



世界自然基金會  
香港分會

WWF-Hong Kong

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**Chairman and Members of Panel on Development**

Legislative Council Secretariat,  
Legislative Council Complex,  
1 Legislative Council Road, Central, Hong Kong  
(E-mail: [panel\\_dev@legco.gov.hk](mailto:panel_dev@legco.gov.hk))

**By E-mail ONLY**

Dear Sir/Madam,

**Re: Meeting on 8 November 2016 about “Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030”**

We understand the captioned will be discussed in the meeting of the Panel of Development on 8 November 2016. WWF would like to express our serious concerns on the proposed East Lantau Metropolis (ELM) development which is one of the two future strategic development areas.

**Lack of strategic need assessment**

According to the consultation booklet of “Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030”, ELM is one of the two strategic growth areas in Hong Kong after 2030. About 1000 ha. of land (mainly through large-scale reclamation in the central waters) to accommodate a population of 400,000 to 700,000<sup>1</sup>. **No data thus far has been provided to justify the need of ELM but it will cause irreversible damage to the marine environment if goes ahead. Therefore, WWF believes a strategic need assessment should be first carried out on the proposed ELM before any further actions be taken.**

According to the population and household growth estimates by the Census and Statistics Department and information on planned developments from the Development Bureau, the medium- and long-term supply of housing is more than the projected increase in household numbers. In October 2015, the Census and Statistics Department published the “Hong Kong Domestic

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Household Projections”, showing that the number of households will only increase by 482,700 units over the next 35 years (2015-2049) and the population will decrease after peaking in 2043. On the other hand, a total of 508,041 housing units will be built in the coming two decades or so, and additional units will be provided from NT North proposed development and other long-term government plans (Figure 1). **Therefore, the housing supply measures being planned by the government should be able to accommodate the future growth in households. We question the justification of ELM to provide land for accommodating a population of about 400,000 to 700,000.**

|  | 圖示<br>Legend | 土地供應項目<br>Land Supply Plan  | 面積 Area<br>(公頃 ha)       | 可提供房屋單位<br>Housing Unit            |
|--|--------------|---|--------------------------|------------------------------------|
| 短中期 (2014年及以後)<br>Short to Medium Term (From 2014 and after)             | ●            | 151幅具潛力作房屋發展用地<br>151 Potential Housing Sites                             | 約 ca. 300                | > 210,000                          |
|  | 1            | 啟德發展區<br>Kai Tak Development  | 323                      | 41,000                             |
|  | 2            | 鑽石山綜合發展區<br>Diamond CDA Site  | 7.18                     | 4,050                              |
|  | 3            | 前茶果嶺高嶺土礦場<br>Ex-Cha Kwo Ling Kaolin Mine                                  | 3.29                     | 2,200                              |
|  | 4            | 安達臣道石礦場<br>Anderson Road Quarry   | 40                       | 9,410                              |
|  | 5            | 前南丫石礦場<br>Ex-Lamma Quarry   | 20                       | 1,900                              |
|  | *            | 鐵路物業發展 (短中期)<br>Railway Property Developments (Short to Medium Term)      | 31                       | 18,500                             |
|  | *            | 市區重建局重建項目<br>Urban Renewal Authority Redevelopments Projects              | 2.24                     | 2,621                              |
| 中長期 (2023年及以後)<br>Medium to Long Term (From 2023 and after)              | 6            | 古洞北和粉嶺北新發展區<br>Kwu Tung North and Fanling North NDAs                      | 320                      | 60,000                             |
|  | 7            | 東涌新市鎮擴展<br>Tung Chung New Town Extension                                  | 133                      | 49,400                             |
|  | 8            | 洪水橋新發展區<br>Hung Shui Kiu NDA  | 442                      | 60,100                             |
|  | 9            | 元朗南<br>Yuen Long South  | 183                      | 26,100                             |
|  | 10           | 錦田南<br>Kam Tin South  | 60                       | 16,700                             |
|  | *            | 鐵路物業發展 (長期)<br>Railway Property Developments (Long Term)                  | 24                       | 6,060                              |
| 長期及正在研究項目<br>Long Term and under study                                   | 11           | 新界北發展潛力研究地區<br>NTN Potential Development Area                             | 未有公佈數字<br>No data        |                                    |
|  | 12           | 馬料水<br>Ma Liu Shui  |                          |                                    |
|  | 13           | 青衣西南<br>Tsing Yi South West   |                          |                                    |
|  | 14           | 欣澳<br>Sunny Bay   |                          |                                    |
|  | 15           | 小蠔灣<br>Siu Ho Wan   |                          |                                    |
|  | 16           | 龍鼓灘<br>Lung Kwu Tan   |                          |                                    |
|  | 17           | 西貢污水處理廠<br>Sai Kung Sewage Treatment Works                                |                          |                                    |
|  | 18           | 沙田污水處理廠<br>Sha Tin Sewage Treatment Works                                 |                          |                                    |
|  | 19           | 鑽石山食水及海水配水庫<br>Diamond Hill Fresh Water and Salt Water Service Reservoirs |                          |                                    |
|  | 20           | 深井污水處理廠<br>Sham Tseng Sewage Treatment Works                              |                          |                                    |
| 總計 (未計算長期及正研究項目)<br>Total (Not Including Long Term and Plan Under Study) |              |   | 約1,890公頃<br>ca. 1,890 ha | 最少 508,041 個單位<br>最少 508,041 units |

\* 該項目未有位置資料  
\* No location information  
資料來源：發展局  
Data Source: Development Bureau

Figure 1. The number of housing units provided under short-, medium- and long-term land supply plans<sup>2</sup>

<sup>1</sup> P.75 of the HK2030+ consultation booklet ([http://www.hk2030plus.hk/document/HK2030+ Booklet\\_Eng.pdf](http://www.hk2030plus.hk/document/HK2030+ Booklet_Eng.pdf))

<sup>2</sup> WWF's Response to a Report on Hong Kong's Land and Housing Supply <http://www.wwf.org.hk/en/?14400/WWF-rapid-response-cons-20151109#>

## **Potential ecological impacts of the ELM and its associated transport infrastructures**

WWF is not only concerned about the ecological impacts of this massive reclamation, but also the ecological impacts resulted from the associated transport infrastructures of the ELM. According to Section 5.11 of “Preliminary Concepts for the East Lantau Metropolis” released simultaneously with the “Hong Kong 2030+” consultation, it is stated that *“given the potential population and employment opportunities at the proposed ELM and its CBD3 function, it is crucial to connect the ELM with the existing urban districts through a strategic transport network”*. Indeed, during the public engagement of the “Lantau Development – Space For All” in January 2016, possible transport links between the ELM and other urban areas have already been identified by the government, which included “Possible Rail/Road Links between Mui Wo & North Lantau” and “Possible Rail Link between North Lantau and Tuen Mun”.

### **Marine Ecology**

The proposed ELM involves reclamation at the central waters, including the waters near Kau Yi Chau, Hei Ling Chau and Peng Chau. We would like to point out that there is lack of updated information on the marine ecology and fishery resources in these waters. Also, **no ecological and fishery surveys and impact assessments have been conducted by the government, therefore the ecological value of these waters and impacts from the large-scale reclamation are unknown.**

Moreover, the construction of the “Possible Rail Link between North Lantau and Tuen Mun”, which will connect to the ELM, would likely take place inside the Marine Park which is a compensation because of the Third Runway project (to be designated by 2023) (Figure 2). **This railway would cut through the traveling corridor of the Chinese white dolphins that move between NE and N Lantau waters. Both the construction and operation phase of this railway would potentially cause disturbance to the dolphins using the areas.**

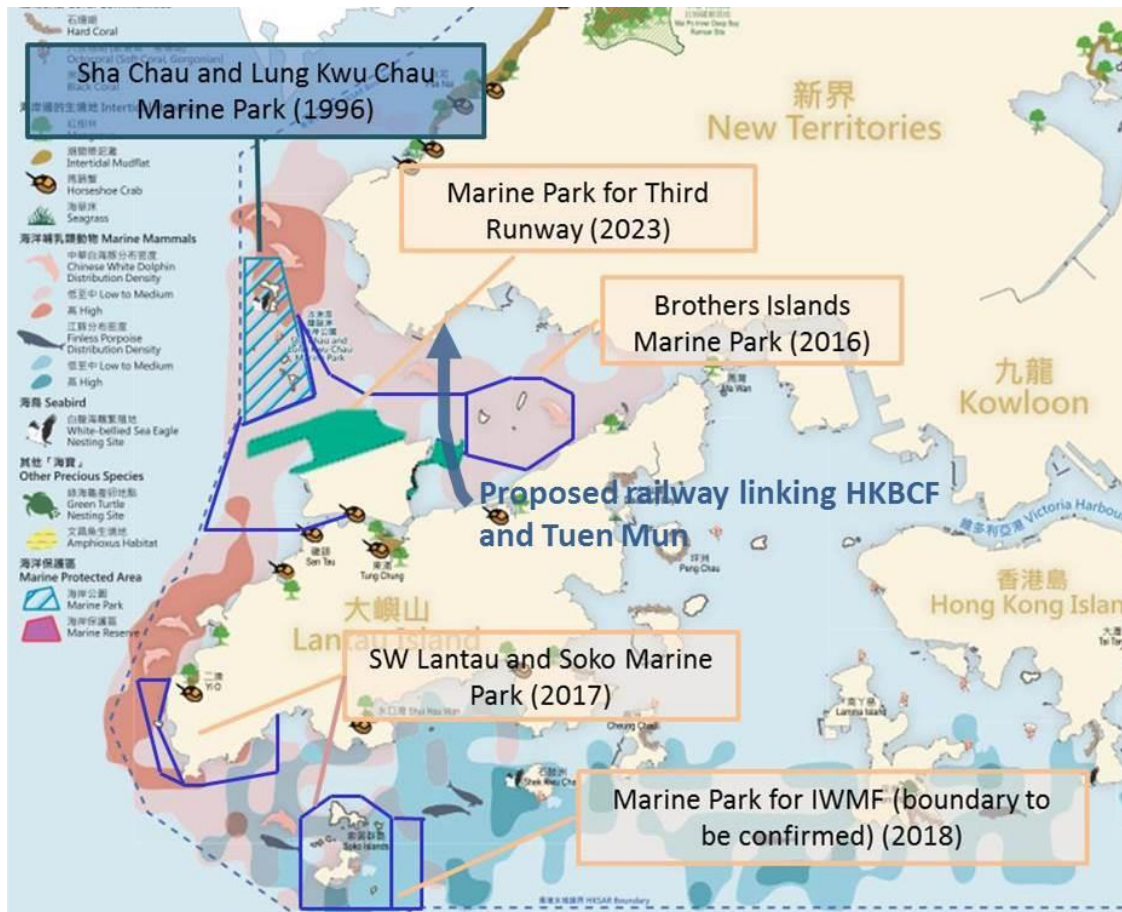


Figure 2. The proposed railway to be built between the Hong Kong Border Crossing Facility (HKBCF) Island and Tuen Mun would cut across the traveling corridor of the Chinese white dolphins move between NE and N Lantau.

The marine traffic generated by the work barges during the construction period of the railway would likely cause serious disturbance impacts to the marine environment inside the Marine Parks (The Brothers and that from the Third Runway), adding concerns to the already congested marine traffic in the area. Although the speed of vessels will be restricted down to 10 knots within the marine parks, high volume and frequency of vessels crossing the Marine Parks would still cause significant disturbance to the dolphins and undermine the effectiveness of these two marine parks. The Brothers Marine Park and Marine Park for the Third Runway are planned to be designated in 2016 and 2023 as compensation measures for the large scale development projects. **It would defeat their purpose if incompatible development plans are added subsequently.**

## Terrestrial Ecology

In the Green Groups' joint request for the Lantau conservation plan submitted to the Panel on Development on 13 April 2016, Mui Wo is one of the "NO-GO areas" on Lantau due to its significant ecological value<sup>3</sup>. The wetlands and abandoned fish ponds and estuaries in Mui Wo are important habitats for water birds and wetland-dependent bird species. Moreover, the wetlands in Mui Wo are also an amphibian hotspot recognized by the AFCD and the "Globally Endangered" Romer's Tree Frog occurs in the valley. WWF is concerned that the **ELM associated transport and traffic infrastructures (e.g. "Possible Rail/Road Links between Mui Wo & North Lantau") will increase the development pressure and will result in irreversible loss of important habitats at Mui Wo.**

Moreover, WWF is concerned that the transport link to Mui Wo will likely trigger the villagers' demand for relaxing the traffic restriction on South Lantau Road and other closed roads. This will open the floodgate for unplanned development, land filling and dumping of C&D waste in South Lantau where there is no Development Permission Area (DPA) Plan for planning enforcement. The relaxation of traffic restriction will cause significant ecological and environmental impacts to the areas along the roads. For example, the retreat of Tung Chung Road Control Station from Wong Lung Hang to Shek Mun Kap in 2007 had already led to uncontrollable land filling and dumping of C&D waste in the ecologically sensitive Tung Chung Valley where it had no DPA Plan until 2015. Furthermore, unenforceable eco-vandalism cases have already been happening on private lands of South Lantau, such as on-going dumping activities in the ecologically important wetlands at Pui O. As such, we are worried that **the proposed transport link to Mui Wo will make landowners along South Lantau Road to think there are many development opportunities and result in further destruction of unprotected sites of ecological importance.**

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<sup>3</sup> <http://www.legco.gov.hk/yr15-16/english/panels/dev/papers/dev20160416cb1-800-11-e.pdf>

### **WWF Key Asks on the proposed ELM**

1. Since the need of the proposed ELM has not been justified and the proposed ELM and the associated transport infrastructures will cause irreversible damage to the terrestrial and marine environment, WWF urges the Panel on Development to request the government to conduct a strategic needs assessment.
2. Fig. 1 of the consultation booklet “Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030” shows that key studies such as “Economic Land Requirement Study”, “Transport & Land Use Assessment” and “Strategic Environmental Assessment” are still in progress and not yet available. Since ELM is one of the key development proposals under the “Hong Kong 2030+”, we consider that it is too early for the Panel on Development to discuss the ELM, until the detailed technical reports and studies and the strategic needs assessment mentioned above are available.
3. WWF supports the Save Lantau Alliance’s letter to the Panel on Development (2 November 2016) requesting for a public hearing about the proposed ELM development before the government securing the funding for the Strategic Studies for Artificial Islands in the Central Waters from the LegCo<sup>4</sup>.

We are grateful if members of the Panel on Development will duly consider our concerns on the captioned.

Yours faithfully,



Andrew Chan  
Conservation Officer, WWF-Hong Kong

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<sup>4</sup> <http://www.legco.gov.hk/yr16-17/chinese/panels/dev/papers/dev20161108cb1-57-1-c.pdf>