



Citizens Party's comments on the Environmental Impact Assessment for Construction of an International Theme Park (ITP) in Penny's Bay of North Lantau together with its Essential Associated Infrastructure

Summary

Citizens Party is concerned that the SAR Government puts speed of completion of the International Theme Park (ITP) ahead of conducting a thorough EIA. We found crucial aspects of the EIA Report to have been inadequately investigated resulting in many speculative conclusions as well as misleading statements. From the many questionable aspects of the EIA Report, we believe that Hong Kong is being forced to make serious environmental compromises in water quality, marine ecology (including that for the dolphins), fisheries protection, and land contamination. We conclude that the EIA conducted is far from exemplary.

Introduction

Under Section 7 of the Environmental Impact Assessment Ordinance (EIAO), Citizens Party submits the following comments on the above-captioned EIA, published for inspection on 13 March 2000. We believe heavy political pressure is being brought to bear on the Environmental Protection Department (EPD) to approve this project. We hope that the Director of EPD will uphold the credibility of the EIA process by taking into consideration the very serious deficiencies in the EIA Report.

Section 2: Benefits and Dis-benefits

Statements made about the environmental "benefits" are misleading as aspects that are not environmental "benefits" are included as such.

Section 2 on benefits and dis-benefits is very misleading as it includes items such as excluding fireworks that contain toxic metals, and that noise level would comply with the law. These and others are NOT environmental benefits. They are basic legal or commonsense requirements. Many of the other 'benefits' are also merely mitigation measures. The 'disbenefits', on the other hand, are not elaborated upon, and many are described only as 'potential' benefits.

In Section 2.15, "scenarios with and without the project", it is stated that the alternative port development would lead to worse noise, air, visual and glare impacts. We do not regard it as proper to contrast the ITP development with that for port development as a less bad option.

Section 3: Air Quality Impacts

The results of various calculations on air quality and air pollution emissions are unclear and need clarification. In the event that the Air Pollution Index (API) is exceeded, the ITP operator should not be allowed to use fireworks.

Paragraph 3.4.3 states that half of the public fill will be transported by road. It is unclear how this quantity was arrived at. More importantly, if transport could be by boat, it would reduce dust emissions significantly if this. We propose that a high proportion by boat transport be adopted.

In calculating vehicle emissions, the EIA Report states that Euro III standards were adopted. It is unclear from Annex B6 whether emissions from older vehicles were included. Was it assumed that all diesel vehicles would meet Euro III standards? If so, this would seriously underestimate the emissions, since many pre-Euro, Euro I and Euro II vehicles will still be on the roads in 2005.

Paragraph 3.5.34 states that the background conditions indicate that the average levels of all pollutants are well below the Air Quality Objectives (AQO). However, this does not mean that there are no AQO exceedances (there were two exceedances of the hourly ozone level in Tung Chung last year). Simply quoting average air quality levels may not provide an assessment of air quality.

The comprehensive modeling undertaken for the Third Comprehensive Transport Study (CTS3) predicted that air quality will fail AQO all over Hong Kong by 2016. How can this prediction be reconciled with the conclusions in the EIA Report that predicted air pollutant concentrations will be much less than the AQO once the ITP is built?

The EIA for the gas turbine plant shows that levels of sulphur dioxide exceed the AQO at high wind speeds and elevations (paragraph 3.5.49). This led to a recommended height restriction for the park of 60m. It is assumed that pollution will be discharged into a highly turbulent wake and effluents transported to the ground. What supporting evidence is there for this? Will this lead to acidification of soils?

In the event that the Director of EPD issues a Permit for the ITP, it is recommended that if the API reaches 'high' levels, fireworks should be banned.

Section 4: Noise Impacts

Noise levels will be much worse and yet no mitigation measures are mentioned in the EIA.

Table 4.5c indicates that operation of the ITP will result in noise levels within the North Lantau Country Park extension as high as 67 dB(A), which is significantly higher than existing levels. What mitigation is planned for this impact?

Section 5: Water Quality Impacts

Sewage: The existing sewage treatment works was not designed to cope with the increased flow from the ITP. The EIA Report did not provide details on a back-up system in case there is a system failure.

The sewage from the ITP will be transported to the Siu Ho Wan sewage treatment works. These works were never intended for such additional flows and as a result require upgrading. The park flows are higher than the ultimate flows from Discovery Bay and represent a 7% increase on that originally planned for.

The cumulative effects of all the additional flows to the Siu Ho Wan sewage treatment works are being carried out as part of the Northshore Lantau Development Feasibility Study. However, there should be a section in this EIA on the cumulative impacts of sewage flows on Siu Ho Wan's capacity and in turn, the receiving waters of North Lantau, since this project post-dates the Northshore Lantau Study. It has already been determined that the Siu Ho Wan sewage treatment works would not have sufficient capacity to treat the sewage effluent flows beyond 2011 and would

need to be upgraded. Would the Disney Company be required to contribute to the capital costs of upgrading the works?

Paragraph 5.10.46 states that there may be a risk of failure of systems, such as pumping stations, which could result in the discharge of raw sewage to the surrounding waters. It states that any impacts could be prevented by the provision of suitable back-up or redundant systems. However, no details are provided. Please confirm what back-up systems will be in place?

Artificial lake: The Government needs to explain why the ITP is allowed to use potable/mains water for irrigation when it is against existing policy.

Paragraph 5.10.28 states that the Water Supplies Department (WSD) has identified the Tai Lam Chung Reservoir as a potential source of water to replenish the artificial lake in the dry season. It was not explained whether additional infrastructure will be required that may impact the Tai Lam Country Park or the seabed. Paragraph 2.8.5 notes that the water will come from Yam O Tuk. This needs to be clarified.

The artificial lakes will be used for irrigation for the landscaped areas. This appears to be a major reversal of WSD policy, which does not permit potable water to be used for irrigation in other privately operated leisure parks. In the EIA for the Kau Sai Chau public golf course, it was stated "Mains water supply was rejected [for irrigation] because it is Water Supply Department policy that mains water should not be used for large-scale irrigation purposes". The Discovery Bay development was required to provide its own drinking water reservoir.

The Government needs to explain why this significant concession is to be given to the ITP. The amount of potable water that will be used for irrigation should also be released.

Cumulative Dredging Impacts: The EIA Report treats the WQOs with impunity, not caring as to whether they are exceeded or not.

Paragraph 5.12.2 states that the cumulative impacts of dredging/reclamation of the ITP and other concurrent projects will result in an exceedance of the Water Quality Objectives (WQO) for suspended sediment concentrations at Ma Wan Fish Culture Zone. In the same paragraph it states "it was determined that the predicted increase in suspended sediment concentrations at the Ma Wan Fish Culture Zone would not adversely affect the fish stocks. It is therefore concluded that the predicted exceedance of the WQO at the Ma Wan Fish Culture Zone is not an adverse impact and that there will thus be no residual impacts." This is an extraordinary conclusion. Following the EIA Report's logic, the WQO can be exceeded with impunity. Either the WQO are inaccurate and need revision, or the consultants have subjectively decreed that environmental quality objectives can be exceeded.

Reclamation: Due to time consideration, a more ecologically damaging reclamation method is chosen for Phase I which will impact the marine habitat twice over. There are also questions surrounding the extent to which the reduction in flushing in the area will impact on water quality.

Reclamation of Stage I of Penny's Bay will be carried out by a fully dredged method and will involve 40 million cubic meters of dredging. Since some of the sediments are heavily contaminated with copper, chromium, lead, zinc TBT, it would be better environmental practice to leave the sediments *in situ* through adoption of a drained reclamation method. This would also have the benefit of reducing the amounts of contaminated waste that need to be dredged, handled and



dumped. The Stage II reclamation will be by a drained method and will involve 5 million cubic meters of dredging.

In choosing the fully dredged method, the marine habitat will be impacted twice over unnecessarily during Phase I. Firstly, from the dredging and release of contaminants at Penny's Bay and secondly, from the dumping and release of contaminants at East Sha Chau contaminated mud dumping ground. Both of these are the habitat of the Chinese White Dolphin.

Again choosing the fully dredged method for Stage I represents a remarkable reversal of government policy, which is to use this method only where necessary. The alternative option is not discussed in the EIA Report. Paragraph 6.5.5 explains that dredged reclamation is the adopted because it is quicker as the project needs to be completed within 32 months.

The EIA reports notes that the ITP would reduce natural flushing of the areas to the south west of the reclamations, Sze Pak Wan and Discovery Bay, which have the potential to cause adverse water quality impacts. As no breaches of the WQO were predicted, the Report concludes that there would be no adverse impacts. However, in the EIA for the container port development, it was found that the reclamation would impair flushing in Discovery Bay, such that the majority of the pollutants generated in Discovery Bay remain within the bay for at least 48 hours. It raises suspicion that there is such a large discrepancy between the two EIAs?

Section 6: Waste

Insufficient attempt has been made to ensure that the public fill generated in Hong Kong be used for the Phase I reclamation.

The amount of public fill being used in Phase I is still only a fraction (less than 3%) of the amount of total amount of sandfill needed. Better inter-facing with other projects where fill material is being generated for use in Phase I is the only sensible option.

The final disposal site for any construction and demolition waste must be specified in all contracts. There should not be a repeat of the excessive waste dumping resulting from the airport and core projects.

Section 7: Terrestrial Ecology

Surveys: The ecological surveys were of insufficient depth to ensure all the species were properly accounted for.

It is unclear when the ecological surveys actually started. The Report states that they started in February 1999 when the Government first announced proposals for an ITP. This only makes sense if work started even before the project was made public.

The survey effort is not quantified (except for the night survey) and it is difficult to judge the significance of the results, especially with animals. In the case of herptofauna (7.3.38), the results show that there are only three frog species, which suggests that the survey was inadequate as there are many wetland habitats on site (streams, freshwater wetlands). For example, species such as the very common Asian Common Toad, *Bufo melanostictus*, ought to occur at the ITP site.

Paragraph 7.3.13 states that one nighttime survey was undertaken on nocturnal avifauna and large mammal. This suggests that amphibians and reptiles were not included. Many of these are more

active at nights, including the Romer's Tree Frog (while it is likely that the Romer's Tree Frog does not occur at the site, a daytime survey would not find them even if they were there). Since only one survey was conducted at night, it is extraordinary that the EIA Reports concludes that there are no adverse impacts from park operation to general wildlife since no nocturnal wildlife activities were recorded in the night survey (7.6.14).

Terrestrial Habitat Loss: a wetland and some species were not included.

The 1 ha freshwater wetland (see 7.3.22), which has 3 rare plant species, is not included in Table 7.6a. Similarly in the overall impact evaluation (7.6.19-24) and general mitigation (7.7), this wetland is not mentioned, neither is the Pitcher Plant.

Avifauna: The section of EIA Report on the impact of the project on the White-bellied Sea Eagles was entirely speculative.

The EIA Reports states that White-bellied Sea Eagles were observed foraging from Yi Chuen to Pa Tau Kwu. Except for this statement, the Report does not indicate anything about the major foraging areas of the breeding pair. Indeed, it appears no study was carried out to study their foraging behaviour. The EIA only concentrates on whether the noise disturbance from the construction work or the fireworks would affect them. The statement in paragraph 7.8.2 that "*the White-bellied Sea Eagles should be able to find suitable alternative nest sites, such as the remote Tang Lung Chau or Kau Yi Chau*" is purely speculative.

General mitigation of adverse environmental impacts: Vegetation loss and impact on the White-bellied Sea Eagles do not appear to have been thoroughly considered.

Habitat/Vegetation Loss

Point 1: The EIA Report recommends (a) providing compensatory woodland, and (b) using species native to Hong Kong or the South China region for compensation. Firstly, it would be better to use only species native to Hong Kong, and secondly, compensation might be problematical, as there is a major supply problem in native tree species. It is unclear how the problem can be solved.

Point 3: It is easier to recommend transplanting the two rare plant species than actually doing it. The EIA Report does not mention who will actually transplant those plants, which is critical if it will be successful. The Report states that pitcher plants were transplanted from North Lantau, during the development of the North Lantau Highway, but failed to inform whether it was successful.

Point 4: Its is highly doubtful whether the Report's recommended measures to prohibit construction workers and the public to disturb the White-bellied Sea Eagles nest will be effective.

Point 6: There does not appear to be any mitigation for noise disturbance to the eagles. On the contrary, it suggests that the impact cannot be ameliorated.

The Report states that the eagles may have a certain degree of tolerance to disturbance. It notes that the current nest site is about 2km from the Phase I ITP fireworks launching position. Figure 7.6a shows that the nest site will be in an island surrounded by a major highway and railway. The chances of the birds adapting to this' disturbance appear negligible. The Report does not consider banning fireworks as a mitigation measure.



Construction Practice

Point 5: The EIA recommended fire control measures will not be effective. A regularly maintained, 20m no vegetation firebreak at the boundary of the work areas will be more effective (provided that no rare and protected plants occur in the firebreak). However, the firebreak should be reinstated with native woody species as soon as the construction work is completed.

The extension of the North Lantau Country Park must be in place before any construction works commence to provide adequate control on surrounding areas.

Section 8: Marine Ecology

The section in the EIA Report on marine ecology may not comply with the original EIA brief as it was reduced in area. Overall, the assessment of marine ecological impacts is inadequate, and in some respects misleading. For example, the cumulative impacts of coral loss have not been assessed, and the artificial seawalls are made to have an ecological enhancing characteristics which is speculative. Most worrying is the assertion that the majority of the dolphins would not be affected when in reality they will be. We also recommend that all boat speed be limited to less than 10 knots in the area. This section of the Report breaches the EIA Ordinance (Technical Memorandum) as it does not address ecological linkages.

The assessment area defined in the EIA brief was all sensitive receivers within the North Western, Western Buffer and Southern Water Control Zones. This was reduced in the EIA Report to a so-called 'refined area,' which means that the entire area was not assessed. Does this section therefore conform to the EIA brief?

Paragraph 8.3.8 notes that Penny's Bay supports a relatively healthy, simple coral community. *"The findings are of some significance as the presence of reef building corals in Penny's Bay extends the known local geographic range for local hard corals"*. The EIA states that this allows for a more precautionary approach to be taken when assessing impacts. However, this approach does not seem to have been carried through in the assessment or the mitigation. For example, the cumulative impacts of loss of corals from the Northshore Lantau Development have not been assessed.

In Section 8 states that few surveys have been conducted on the colonization of organisms on artificial seawalls in Hong Kong. While the habitats have the *potential* to support high ecological value assemblages, this does not mean they will necessarily do so. It is not accepted (paragraph 8.5.7) that the *potential* habitat provided by the rubble mound seawalls is mitigation for the loss of high ecological value assemblages of high corals within the reclamation sites.

We take exception to the description in paragraph 8.5.8 of the artificial seawalls as *"ecologically enhancing"* while the existing intertidal rocky shore communities are described as low diversity. There is also a big assumption that a regular supply of larvae will be brought to the area to recolonize the new seawalls. It is predicted that there will be elevated suspended solids, which have a particularly adverse impact on the eggs and larvae of fish, it therefore cannot be assumed that there will be a regular supply of larvae.

The work conducted by Dr Tom Jefferson on the dolphins usage of the area is referred to. The EIA Report states that *"East Lantau is not thought to represent a critical habitat for this dolphin species"*. This is not actually the conclusion of Dr Jefferson's report, which was that 80% of dolphins do not use the habitat. Up to 20% of the dolphins do use the area, including a high percentage of juveniles. Dr Jefferson's report states *"Most dolphins in Hong Kong do not appear*

to use the East Lantau area. However, of those that do, some individuals may use the East Lantau area as a very important part of their range." (our emphasis) The report also states "some animals do appear to use the East Lantau area heavily and many of these are young animals that may be more susceptible to disturbance than older, more experienced animals. Death, injury or serious disturbance to these individuals could have a deleterious effect on future recruitment to the population." (our emphasis) Clearly, the loss of Penny's Bay could have critical impacts on the dolphins.

Further, Dr Jefferson's report did not consider the impacts of reclamation on the availability of food for the dolphins. This is not addressed in the EIA Report. Paragraph 8.5.12 refers to the loss of natural coastline and the concomitant effects on the prey species of the dolphins, as a primary concern. However, since the Fisheries Impact Assessment does not show serious impacts on fisheries, the Report assumes that there will be no effects on the dolphins' food supply.

Firstly, we disagree with the conclusions of the fisheries assessment for reasons outlined below. Secondly, the fisheries assessment concentrates only on commercially valuable fish. Paragraph 8.5.21 refers to twenty species of fish found in the stomach of dolphins, including species of anchovies, croakers and sardines. These are among the 'low commercial value' fish found in Penny's Bay. There is no assessment of their abundance in Penny's Bay and the impact of the reclamation on those sources. Thus poor assessment in one section leads to erroneous conclusions in another.

Paragraph 8.5.11 on cumulative impacts of all the reclamation projects around Lantau Island in recent years on marine mammals concedes that "*these works may have had an adverse impact*". However, it goes on to make the extraordinary statement that the loss of shorelines in Hong Kong's inshore waters is probably not of major importance to the population. Where are the studies and analysis to bear this conclusion out?

There is also no assessment of the impacts of release of contaminants such as TBT, chromium, lead, zinc and copper from sediments on marine mammals.

Paragraph 8.8.8 states that the traditional island ferries that travel less than 10 knots will be used but the use of smaller faster outboard boats would be a concern to dolphins. The newer island ferries are actually high-speed ferries (paragraph 2.7.13 indicates ferry speeds of up to 33 knots). Rather than simply 'anticipating' that faster ferries would not be used at the theme park, the environmental permit should specify that boats should not be allowed to travel over 10 knots within the vicinity of the dolphin habitat.

In the assessment of impacts on different marine resources, the EIA Report focuses on whether any rare species will be lost. It does not address ecological linkages as required by the EIA Ordinance's Technical Memorandum.

Section 9: Fisheries Impacts

There is evidence that Penny's Bay is a nursery for fish but the EIA assessment process did not appear to have been thorough enough to be definitive. There will also be a loss of fishing zone and the value and volume of the loss may be much higher than the EIA Report suggests.

The EIA Report states that Penny's Bay is ranked low in terms of fishery value due to over-fishing, pollution and dredging/dumping. However, the Report has not provided information about resources in Penny's Bay or the nearby area. The loss of rocky shoreline is a major problem



because this provides food and shelter to young and adult fish and is not being mitigated for specifically (despite the artificial seawall). The consultants needs to confirm the total length of rocky coastline that will be lost through this project, and how the seawalls compare in terms of habitat value to natural rocky shoreline.

Paragraph 9.3.8. states that the main fishes are of low commercial value including croaker, sole and juveniles of various species. The recorded presence of these juveniles indicates that this area is a nursery area. Also, sole and croaker can be reasonably valuable (depending on species) and the juveniles of the species like rabbitfish, which are referred to as 'trash' fish are not without value, as adults are sold for food and smaller species are popular for mariculture feed. The EIA Report does not provide any quantitative data which shows the importance or otherwise of Penny's Bay for nursery and the possibility cannot therefore be rejected. Indeed, one of the main aspects of the local Hong Kong fishery these days is for trash fish for mariculture.

The ichthyoplankton trawls cannot be a measure of the importance of spawning grounds because they were only taken within a one-month period or so in each location. The only way to know whether a site is important for spawning based on egg presence is a survey of all lunar phases during all months of the year because of a high degree of spawning seasonality in some species. Nor should one compare plankton samples from one month in one place with another month in another place as is done in comparing Penny's Bay trawl in December 1999 with North Lantau in February 1999 with others in other months.

We therefore disagree with the conclusion that the area is not an important nursery area. There is insufficient detail to decide and there is some suggestion from the presence of juveniles of several species that it may be.

The loss of 205 ha of fishing zone will represent a loss to fishing and yet there is not mitigation for this loss (Paragraph 9.10.2 states that "*no fisheries-specific mitigation measures are required during operation*").

The relevance of the artificial reef program to this EIA is not clear. Is this supposed to be a mitigation measure? If so, supporting evidence which demonstrate that artificial reefs enhance, rather than simply aggregate, fisheries needs to be provided.

It is not clear how the figures on values and volumes of the fishery in Hong Kong waters have been calculated. For example, in Annex H, it is stated that in 1997 fisheries production estimated from Hong Kong waters was 186,000 tonnes. This represents the landings of the entire Hong Kong fleet (who fish mostly out of HK) with only about 5-10% of that coming from Hong Kong waters. If the consultants are using the 186,000 as 100% of Hong Kong water captures and then calculating the relative importance of certain areas in Hong Kong in terms of fishery production/value based on this figure, then most areas will represent just a tiny proportion.

The 1998 ERM study frequently cited reports about 17,681 tonnes from Hong Kong waters. Penny's Bay was recorded as among the most productive of western waters (indeed, southeastern Lantau and eastern Lantau were the most productive west of eastern Hong Kong island with the exception of western Lamma). A later survey showed lower production from Penny's Bay than the first and the general area is still the most productive in the west. The updated information cited in paragraph 9.3.5. cannot be checked because Fig. 9.2a, Annex H, was not included in the web site. The conflicting information on the fisheries resources of Penny's Bay means that no firm conclusion can be brought on production.

Section 12: Land Contamination

Given that the EIA consultants could not gain access to take site samples from the shipyards, it is expected that they would have assumed a worst case scenario and worked on that basis. Instead the report seems to suggest contamination will be low based on samples taken on the periphery of the site.

The Report's conclusion may be premature:

- Paragraph 12.6.15 indicates that waste disposal has been into large, unlined pits excavated in the ground. The pits were observed to contain "an extensive range of solid wastes, including tyres and drums, and the materials appeared to be burned". The EPD is duty bound to explain how this practice has been allowed to continue under the Waste Disposal Ordinance? EPD should also advise the number of times the site was inspected.
- Paragraph 12.6.17 surmises that the horizontal and vertical migration of any contaminants would be low. If this is true, then contamination would be highly localized and the samples taken on the periphery of the site would not give a true picture of contamination.
- Table 6.5b shows the sediment quality at one site located outside the seaward boundary of the Choy Lee Shipyard, to be contaminated with high levels of copper, chromium, lead and zinc. The EIA Reports speculates that this may be due to the shipyard. This is not referred to in either the section on land contamination or water quality. Further, the sediment depth is not known in several areas, leading to guesswork on the amount of contaminated mud to be dredged.

The chemical waste licence for the site indicates that spent solvents and lubricating oils are disposed of. However, the site also has electroplating facilities, which means it has or still is generating waste containing toxic metals. What happens to these? Does EPD's records for disposal of chemical waste include disposal of electroplating wastes? If not, it can be assumed they have been disposed of at the site, with the potential for contamination.

EPD needs to urgently confirm:

1. Whether an environmental permit for the project will be granted if no EIA has been done on this particular site?
2. Who will be liable for the clean-up costs of the contaminated land?
3. Who will be liable if there is any release of contamination during construction or operation of the theme park?

Section 13: Landscape and Visual Impact

The EIA Reports relegates visual impacts to be unimportant when the cumulative visual impacts of all the infrastructure works on North Lantau will be significant. This part of the Report also does not meet the EIA Ordinance (Technical Memorandum).

Paragraph 13.3.2 states that the transport infrastructure will have the most significant effects on the local hilltop topography. Chok Ko Wan Link Road and Road P2 will also create 'significant adverse impacts'. Woodlands and natural streams will also be adversely affected. These impacts are not referred to at all in the Executive Summary of the EIA and have not been mitigated for.

The mitigation section is completely inadequate. It is unfortunate that all of the detail on the visual impact assessment is relegated to an Annex. This gives the impression in the main report that landscape and visual impacts are relatively unimportant.

The cumulative visual impact of all the infrastructure works on North Lantau will be high. The residual impacts from the ITP alone, including the Chok Ko Wan Link Road, are significant. However, the main EIA Report concludes, with no explanation or supporting evidence, that the impacts are acceptable. We totally disagree with this conclusion and consider this section has not met the requirements of the EIA Ordinance (Technical Memorandum).

Section 14: Siting and Alignment Options

No serious alternative sites were considered for the ITP. Relevant documents relating to the review of other locations have not been made available despite repeated requests. Data in the EIA Report on mode of transport are also contradictory. The Government has the duty to provide full transparency on outstanding information not yet released.

For large infrastructure projects, the project proponent would be required to undergo extensive studies on alternative sites and alignments. In the case of the ITP, the consideration of alternatives was far from thorough. The Government has a duty to provide a copy of the "substantial review of multiple locations" referred to in Paragraph 14.2.13. The studies on alternative land-use proposals for North-East Lantau have not been made available to the public or this office, despite several requests.

Section 2 states that the public modes of transport to and from the ITP are expected to dominate the travel market, accounting for about 95% of all travel. The EIA Report states that the rail mode is expected to be dominant. However, in Table 14.3a it appears that rail would only be marginally dominant. For day visitors (who are expected to comprise the majority of visitors), 83% will arrive by franchised bus. Most tourists will also use tour coaches rather than rail. No figures were provided on the numbers of passengers predicted to travel to the ITP by road, or the number of road vehicles per day expected to travel to the theme park be provided. These need to be made public.

Paragraph 14.3.10 states that "*rail is forecast to gain market share in the future as increasing road congestion deters visitors from road-based modes*". Surely, it is better to plan to prevent road congestion rather than allowing it to happen. Since the aim of the theme park is to shield guests from the outside world, consideration should have been given to preventing any vehicular passenger traffic from entering the area, and providing park and ride schemes or rail-only transport options. But that has not been done.

Section 15: Territory-wide Implications

The EIA Report did not spend much time to discuss territory-wide implications of the ITP which is surprising in view of the magnitude of the project.

It is surprising in view of the enormous implications of this large infrastructure project, that only 3 pages has been devoted to the territory-wide implications. The section has not even attempted to look at the knock-on effects of additional road infrastructure requirements, the inevitable pressure for additional tourism facilities on North Lantau, nor the consequences for development of South Lantau. This chapter is totally inadequate.

5 April 2000