

**Comments on ‘Concept Plan for Lantau’
The Conservancy Association
February 2005**

The Conservancy Association (CA) has grave concerns regarding the ‘Concept Plan for Lantau Consultation Digest’ (the Plan). From every perspective, including core values, procedure and the substance, the Plan violates the principles of sustainable development.

We urge the Government to revise its approach to the future development of Lantau, and adopt a ‘conservation first’ principle.

Following are CA’s concerns over the Plan:

The Plan bypasses the formal planning procedure

It’s common practice that planning concepts go through various stages of consultation, and that any proposed project is only developed after thorough consultation. Planning studies related to Lantau, such as “South West New Territories Recommended Development Strategy” and “Hong Kong 2030”, are still in progress. However, many of the proposals in the Plan have never been mentioned during the consultations on these studies. The many ‘parachute’ proposals creates suspicion that the Plan did bypass the formal planning procedure.

The Plan aims for development, not conservation

The main purpose of the Plan is ‘development first’, and conservation appears only as a cosmetic element. The Plan stresses that to ‘utilize’ the development potential of Lantau, even for the conservation elements the proposals aim to ‘maximize’ the recreation and tourism potential of the island’s green areas. It is clear that the core value of the Plan is ‘development first’. Matters are made worse by the selection of sites, whereby the development is concentrated on green-field and reclamation sites rather than brown-field sites.

In our opinion, without a change to the core values, the proposed conservation measures will only be cosmetic and the real conservation of Lantau will not materialize.

Lack of assessment studies for the proposed facilities and projects

Many facilities proposed in the Plan have not passed any environmental impact assessment or sustainability review, neither have there been any assessment of the carrying capacity of the effected area. In this situation, the public can hardly make a fair judgment whether these facilities meet the requirements of sustainable development. Further, there are no alternative options included for each of the proposed facilities, which significantly limits the choices available to the public and the quality of the feed-back.

CA urges the Government to conduct environmental impact assessments for each proposed facilities and projects, and to complete carrying capacity studies for each affected area. Each development should only be included after completion of the detailed assessments and the public has been fully consulted on each.

There are no active conservation measures included in the Plan

The Plan talks a lot about how to develop Lantau, but there were no new active conservation plans proposed. CA is disappointed with the lack of active conservation measures. Several years ago, and together with other green groups, CA has proposed to the Government measures to strengthen the conservation of Lantau. The ‘Conservation Strategy for Lantau’ calls for the preservation of more than half of the land in Lantau and all the streams and rivers in the low lands.

CA urges the Government to respond to the green groups long-standing demands and adopt a full-scale conservation plan for Lantau immediately.

Lantau North (Extension) Country Park cannot be regarded as a new conservation measures

Though the Plan mentions the extension of the Proposed Lantau North (Extension) Country Park, this is an old commitment and remedial measure agreed with the “Port and Airport Development Plan”. This was gazetted in 2001 but the implementation has been frozen for years. Therefore, this should not be regarded as a new conservation measure, and should not be used as a new compensation measure against for any of the new proposed developments.

CA demands that the Government adopts all the promised conservation measures, such as the Proposed Lantau North (Extension) Country Park and the establishment of the Marine Park including the Soko Islands. These measures should not be regarded as mitigation for the proposed developments. For the developments, any damage to the

environment should be avoided, and failing to do so, then specific new measures should be provided to mitigate any such damage.

The ecology of South Lantau

Many areas in South Lantau have a rich ecological value. There are mangroves in Pui O Wan with full of water birds and amphibians. The Romer's Tree Frog has been recorded at nearby Cheung Sha, Tong Fuk and Shui Hau. CA is concerned whether the proposed developments of the Plan will have a negative impact to the environment of these.

CA condemns the lack of plans for the improvement of the ecology of the South Lantau, and demands that the Government includes proposals for the preservation of the ecology of South Lantau before the starting of any development plans in the region.

Population Boom

According to the figures listed out in the consultation paper, there will be a dramatic growth in the population of Lantau from 88,000 in mid 2004 to 267,000 in the near future. For example, the population of Tai O is expected to more than double, and in Tung Chung, the population size will increase more than 3 times. This is substantial growth, however, the Plan does not mention the impact and any measures taken to deal with this.

In our opinion, the expected population growth will much pressure on the resources and create more pollution. The Government should inform the public and provide clear plans to meet the needs of the increased population.

Comments on the proposed facilities:

Third Theme Park in Hong Kong ---- Hong Kong will soon have 2 theme parks and the Plan does not provide sound grounds for building a third theme park demonstrating whether it is financially or environmentally sustainable.

Proposed Logistic Parks and Container Terminal 10 ---- The building of the proposed Logistic Parks should be considered together with the proposal for Container Terminal 10, in order to avoid any overlap. Further, the Government should provide details on the development of proposed Logistics Parks.

Eco-Tour Centre ---- The proposed center is simply cosmetic. There is no substantial improvement of the environment.

Holiday Village/ Resorts ---- The proposed sites have a limited carrying capacity

limited and the establishment of resorts will definitely aggravate traffic, which means that more roads will need to be built.

Golf Course ---- Golf course is an unsustainable project with a large eco-footprint.

Strategic Road ---- Before construction, a thorough study is required first of the impact on Lantau as a whole.

Proposed Container Terminal 10

Last but not the least, Container Terminal 10 was proposed to be built around the marine area near Tai O. This will have a great impact on the environment of Lantau. However, the Plan never mentions this and instead other logistic facilities are proposed.

First, CA questions the needs for building another container terminal in Hong Kong and we are deeply concern about its impact on the environment. CA urges the Government to conduct a thorough environmental impact assessment of the proposed Container Terminal 10 and Logistic Park before making any decision.

Conclusion

To date, Lantau has escaped development and has provided a green zone for an intensely developed Hong Kong. However, the proposed development in the Plan will permanently end the peaceful character of Lantau.

Lantau is a virgin land with great spiritual value for the Hong Kong people of every generation, and we should avoid an irreversible impact on the island for short-term economic benefits. It is wrong to reap political gains by vandalism. The planning of future Lantau should be 'conservation first', and not be driven by an unwarranted 'development first' Concept Plan.