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BY EMAIL ONLY

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Dear Mr. Wu

Green Groups' Joint Response to
Study on Traffic, Transport and Capacity to Receive Visitors for Lantau –
Feasibility Study

Background

1. Civil Engineering and Development Department (CEDD) commenced the above-captioned study, namely "Study on Traffic, Transport and Capacity to Receive Visitors for Lantau - Feasibility Study" (the T&T Study) in July 2017. The results were released in June 2022 with the findings and assessments of the strategic and local transport infrastructure and services, and visitors' receiving capacity in Lantau, and the corresponding recommendations. Further study of the feasibility in detail on a total of five preliminary enhancement options in next stage has commenced in March 2023. Therefore, undersigned groups would like to draw your attention to our comments and recommendations for the T&T Study and the "Feasibility Study on Road Network Enhancement to South Lantau"[1](FS Study).

2. In prior to the commencement of the T&T Study, 16 green groups had jointly submitted a position captioned "***Joint Green Groups' Appeals for a Green Transport and Traffic Strategy on Lantau"*** (JGG2016) regarding the "Strategic Traffic and Transport Infrastructure" proposal in "Space for All" launched in January 2016 that appeared to be development-orientated which neglected the potential and associated impacts to the ecologically important sites and habitats on Lantau, and the living quality of residents.

3. Green groups stressed that conservation should be the planning premise for Lantau before any traffic and transport infrastructure is proposed and they were gravely concerned about the impacts of "Strategic Traffic and Transport Infrastructure" proposal on the residents, road safety, water supplies, environment, ecology and tourist assets on Lantau Island.

4. Green groups opine (JGG2016) that the traffic and transport strategy for Lantau
   (a) should provide environmental-friendly passenger and freight commutation for local residents and visitors, while protecting the natural environment and heritage but not facilitating incompatible developments on Lantau,
   (b) should not exceed the environmental and social carrying capacity of habitats on Lantau that includes, but not limited to, air quality, river, marine and bathing beach water quality, noise level, vehicle-to-road ratio and parking spaces, disturbance to local community,
   (c) should not exacerbate air pollution and flytipping, and degrade the ecology and landscape.
   (d) should not encroach sites of conservation value which include, but not limited to, existing, proposed and potential country and marine parks, water gathering grounds, reservoirs and irrigation

[1] Consultancy agreement for Feasibility Study on Road Network Enhancement to South Lantau - Feasibility Study, CEDD: https://www.cedd.gov.hk/eng/events-publicity/ceremonies/index-id-344.html

reservoirs, existing, proposed and potential "Sites of Special Scientific Interest", "Coastal Protection Area", "Conservation Area", natural streams and watercourses with high ecological value, Ecological Important Streams, natural shorelines, active and fallow agricultural lands, monuments and identified ecological hot spots according to "Lantau-Hong Kong Jewel"[2].

5. As pointed out in the executive summary (ES) of the T&T Study, "*fundamental change to Lantau's functions and development potential*" have already been brought to Lantau (Sec. 1.1.1). We have to re-iterate that Lantau has preserved irreplaceable natural, cultural and historical heritage but formulated "*vision, strategic positioning and planning principles for development of Lantau*" (Sec. 1.1.2) are far from sustainable and feasible to conserve the natural, cultural and historic heritage of Lantau.

6. Although "*the existing and above ongoing/planned strategic traffic and transport infrastructure can generally meet the long-term external transport needs of Lantau*" (Sec. 2.1.3), their potential impacts and induced development pressures on South Lantau, particularly Mui Wo, and South Lantau Road (SLR) have not been addressed that confronts the overarching principle of "Development in the North; Conservation for the South" embraced by the Sustainable Lantau Blueprint promulgated in June 2017.

7. We opine that compatibility of "Development in the North; Conservation for the South" principle should be the basic requirement for any new developments. Proposed new transport infrastructures should not only "*be sited away from conservation related zonings and country parks"* (Planning and Land Use, Sec. 3.1.3(b)), but also avoid adverse impacts and encroachment to any habitats and environmental settings which constitute the characteristic of natural, cultural and historic heritage, water gathering grounds of Lantau (Environmental Consideration, Sec. 3.1.3(c)).

8. We reiterate green groups opinions in JGG2016 that

   (i) any new roads should be well justified, properly assessed (in the context of environmental impacts and cost effectiveness) and publicly consulted. No new roads should be planned in Country Parks, South Lantau and Tung Chung Bay, and near or in other ecological important sites.

   (ii) all roads in South Lantau and Tung Chung Road south of Shek Mun Kap should be maintained as Closed Roads in order to protect the ecology, natural, cultural and tourist resources. If environmental vandalisms on Lantau persists or exacerbates, the Closed Road measures should be extended and tightened.

   (iii) Lantau Closed Road Permits should be strictly enforced. Vehicles permitted to use all roads in South Lantau & Tung Chung Road west of Ma Wan New Village should be tightly controlled, especially for heavy vehicles, construction trucks and machineries, to safeguard bikers and pedestrians, and lower the risks of fly-tippings and incompatible developments.

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[2] Lantau-Hong Kong Jewel, A Biodiversity Study of Lantau, Noffke C. & Yip P. (2014): https://issuu.com/conservation_lantau/docs/lantau-hong_kong_s_jewel_publish

(iv) The criteria to issue Lantau Closed Road Permit should be publicly consulted with stakeholders, including green groups, cycling and hiking associations. Daily quota for tour coaches and private cars to access all roads in South Lantau and Tung Chung Road should not cause unfavourable environmental impacts e.g. air and water pollution, noise nuisance, disturbance to local community, etc. While the "Driving on Lantau Island" Scheme should be tightened immediately and cancelled in a long run, no additional quota should be given to private cars to access all roads in South Lantau and Tung Chung Road on Saturdays, Sundays and public holidays.

(v) the driving speed of all vehicles must be limited to a safe speed and measures in place to enforce and safeguard road safety of bikers, pedestrians, buffaloes and cattle using roads in South Lantau and Tung Chung Road.

(vi) Environmental-friendly (such as electric vehicle, cycling), smart, public transportation should be encouraged as the priority to deal with any transport needs on Lantau. Ferries and trans-district buses and coaches can be considered to improve the public transport to and from Lantau, especially on public holidays.

(vii) the government should commit itself to protecting the land and waters of Lantau for their environmental, ecological, landscape and heritage values, and not to sacrifice these as a result of the development-orientated "Transport Infrastructure". The government should abandon such development biased mentality and formulate a novel and visionary transport and traffic plan for Lantau safeguarding the natural resources for future generations.

Possible Road Connection Options between Tung Chung and Tai O

9. The recent field surveys revealed that a total of 75 freshwater fishes (with 64 species of native fishes), 16 amphibians, 21 reptiles, 55 odonates, and 429 species of vascular plants were recorded in Tung Chung River basin *cum* bay. 7 fishes, 6 amphibians, 7 reptiles, 15 odonates, and 17 of the plant species which are native and being of conservation concern were recorded in the surveys. These included the "Endangered" and endemic Romer's Tree Frog (*Liuixalus romeri* 盧氏小樹蛙), the state-protected Burmese Python (*Python bivittatus* 緬甸蟒), the "Vulnerable" Mangrove Skimmer (*Orthetrum poecilops poecilops* 斑灰蜻), the "Vulnerable" plant *Gmelina chinensis* 石梓, and the first Lantau record of the globally restricted Glass Goby (*Gobiopterus macrolepis* 大鱗鰭鰕虎魚). The study reveals extensive utilization of the lower Tung Chung River basin and Tung Chung Bay by these important species and indicates an urgent need for prudent conservation measures to be implemented against threat of any development.

10. In Tai O, the stream and wetlands also support 49 species of odonate (dragonflies and damseflies)[3] (38% of Hong Kong total no. of species) which include 2 species of conservation concern, i.e. Mangrove Skimmer (*Orthetrum poecilops poecilops* 斑灰蜻) , Four-spot Midget (*Mortonagrion hirosei* 廣瀨妹蟌)[4].

[3] Record of Green Power surveys from 2015 to 2022.

[4] Mangrove Skimmer (*Orthetrum poecilops poecilops* 斑灰蜻) - Fellows: Global Concern; IUCN: Vulnerable
Four-spot Midget (*Mortonagrion hirosei* 廣瀨妹蟌) - Fellows: Global Concern; IUCN: Near Threatened

11. In view of various planned, approved and undergoing projects (e.g. Tung Chung New Town Extension, River Park and SUDS, Tung Chung Line Extension), we regret that potential cumulative environmental, ecological and social impacts on Tung Chung West have not been identified and assessed at an early planning stage of Option 1,2 and 5 to avoid adverse impacts on areas and species of conservation importance. These recommendations have been expressed in green groups' joint submission JGG2016.

12. We are also frustrated that our request for "the functions and constraints of transport strategy for Lantau should be clearly defined taking into account of its rich natural and cultural heritage, and possible adverse impacts on the biodiversity, living quality and ecotourism" in the JGG2016 had not been adequately addressed in the T&T Study. Without a clear and commitment to a green transport and traffic strategy, Lantau may very likely follow the fate of most areas in the New Territories with massive loss of natural assets, deterioration of living quality and proliferation of brownfield after transport development.

Option 1 (North Coastal Viaduct)

13. We strongly object to Option 1 which comprises a marine viaduct and a land viaduct of dual-one lane carriageway (Sec. 3.2.2). This option requires near-shore and coastal construction activities that damage the natural coastline, sea grass beds and inter-tidal habitats. The ES also neglects the massive environmental impacts of construction of road connections to the existing road network in Tai O and Tung Chung.

Option 2 (Nei Lak Shan Tunnel)

14. We strongly object to Option 2 mainly comprises a land tunnel (about 7 km in length) underpassing Lantau North (Extension) Country Park and Lantau North Country Park from Tung Chung through Nei Lak Shan to Tai O (Sec. 3.2.4). In addition to extensive site formation works at tunnel portals in Country Park, environmental impacts on conservation areas in Tai O and Romer's Tree Frog habitat in Sham Wat (Sec. 3.2.5), ES also neglected the massive environmental impacts of construction of road connections to the existing road network in Tai O and Tung Chung brought about by this option.

15. The direct and indirect impacts of this option on the environment and habitats in Sham Wat has not been fully mentioned in ES such as lands disturbed by construction activities (e.g. stock piling, machinery storage, car parking, other back-up facilities), increased development pressure to Sham Wat and subsequent traffic loading on Sham Wat Road. This option threatens the good quality natural streams that designed as EIS, agricultural lands, well-preserved natural river mouth, seagrass bed and mangroves in Sham Wat.

16. In the intertidal ecological survey of Sham Wat[5], species of ecological concern included Tri-spine Horseshoe Crab (*Tachypleus tridentatus* 三棘鱟) and Beccari's seagrasses (*Halophila beccarii* 貝克喜鹽

[5] Survey conducted by Green Power and Eco-education & Resources Centre from 2015 to 2020.

草)were observed. In addition, Incense tree (*Aquilaria sinensis* 土沉香) was also found in Sham Wat.

Option 3 (Keung Shan Tunnel)

17. We are highly concerned about Option 3 which mainly comprises about 2 km land tunnel underpassing Lantau South Country Park through Keung Shan connecting from Shek Pik to Tai O Road (Sec 3.2.6) as extensive site formation works at tunnel portals in Country Park is required and Romer's Tree Frog habitat in Keung Shan is impacted. (Sec. 3.2.7)

18. Also, the huge amount of solid wastes, such as C & D wastes, soil and rocks from this option will trigger landfilling in Lantau South and threaten important habitats such as wetlands in Pui O and coastal mudflat in Shui Hau. As most of the areas adjoining the project site of this option are vehicular accessible to countryside places and farmlands, any fly-tipping of such solid wastes generated from this project will be hard to combat, not to mention the unenforceable South Lantau Coast Outline Zoning Plan. Even if such incidents are spotted and reported, reinstatement can seldom be implemented because of various reasons such as land ownership, land use zoning and etc.

Option 4 (New Bridges at Keung Shan Road)

19. Regarding Option 4 which mainly comprises two new bridges (about 350 m each) across the sharp bends of existing Keung Shan Road (Sec. 3.2.8), we are highly concerned about its impact on Country Parks and water gathering grounds, especially during construction phase.

Option 5 (Upgrading Tung O Trail)

20. We strongly object to Option 5 which will upgrade an existing coastal pedestrian walkway of about 12 km long between Tung Chung and Tai O into a vehicular access (Sec. 3.2.10). This option has various insurmountable problems including significant adverse environmental impacts such as running through San Chau SSSI and close to San Tau Beach SSSI and some ecological sensitive areas such as Ecologically Important Stream (EIS), mangrove, seagrass bed, horseshoe crab nursery sites and butterfly hotspots. It would also encroach onto several SAIs. The impact on the environment is another concern given land in Tai O is predominantly of conservation areas (Sec. 3.2.11).

21. ES also neglected the massive environmental impacts of construction of road connections to the existing road network in Tai O and Tung Chung brought about by this option.

Option 6 (New Slip Roads from Hong Kong Link Road)

22. We strongly object to Option 6 which comprises new slip roads (about 4 km) stemming from marine portion of existing Hong Kong Link Road (HKLR) near Sham Wat Wan (Sec. 3.2.12).

23. The reasons mentioned for Option 1 are applicable to this option.

24. Also, besides this option would be close to Tai O Site of Archaeological Interest (Sec. 3.2.13), customs, immigration and quarantine facilities will require more lands in Tai O or Northwest Lantau in addition to the footprint of the road itself that will further alter the land use and environment of Tai O.

25. Fundamentally, Tai O should not be turned into a frontier town because of not only lack of facilities and capacity but also contradiction to the "Development in the North; Conservation for the South" principle.

26. We welcome that Option 1, 2, 5, 6 have not been recommended for further study the feasibility in detail in the next stage (Sec. 10.1.3), i.e. Feasibility Study on Road Network Enhancement to South Lantau. However, we stress the Administration to be aware of our concerns on grounds of environment and ecology for all studied options other than factors such as traffic needs, capital costs, capacity to receive visitors.

Possible Road Connection Options between North Lantau and Mui Wo

27. We are highly concerned about Option A (Siu Ho Wan - Mui Wo Tunnel)**,** Option B (Tung Chung - Mui Wo Tunnel) and Option C (Discovery Bay - Mui Wo Tunnel) which comprises land tunnel underpassing existing Lantau North (Extension) Country Park with a connecting road from Mui Wo to Siu Ho Wan (Sec. 3.3.2), Tung Chung (Sec 3.3.4) and Discovery Bay (Sec. 3.3.6) respectively regarding extensive site formation works at tunnel portals in Country Park and impacts on Romer's Tree Frog habitat (Sec. 3.3.3, 3.3.5) and environmental impacts to Mui Wo (Sec. 3.3.7).

28. We are disappointed that ES ignored the massive and significant environmental impacts of these options on the environment and ecology of Mui Wo. Mui Wo area comprises a high diversity of natural habitats and species. The stream and wetlands also support 54 species of odonate (dragonflies and damseflies)[6] (42% of Hong Kong total no. of species) which include 3 species of conservation concern, i.e. Hainan Hooktail (*Lamelligomphus hainanensis* 海南環尾春蜓), Yellow-spotted Shadowdamsel (*Sinosticta ogatai* 緒方華扁螅) and Black Riverdarter (*Onychothemis tonkinensis* 海灣爪蜻)[7]. Mui Wo is also a butterfly hotspot where 154 species have been recorded from survey during 2014 to 2022, that include 16 "Very Rare" species (e.g. Small Yellow Sailer (*Neptis miah* 彌環蛺蝶), Forget-me-not (*Catochrysops strabo* 咖灰蝶)) and 20 "Rare" species (e.g. Swallowtail (*Papilio xuthus* 柑橘鳳蝶), Grey Scrub Hopper (*Aeromachus jhora* 寬鍔弄蝶)).

29. 16 bird species of conservation concern were recorded, such as Eurasian Eagle-Owl (*Bubo bubo* 鵰鴞) and Western Osprey (*Pandion haliaetus* 魚鷹) of "Regional Concern". It is also an important bird

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[6] Record of Green Power surveys from 2015 to 2022.

[7] Hainan Hooktail (Lamelligomphus hainanensis 海南環尾春蜓 – Fellows: Local Concern; AFCD status 2021: uncommon)

Yellow-spotted Shadowdamsel (Sinosticta ogatai 緒方華扁螅) – Fellows: Global Concern; AFCD status 2021: uncommon)

Black Riverdarter (Onychothemis tonkinensis 海灣爪蜻) - Fellows: Local Concern; AFCD status 2021: uncommon)

breeding site with the highest breeding bird diversity (i.e. over 50 species) on Lantau. Besides, from observation in February 2021, day roosting site of Black-crowned Night Heron (*Nycticorax nycticorax* 夜鷺) and a night roost of more than 75 ardeids, including Little Egrets (*Egretta garzetta* 小白鷺), Great Egrets (*Ardea alba* 大白鷺) and Cattle Egrets (*Bubulcus coromandus* 牛背鷺), were recorded at the mangrove stand near the estuary of Wang Tong River. The wetland habitats in Mui Wo and South Lantau as a whole are important foraging grounds for ardeids and should be well protected.

30. We also question why the road link and railway link from proposed Kau Yi Chau artificial lands was omitted in T&T study which may alter the scale and/or alignment of the possible road connecting North Lantau and Mui Wo. The cumulative environmental and ecological impacts involved would be substantially larger and more extensive.

31. In view of proposed Kau Yi Chau artificial Island project (Lantau Tomorrow reclamation), we regret that potential cumulative environmental, ecological and social impacts on Mui Wo have not been identified and assessed at an early planning stage. This recommendation was expressed in green groups' joint submission JGG2016.

32. ES also neglects the massive environmental impacts of construction of road connections to the existing road network in Mui Wo and Tung Chung brought about by these options. The subsequent impact on the traffic loading and Lantau Closed Road system of South Lantau Road were also shunned. We strongly urge to maintain Lantau Closed Road system of South Lantau Road and Tung Chung Road south of Shek Mun Kap Road, and extend the system to any new road access between North Lantau and Mui Wo.

Option D (Upgrading Old Tung Chung Road)

33. We are highly concerned about Option D mainly comprises upgrading existing Old Tung Chung Road of about 2.5 km long between Pak Kung Au and Cheung Sha (Sec. 3.3.8) regarding the environmental and ecological impacts on the natural Cheung Sha Stream and Cheung Sha beach.

34. We agree that "*there is insufficient justification to support the construction of major road infrastructure for connecting south and north Lantau due to traffic demand*" (Sec.3.4.1) and compatibility *overarching principle of "Development in the North; Conservation for the South" for Lantau* (Sec.3.4.5) should be the basic requirement for any new developments.

35. Although Option B has not been recommended for further study the feasibility in detail in the next stage (Sec. 10.1.3), i.e. Feasibility Study on Road Network Enhancement to South Lantau, we urge the Administration to protect the rural environment of Mui Wo and protect the rich natural resources there against any development.

Preliminary Local Road Improvement Proposals

36. We criticize that it is not adequate to state that the existing transport network has a low level resilience without providing the actual number of incident occurred on Tung Chung Road and the actual impacts (i.e. no. of deaths, time of closure, economic loss, etc) in the past 10 year. To enhance the resilience, it is more appropriate to prioritize the review and improvement of the existing alternatives (i.e. water transport connecting Tai O and Tung Chung in particular) (Sec. 3.4.2).

37. In addition to two main principles adopted in formulating the preliminary local road improvement proposals " *i.e. (a) avoid extensive hillside cutting / filling, burial grounds, and SAIs, etc.; (b) minimise impacts on sensitive environment such as CPA, country park, etc.*" (Sec. 4.2.2), we advise that (i) avoid impacts on water gathering grounds, (ii) avoid tree felling and (iii) conduct ecological surveys and implement avoidance and mitigation measures in prior to finalizing works plan and design should also be included in related proposals which green groups should be consulted to minimize environmental impacts.

Pier Facility Improvement

38. We agree that water transport can complement land-based transport for Lantau and help diverting road traffic during holidays and provide an alternative leisure transport mode for Lantau residents and tourists to other hotspots (Sec. 5.1.3).

39. However, provision/improvement of pier facilities/landing steps for water transport in Lantau should aim at (i) serving the commuting need of local residents, (ii) serving the visitors/tourists to travel to existing popular tourist spots.

40. Amongst the issues concerning Pier Facility Improvement on Lantau, e.g. locations and conditions of existing pier facilities in Lantau, the "Conservation for the South" principle under the Sustainable Lantau Blueprint, and the requests from locals for pier upgrading, etc., we stress the environmental factor should be placed at the top priority so as to align with the principle of "Development in the North; Conservation for the South" (Sec. 5.1.2).

41. Under this principle, the associated works should not generate insurmountable adverse environmental or ecological impacts, such as significant loss of natural shoreline, shore habitats and back-shore vegetation.

42. We are disappointed that environmental, ecological and visual impacts, and existing connection to land-based access have not been considered in the T&T Study. We opine that the locations of these pier facilities/landing steps should be well connected to existing road access or well-maintained footpath that no major upgrading works is required. Otherwise, the efficiency of these facilities will be minimal.

43. In this aspect, we are gravely concerned about the locations of existing public piers indicated on the map in (Figure 5.2) that many of them may not serve commuting need of local residents or popular tourist

spots. We question why Man Kok Tsui has been identified for “Recommended Potential Pier Improvement Locations” (Sec. 5.1.4) as Mui Wo is already well served by existing Mui Wo Ferry Pier which is also well connected to land-based transport network. Man Kok Tsui locates near to Mui Wo, but further from settlements and popular tourist facility than public ferry pier. Also, it is only connected to footpath and distant from popular hiking trails.

44. Also, we are extremely worried about the proposed improvement in Tong Fuk, Cheung Sha and Pui O. These places have natural coastlines and wetlands of conservation value. However, all of them are vulnerable to eco-vandalism/developments as they cannot be regulated under Town Planning Ordinance due to the absence of Development Permission Area plan. The provision of larger pier to cater large-sized vessels and large number of visitors would inevitably increase the threats to these fragile environments.

45. The direct impacts of the improvement works must not be overlooked. From the experience in Yi O and Man Kok Tsui, the ecological footprint and the visual impacts of the improvement works of the piers could be unexpectedly huge. However, there were no ways for the public to fully access the environmental impact assessment reports unless the project is a designated project under EIAO. For the projects do not require planning permission or environmental permit, the ecological baseline study and environment impact assessment could be insufficient and could not adequately identify, assess, avoid and reduce the impacts.

46. We also concerned about the footprint of the design of proposed new/improved piers (Sec. 5.2.2). The long catwalk will impose irreversible visual and larger environmental impacts.

Provision of Green Transport

47. We agree to introduce green transport modes to Lantau to improve the air quality and reduce the health risk and greenhouse gas emission associated with internal engines of vehicles.

48. However, introduction of green transport modes should not be the excuse of provision of new roads and extra car park spaces. Improving the road network is not aim for encouraging driving.

49. To promote green transport, Chief Executive in the recent Policy Address 2022 announced that apart from the promotion of electric public transport and commercial vehicles, long-term strategies for the application of hydrogen energy road transport would be formulated by 2025. We opine that associated trial schemes, tests or researches on green transport technology, other than electric vehicle, could be further put forward for consideration.

50. Improvement of public transport system and Demand-responsive transport (DRT) should be considered to encourage people to use public transport.

Expansion of Biking Networks in Lantau

51. We agree to promote cycling to enhance connectivity and improve accessibility to various recreation nodes both in North and South Lantau (Dec. 8.1.1). However, the recommended potential biking alignments for Cycle Tracks and Mountain Bike Trail in T&T Study are mainly for recreational purposes and is not connected to any existing settlements.

52. We request the Administration to improve the biking condition for travel between settlements to facilitate the local residents.

Capacity to Receive Visitors for Lantau

53. Using the word "capacity" will mislead people that the current assessment is to reflect the "maximum number of visitors that a place can accept". To avoid this, SLO should conduct a comprehensive study on carrying capacity of Lantau based on the criteria/indicators listed in Table 9.1 (Sec. 9.1.3). However, relevant findings have not been released in ES.

54. We agree enhancing the public transport services and dissemination of respective information (Sec. 9.4.1) to help enhance the visitors' visiting experience.

55. We object to provision of more parking spaces in areas such as Tai O and Mui Wo that will encourage more possession of private cars by local residents and thus increase the traffic loading of closed roads on Lantau, i.e. Tung Chung Road and South Lantau Road. More importantly, parking spaces will not promote the capacity to receive visitors for Lantau under the current Lantau Closed Road Permit system.

56. We urge the Administration to disclose the details of the "process of continuous monitoring and evaluation" (Sec. 9.4.2), such as methodology and frequency. We would like to know whether green groups will be engaged in these processes.

For Immediate Follow-up

57. Any transport related study for Lantau must be environment-orientated in order to act compatibly with the "Conservation for the South" policy. The environmental carrying capacity should be properly assessed in prior as basis for study. The practical ability to receive visitors is considered for different sites on Lantau. Then, traffic control or improvement measures are recommended accordingly.

58. Regrettably, the options of traffic improvement measures recommended in T&T Study emphasize on the accessibility that deviated from the "Conservation for the South" policy and risked the pristine environment of South Lantau.

59. We urge the Administration to disseminate regularly the progress of FS(Feasibility Study on Road Network Enhancement to South Lantau).

60. As the public consultation with green groups and concerned parties have not conducted properly for T&T Study, we urge the Administration to undergo regular and comprehensive consultation with green groups for FS.

Thank you for your kind attention. We look forward to your positive response soon. For any inquiries, please contact CHENG Luk-ki, Director of Green Power (T: 3961 0200, F: 2314 2661, Email: lkcheng@greenpower.org.hk)

Co-signatories (in alphabetic order)

Clean Air Network
Designing Hong Kong
Green Sense
Green Power
Greeners Action
Greenpeace
Hong Kong Bovid Conservation Association
Hong Kong Outdoors
Living Islands Movement
Save Lantau Alliance
The Conservancy Association
The Green Earth
The Hong Kong Bird Watching Society
WWF-Hong Kong