

Hong Kong, 5 May 2024

Public Engagement on Lau Fau Shan Development Proposal
Level 5 Festival Walk,
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Kowloon, Hong Kong
Email: info@nm-lfs.hk

Re: Public Engagement on Lau Fau Shan Development Proposal

Dear Sir/Madam,

Following are our questions and comments regarding the Lau Fau Shan Development Proposal.

Conservation of natural coastline and waters

We fully support the establishment of a coastal protection park along the coastline between Pak Nai and Tsim Bei Tsui. It is important to minimize development, prevent further disturbances by human activities, and to ensure the protection area is continuous and not segmented by any new development. To ensure the long-term preservation of this area especially the mangroves and nearby habitats. We urge for the area to be zoned "Coastal Protection Area" or stricter.

There are several Site of Special Scientific Interest located in Pak Nai and Tsim Bei Tsui. Their conservation needs to be prioritized with a clear buffer needs to be identified to prevent further human disturbance.

The proposal for a 4.8km long promenade for pedestrians and cyclists is welcomed. Such promenade will enhance the opportunity for hikers and cyclists to enjoy the nature and beauty of the area. However, clarity is needed regarding the alignment and design of the promenade. It is yet unclear how negative impacts on the natural coastline will be avoided or mitigated. The project should contribute to the conservation efforts rather than cause harm.

Incompatible land uses

A clearly articulated plan on how government will deal with the existing land uses which are incompatible with a coastal protection park is lacking. Will they be removed? Will the land be resumed? Will owners be obligated to remove structures and halt activities which disturb and / or pollute the land, sea and coastal area or are otherwise incompatible with a coastal protection park? Many of the existing developments in the area considered for the coastal protection park and its vicinity are of poor quality, lack adequate environmental controls, and are incompatible with a nature park. What actions will be taken?

Future of existing brownfields

The area between Pak Nai and Tsim Bei Tsui is littered with brownfield sites. We appreciate the expressed intention to phase out incompatible uses, and to designate some areas for redevelopment into tourism nodes. It is entirely unclear how government will execute on these suggestions, and whether encouragement of redevelopment will result in land uses which compatible with the proposed conservation of the land and seas along the coast. What are considered acceptable land uses? What are acceptable environmental impacts, such as light, noise, and sewage?

It is apparent from the proposals that Government is shying away from land resumption or other measures to halt the incompatible land uses. It is unclear what incentives landowners of these brownfield sites will be given to encourage them to transition to conservation or eco-tourism related uses. Simply rezoning is insufficient. Already some brownfield activities are found in the current "CPA" area. "Existing uses" are permitted to continue under Statutory Outline Zoning Plans. Land control and resumption measures will be needed to take adequate control in support of the planned conservation and tourism efforts.

Timing of implementation of conservation and management measures

WHEN will controls be implemented to stop negative impacts of current activities along the coast from Pak Nai to Tsim Bei Tsui ? It is important protection measures are implemented ahead of development plans. Again and again, it is seen with development, whether in the New Territories or on Lantau, that development attracts and encourages legal and illegal incompatible development on nearby land and seas are earmarked for conservation. More recently, we have seen that funding for development work for the San Tin Technopole plans has been approved, but implementation and funding for protection measures have yet to be articulated beyond an initial study by AFCD.

How will economic and human activities in the area designated for the park and its vicinity be managed? When will control over the area be taken to stop further rot from incompatible developments? How will the coastal protection park be managed, and when? What management strategies will be implemented to prevent further damage of the natural assets in the area surrounding the park, and when? Public enjoyment and natural conservation are not mutually exclusive. However, the development pressure on the area is rapidly increasing, and conservation action is overdue.

Impacts of transportation systems

We have concerns regarding the Hong Kong-Shenzhen Western Rail Link. Construction and operation of the link will disrupt existing habitats. The proposed alignment passes through vital habitats and internationally recognised wetlands supporting migratory birds and other wildlife. While the coastal area near Lau Fau Shan will be designated Wetland Conservation Park, Coastal Protection Park, and Waterfront Promenade, the construction and operation of the rail link risks the effectiveness of these future protection measures of the landscape and environment, and future public enjoyment of the area. What measures will be implemented to limit negative impacts on this wildlife and nature corridor?

The existing road network is limited. It is foreseeable that extensive road widening and construction of new roads will be necessary to support the planned developments. What are the details? Will these developments impact the environment? The planned development is expected to generate significant traffic both during the construction period and after completion. What measures will be taken in designing, planning and construction of roads and road widening to safeguard the natural landscape?

Conclusion

While acknowledging the ambitious plans to enhance urban-rural integration in the area, the plans lack credible commitment to control over development, land uses and quality “integration” outcomes. The natural resources in this region are valuable natural treasures of the Greater Bay and Hong Kong.

The preservation of the natural landscape and its habitat functions requires a thorough understanding of the region's carrying capacity and the potential impacts of proposed developments based on a comprehensive study, planning, and design process. Importantly, implementation of protection measures in the area are long overdue as can be observed from the many incompatible developments which have been allowed to proliferate. The promise to strike a balance between urban development and the preservation of the area's natural beauty requires timely implementation, and drastic measures. Both are currently absent from the Lau Fau Shan Development proposals.

Herewith we submit our questions and comments for your consideration. If we are wrong, let us know. Either way, we look forward to your response to the points raised above.

Yours sincerely,
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