CB(1)1340/04-05(05)



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bcc

Subject Planning Lands and Works Panel - Lantau Concept Plan

Dear Miss Yuen

We in the Green Lantau Association (GLA), have become aware that the Planning Lands and Works Panel may be discussing the Administration's Lantau Concept Plan, in May. If that is so, and were it to be possible, we would like to present our views before the Panel.

For you information I am attaching our detailed submissions made to Government in respect of the Concept Plan. I have earlier e-mailed these documents to all members of the Panel who have e-mail access. That unfortunately does not include the Chairman.

Please let us know in due course.

Yours sincerely

Clive Noffke Green Lantau Association

Concept Plan - letter to LDTF - Feb. 2005.doc Lantau Concept Plan - GLA submission - Feb. 2005.doc Conservation according to the Lantau Concept Plan.doc A Consultation on the Future of Lantau.doc Lantau Concept Plan submission Appendix 3 - Feb 2005.doc

Green Lantau Association House B12, Leyburn Villas Cheung Sha, Lantau 24 February 2005

The Lantau Development Task Force c/o Planning Department 15/F Sha Tin Government Offices Sha Tin, NT

Dear Sirs,

Lantau Concept Plan – Response to Consultation Document

The submission of the Green Lantau Association (GLA) is attached. GLA is a voluntary organisation which has been established since 1989. We are committed to working toward the environmental protection of Lantau. We believe that Lantau is a uniquely valuable island, a natural and national treasure which should be conserved for this and future generations.

The original remit of the Lantau Development Task Force was to '*provide a high level policy steer on the economic and infra-structural development of Lantau and to ensure the timely delivery of the planned projects*". We were therefore initially pleasantly surprised that the outcome of 10 months of closed door meetings was the Consultation Digest. This went far further, it first appeared, than mere development, and actually articulated a number of conservation philosophies with which we fully agree.. It did indeed appear that mounting public concern over the development-oriented thrust of the Task Force had been heard.

We have studied the Digest carefully, and have attended three consultation sessions. We have also spoken informally with officials from the Housing Planning and Lands Bureau, and the Planning Department.

However despite the initial impressions and the rounds of meetings, we are generally disappointed with the Concept Plan, which <u>in detail</u> falls far short, we feel, of its purported aims. From comparison with the 2001 SWNT DSR we are aware that the plan is incomplete. An analysis of the conservation philosophies shows they are largely empty and without firm commitment. And the Plan remains unabashedly about short term and piecemeal economic development, little of which will benefit the island community.

We are also disappointed with the actual process by which the future of Lantau is being taken forward. There is an apparent lack of full disclosure of development intentions and information relating thereto, a failure to effectively seek opinions and a vision for Lantau through meaningful dialogue, and the whole is being pushed through in unnecessary haste. Our comments on these issues are attached

We have also made some recommendations which we believe would restore the situation, and achieve community consensus on the future of Lantau.

Yours faithfully

LANTAU CONCEPT PLAN

Submission by the Green Lantau Association

Summary of views

1. The Concept Plan contains no 'bankable' commitment to conservation, and is not specific on what aspects might be conserved. Conservation is merely "an important philosophy" and not "the priority" or even "a priority". The north coast appears to have been abandoned to development notwithstanding areas of great environmental value.

2. The Concept Plan is incomplete. Proposals such as CT 10 off Tai O are not shown, although in respect of CT 10, this is the only option under study for a new container port. The outlying islands have been omitted notwithstanding their prior inclusion (for conservation) in the SWNT DSR, and private sector plans for development.

3. The Concept Plan is misnamed. It is not about concepts but about site specific development proposals. It is being presented in forums which do not allow meaningful stakeholder debate. It is being rushed through over a brief 3 month period spanning 3 significant public holidays.

4. The present flawed and inadequate consultation exercise should be followed by a second exercise to redress the situation. Full disclosure should be made of all proposals and their status, and links provided to relevant studies. The adjacent islands should be included. A detailed Conservation Plan should be issued and accompanied by commitments. Facilitated stakeholder meetings should then be held to develop an informed community consensus on the future of Lantau.

Conservation

5. Upon completion of the Airport Core Programme, the then Administration advised that further development of Lantau was not contemplated beyond the known developments at Tung Chung and Tai Ho. Notwithstanding, *A Conservation Strategy for Lantau* was drawn up in 1998 by six green groups. This document recommended the formal conservation of a number of ecologically valuable areas which lay outside effective planning protection. We have furnished the Task Force with copies of this Strategy. None of these recommendations have been adopted however. The official albeit informal advice that as none of these sensitive areas are currently intended for development does not equal conservation. Without formal planning protection we will see more Tung Chung River incidents where unprotected environment is destroyed, in that case by contractors for a government project.

6. A prior or at least parallel *Conservation Strategy Plan for Lantau* should be a prerequisite. This would identify for preservation/conservation, all natural and cultural heritage features. The Landscape Value Mapping exercise and the Baseline Ecological Survey are available to provide data.. We expect much of the island will qualify for conservation. With this Plan proposed, discussed and agreed ,

development proposals can be 'hung' to determine whether they can be achieved whilst still retaining the agreed conservation objectives. The current development-led approach puts the cart before the horse.

7. The Consultation Digest contains many references to 'conservation'. Unfortunately none are 'bankable' in the sense of being specific commitments. By way of illustration, we note with dismay that even the Lantau North Extension Country Park, promised in the Chief Executive's 1999 Policy Address, remains "subject to resources". That this conditional offer is being recycled as off-setting the new development proposals, is quite unacceptable, and indicative perhaps of the Administration's commitment to conservation. We have extracted the various references in the Digest to conservation and related issues, and attached these with our comments at <u>Appendix 1</u>.

Omissions from the Concept Plan

8. There are 3 significant <u>known</u> omissions from the Concept Plan. The first is CT 10. It is apparent from the Port 2020 Study that there is a clear intention to develop a new deepwater container port and that North West Lantau (NWL) is the preferred and single option identified for further study. Indeed we see no difference between this 'concept 'and the other, ostensibly flexible 'concepts' included in the Plan. The omission of the massive reclamation project off highly scenic Tai O is, we feel, most regrettable and misleading.

9. The second obvious omission is the offshore islands comprising the Sokos, Hei Ling Chau, Shek Kwu Chau, and Sunshine Island. These were included in the publicly debated 2001 SWNT DSR, and identified for conservation. To omit these because, according to one official explanation, there are no government projects planned, is misleading as many of the other 'concepts' in the Plan will inevitably be private sector projects. By omitting these islands, it would appear that they are being removed from public view so as to facilitate private sector development which would be contrary to the publicly agreed conservation intent.

10. Omitted entirely are references to official studies made into the various development proposals, and the status of these proposals. That the proposals are site specific suggests feasibility analyses have been done, yet the Digest contains no reference links, nor have requests to view these been replied to. Certain proposals seem to have moved beyond 'concept' status and are actively advancing (eg the logistics park), notwithstanding that the consultation is on-going and verbal high level assurances have been given that all proposals are negotiable. We would contrast this failure to disclose underlying planning studies, with the 2030 consultation exercise where background papers were made available on-line.

11.. Unfortunately the above known omissions may not be a complete list. That they exist however, places grave doubts on sincerity. The failure to commit to a land-use plan for overall Lantau further suggests that the Administration will shortly announce a new 'striking the balance' where the last agreed position becomes the basis for further erosion of the conservation aims.

Consultation Process

12.. Lantau is a unique natural and national treasure, and its future should simply not be disposed of in the perfunctory approach exhibited by the current process. The Administration has taken a short 10 months of <u>closed door</u> studies to arrive at the Concept Plan. The public are being given but 3 months spanning 3 major festivals to deal with the issues. Possibly not coincidentally, public consultations on West Kowloon and the HK Port span the same period. The timing is inappropriate and the haste is unnecessary and unseemly. It casts doubt on the Administration's sincerity in reaching genuine community consensus on the future of Lantau.

13.. The Plan is not about concepts but about site specific proposals. We have not been asked how we see the future of Lantau, but rather 'what do you think of these developments'. The Council for Sustainable Development has most successfully used facilitated workshops of stakeholders and experts in its recent studies into renewable energy, waste management, etc. This process set out the background, the issues, the objectives, and a series of indicative options (with their perceived implications) for study. We firmly believe that this is how the future of Lantau should be taken forward. We have drafted a sample example of how such an approach might be presented, and this is attached at <u>Appendix 2</u>.

Specific Development Proposals

14.. Our comments on the specific proposals in the Concept Plan are appended at <u>Appendix 3.</u> In the absence of access to the study information, these are of necessity brief

The Way Forward.

15. The present consultation exercise will conclude on 28 February. We strongly suggest that the Administration thereafter announce the commencement of the 'second round of consultation', during which period the Administration will:-

15.1- issue supplementary plans and data setting out specific conservation commitments including a draft timetable for achieving these

15.2 - provide full details of all possible developments both on Lantau and the adjacent islands

15.3 - provide links to access all relevant internal studies in respect of these proposals

15.4 - advise which 'concepts' are in fact non-negotiable, and which are review able to the stage of abandonment

15.5 - undertake a series of facilitated workshops to obtain community consensus on the future of Lantau.

15.6 - from the above, distil a land-use planning framework overall Lantau which will enshrine community agreement.

16. We believe that such measures will go far in restoring trust in the Administration's sincerity, and commitment to sustainable development. We will also secure a sound framework with which to chart the future of Lantau.

Green Lantau Association February 2005

Appendix 1

'Conservation' according to the Lantau Concept Plan

Comments by the Green Lantau Association

Country Parks

<u>Para 1</u> "...over half of the land area is covered by Country Parks" [Comment- intended to show that perhaps this is already generous. It is quite misleading when it comes to areas of high value such as Lantau. One might say that the whole of Mai Po is a Ramsar site, whilst there are no Country parks in Kowloon. All these statements are useless out of context]

<u>Page 18.</u> "the Lantau North and South Country Parks, occupying about 7840 ha, have been designated since 1978. Within them, woodlands at the lower slopes of Lantau Peak and Sunset Peak were designated as Special Areas in January 1980. Other than country parks, there are eight designate Sites of Special Scientific Interest (SSSIs) to protect fauna and flora with special value. These eight SSSIs are at San Tau Beach, Sunset Peak, Lantau Peak, Man Cheung Po, Pok To Yan and Por Kai Shan, San Chau, Ngong Ping and Tai Ho Stream. The ecologically important sites are also protected under the conservation zonings on statutory town plans"

[Comment- there is an impression given that much, possibly all, that needs to be done in terms of conservation, has already been done. This is simply not so. Most coastline, valleys, streams and wetlands remain outside effective protection

- the last sentence is misleading. <u>Some (few)</u> sites are protected but not <u>the</u> sites. Many sites are quite unprotected and likely to remain so it appears.]

Page 19 "DI – Proposed Lantau North (Extension) Country Park.

Previous study concludes that the proposed Lantau North (Extension) Country Park in North Lantau, covering an area of 2360 ha, is suitable for designation as a country park in terms of its conservation value, landscape amenity and recreational potential. The draft map was gazetted in 2001 for public scrutiny under the Country Parks Ordinance. The proposed country park extension is consistent with other Concept Plan proposals. The Government is considering the timing for implementation of the designation proposal, taking into account the planned developments in Lantau and resource availability."

[Comment - this country park extension was promised in the 1999 Policy Address. Whilst gazetted, the Park has never been implemented despite requiring a paltry sum (some \$10 million) in funding only. It is quite unacceptable to 'recycle' this promise as an initiative offsetting the <u>new</u> development proposals. And it is unacceptable that this remains "subject to resources". This extension should be implemented immediately and unconditionally

- it would appear that the Administration is deliberately failing to deliver on the CE's promise until some currently un-revealed agenda will make it impossible to do so]

Coastline

<u>Para 1</u> "...and much of its coastlines...are still in their natural state" [Comment- there are no initiatives to protect the remaining natural coastline other than the Marine Park Proposal covering a limited area at Fan Lau. In particular, the remaining untouched North coast is at high risk from the possible CT 10 project, and as yet unannounced development proposals.]

<u>Page 19 D3</u> "Many of these sites have been protected under statutory town plans,....the natural coastlines at Pui O, Cheung Sha, Tong Fuk, Shui Hau and Discovery Bay as Conservation Areas"

[Comment- the protection is imperfect owing to the age of the OZPS which cannot enforce against Unauthorized Developments. The TPB has also seemed pliable to permitting excessive development beyond the scope of the OZP. The Concept Plan itself admits of a resort proposal in the Coastal Protection Area.

- these superb beaches are not the only natural coastline worthy of protection. Indeed the URBIS Landscape Value Mapping exercise, rated almost all Lantau of the highest value. That Planning Department have failed to mention or recognize their own consultant's report is disturbing. It is suggestive of a secret development agenda.]

Rural Character

<u>Para 7</u> "...the rural township at Mui Wo, and village clusters at South Lantau and Tai O. No substantial growth is envisaged, having regard to their rural character and limited transport and infrastructure capacities"

<u>Para 13 (g)</u> "to allow limited growth of the existing rural and suburban clusters at Mui Wo, South Lantau and Discovery Bay to preserve the character of the surrounding environment and to avoid overtaxing the infrastructure"

<u>Para 14.</u> The population of Mui Wo is projected to increase from 4700 to 7600, South Lantau from 2800 to 6400, Tai O from 2700 to 6700 and other rural parts from 500 to 1200.

[Comment – the total figures are in effect a <u>doubling</u> from 10900 to 21900. This is a massive and unexplained increase in communities that are stagnant or in decline. The figures suggest a Government agenda quite at variance with stated intentions, and an inconsistency which may be indicative of the standard of the whole report]

Planning Considerations

<u>Para 10 (a)</u> "the need for conserving high quality natural landscape, ecological environment and cultural heritage sites"

<u>Para 12</u> "the overall planning concept is to focus major economic infrastructure and urban development in North Lantau to optimize the use of the existing and planned transport links and infrastructure, while protecting the other parts of Lantau, which comprise primarily high-quality landscape and ecologically sensitive areas, for nature conservation and environmentally sustainable recreational and visitor uses" [Comment – the developments are to optimize planned transport and infrastructure links, i.e. a self –perpetuating cycle of construction justifying more construction!

- The statement clearly illustrates the development driven nature of the Concept Plan. The cart is placed before the horse, in that conservation becomes a residual
- It is not acceptable that the north coast be written off. There are areas of great conservation value. The Tai Ho Valley, the Jurassic coastline between Tung Chung and Tai O, the Tung Chung Bay, the Wong Lung Hang Valley, the Luk Keng headland are a nonexhaustive list]

Page 18 "(D) meeting nature conservation needs

Lantau is famous for its scenic value and ecological diversity. In pursuit of the nature conservation objectives, the protection of the uplands in Central Lantau, waters in South West Lantau and other important habitats as significant conservation areas is an important philosophy underlying the overall planning"

[Comment- these words are not underpinned by detailed proposals other than the long promised Country park extension and a small marine park. To say that conservation is merely "an important philosophy" rather than a primary policy clearly indicates the unfortunate and deficient importance afforded to conservation in the Concept Plan]

Page 19 "D3- Other Nature Conservation Proposals.

The protection of ecologically important or sensitive sites outside country parks has also been taken into account in the formulation of the Concept Plan. Many of these sites have been protected under statutory town plans, for example, the zoning of the habitat for Romer's tree frogs at Ngong Ping as SSSI, the natural coastlines at Pui O, Cheung Sha, Tong Fuk, Shui Hau and Discovery Bay as Conservation Areas. [Comment – these are existing and longstanding protective measures which have nothing to do with the formulation of the Concept Plan.]

The Government will continue with the investigation of the need and feasibility of designating SSSIs which support rare species of fauna and flora. Due regard will be given to the protection of sites of conservation value in preparing and updating the town plans. These include, in particular, Tai Ho Stream and Tai Ho Valley, Tung Chung Stream, and significant wetlands in Rural Lantau"

[Comment – there is neither detail, timetable nor commitment to achieving results. The words "will continue with" are meaningless in the absence of any announced programmes. There is no reference to studies made, which suggests that none have been done. There is no mention of <u>landscape preservation</u> as well as bio-diversity. "need ' and 'feasibility ' will evidently be determined by government acting alone.]

Para 20 " with due emphasis given to the protection of the natural habitats, the proposals will help maintain the rich bio-diversity in Hong Kong" [Comment – there is no mention of maintaining coherent natural landscapes, natural wild places, coastal vistas. The clear implication is to narrow conservation to species protection only]

Marine Parks

<u>Para 11</u> "For Soko Islands and surrounding waters, apart from being a potential site for designation as a Marine Park, other competing land uses are under consideration. The Castle Peak Power Company/CLP Power have advised the Government that they are considering Tai A Chau, among other sites, for the development of a liquified natural gas terminal.."

[Comment - this is the only mention of any of the offshore islands (including Hei Ling Chau, Sunshine Island, Shek Kwu Chau) all of which were included in the publicly debated 2001 SWNT DSR, and which were slated for conservation. Their deliberate omission from the Concept Plan seems intended to pave the way for unfettered development of these natural assets outside of any public involvement. These islands must be included in the Concept Plan]

- the Soko Islands were slated for a Marine Park in the 2001 SWNT DSR. They are now clearly being made available for wholly incompatible uses such as a massive LNG terminal. Again, this is now outside the public discussion of the Concept Plan. The EIA process offers no protection]

Page 19 "D2 – Proposed Marine Park in South West Lantau.

Previous study concludes that the waters around Southwest Lantau are important habitats for Chinese White Dolphin and Finless Porpoise and other marine life. The Country and Marine Parks Board has endorsed the Southwest Lantau waters, covering about 657 ha, as suitable for Marine park designation."

[Comment – this is a very small concession to the evident value of the whole of the South Lantau waters. As noted earlier, the Soko Islands are now excluded from consideration although hitherto considered of high value]

Green Lantau Association February 2005

<u>A Example of a Possible Consultation Format on the Future of Lantau</u> <u>Prepared by the Green Lantau Association</u>

Issues

- 1. Lantau is widely regarded as Hong Kong's 'western green lung'. It is largely undeveloped and contains our second and third highest mountains, untouched streams and wooded upland valleys containing a considerable bio-diversity, a rugged and beautiful coastline, and some of our best and most natural beaches.
- 2. Hong Kong has a relatively small land area for the population carried. Economic development has tended to concentrate in the urban areas and more accessible parts of the New Territories.
- 3. Whilst unemployment is relatively low by world standards, livelihood issues arising out of the Asian financial turmoil, and latterly the SARS outbreak, are causing caution in spending. This in turn is impacting on the property market, long seen as a barometer of Hong Kong's well being.
- 4. The HK Administration therefore see it necessary to 'kick start' investment and consequent employment by devising a range of development initiatives. These would also serve to placate the construction industry which is geared to a greater capacity than HK now requires, and is facing harder times.
- 5. In view of the improved transportation links to Lantau and the location of the Airport, consideration is now being given to the possibility of siting various development projects on Lantau.
- 6. This paper looks at these proposals on a sub- regional basis, and postulates various options to generate further discussion.

South Lantau

Background

South Lantau (SL) encompasses the rural townships of Mui Wo in the east and Tai O in the west. Between these are the village hamlets of Pui O, Cheung Sha, Tong Fuk and Shui Hau.

The geography comprises stretches of magnificent natural beaches backed by flood plains and shielded from the north by a spine of mountains of considerable grandeur.

Population density is small, comprising some 11000 in total, most accommodated in small houses not exceeding 3 storeys in height. There are public housing estates at Mui Wo and Tai O, and prison complexes at Chi Ma Wan, Ma Po Ping, Shek Pik and Sha Tsui. However the overall impression is an area where human habitation sits lightly on the natural setting.

The area is accessible by ferries arriving at Mui Wo and a bus network therefrom. Access to the north of the island is by the Tung Chung Rd. which is currently being upgraded to permit normal 2 way traffic throughout.

The economic activities on SL comprise local service industry, simple tourism activities in renting holiday flats and providing tour bus services, and to a minor extent, market gardening. There is abed hotel and two smaller hotels at Mui Wo, whilst a former hotel at Pui O closed some years ago.

Tourism is the main activity which includes providing access to the Buddhist complex at Ngong Ping. However many outdoor social and recreational activities

take place including the Action-Asia Challenge, hiking festivals along the numerous and spectacular trails, mountain bike riding and swimming outings to the beaches. Overseas tourists often visit Lantau, for whom a stop at the stunning SL beaches is a must.

Development and Conservation Issues

SL has been 'protected' from full scale development by its remoteness, coupled by an Outline Zoning Plan which puts much of the scenic lowland inside a Coastal protection Area zoning. Whilst during the construction of the Airport there was a boom in demand for accommodation, this has now given way to a gradual decline. Population numbers are now static.

The indigenous population of SL has however seen what development, particularly of new towns, has brought by way of economic returns to their brethren. There is pressure from this sector for any 'development' which might see them realize profits from their holdings.

Other residents of Lantau generally work in the urban areas, and have accepted long travelling times in return for living in a tranquil and untouched environment. This sector is generally keen to see Lantau remain as it is.

In conservation terms, Lantau as a whole has rated highly in all studies It exhibits a coherent natural landscape which is unique in Hong Kong. The biodiversity is very high. SL offers its magnificent beaches and the mountain backdrop of Lantau Peak and Sunset peak. There are mountain bike trails notably around the wooded Chi Ma Wan peninsular, which is protected inside the Lantau South Country Park. Wetlands exist at Mui Wo although these are being eroded due to lack of zoning protection.

In general, ample holiday accommodation is available in the form of the Silvermine Beach ... star hotel, two smaller beach hotels at Mui Wo, furnished holidays homes and apartments along the whole coastal area, a youth hostel at Mong Tung Wan, and tented campsites at Pui O and Shui Hau.

Recreation activities comprise guided tour services (usually by bus), government or NGO sponsored hill walks, tree-planting and nature study activities organised by private operators, dining at beach restaurants at Cheung Sha and Pui O, Mountain biking, and hill walking. There are at present no organised water sports centres other than a canoe club operator at Cheung Sha.

During the SARS outbreak, Lantau saw a surge in recreational visitors. This has diminished somewhat, but weekends still see numerous buses bringing visitors to visit Tai O in particular.

Potential for Development

Various suggestions for development have been raised from time to time. Indigenous residents would like to see a lifting or relaxing of the Coastal Protection Area zoning to enable them to convert their agricultural land into building sites. A study by the Tourism Commission has identified the possibility of constructing a 'spa hotel' at Cheung Sha. A cultural centre and better civic amenities have been requested. Plans for revitalizing the Mui Wo pier area have been received from residents. Others see potential in developing attractions such as a butterfly park, a botanic garden and even a safari park. There is also a feeling from some sectors that SL should be made more accessible with concrete cycle trails and boardwalks along the beaches.

The Development Options

The following options are presented to foster discussion and by no means reflect the Administrations position. It is hoped by so doing that :-

- the public can participate in deciding the future for SL

- a wide range of organisations and individuals can contribute their views
- feedback can be provided to assist the Administration in devising a sustainable plan for SL

Option 1.- Preserve the Status Quo

Other than committed projects, there will be no new initiatives from the administration for the time being. The current OZP for SL will require updating and extending to achieve the overall intent. Economic development will be undertaken by private individuals using existing and resources to develop small scale nature and tourism projects.

Environmental Implications

- preservation of the existing beaches, coastline and forest areas in a truly natural state for the benefit of future generations of Hong Kong people.
- existing OZP requires updating to provide protection from unauthorized developments, and extended to include Mui Wo Town
- villagers will continue to degrade protected areas unless provided with economic outlets elsewhere, or unless effective enforcement controls are imposed

Economic Implications

- villagers will feel, rightly or wrongly, deprived of opportunities to make money from developing currently protected land
- economic gains can be expected by developing tourism which caters to those travellers interested in the outdoor experience. Guided walks, hill climbing, nature tours, adventure racing are but some of the options which should generate employment within the local community.

Social Implications

- protection of our last remaining wild places may be welcomed by HK people as a whole
- Hong Kong will be seen as a World City in environmental aspects
- the indigenous community will be able to retain their land heritage and achieve employment in the related tourism and recreation ventures.

Option 2 - Limited Development

This might see the introduction of larger scale tourism opportunities which require substantial investment, such as resort hotels, and water sports centres. Further construction might be undertaken by Government to provide easier access to the countryside such as concreted hiking trails and cycle paths, and boardwalks along beaches. There may be a selective relaxation of the Coastal Protection Area zoning to allow land–owning villagers to erect recreation facilities such as go-kart tracks, holiday accommodation, wargames centres, and the such like .

Environmental Implications

- resort hotels will place a considerable demand on water, sewerage and access facilities. They will require uptake of land currently protected from development
- water sports centres may require dedicated beach access, and if motorized sports are permitted, may close off beach areas from public access.
- concreted cycle trails, and boardwalks will require the destruction of a considerable swath of natural vegetation which currently provides the coastal environment visual experience
- development of currently protected agricultural land into informal and unregulated recreation and entertainment areas will create unsightly areas out of keeping with the nature experience.

Economic Implications

- resort hotels will require substantial funding which may attract large local developers seeking ventures. Employment opportunities may be given to locals, but skill levels may preclude this other than at the construction stage. Given however the existing provision and history of accommodation initiatives on Lantau, the economic prospects of such resorts are doubtful.
- the construction of cycle trails will provide local employment initially. Cyclists should also provide economic gains for service shops and restaurants
- boardwalks and easy-to-walk hiking trails may bring more visitors to SL and similarly improve and encourage additional service industry.
- locally operated tourist venues will also attract custom and business. These may well be offset by others who stay away by virtue of the loss of the natural environment

Social Implications

- large developers may welcome the chance for new investment opportunities
- villagers will welcome the prospects of immediate economic gain
- the community at large and other Lantau residents may regret the permanent loss of remaining wild places

Option 3 – Substantial Development

This would see the development of SL as another dormitory suburb of Hong Kong, the construction of more North-South links, the removal of development restrictions, and the construction of housing and facilities on an urban scale. Ribbon development of housing will be allowed all along the South Lantau Rd. The remaining beaches and countryside will mirror such places as Tuen Mun, where Butterfly Beach is a remnant of nature hemmed in by development of all types. .Environmental Implications

- SL will be destroyed as an open and natural place
- Irreplaceable vistas ,coastline, valleys and wetlands will be lost
- International opinion would cast Hong Kong in the worst light.

Economic Implications

- assuming effective demand for all the accommodation created, the result will be considerable wealth to existing land-owners and real estate developers. Public gains through land conversion premiums and land sale, are likely to more than offset by the added cost of public infrastructure needed, particularly transport and sewerage however.
- there will be considerable employment opportunities during construction, and thereafter in service industry
- tourism related activities and industry on SL would disappear

Social Implications

- the pressure on developing urban land may ease
- more HK people can experience what would be a quasi-rural environment
- the indigenous community on Lantau would have wealth equalling their NT brethren.
- social and personal stress within the wider community will have fewer outlets for relief
- there may be a sense of loss and guilt for that destroyed.
- expatriates may find HK an increasingly undesirable place to reside

In Summary

We hope that the options presented above provide scope for widespread community discussion on what the future should of this valuable area. The options presented do not represent all that might be said and suggested. We encourage all suggestions and opinions.

We will be conducting a series of facilitated discussions over the coming ...months. If you would like to take part, please write or e-mail to and we will contact you for a mutually convenient arrangement.

Should readers wish to see more details of existing zoning plans, current development projects underway, or related studies undertaken, they may log onto the website......

Housing Planning and Lands Bureau Planning Department

[Green Lantau Association February 2005]

Appendix 3

LANTAU CONCEPT PLAN - DEVELOPMENT PROPOSALS

Comments by Green Lantau Association

Logistics Park

- We note that this is pressing ahead despite the on-going consultation.
- The need, location and scale are apparently not open to public comment
- Tai Ho which adjoins the proposed site, is of almost unique ecological value.
- The proposed Country Park extension borders the area
- The North Lantau Expressway is a major gateway for visitors to HK
- Siting an industrial estate with its concomitant traffic, noise and visual impact appears quite inappropriate, and potentially damaging.

Logistics Park Extension/recreational use

- we note that a motor racing track is a possible use and consider this quite inappropriate (given the noise, fumes and traffic) in juxtaposition to the Tai Ho valley
- Consideration might be given to more passive recreation, eg airship rides.

Cross Boundary Transport Hub

- this would include park-and-ride facilities, evidently because a decision has been taken not to include a rail link in the HMZB which would otherwise ensure rail productivity
- This latter, short-sighted decision will result in otherwise unnecessary extra and polluting infrastructure
- The statement that this is also needed for vehicles coming from the PRD suggests the HMZB will (unacceptably) be used by vehicles which fail HK emission standards..

Hong Kong –Zhuhai – Macau Bridge (HZMB)

- Announcements in the Press clearly indicate that this is not a 'concept'.
- The public have had no chance to comment on the landing site, the alignment, the design, the inclusion of rail, the environmental impacts. The EIA outcome appears to be pre-determined.
- The impact on the environment will be considerable, and for Tung Chung residents, there will be degradation of their already damaged quality of life
- The HZMB should be a 'green bridge' in every sense.

What is apparent is that the nature and siting of the above projects, taken together with the HZMB, will considerably exacerbate the already bad air breathed by Tung Chung residents. This is unacceptable.

Leisure and Entertainment Node at Sunny Bay

- we have no-in principle objection to this proposal, *provided* the bay and Luk Keng headland are conserved.

Theme Park/Recreational use at Tung Chung East

- Community facilities (eg a hospital) in Tung Chung are still lacking due to want of site and/or commitment
- To propose development aimed at overseas tourists without first addressing legitimate local needs is inappropriate
- Spare land at Tung Chung should first be used to addressing the need of Tung Chung residents (220 000 planned).

Golf Course cum Resort at Tsing Chau Tsai East

- this site presently forms a natural gateway to Lantau and is largely unspoiled with an attractive coastline and steeply contoured hillside
- on the Landscape Value maps commissioned by Plan D. the area has the highest visual amenity value
- the proximity of the proposed golf course to the on going construction of the Park Island residential estate by a leading developer, will be viewed with justifiable suspicion.

South and rural Lantau - general comments

Lantau presently offers substantial areas where nature can be viewed and enjoyed in a relatively pristine state. Limited access has helped to achieve this. Lantau is not however remote or inaccessible. The MTR serves Tung Chung, and ferries serve both Mui Wo and Tai O. A network of buses provides access to all settled areas. Most parts of Lantau are within 90 minutes travel from downtown Hong Kong. This includes the natural beaches at Cheung Sha and Pui O, the Lantau Trail access points, and the tourist attractions at Tai O and Ngong Ping.

The listed development proposals are intended to open these high conservation value areas up to even greater use by the general public and tourists alike. There is a clearly perceived belief that what is required is more accessibility, easier recreational opportunities, and the removal of inconvenient nature. This is manifested in the stated possibility of relaxing road access restrictions, the creation of concrete cycle trails along untouched coastline, the covering of the natural beaches with boardwalks, the building of more trails of possibly concrete type.

These proposals uniformly fail to recognize that which makes rural Lantau special. They represent the 'dumbing down' of nature to a lower denominator, where convenient, safe, and accessible are the criteria. A 'managed' landscape might provide opportunities to a less active population but in so doing, what is unique, exciting and challenging is diminished.

With these general comments our specific remarks follow.

Resorts at (a) Lower Cheung Sha and (b) Chi Ma Wan

- we believe that neither location has prospect of commercial success. Hotels have failed at Pui O and Cheung Sha, and Sea Ranch is proof if any is required of continued failure at Chi Ma Wan. Neither the sea quality nor the hinterland attractions offer the standards of enjoyment overseas tourists require.
- Sewerage disposal will be an issue for both locations,
- At Tai Long Wan, we would expect all access by sea and would oppose destruction of Country Park to construct the long and difficult road access to the nearest road head.

- Whilst it is said that the resorts would be *compatible with the natural environment*, it is almost certain that there would be a huge land take to provide a commercially viable low-rise footprint. Taken with the ancillary facilities we would see the loss of a large area of natural woodland

Facelift of Mui Wo

- we support proposals which will revitalize MuiWo whilst not damaging the environmental fabric of this settlement
- we support the principle of a heritage trail and cycle track within Mui Wo
- We suggest and expect that wide participation from residents will be sought before finalizing any plan.

Preservation of Tai O Fishing Village

- we fully agree that the cultural heritage and natural attributes of Tai O be preserved
- We are however most concerned about the statements *improvements will be made* to enhance its visitors appeal, and early improvement of the existing infrastructural facilities is required.
- We consider that it is important to agree what constitutes visitor appeal and preservation of existing conditions.
- We expect that the appeal lies largely in Tai O as it now is, untrammelled by the heavy hand of government-instituted improvements

Cycle Tracks (a) from Pui O to Shui Hau

- the intent is laudable, and visitors can derive much pleasure from this particularly beautiful coast

- it is however impossible to see how this might be constructed (in all weather materials, of sufficient width, with safety railings, and protected from the sea) without *substantially destroying* that which makes this coastline so attractive. The connectivity between the sea and the mountains will be further breached.

- were there to be destruction of the coastline, this would be too high a price for the creation of yet another cycle track in HK.

- the transport of cycles to and from Lantau is an issue which would need careful consideration, as existing provisions are inadequate.

(b) from Ferry Pier to Mui Wo Old Town

- we are not opposed to this but there are practical difficulties in achieving this without cost to the existing attractive vistas

© mountain bike trail

- a small linkage is proposed used using a scenic walking trail. This is acceptable

Beachside Boardwalk

- it is difficult to see how replacing or partly covering a natural sand beach can *"enhance the attraction thereof"*.
- There is an apparent intention to remove inconvenient nature as far as possible from the countryside experience.
- The construction of such a boardwalk will use tropical hardwoods, and require massive concrete sea protection measures neither of which showcase our conservation credentials.

- We suggest that the beaches be left as natural as possible, which in itself will continue to strike visitors as amazing in this highly urbanized city.

Water Sports Centres

- Lantau has a number of abandoned centres and the viability is very much in doubt
- Neither Pui O nor Cheung Sha have a population density to support such centres
- Motorized water sports centres require exclusive water and we oppose them also on noise and pollution grounds also

Review of Road Permit System

- South Lantau has retained its unique environment in large part due to the restriction on private vehicle use. The improvement works underway on the Tung Chung Rd. are intended to provide more convenient 2 way traffic throughout, and a safer gradient and alignment.
- The planning intention is to maintain the current permit system, and is one we support.
- Notwithstanding, the improved road will undoubtedly lead to an exponential increase in private vehicle ownership on South Lantau, once all residents are entitled to access Tung Chung (and beyond) with their own vehicle.
- This will result in a massive requirement for parking areas which experience in rural NT shows will be met by informal filling and conversion of agricultural land. As much agricultural land is in the Coastal Protection Area zone, or is ecologically valuable wetland, this conversion will substantially degrade that environment which makes the area so attractive and ecologically valuable.
- To contemplate further relaxation of road access restrictions in the light of the foregoing, is in our view, sheer folly.

Museum of Lantau

- we support this in principle.

Eco Tourism Centre at Tung Chung Fort

- a centre is supported
- Tung Chung Fort is however not well placed. Such a centre should be on South Lantau, perhaps the site of the former Cheung Sha Hospital
- The Fort is however a valuable cultural attraction

Eco Trails and Heritage Trails

- we support these ideas in principle
- however we strongly caution about constructing trails which provide maximum comfort at minimum inconvenience. Trails should remain as natural as possible, steps constructed (if necessary) using natural stone and without cement, the provision of railings and safety chains minimized.
- Lantau's charm lies in its 'wildness'. To 'dumb it down' to suit all possible visitors is not appropriate. We need to keep areas which challenge and inspire young people, and where adventure can be experienced.

High Quality Camping Sites

- there are existing YHA hostels at Mong Tung Wan and Ngong Ping, which we expect, are under-utilized, and we question the need therefore for additional facilities
- we do not however oppose the idea in principle
- the Kwun Yam Shan site would appear to compromise an outstanding natural vista.

Proposed Lantau North Country Park Extension

- we have commented in the main body of the paper

Proposed Marine Park at South West Lantau

- we applaud this measure but would strongly recommend that the area be enlarged to form a viable water body.
- The Soko Islands should be included
- The proposal should not be 'subject to resources' but rather a commitment.

Protection of Sites of Conservation Value

- the intention is laudable but details are lacking
- we would wish to see early dialogue on this issue, to identify and agree all such sites and to establish a target timetable
- the recent destruction of part of the Tung Chung River by a contractor for a government project is an example of what can happen

Green Lantau Association February 2005