitats and the species.
Pui O/ Chi Ma Wan	<ul style="list-style-type: none"> - Mangroves - Mudflats - Estuaries - Freshwater and brackish marshes - Seasonal wetlands - Ecologically Important Stream (recognised by AFCD) - Natural watercourses - Important fish habitats - More than 180 bird species recorded (at Pui O) - Amphibian and butterfly hotspots (both recognised by AFCD) - Woodlands 	<ul style="list-style-type: none"> - Water Sports Centre - Paragliding - Facilities for extreme sports - Aqua Park 	<ul style="list-style-type: none"> - The development proposal would raise the expectation (for development) of the local land owners in the area, and hence, we are concerned that there would be more dumping cases as at present there are NO LAWS that can protect the habitats there. - The proposed developments need land, and thus the proposals would cause direct and irreversible habitat loss; associated impacts (e.g., haphazard dumping of C&D waste, construction runoff) also significantly threaten the habitats and the species. - The proposed development would bring in more visitors which would seriously threaten those bird species sensitive to human disturbance. - The proposed facilities would also cause serious visual and landscape impacts, and, disturbance to the coastal environments.
Shui Hau	<ul style="list-style-type: none"> - Mangroves - Mudflats - Freshwater wetlands - Woodlands - Breeding and nursery grounds for Horseshoe Crabs 	<ul style="list-style-type: none"> - Paragliding - Animal farm - Exploration campsite 	<ul style="list-style-type: none"> - The development proposal would raise the expectation (for development) of the local land owners in the area, and hence, we are concerned that there would be more dumping cases as at present there are NO LAWS that can protect the

Location	Species/ habitats of conservation importance recorded	Facilities/ activities proposed in the LanDAC Report/ Digest	Foreseeable potential impacts
	<ul style="list-style-type: none"> - Amphibian and butterfly hotspots (both recognised by AFCD) 		<ul style="list-style-type: none"> habitats there. - The proposed developments need land, and thus the proposal would cause direct and irreversible habitat loss; associated impacts (e.g., haphazard dumping of C&D waste, construction runoff) also significantly threaten the habitats and the species. - The proposed development would bring in more visitors which would seriously threaten those species sensitive to human disturbance (e.g., juvenile Horseshoe Crabs). - Sewage and run-off from the proposed animal farm would also threaten the Horseshoe Crab nursery and breeding ground.
Tai Ho Wan	<ul style="list-style-type: none"> - Mangroves - Mudflats - Estuaries - Freshwater and brackish marshes - Ecologically Important Stream (recognised by AFCD) - SSSI - Seagrass - Habitats for rare bird species - Breeding and nursery grounds for Horseshoe Crabs 	<ul style="list-style-type: none"> - Botanic Garden - 'Eco-tour' Centre - 'Eco' Retreat 	<ul style="list-style-type: none"> - The development proposal would raise the expectation (for development) of the local land owners there, and hence, we are concerned that there would be more tree felling cases as at present there are NO LAWS that can protect the trees (on private land) there. - The proposed developments need land, and thus the proposal would cause direct and irreversible habitat loss; associated impacts (e.g., haphazard dumping of C&D waste, construction runoff) also significantly threaten the habitats and the species. - The proposed development would bring in more visitors which would seriously threaten those species sensitive to human disturbance. - Sewage from the proposed facilities would also threaten the Tai Ho Stream SSSI and the Horseshoe Crab nursery and breeding ground.
Yi O	<ul style="list-style-type: none"> - Reed bed - Mangrove - Mudflat - Natural watercourses - Freshwater marshes - Woodlands 	<ul style="list-style-type: none"> - Harvest walk - Farm-to-table eatery - To allow 'visitors' to experience agricultural lifestyle 	<ul style="list-style-type: none"> - We observed trashing of the original habitats at Yi O in October 2012, just before the exhibition of the draft DPA plan in late November 2012; the destruction of habitats (i.e., extensive excavation, vegetation clearance) was also noticed by the Government¹¹.

¹¹ http://www.info.gov.hk/tpb/en/papers/TPB/1023-TPB_9226.pdf

Location	Species/ habitats of conservation importance recorded	Facilities/ activities proposed in the LanDAC Report/ Digest	Foreseeable potential impacts
			<ul style="list-style-type: none"> - Genuine organic farming which is on part of the site can be beneficial for some species, provided the use is low impact and non-polluting, and subject to careful conditions. - The permitted uses should not expand to non-farming activities such as restaurants or lodging facilities which would lead to pollution, disturbance and demands for roads. - Allowing non-farming uses will also provide a perverse incentive to develop; owners will then not rent the land for farming and there will be an eventual loss of farmland.
Tai O	<ul style="list-style-type: none"> - Reed bed - Mangroves - Freshwater and brackish marshes - Natural watercourses - Mudflat - Estuary - Woodlands 	<ul style="list-style-type: none"> - Guesthouse - Cable car extension from Ngong Ping to Tai O 	<ul style="list-style-type: none"> - The proposed developments need land, and thus the proposal would cause direct and irreversible habitat loss; associated impacts (e.g., haphazard dumping of C&D waste, construction runoff) also significantly threaten the habitats and the species. - The proposed cable car development would carry in more visitors to Tai O which would seriously increase the crowding condition and burden the carrying capacity of this tiny place on the edge of Lantau.
Yam O (Sunny Bay)	<ul style="list-style-type: none"> - Mangroves - Mudflat - Seagrass 	<ul style="list-style-type: none"> - Proposed reclamation - Large performance venue - Indoor adventure park - Marinas 	<ul style="list-style-type: none"> - Reclamation would increase the turbidity, affecting sedimentation and the flow of currents, impacting on the seagrass and possibly causing their extirpation in this bay. - The proposed development would bring in more visitors which would seriously threaten the existing rural character of the site. - The proposed marinas would increase the marine vessel traffic, threatening the survival of the Chinese White Dolphin in the adjacent Brothers Marine Park. - There would be significant marine water pollution generated by the daily maintenance and operation of the vessels in the marinas which could potentially spill-over into the adjacent Brothers Marine Park. - The proposed facilities would also cause serious visual and landscape

Location	Species/ habitats of conservation importance recorded	Facilities/ activities proposed in the LanDAC Report/ Digest	Foreseeable potential impacts
			impacts.
Sunset Peak	<ul style="list-style-type: none"> - Important habitat for Chinese Grassbird - Important habitat for wild orchids, at least one species is very scarce and restricted 	Viewing and stargazing facilities	<ul style="list-style-type: none"> - The proposed development would bring in more visitors which would seriously threaten the Chinese Grassbird and the orchids. - The proposed man-made facilities would also severely affect the visual outlook and mar the natural landscape.
Luk Wu and Keung Shan	Woodlands and natural watercourses	<ul style="list-style-type: none"> - 'Zen' tour - 'Zen' meditation and accommodation 	<ul style="list-style-type: none"> - The proposed development/ activities would bring in more visitors which would seriously threaten the existing tranquil rural character and the serenity of the nunneries and monastic institutions of the region. - Sewage from the proposed accommodation facilities would also affect the watercourses.
Cheung Sha and Soko Islands	<ul style="list-style-type: none"> - Natural watercourses with fish species of conservation importance (Cheung Sha) - Habitats for both Chinese White Dolphins and Finless Porpoises (Soko Islands) 	<ul style="list-style-type: none"> - Spa and resort - Facilities for wedding centre/ extreme sports 	<ul style="list-style-type: none"> - The proposed development/ activities would bring in more visitors which would seriously threaten the existing rural/ landscape character of the site. - Sewage from the proposed facilities would cause water pollution. - The proposed facilities would also cause serious visual and landscape impacts. - The proposed facilities on the Soko Islands would increase the marine traffic in the area and threaten the cetaceans. - There is a potential for the building of seawalls and forming protected anchorages for vessels that may involve destruction of natural coastlines. - The proposed developments need land, and thus the proposal would cause direct and irreversible habitat loss; associated impacts (e.g., haphazard dumping of C&D waste, construction runoff) also significantly threaten the habitats and the species. - The development proposal at Cheung Sha would raise the expectation (for development) of the local land owners there, and hence, we are concerned that there would be more dumping cases as at present there are

Location	Species/ habitats of conservation importance recorded	Facilities/ activities proposed in the LanDAC Report/ Digest	Foreseeable potential impacts
			NO LAWS that can protect the habitats there.
Hei Ling Chau and Sunshine Island	Habitats for Bogadek's Legless Lizard <i>Dibamus bogadeki</i>	The proposed road(s) will pass through these islands.	<ul style="list-style-type: none"> - The proposed developments would need land, and thus the proposal would cause direct and irreversible habitat loss. - The proposed facilities would also cause serious visual and landscape impacts.
South Lantau	Besides those habitats at Mui Wo, Pui O, Shui Hau and Cheung Sha mentioned above, there are wetlands, woodlands and natural watercourses at Tong Fuk, Shap Long and San Shek Wan (on south Lantau).	<ul style="list-style-type: none"> - The proposed road(s) will enter Mui Wo and connect South Lantau with Hong Kong Island and the New Territories. - The LanDAC also proposed to relax the vehicle restriction to the entire of South Lantau. 	<ul style="list-style-type: none"> - The development proposal would raise the expectation (for development) of the local land owners there, and hence, we are concerned that there would be more dumping cases as at present there are NO LAWS that can protect the habitats there. - The proposed developments need land, and thus the proposal would cause direct and irreversible habitat loss; associated impacts (e.g., haphazard dumping of C&D waste, construction runoff) also significantly threaten the habitats and the species. - The proposed development would bring in more visitors which would seriously threaten those species sensitive to human disturbance. - The proposed facilities would also cause serious visual and landscape impacts.

Social development – We need a Green Economy on Lantau

27. The Report mentions that: '*Lantau provides ample existing and future job opportunities of a diversified nature in diverse industries, which will be sufficient to meet the future population growth.*' It seems that the intention is to create a modern services and logistics hub (i.e., the ELM and the North Commercial District (NCD) and employment is to be generated with a services-led production and employment structure. Again, this reflects that the LanDAC is narrowly-focused, and indeed, only thinking of socio-economic development in a traditional way, i.e., only driven by commercial activities. We consider that a diversified economy should include a green economy that supports socio-economic development, but not at the expense of

biodiversity and the natural environment, and, which can also drive our economy forward in a sustainable and environmentally-friendly way. However, the above statement alludes to “*future population growth*”. Are the development plans proposed by LanDAC meant to cater for a projected increase of the population in Hong Kong? If so, what is the projected level of the population numbers and where will these extra people come from? Will it be achieved by natural birth rates or will it be driven by immigration policy? Hong Kong is already seriously over-crowded.

28. Tourism/ eco-tourism may have once been considered to be purely ‘green’ in the past but nowadays, it is recognised that this brings many negative impacts^{12, 13}. What the LanDAC is proposing (for the so-called ‘green-tourism’) also clearly indicates that blindly promoting tourism and its associated development of facilities/ activities without any professional knowledge/ experience on environmental protection and/ or without an in-depth understanding of what real green tourism is, could lead to very destructive environmental consequences, e.g. by building a star-gazing facility at a pristine hilltop with no superfluous man-made structures. There is also the question of the unexplored consequences of socio-economic impacts caused by mass tourism on the local population.

29. Indeed, when formulating the development plans for Lantau, we consider that the Government/ the LanDAC has ignored or dismissed the importance of agriculture as irrelevant in the diversification of the local economy. Although optimising the usage of those abandoned agricultural lands on Lantau has been mentioned in the Report, there is, again, no solid plan or strategy outlined on how to actually revitalise/ protect this industry. We do see some proposals that are seemingly relevant to agriculture but, again, these are actually promoting tourism, e.g., the Farm-to-Table Eatery at Yi O or revitalising those abandoned fish ponds at Mui Wo for recreational tourism rather than sustaining agriculture as a source of employment and food in its own right.

30. Public dis-satisfaction and the social tensions caused by the developments in Choi Yuen Tsuen and the Northeast New Territories New Development Area should have clearly demonstrated that farming is not at all a diminishing industry in Hong Kong. In addition, the

¹²<http://www.unep.org/resourceefficiency/Business/SectoralActivities/Tourism/FactsandFiguresaboutTourism/ImpactsofTourism/EnvironmentalImpacts/tabid/78775/Default.aspx>

¹³ <https://portals.iucn.org/library/efiles/html/tourism/section6.html>

demand for good quality local produce is increasing¹⁴. By conserving our remaining agriculture areas to safeguard our capacity and potential for sustainable food production both for the present and future populations, the livelihoods of those in the rural community of Hong Kong who possess the skills and knowledge, and, who also wish to continue with farming as a traditional way of life can also be protected. People with low workplace skills and/or education levels in the community can also be absorbed into honourable and useful agricultural work – this is exactly how to go about diversifying the economic base; provide sustainable employment and produce healthy and nutritious food for the community. A socially relevant vision should be that fallow or abandoned land in Lantau is re-vitalised to support sustainable farming so that Lantau becomes a thriving ‘Market Garden’ for Hong Kong. One way to do this is to impose a significant penalty tax on unused land. That should quickly inspire most landowners to find tenant farmers.

31. We strongly urge that the Government take pro-active and practical measures to re-vitalise and support local food production as a fundamental pillar of the local economy of Lantau. We consider that the first thing to do to achieve this is a strategy to secure those active and fallow agricultural lands on Lantau so that these can only be utilised for genuine cultivation activities. Obviously, as reflected by the dumping problem mentioned above, the existing legal and administrative systems are not sufficiently robust to protect farmland. The authorities thoroughly understand this issue. In discussions on assisting farming activities in the Frontier Closed Area, a Planning Department report states: ‘*Areas for agriculture should be demarcated as a form of permanent land use to support agriculture/ agri-tourism and/ or to protect rural landscapes. Land for agriculture needs to be zoned very specifically for this use to avoid competition from other higher return uses and to ensure appropriate anticipation of landowners on the future use of these agricultural lands. In the planning context, the designation of agricultural use on abandoned farmlands can also ensure land use certainty, help to manage public expectations for development and prevent incompatible surrounding land uses.*’¹⁵ Hence, the numerous development proposals supported or being promulgated by the LanDAC would have the inevitable consequence of clearly raising the land owners’ expectations for development. Taken together with the existing malfunctions in the land use and environmental protection systems, we are highly concerned that even the existing genuine farming activities currently on Lantau would eventually disappear due to development pressure for higher-return commercial activities.

¹⁴ http://producegreen.org.hk/download/LocalAgriRTDiscussion_final.pdf

¹⁵ http://www.pland.gov.hk/pland_en/misc/FCA/files_072010/Final_Report/Appendix%20M.pdf

LanDAC achieved ‘thorough understanding’ of Lantau – Is this really the case?

32. The Report mentions that site visits had been arranged for the members of the LanDAC to help them to thoroughly understand the conditions of Lantau Island. Based on the papers and the minutes of the LanDAC¹⁶, however, we can see that there would have been only one or two visits, at most, and there would have been just one visit only to several sites of conservation value including Luk Wu/ Keung Shan, Shui Hau, Mui Wo, Pui O and Tung Chung, all occurring on the same day (17th December, 2014; Wednesday). We would like to ask the members of LanDAC: have you visited Lantau during weekends/ public holidays, to actually feel and experience the overcrowded conditions? We would like to know how many members of the LanDAC have hiking as a hobby, and, how often have they spent time walking the entire lengths of the paths and hiking trails on Lantau, and how many of them have an understanding of ecology and that in the real world it is widely accepted that economy is subservient to nature, not the other way round – that you cannot possibly have a healthy and sustainable economy without a healthy natural environment.

33. **Figure 4** shows a typical scene of the overcrowded conditions of Tai O during weekends. We, therefore, do not understand why the LanDAC would support the building of a new cable car system from Ngong Ping to Tai O to cram even more people, even more frequently into Tai O? Such a proposal defies belief from a planning perspective, although it makes sense if one’s primary interest is making money. The land area in and around this south-western tip of Lantau is highly limited and the cable car proposal would undoubtedly worsen the ‘crush of humanity’ in Tai O’s narrow streets. We do not understand how it is possible for the LanDAC members to ‘thoroughly understand’ the value of the entire island of Lantau and its surrounding waters by merely conducting one/ two site visits, and also, by going to several sites only, all on the same day.

34. According to the Liber Research Community, there were 1,847,100 people already visiting the Country Parks of Lantau in 2012¹⁷. During weekends, there are also many people visiting Tai O, Tung Chung, Ngong Ping, Mui Wo and the entire South Lantau coast for recreation and relaxation. There are also many people who visit the monasteries in Luk Wu, Keung Shan and the other serene spiritual places for contemplation, moments of mindfulness

¹⁶ https://www.devb.gov.hk/en/boards_and_committees/landac/agenda_and_minutes_of_meetings/index.html

¹⁷ <https://www.facebook.com/localresearch/photos/a.326590167437063.72534.244689185627162/526013614161383/?type=3&theater>

and tranquility. The island, itself, and its current existing facilities are already providing both Hong Kong people, and overseas and mainland visitors, with invaluable, fruitful, varied and uplifting experiences – right now, in the present moment, and counting – connecting them with nature, the breath-taking landscapes of land and sea, and, the quietness and tranquility of nature. Lantau is a ‘Green Lung’ giving people the space to savour the relaxing, refreshing atmosphere, which is completely absent in the highly urbanised districts of Kowloon and Hong Kong Island, as well as the adjacent massive and densely-packed conurbation stretching unbroken from Shenzhen all the way to Guangzhou. Lantau Island is a haven – a remnant of the wide open refreshing green spaces left in this corner of China. Hong Kong is already highly congested, so what is the purpose of developing Lantau and turning it into a concrete jungle and making it even more overcrowded, just like the above mentioned places? What would be people’s reason to come if they are just going to be offered what they are trying to escape?

35. This idyllic island is still, mostly, in a pristine natural state, crisscrossed by a verdant mosaic of natural habitats and a lush cloak of natural vegetation that **does not need any kind of further development**. Indeed, we believe the Government should find practical and meaningful ways to **strengthen and enhance the existing wilderness areas** and to **preserve** the existing natural landscapes with its rich diversity of wildlife. The emphasis of any development plans for Lantau should be on keeping the ‘wilderness’ of Lantau, together with its rural heritage and pockets of habitation, **intact**. It should be as simple as that. Some wise leadership is required please.

36. Most importantly, with due regard to the essential needs of **healthy living** (clean air, clean water, safe and healthy food, wide open green spaces, relief from stress provided by the quiet tranquility of natural places), a **real understanding** of sustainable development and conservation and **higher level thinking** than just making money is needed. It is clear that Lantau should **NOT be sacrificed** and should **NOT** be driven down the path of becoming an **over-crowded** recreational get-away for **mass tourism**, or yet another concrete **metropolis**.

Concluding Remarks

37. Since the Earth is finite and ‘natural resources’ are already being depleted, economic growth must also be finite: in other words, a line must be drawn somewhere, if we are to survive. The multi-billion-dollar infrastructure programmes for developing Lantau and its surroundings into a transport, tourism and economic metropolis housing people and businesses serving the Pearl River Delta will need lots of resources including energy. **All development**

and technology requires ADDITIONAL energy input. LanDAC and the Development Bureau dreams of Lantau and the wider Hong Kong becoming a mega-city, just as fossil fuels are becoming seriously depleted and costs will certainly rise. It will one-day become too expensive to power the extensive network of public transport systems, buildings and Hong Kong's seriously un-resilient food system and globalized economic system. What then?

38. More thoughtful, realistic and informed planning is required, please, by the people with the responsibility to think ahead with the wellbeing of all members of the Hong Kong community as their priority. Those with vested interests should be sidelined.

39. We feel that the Government needs to be explicit in terms of where the limits of population, development and economic growth are to be drawn, taking into account our critical dependence on external imports for almost every kind of natural resource, e.g., food, water, goods and fuel. Relentless development should not encroach and dismantle the functioning of ecosystem services in the remaining natural spaces that we have in this tiny corner of China. This requirement is reflected in the **Hong Kong Government's legal obligations** under the international **Convention on Biological Diversity**. Articles 6 and 8 of the Convention state:

Article 6: General Measures for Conservation and Sustainable Use

Each Contracting Party shall, in accordance with its particular conditions and capabilities:

(a) Develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity or adapt for this purpose existing strategies, plans or programmes which shall reflect, inter alia, the measures set out in this Convention relevant to the Contracting Party concerned; and

(b) Integrate, as far as possible and as appropriate, the conservation and sustainable use of biological diversity into relevant sectoral or cross-sectoral plans, programmes and policies.

Article 8: In-Situ Conservation

(d) Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;

(e) Promote environmentally sound and sustainable development in areas adjacent to protected

areas with a view to furthering protection of these areas.

40. We are now living in the era of crises: loss of biodiversity, loss of wilderness areas, climate change, lack of clean water resources, depletion of fossil fuels and insecurity of arable lands and food supply. Indeed, there is an actual need for a transition and mindset change from a scenario of unlimited economic growth and population increase to **real sustainable development**: development of systems of living that lead to long-term sustainability of life on earth, systems that will allow people to live well in Hong Kong, including on Lantau, 1,000 years from now. Our decisions now must make that vision possible, not impossible. This includes limiting birth rates and reversing population growth; reducing the size of government; resisting the temptation to build more and more infrastructure, which requires funding by the tax-payers; adopting better and effective land-use planning; reducing consumption and waste per capita; supporting an eco-friendly and sustainable localised economy; mainstreaming biodiversity protection into government policies; restoring degraded ecosystems and restoring degraded agricultural lands.

41. The proposals by the LanDAC, however, reflects that the Hong Kong Government still takes a narrow and shallow view, with limited consideration of alternative sustainable options of development, of the urgent need for transition to sustainable living and of the irreversible consequences of non-stop economic growth. Hong Kong needs to be prepared and build economic, social and governmental resilience to the crises that are upon us. This will not only enhance the living environment and make better our home, but will also free Hong Kong from the reliance of extracting and over-harvesting resources from the people of other countries. Hong Kong is capable of becoming one of the leading sustainable cosmopolitan cities in the Asia-Pacific region but that will only come about if there is a change to new ways of doing things that will follow from facing up to realities. The proposals by the LanDAC are, unfortunately, an antithesis of what Hong Kong needs, promoting a relentless contradiction to low carbon communities, sustainable development or balancing development with conservation.

42. We sincerely hope that **all the current proposals by LanDAC will be disregarded** by the Policy Bureaus of the Hong Kong Government, and, that there will be a complete re-thinking of the broad-brushed conceptual plan for Lantau Island and its surrounding waters. Moreover, we also wish to recommend that careful consideration be given to a re-structuring of the composition of the membership of the LanDAC to include more representatives from the environmental sectors and civil society to help Government to formulate a meaningful and

visionary plan that would be truly seamless with the **globally accepted concepts** of sustainable development, low-carbon communities and conservation in any future development for Lantau.

43. Thank you for your attention.

The Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

- cc. Chief Executive
The BSAP Steering Committee of Hong Kong
Environment Bureau
Development Bureau
Association for Geoconservation
Hong Kong, Conservancy Association
Designing Hong Kong
Friends of the Earth
Green Lantau Association
Green Power
Hong Kong Bird Watching Society
Hong Kong Countryside Foundation
Hong Kong Dolphin Conservation Society
HKwildlife.net
Save Lantau Alliance
Save Our Country Parks Alliance
WWF-HK

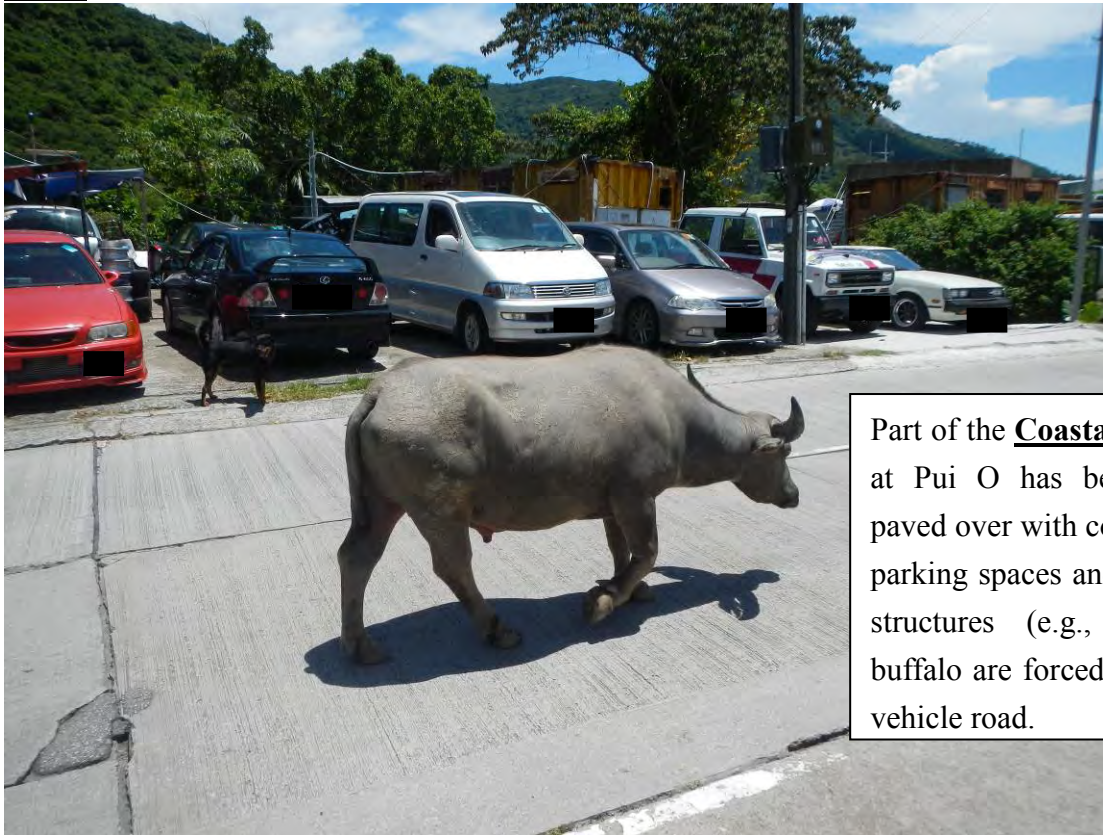
Figure 1. Recent photographs of haphazard and flagrant dumping of construction materials taken in the Coastal Protection Area at Pui O, which our Government has no power to stop.



Figure 1. Con't.



Figure 2. Paved concrete areas/ structures/ haphazard development in the ‘**Coastal Protection Area**’ of South Lantau.



Part of the **Coastal Protection Area** at Pui O has been occupied and paved over with concrete to form car parking spaces and for placement of structures (e.g., containers); the buffalo are forced to walk along the vehicle road.

Another concrete paved car parking space in the Coastal Protection Area of South Lantau



香港新界大埔林錦公路
Lam Kam Road, Tai Po, New Territories, Hong Kong
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Figure 2. Con't.



A site in the **Coastal Protection Area** of Pui O was filled with construction materials (Photograph 1)



A site in the **Coastal Protection Area** of Pui O was filled with construction materials (Photograph 2)

Figure 2. Con't.



A site in the **Coastal Protection Area** of Pui O was filled with construction materials (Photograph 3)



Structures were eventually built at the same site (Photograph 4)

Figure 2. Con't



Another site in the **Coastal Protection Area** of Pui O was filled with concrete (Photograph 1)



A big industrial structure was built at the same site (Photograph 2)

Figure 3. Other structures/ concrete paved areas in the Coastal Protection Area of Pui O



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Figure 3. Con't



香港新界大埔林錦公路
Lam Kam Road, Tai Po, New Territories, Hong Kong
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Figure 4. A photograph to show the typical over-crowded conditions at Tai O during a weekend.

