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Lantau Development Task Force
c/o Lantau and Islands District
Planning Office
Planning Department
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Shatin
New Territories
Attn. Mr Henry Tang GBS,JP.

28th February 2005

Legislative Council Panels on Environmental affairs and Planning Lands and Works;
Advisory Council on the Environment.

Dear Sirs,

Re: Concept Plan for Lantau Consultation Digest

1. I object to this plan which amounts to a massive development proposal for Lantau. It is a conventional private property led approach but cloaked in the terminology of sustainability. There are prominent claims for sustainable development but little of real substance. The Concept Plan is misleading and fails to inform the public of several important matters, and especially the background context for the decision making. It is not conceptual when dealing with some of the developments which appear to have already attracted Government commitment.
2. **Implicit in the proposal is a change in Government policy and planning intention towards Lantau.** This is the fundamental but concealed concept in the Concept Plan. Although not mentioned but only hinted at in this document, Government's general policy for several decades has been to state that **Lantau was to be kept for conservation and recreation** as mitigation for environmental damage elsewhere and while Hong Kong Island was to be developed and reclaimed as fully as possible and the coast was built over from Kowloon to Tsuen Wan. Thus the promise was that Lantau was to be the close by and natural haven and lung for the ordinary hardworking people of Hong Kong to enjoy, while Hong Kong and Kowloon became more and more polluted. When Hong Kong's environmental conditions and lack of controls were criticized internationally, the official reply would include words to the effect that we have our country parks and Lantau to make up for that.
3. A quick review provides an example of this policy, the official Hong Kong Government annual report, Hong Kong 1980, pages 60 onwards, featured Lantau as

“Island in the Sun”. The theme of this piece is that Lantau is Hong Kong’s place for recreation and history and beauty, “....Lantau is a lovely island where the past merges with the present. Bustling at weekends with cheerful crowds of swimmers, campers and hikers revelling in sun, sea and greenery, Lantau moves at a different pace mid week....Because of growing urbanisation on the New Territories mainland, Lantau with its vast country parks, beautiful beaches and serenity, has become an important recreational outlet. To cater for increased holiday makers and to provide better amenities for local people, a number of development and tourism programmes are going ahead....” It also however notes the feasibility studies for the airport and for industry on northern Lantau (which was later abandoned in favour of Disney).

4. Another example of Government planning policy for Lantau is contained in the Hong Kong 2030 Planning Vision and Strategy Stage 3 Public Consultation Booklet, November 2003, page7 which states **“It is our planning intention to conserve the beautiful countryside of, for instance, Sai Kung, Lantau and many of our offshore islands.** At the same time, opportunities for compatible recreational uses will be explored to ensure that these regions will remain as recreational and leisure gardens of Hong Kong as well as important resources for eco-tourism....” There are other examples which show that there has been a consistent planning intention for Lantau which is very different from the new Concept Plan.
5. Over the last 30 years Government has made various exceptions to this Policy such as:-
 - a. Discovery Bay, this became an exception for political reasons primarily as the original development was a resort primarily intended for recreation with numerous promises to show it was compatible with the environment, see enclosed advertisement dating from 1974 which shows how the green low rise was planned. Few of those promises were kept as it became increasingly residential and then high rise, apparently without much control as revealed in recent LegCo investigations;
 - b. Chek Lap Kok Airport was another exception, it was justified as being mostly offshore, there was no other place for the airport we were told, it was the legacy of the colonial administration, and this was strictly on the condition that mitigation was to be extensive with the creation of much expanded country parks on Lantau.
 - c. Disney was another exception but justified on the basis of recreation and tourism, thus compatible with the policy for Lantau.
6. Recreation became here defined very widely by Government to include golf resorts aimed at businessmen and hotels. Recently an official has unwisely supported a motor racing track with all its added fumes and noise pollution. Thus Government’s planning intention and idea of recreation has changed from the normal low impact outdoor “compatible recreation” for which Lantau was originally intended. This is contrary to the original planned concept of “Island in the Sun” or in the Hong Kong 2030 eco-tourism plan as quoted above.
 - a. The non-compatible recreation which is now being planned is contrary to the

Planning Department's Planning Standards and Guidelines on Recreation and Open Space, Chapter 4, page 4, for places such as Lantau which are mostly Green Open Space, for which "the prime function is for conservation of the natural environment and for amenity and visual purposes." The recreation under favour by the Concept Plan is instead the highly intensive and polluting type of recreation which is not suitable for tranquil Countryside, Coastal Area and Country Park which are mostly green and beautiful.

- b. The proper context for Recreation in the Countryside in HKPSG Chapter 4 at page 23 should be followed.
 - c. This requires an EIA and landscape plans to prove feasibility be conducted for any recreational development proposal.
 - d. In particular, such facilities must be separated from conservation zones to reduce the potential for adverse impacts caused by recreation.
7. Thus the exceptions on Lantau were on the basis that development on Lantau was focussed on recreation and conservation, not comprehensive development. Without expressly saying so, and without going through the proper procedures, **what the Lantau Development Task Force is attempting is unilaterally changing the planning intention for Lantau, from conservation and compatible recreation and eco-tourism to property led conventional development.**
8. The mitigation conditions for the airport have mostly not been performed. Even in the Concept Plan page 19 there is still no genuine commitment, as the previously promised Country Park Extensions are now made conditional on other developments wanting the land and conditional on "resource availability" ie Government deciding to pay. The Concept Plan expressly does not even give a time table for carrying out this long overdue promise. All the promises have been broken. This has been a continuing feature of Government action and there is nothing to show a change of heart. It has showed continuing insincerity with mitigation for environmental damage to Lantau.
9. Public recreation and Conservation gives way to private port and private property development. Now this Concept Plan shows that the pretense of recreation and conservation have been abandoned. The public's free and open access to the common land which is our countryside is being cut back. The Government is merely providing a private property weighted shift in the 'balance' so that public enjoyment and access now becomes only one of other competing interests such as ports and property and resort development which are regarded as more important. This Concept Plan will mostly benefit port and property business interests at the expense of the ordinary people of Hong Kong who will gradually lose more and more of their convenient and cheap week end holiday destination.
10. **No genuine balance of interests.** The Concept Plan states "On the other hand, Lantau has been well recognized for its nature conservation and recreation value. A right balance of development and conservation is essential." It is clear that this is not sincere. The Introduction sets the real pro-development agenda, "Lantau has tremendous development potentials..." There is no genuine balance intended.

Hong Kong has achieved its regrettable balance now with many other areas damaged and concreted by infrastructure and housing. This Concept Plan will further upset the balance in favour of private business property development. This Concept Plan is now cutting into Hong Kong's green garden and holiday "Island in the Sun" and this must not be allowed. Lantau has in fact tremendous conservation and recreation importance already existing and in place and if this were genuine consultation, this would be emphasized by the authors of the document and would be the main point of the exercise.

11. Who decided on the New Land Use Needs, the new Planning Vision and Overall Planning Concept, and the new Planning Principles? These are all inappropriate for the original planning intention and should be redrafted with much less property development bias.
12. Omissions of major proposals. The Concept Plan itself is seriously defective in that it fails to show in any of the Concept Plan graphics or Plan1 or on any map the proposed Container Terminal 10. There is only a briefest possible mention in the text at paragraph 11. The reality, not mentioned, is that in parallel, the Economic Development and Labour Bureau is conducting a consultation amongst stakeholders i.e. the relevant industry, on the Hong Kong Port Master Plan 2020 which will also end on the 28th February 2005. This involves a proposed Northwest Lantau Port which will involve extensive reclamation of about 245 hectares to form an artificial offshore island near Tai O together with connecting roads to the proposed bridge to Macau and roads along the shore **thus destroying wonderful coastline between Tai O and Tung Chung.** However this major damage is not illustrated on the Concept Plan for Lantau. Of course the impacts on the proposed Marine Park, Country Parks, eco-trails and the tourism plans for Tai O are omitted. This is a scandalous omission. The consultation is being done in a way to minimize public opposition by omitting to provide the full facts yet claiming to be comprehensive and co-ordinated. This is regrettably becoming typical of current Government consultations concerning the environment.
13. Also not detailed are Government plans for the other islands which are just little blank outlines on the Concept Plan. There is nothing to state that Hei Leng Chau has not been given over to intensive development instead of the Super prison. China Light & Power have expressed interest in the Soko Islands. It is noted that the Concept Plan itself does not show the Soko Islands with a liquified natural gas terminal, this is only mentioned in paragraph 11. There is no mention of the public opposition to things like this as shown by the Petition against CLP's attempt to build a power plant near Fan Lau in about 1990. If container ports can be built on artificial islands, it is feasible for CLP to create an LPG island in a place less damaging to the marine and visual environment.
14. **The Bridge to Macao or container port etc must not touch Lantau's natural coast line.** What consultation is being conducted on this, or is it part of this consultation? Why is there an option of a southern route for the North Lantau Highway Connector cutting through woodland and scenic countryside when it is

obvious that the road, if this is built, should run along and from the Airport island without harming Lantau Island? Please could an explanation be provided so the reasoning can be assessed.

15. To be compatible with the Concept Plan's walking trail and recreation intentions for the area the North West Lantau Coast should be a Coastal Protection Area and an extension of the Country Park. The proposed route of the container traffic or Macau Bridge road cuts through about 4 kilometres of extensive wooded areas and areas of high amenity, cultural, and ecological value. This beautiful coastal area with peaceful inlets and countryside must not be lost. The noise and air pollution impacts will cover a large area of high quality landscape and country park land which is the current route of the proposed Eco Trail or Heritage Trail. What study has been made to enable the Lantau Development Task Force to already decide on the most damaging route?
16. Originally part of the coast between Tung Chung and Sham Wat was promised for a potential extension of Lantau North Country Park. Who decided to break that promise and why? Again the background to the changes in planning intention are omitted from this Concept Plan.
17. Finally this Port Plan and major Bridge road cutting through North West Lantau coast contradicts the Planning Vision and Overall Concept in paragraph 12 which is intended to focus the major infrastructure in the already spoiled North Lantau while protecting the other parts which comprise primarily high quality landscape and ecologically sensitive natural environment. Lantau lost 25% of its natural coast line by the decision to save money and build the airport highway on land. That was more than enough loss and must not be aggravated with more damage to an additional 10 kilometres of coastline.
18. **Misleading and defective consultation.** In these circumstance this consultation is flawed from the beginning, fails to provide the true context, conceals relevant facts and consequences of the proposals, and conceals from the public the fact that we are now seeing a complete change of Government policy towards Lantau. This change of planning and policy has not been explained nor justified. I object to this change of policy towards Lantau.
19. **Loss of Agricultural Land and countryside.** The Planning Principles and Broad Land Use Pattern at paragraph 13 are unacceptable. This shows the main concept is conventional land development as usual, there is no genuine sustainable development feature about this change in planning intention.
20. Re-zoning to Green Belt development zonings. In particular paragraph 13(g) to allow limited growth of the clusters at various places, this is so vague as to be meaningless unless specific zoning limits and height and density limits are set. Any growth of these will not preserve the character of the surrounding environment. Care is needed to deal with speculative pressures for intense development and the

need for yet further infrastructure and damage to landscape and public access to green countryside. What is the current zoning? The Agricultural Land should be re-zoned if at all to Country Parks, Conservation Area and or Landscape Protection Areas or Coastal Protection Areas.

21. Development Areas or Countryside Area? The large areas to be re-zoned tends to contradict the Concept Plan which sees “possible development pressure” as an issue to be addressed, para 21 page 20, yet is providing the zoning basis to aggravate such pressures. There are large areas coloured pale green which are vaguely marked on the map as Green Belt/Countryside Area. There could be a considerable difference between these. For example Discovery Bay is all pale green, but what does this really mean in terms of development and density?
- What is intended to be the development status of the Countryside Area?
 - What is the difference between Green Belt which is a statutory zoning and Countryside Area?
 - Where are the Countryside Areas?
 - What heights and building density is to be permitted in the Green Belts?
 - What heights and building density is to be permitted in the Countryside Areas?
 - In so far as the Countryside Area permits more development than Agriculture and permits Agricultural Land to be converted into development land, than this radical change of planning intention for large areas of Lantau is rejected as contrary to the original planning intention for Lantau and is not consistent with the representations of the Concept Plan itself.
22. How is this Re-zoning going to be sustainable? What indicators for sustainability were used to justify this Concept Plan, if any? In particular:-
- How many trees, including saplings and shrubs, and over what number of hectares, will be lost to development and infrastructure and access roads?
 - How many hectares of Agricultural Land will be lost to Green Belt and other development zonings?
 - What percentage of Lantau’s Agricultural Land is being re-zoned or changed in some way?
 - How many hectares of hard eg concrete and tar and artificial surfacing will be laid?
 - How many kilometres of roads and access will be constructed?
 - If one adds in the Container Terminal damage, what extra damage figures need to be added to each item above?
23. Re-zoning to Green Belt means that development is now proposed to be permitted under conditions which are always subject to Government or Town Planning Board discretion. If there is re-zoning to Green Belt, this is a significant gift to land owners/speculators currently holding non-development land on Lantau. This is a gift at public expense. In these circumstances the re-zoning of huge areas of presumably mostly Agricultural Land to Green Belt is of grave long term concern. Green Belt Zoning contains no real protection for the natural environment and no real protection for conservation purposes. It is viewed as a thinly disguised first

step to property development. It encourages property speculators to move in, they apply pressure to Government and District boards and other interested groups to more intensively re-zone so that private development is eventually permitted on a case by case basis. Once a house development is permitted, the precedent is set, and further applications become harder to resist, until the end result of suburban sprawl is achieved.

24. In particular the long stretch of Green Belt along South Lantau Road and other areas along South Lantau is objected to because it will inevitably lead to pressure for housing development. Changing land from Agricultural Land to Green Belt will especially encourage property speculation and development. Such private housing at such an important community and recreation area will have the effect of isolating the coastline from the hillside hinterland. Effectively the public will face a barrier of private property between them on the coast and the country parks on the hills. Instead of being continuing greenery, it will be continuous concrete and walls and access roads and private property. This “ribbon development” is bad planning practice and not acceptable according to Hong Kong Planning Department Standards and Guidelines and is objected to.
25. **What should be preserved is what the public have now, namely total visual access and actual access from hill to coast.** Any development should be strictly confined to the existing village areas and no more. The reports from Government, eg Urbis Landscape Value Mapping, have rated most of Lantau of the highest landscape value, with its integrity, not blighted by intrusive blocks of development or housing. We must not allow any possibility for suburban or urban sprawl by the coast.
26. Additionally there is no need for converting open and beautiful Agricultural land to another large area of Green Belt all along the Tai O Road and valley. This will destroy the recreation and tourism potential of large areas of country park and the exceptional scenic quality of the surrounding area. The heritage value and biodiversity value will also be mostly lost.
27. Agriculture Policy. There has been total failure to consider the loss of Agricultural Land which is generally in good condition. In appropriate areas genuine organic agriculture can still have economic, recreational, educational, cultural and therapeutic values. Despite claims to be concerned for protecting heritage, there has been failure to remember that Agriculture is deeply part of our South China culture and heritage. Loss of agricultural fields under concrete will be a serious loss to claims for sustainability. Tourists will have even less reason to come to Lantau if traditional cultural activities are just preserved in museums surrounded by high rise blocks per page13.
28. In these circumstances the areas proposed for Green Belt/Countryside Area should be zoned to a more protective zoning with a strong presumption against development. The Country Parks should extend mostly all the way to the coast wherever possible. This will preserve the public’s free access between hill and

coast as currently exists. It would also preserve the remarkable scenic quality and integrity of this area. It will render agriculture possible again in future. By whom and when was a policy decision taken to abolish agriculture in Lantau?

29. These Green Belt extensions are thus substantial property gifts to land owners and speculators out of the pocket of the ordinary public, there is no justification attempted for this change in policy and objection is made to this. This sets a serious precedent and makes applications for change of land use hard to resist in future.
30. No need for luxury private resorts. Developing South Lantau into a series of private resorts will simply cater to the rich and privileged who have no need for such facilities here. In a place such as Hong Kong where recreation facilities close at hand are scarce, it is essential that such amenities be preserved generally for the masses, not for the privileged few. The Green Belt Development Proposal all along South Lantau will not do anything to solve any housing shortage in Hong Kong. It will simply aggravate the situation and reduce the public's enjoyment of one of its few assets close to areas of population. To add to the injury, the public will be paying for the cost of the infrastructure to support the resorts for the wealthy. If roads are built to proposed beach side resorts such as Tai Long Wan they will destroy large areas of countryside. It is contrary to the HKPSG Chapter 4 and not correct to say at page 12 that such resorts are "compatible with the natural environment."
31. The luxury low rise recreational resort plans did not work on Discovery Bay, so it became an excuse for high rise. This has become clear to LegCo from its recent investigation into this case. Most of Lantau is an area of significant landscape quality. The end result for Lantau is likely to be a chain of high rise blocks cutting off views of sea and sky and mountains, probably even more damaging than other coastal suburbs and beach side flats and hotels one sees in previously attractive coasts such as in Surfers Paradise and some USA beach cities. This is bad planning and contrary to many of our Planning Standards and Guidelines which for example in Chapter 10, Conservation, includes as a first principle for conservation "Retain significant landscapes....". **We do not want such beach towns or coastal suburbs dividing our beaches from our hills in Lantau.**
32. No genuine sustainable development. Please could I have a copy of the alleged sustainability assessment and all related standards? Contrary to paragraph 20, one fails to see how a genuine sustainability assessment has been conducted when Hong Kong still has no real sustainability policy in place and has not become a party to any of the main international instruments such as the Convention on Biological Diversity. There is thus no official Biodiversity Action Plan for Hong Kong. There is little sustainable about this Concept Plan, it is simply the conventional idea of development in the minds of a few persons in Government, with reserves for even more future development, which are claimed as being sustainable. **All that is**

being sustained here is development. This is made explicit on the Concept Plan where it is stated that the Bridge, the Theme Parks, etc “would continue to play an important role in sustaining Hong Kong’s development.” This failure is a consequence of failing to have a proper commitment to genuine sustainable development in Hong Kong.

33. The Concept Plan is rejected as being totally unsuitable to the needs of Hong Kong when considered as a whole in the context of the needs of the whole SAR and in the context of the South China Region.
34. It is wrong in principle to look at Lantau in isolation from the rest of Hong Kong, then see Lantau is green mostly, and then try to balance the Lantau situation by adding more concrete and roads to Lantau. **Lantau’s greenery and scenery is Hong Kong’s mitigation for past environmental damage and loss in other parts of the SAR.** There is no justification to remove or reduce from ordinary week ends this remaining precious refuge from polluted Hong Kong Island. With increasing pressures on wild life and plant habitats, with increasing pollution in Hong Kong and in the South China region and the Pearl River Delta in particular, it has become all the more important to conserve Lantau. Lantau is not a land bank for this SAR Government to alienate piece meal or sell bit by bit for private development. These failures are part of the continuing failure for many years to apply or have a proper conservation policy and strategy which applies the Convention on Biological Diversity. Hong Kong has a responsibility to China to conserve Lantau as part of the China’s threatened southern biological diversity.
35. Huge port and logistics infrastructure are wrong in principle, not needed and not sustainable. It is wrong in principle to look at Hong Kong SAR in isolation from the rest of the Pearl River Delta and try to build yet more ports and infrastructure just to steal or recover a competitive advantage from our neighbour South China. If other places in China can deliver port services cheaper and with less pollution and loss of countryside than us, then they should be encouraged. There is no need to import and create pollution and environmental damage just to compete for port services. Every dollar gained by the port operators will cost the public more dollars spent on health and illness caused by increased pollution together with reduced land values and quality of life. Hong Kong can move to provide other less dirty services.
36. This Concept Plan, its claims for New Land Use Needs and its Planning Considerations, and the Hong Kong Port Master Plan 2020 are environmentally irresponsible and not sustainable. China is a party to the Kyoto Protocol in force from 16th February 2005 and Earth Summit international agreements. Hong Kong by its self-centred decisions is doing what it can to aggravate the situation, and is not doing all it can in planning to mitigate the damage. We should co-operate with the Mainland on ports, not opt for Government sponsored development action to subsidize private operators at the expense of the public generally. This Concept

Plan will supply further evidence of claimed collusion between the Administration and big companies.

37. **A Conservation Strategy for Lantau, July 1998.** A more appropriate plan for Lantau was devised by the Green Lantau Association, Friends of the Earth and others in 1998. This was in response to the Government's policy of preserving Lantau as a haven for conservation and recreation for the public and in response to international conservation obligations such as the Convention on Biological Diversity. That proposal was welcomed by the Government at the time and now should be considered more fully. However it is not even mentioned in this Concept Plan.
- Have you considered this and tried to apply it? Prior to publication of the Concept Plan had the Lantau Development Task Force seen it? (It is understood that recently a copy was provided to the Task Force. A colour photo copy can be made if required. A colour copy will be sent to LegCo with a copy of this letter).
 - Government's response was dated 5th November 1998 is enclosed, what has actually been implemented or will be implemented and when?
 - What features noted in the FoE Lantau Island Coastal Guide Series of 1997 are being considered for conservation?
38. All the Conservation Strategy proposals and FoE proposals are adopted and supported now. With the delay and increasing damage, each one of the proposals is of more importance than they were 7 years ago. Paragraph 13(i) of the Concept Plan is far too little and limiting and yet vague. Please could I have your updated responses, preferably positive, to each of the conservation proposals contained in the Conservation Strategy for Lantau of July 1998?
39. Public awareness for damage to the environment to benefit business interests is now acute. Represented by various NGO's the public objected to the CLP Power Plant at Fan Lau. The public objected to Hei Ling Chau being developed into a super prison. The public is totally against proposals which will alienate them from their ability to fully enjoy and access one of the last natural assets which is close and convenient to areas of population such as Hong Kong Island, Kowloon and Tsuen Wan and Tuen Mun.
40. No real gain in Recreation areas. There are pages 12-17 in the Concept Plan devoted to Recreation but this is mainly recognizing what the public already enjoys for free and then suggesting building more so that in future the public has to pay for it. The agricultural land and coastal areas which are regarded as common land should be left un-cluttered with private facilities. For example there is no need for an indoor beach in Hong Kong. Even Ocean Park could not make their Water World financially viable and scrapped it. However by re-zoning many coastal areas as Green Belt Government will be encouraging private developments which is contrary to the main recreation intention. What is now common land with free access will be lost to the public once it becomes development potential land.

41. The proposed coastal Eco trail or Heritage trail from Tung Chung to Tai O should be a walk through beautiful Coastal Area and Countryside, as it exists now, not a noisy dirty trudge through houses and massive container lorry roads going to the new bridge and container port. The path from Tung Chung to Tai O and on to Shek Pik should be wild and free from visual pollution and be conserved as one of the great walks of Hong Kong. The value of this with several proposals for conservation was contained in FoE's Lantau Island Coastal Guide Series, with annotated maps, 1997. The SWNT Development Strategy Review advised that "Specifically, North east Lantau has been proposed to accommodate world class tourism facilities including HK Disneyland, and that North west Lantau should be for cultural and religious-oriented tourist and recreation activities, including scenic trails and heritage walks etc..." What reference was made by the Task Force to this and other books and magazine articles and editorials which have repeatedly called for the conservation of these great coastal landscapes? Why is this whole coast not made into a Coastal Protection Area if the intention is to have walking recreation all along it? Why is only South Lantau suggested for Coastal Protection Area but not North West Lantau's wonderful coast? Why was the potential extension of the Country Park to the coast near Sham Wat cancelled and by whom?
42. **No gain in Conservation Areas.** For Conservation, page 18-19 what is being proposed is less than was originally promised for the devastation caused over Lantau and other parts of Hong Kong by the Airport development about 8 years ago. There is nothing extra for conservation provided by this Concept Plan to mitigate for the extra damage planned by the new Port, the new Bridge and connecting roads to Macau, and other logistics, infrastructure and property development. If previous examples are taken into account, these promises are likely to be as devoid of real conservation value. See above paragraph 6. In conservation terms, Lantau has become an island of broken promises. A summary of the promises already made and being broken in 1997 is contained in the FoE Coastal Guide pages 9-11.
43. Tai Ho Stream and Valley, being circled by Green Belt or whatever the pale green may be together with the vague text, amounts to no real conservation gain. Viewed in the context of previous failed promises it points to development but no genuine plan for conservation.
44. The New Town in the Tung Chung Valley is far too large, it should be reduced in size and following the Planning Standards and Guidelines should be surrounded by a wide buffer area so as to protect the surrounding Country Park from urban fringe impacts and pollution. What density and height limits are suggested if any or will it all be high rise up to the Country Park boundaries? Having flats right up against the hills, destroying the landscape, will be further evidence of bad planning. There is no point in siting an Eco-Tour Centre in the town. That area should remain as Countryside Area. On no account should the New Town penetrate up the valleys, especially the major ecologically rich valley leading into the Country Park below Sunset Peak. This will lead to undesirable fragmentation of wild areas right

close to the Sunset Peak SSSI. This valley should be part of the Country Park Extension.

45. In these circumstances it is proposed that the Concept Plan be rejected and that a fresh plan be put forward with conservation and recreation as the prime objectives and original planning intention for Lantau. It has been the legitimate expectation of the people of Hong Kong as encouraged by the Government to regard Lantau as the natural garden for Hong Kong. Relying on this, we have seen much of the other areas of Hong Kong degraded and developed and privatized. Now we see even Lantau is being carved up for development. Unbalanced development which is heavily weighted in favour of property development and infrastructure development and transport development should be abandoned. The past promises to conserve can finally be honoured and new proposals should be made to comply with the international obligations for biodiversity conservation and genuine sustainable development.
46. The piece meal approach in paragraphs 20-21 is sure to lead to piece meal destruction of Lantau as our "Island in the Sun". The EIA process will not be able to protect the public interest here as it will be project focussed, not seeing the overall cumulative impact of all of these harmful impacts as a whole on Lantau and Hong Kong SAR. Fine tuning is not enough. This Concept Plan has to be abandoned and significantly redrafted now before it is claimed it is too late to change minds.
47. Public participation is recognized, such as by Hong Kong's Council for Sustainable Development, as a key component of the Earth Summit and international norms for sustainable development and conservation. It is notably absent in the process of drafting this Concept Plan. I propose that the opportunity to rectify this failure lies in revising the plan considerably and working on a Conservation Proposal for Lantau based on international conservation, sustainable development, and planning principles and faithfully complying with our own Planning Department Standards and Guidelines. This Concept Plan will provide a legacy of planning and development mistakes for Lantau and this can be prevented or reduced now by a far sighted fresh look at the real needs of Hong Kong and its true quality of life.
48. These are just preliminary objections based on the vague and contradictory material provided so far. Could you send me your revised proposals and all relevant material? What is needed are detailed and specific proposals for conservation in a proper Conservation Proposal, not just vague words.
49. I look forward to your replies to all the questions raised herein, and a proper response and proper consultation on this important matter for Hong Kong conservation.
50. Has the Lantau Concept Plan been submitted to Legislative Council? If not, why not? If so please could I have all relevant papers. The matter should be fully debated in Legislative Council along side the Port Plan which has been the subject

of a LegCo Paper but which strangely omits all mention of the Lantau Concept Plan. My submissions on the Port Plan are enclosed so both the matters are seen in context. Please could you keep me informed as to the progress of the matters and any such LegCo meetings.

Yours sincerely,

Ruy Barretto S.C.

[6540.rb]