

28 July 2024

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Dear Sir/Madam,

Re: South Lantau Eco-Recreation Corridor

Designing Hong Kong expresses herewith concerns and comments on the South Lantau Eco-Recreation Corridor.

1. Eco is NOT a slogan - action is needed

The "Development in the North, Conservation for the South" principle has been a key part of the Hong Kong government's policy towards Lantau Island since the 2017 Sustainable Lantau Blueprint. This policy explicitly prioritizes conservation efforts in the southern parts of Lantau, recognizing the unique environmental and ecological value of this area.

We do not oppose attracting more locals and visitors to enjoy the unique rural landscape and natural beauty of South Lantau. However, it is crucial that an assessment of the environmental carrying capacity has been conducted prior to any new developments or plans. The natural environment and ecology should not be compromised when developing recreational or other facilities.

Protecting the natural resources in South Lantau is stated as the key principle in the proposal, however, there are no specific details or control measures provided. The term "eco-recreation" is used to promote the proposal, but the actual plans appear to focus more on development rather than conservation or management strategies. Most of the proposed developments do not seem to have any real connection to ecotourism or environmental protection. The development plans, lack substantive commitments to conservation.

2. Development induced slope works will impact the natural scenery

Importantly, given the steep topology and limited slope stabilisation works, any development and supporting infrastructure will result in significant slope works which in turn will damage the natural environment of Lantau.

3. Clean up and prevention of unauthorised and / or unsightly development

One can witness ample unauthorized and otherwise unsightly ramshackle developments. Promoting tourism will increase the economic incentive for such developments and risk further

destruction. Any development should be preceded by a concerted effort to halt, rectify and remove temporary structures and unauthorized developments. An analysis is required to determine the risk of inducing more such developments and destruction, and how to minimize and mitigate such risks.

4. Cheung Sha

4.1. Lower Cheung Sha Visitor Centre

The proposed location for the landmark visitor centre is south of South Lantau Road, where the majority of the area is zoned as "Coastal Protection Area". It is important to note that the planning intention of this zoning is to "conserve, protect and retain the natural coastlines and the sensitive coastal natural environment". Placing a major visitor facility in this protected coastal zone seems at odds with the stated conservation goals for this area.

During a recent site visit to Lower Cheung Sha, it was observed that some government land had been filled for use as vehicle parking. This is concerning, as it appears to reward a "destroy first, develop later" practice and unauthorized development in this area. Such actions harm the rural environment and natural character of the region. This sets a troubling precedent that could further encourage illegal land modifications, which are detrimental to the conservation of the area's valuable natural resources.

Apart from the concerns about the proposed location, the planned visitor centre is expected to accommodate various uses such as catering, retail, and event hosting. Given this, a comprehensive assessment on the impacts to sewage, drainage, waste management, and the overall environmental impacts should be required and published for residents and the public to access and comment on before any work commences. This is necessary to safeguard the highly sensitive natural resources in South Lantau.

It should be noted that the vested interests in the beach should be supported such as the landing by paragliders flying the mountains of Lantau.

4.2. Barrier-free Beach Walkway

We support the proposed barrier-free walkway in principle, as it could enhance accessibility and walkability for people of all ages and abilities. However, we are concerned about the alignment of the walkway, as it appears that it would encroach upon the natural vegetation in the backshore area. This raises issues about the potential impact on the natural environment and sensitive coastal ecology in that location.

The proposed barrier-free beach walkway is intended to allow wheelchair users to enjoy the scenery of South Lantau.

However, it should be noted that the existing public bus service from Tung Chung to Cheung Sha (Bus 11 and Bus 23) does not currently have designated wheelchair seating. Additionally, there are only 6 wheelchair-accessible taxis serving the entire Lantau area. This inadequate

public transportation infrastructure for the disabled community may significantly limit the effectiveness and accessibility of the barrier-free walkway proposal. The lack of supporting services could hinder the ability of wheelchair users to actually reach and utilize the new walkway as intended.

Apart from the concerns about the accessibility of the proposed barrier-free walkway, there are further deficiencies in the existing amenities in South Lantau that limit accessibility for people with different abilities. For example, the pavement along South Lantau Road is generally too narrow to accommodate wheelchairs safely. Additionally, the lack of proper crossings and curb cuts along the road also pose safety issues for users. A detailed study is required to identify and address these accessibility shortcomings, in order to improve amenities and fulfill the needs of diverse users. However, any such improvement works must also include a comprehensive assessment of the potential environmental impacts, to ensure the sensitive natural environment is not compromised by the additional infrastructure works.

4.3. Water Sports in Cheung Sha

We welcome efforts to promote water sports in Cheung Sha in addition to the existing small-scale water sport rental operations along the beach, to enrich the experience for different visitors.

We urge for the provision of well designed and scaled up facilities for use by boating, sailing and surf clubs offering amenities including dry storage for boats and equipment, changing and shower rooms, and F&B facilities. All these need to be equipped with proper connections to sewage and drainage.

Landings, boat ramps and piers are needed in direct association with the above facilities.

We are concerned that the proposed pier for Cheung Sha Beach is aimed at accommodating (non boating) tourism arrivals rather than supporting local watersports activities. As pier structures could have significant impacts on the coastal environment and natural character of the area, we urge for more detailed operational water sports plans. A large pier for transport and tourism is to be avoided as it will impact the local environment. Small scale landing facilities immediately associated and connected with watersports facilities should suffice.

4.4. Cheung Sha Hillside Adventure

We are highly concerned about the proposed construction of the hillside adventure facilities in Upper Cheung Sha. The new development is proposed to be built on land designated as “Green Belt”, which is intended to preserve the natural landscape and provide a buffer for the adjacent Country Park. Constructing these adventure facilities in this protected green

space would compromise the integrity of the natural environment and go against the stated purpose of the "Green Belt" zoning.

Moreover, the slopes in South Lantau are recognized as hotspots for landslides and mudflows during the rainy and typhoon seasons. The proposed hillside adventure activities, such as rope courses, chairlifts, and holiday accommodations, would require significant vegetation clearing and slope cutting, which could further steepen the gradient and increase the risk of landslides and mudflows in the area. While extensive concrete structures could be used to stabilize the slopes, this would be incompatible with the nearby natural setting and incur high maintenance costs - contradicting the basic "conservation" principle for South Lantau.

We strongly oppose this proposal, as it would not only erode the natural character and landscape that visitors come to enjoy, but also potentially exacerbate the existing environmental risks in this sensitive area. Any new developments should be carefully sited and designed to avoid compromising protected green spaces and exacerbating natural hazards.

5. Pui O

5.1. Pui O Treetop Education Corridor

We would like to raise our concerns about the proposed treetop walkway in Pui O. The woodland near Pui O is zoned as "Green Belt" and serves as a buffer between the built-up area and the adjacent Country Park. Therefore, any facilities developed in this area should emphasize environmental education over recreational value.

Unlike some foreign woodlands that are relatively less diverse, Hong Kong's woodlands are generally mixed with a variety of species and have a dense canopy structure. Excessive vegetation removal to build the walkway may require constructing it directly atop the existing canopy, which could not only impact the trees but also the understory shrubs and other critical canopy layers of the woodland ecosystem.

Maintaining and managing such an elevated treetop corridor would be another significant concern, as the disturbances from construction through the operational phase could negatively affect the existing habitat in the treetops. The condition and structural integrity of the walkway would require constant monitoring, while the noise and potential waste generated by visitors may also have detrimental impacts on the birds and other wildlife species that currently utilize this woodland habitat.

5.2. Glamping Sites

The hillside of Pui O is zoned as "Green Belt," which serves as a critical buffer between the built-up areas and the adjacent Country Park. It is important to note that there is a general presumption against development within this Green Belt zone.

Over the past decades, environmental and ecological degradation has been observed in Pui O due to the proliferation of unauthorized camping and glamping sites. Several complaints have been filed regarding issues such as refuse accumulation, hygiene problems, noise, light pollution, discharge of wastewater, and habitat destruction. However, these detrimental operations have continued despite the concerns raised.

In the latest Outline Zoning Plan (S/SLC/23), the Town Planning Board has further exacerbated the situation by rezoning a piece of wetland in close proximity to the Pui O Ecologically Important Stream into a "Recreation" zone. This decision is intended to accommodate the claimed "needs" for developing sustainable recreational activities in South Lantau. It is highly irresponsible for the Government to take the lead in encroaching recreational activities into the protected Green Belt zone, especially when the nearby designated "Recreation" zone remains largely unplanned and already occupied by several activities that are incompatible with the existing rural setting.

6. Shek Pik

6.1. Shek Pik Heritage Trail

There is currently no existing trail surrounding the Shek Pik Reservoir, and therefore the construction of the proposed Heritage Trail will inevitably involve vegetation removal and significant engineering work within the water catchment area of the Reservoir.

Instead of constructing a new trail within the sensitive Reservoir catchment, the relevant department should consider making use of the existing Shek Pik Country Trail, which lies on the eastern side of the Reservoir. This would allow the Heritage Trail to extend from the Shek Pik Country Trail, thereby minimizing the need for additional engineering work and disturbance to the environment and ecology in the area.

To support the anticipated hiking activities along the Heritage Trail, the department should ensure the installation of appropriate supporting facilities, such as water dispensers, public toilets, and informative signage. Signage should also highlight the connections to nearby trail networks, like the Lantau Trail and Shek Pik Country Trail, in order to enhance the overall connectivity of the trail system in the area.

7. Shui Hau

7.1. Sandflat Walkway

The sandflat in Shui Hau is an ecologically sensitive area. Constructing a walkway could potentially enhance the walkability of the area; however, it may also attract increased visitor numbers that could exceed the environmental capacity of Shui Hau. At this stage, there are no details provided regarding the proposed alignment and design of the walkway. Therefore, it is crucial to consider measures to prevent or restrict visitor access from the walkway

directly onto the sandflat. This would help minimize the direct impact of human disturbance on the sensitive environment and ecology of the area.

8. Transportation and Accommodation

8.1. Land Transport Amenities

Given the high ecological value and the sub-standard transportation network in South Lantau, the existing vehicle restriction measures should be maintained to control the number of vehicles accessing the area. All tourists should be encouraged to visit South Lantau by public transportation, as the government has emphasized during public consultations. Therefore, there is no need to relax the "Driving on Lantau Island" quota or increase private vehicle parking in Cheung Sha and South Lantau. Allowing more vehicles to access South Lantau would bring additional traffic, causing congestion and ultimately reducing the efficiency of the public transport network in the area.

While the government is actively working to improve walkability and accessibility for people with different needs in the city, progress has been slow in Lantau. To promote accessible tourism for all, the government should consider increasing the amount of public transport (buses and taxis) that can accommodate wheelchairs. Minor improvement works along popular destinations, road crossings, and bus stops are needed to enable people with different needs to enjoy the natural beauty of South Lantau, just as others can.

8.2. Water Transport Amenities

The necessity of building a new pier in Cheung Sha is highly questionable. The shallow water depth in Cheung Sha would require a pier with a large offshore footprint to accommodate ferry berthing, which would inevitably damage the marine ecosystem along the shoreline.

Furthermore, there is no clear evidence demonstrating the need for a new pier in Cheung Sha. Government officials claim it can serve as a hub for visitors to arrive in South Lantau and travel to other places by bus, which is the exact same function as the existing facilities in Mui Wo. Duplicating this service in Cheung Sha is unnecessary, especially when Mui Wo is already equipped with the necessary supporting infrastructure and ongoing improvement works can accommodate any increase in visitor numbers.

The government has also suggested the Cheung Sha Pier could be used for developing "island hopping" tourism. However, no studies have been conducted to assess the environmental capacity of the surrounding islands for sustainable tourism. It should be noted that some of the outlying islands to the south of Lantau are ecologically sensitive and serve as unique habitats for local species. Any proposals or developments in these areas should be strongly opposed without detailed environmental impact assessments.

Additionally, there is no clear destination identified for potential ferry services from Cheung Sha. Ferry operations in Hong Kong often run at a deficit, requiring government subsidies to maintain. Given the limited resident base in the area, the demand for regular ferry service to Cheung Sha may be low, making it unattractive for operators to invest in a new route. Without thoroughly assessing the actual need, capacity, and marine traffic in the area, it would not be worthwhile for the government to spend millions and potentially damage the environment to build an underutilized pier when a well-developed alternative exists in Mui Wo.

8.3. Accommodation Experience in South Lantau

We are deeply concerned about the prospect of providing additional accommodation facilities in South Lantau. Over the past decade, we have witnessed the woodland and wetlands in Cheung Sha and Pui O suffer from several suspected unauthorized campsite developments. These developments have often destroyed the natural habitats without prior approval from the relevant authorities. We fear that the legalization of these developments would send a false signal, effectively rewarding such unauthorized behaviour and encouraging further destruction of the natural environment.

Furthermore, there is a distinct lack of a sustainable operational model to demonstrate that these accommodation facilities can viably operate in the long term. In recent decades, numerous applications for hobby farms or holiday camps have been submitted, with some receiving temporary approvals. However, the environment has often been damaged after the operators have ceased their business activities. Given the uncertain demand for these accommodations at this stage, we are highly concerned that a similar scenario may play out in South Lantau once again, potentially undermining the government's extensive conservation efforts in the area.

9. Prevent Destruction Before It Happens

The Government has ambitious plans to transform South Lantau into a popular recreational area in Hong Kong, expressing confidence in their ability to work with various landowners and business operators to bring these proposals to fruition. However, it should be noted that several government-led projects have previously come to a halt due to a lack of interest from the private sector, such as the planned water sports center at the former Shek O Quarry Site. The Government should therefore provide a clear and detailed plan outlining how these projects will be implemented, both with and without input from other stakeholders. This will help ensure that the plans are executed in accordance with their original principles and are well-controlled.

The experience in the Northern New Territories serves as a cautionary tale, demonstrating that the promotion of recreational activities without a comprehensive plan can lead to environmental degradation. A sizeable area in Tai Kwu Ling North and Man Kam To was zoned for "Recreation" in the Outline Zoning Plan, which noted the potential for cultural heritage and eco-tourism

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development, including the provision of tourism and recreation-related facilities such as footpaths, cycle tracks, and accommodation. However, over the past decades, there has been limited recreational development in these areas, while an increasing amount of green space has been observed to have been destroyed and converted into brownfield sites. This raises concerns that a similar disastrous scenario may unfold in South Lantau.

Therefore, we urge the Government to suspend the current proposal until comprehensive assessments and surveys have been conducted to determine the environmental capacity of South Lantau and its ability to sustainably support the proposed recreational activities. Additionally, a detailed management and operational plan should be developed to ensure that any future development in the area is truly sustainable and responsible, with due consideration for the environment and ecology.

Here we submit our concerns and comments for your consideration.

Yours,

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