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Lantau Development Advisory Committee  
17/F, East Wing Central Government Offices  
2 Tim Mei Avenue  
Tamar  
Hong Kong  
By email: [landac@devb.gov.hk](mailto:landac@devb.gov.hk)

22nd April 2016

Dear Sirs,

**Re: Developing Lantau, “Space for All”, Lantau Development Public Engagement Digest, January 2016**

- 1. Introduction. This is an old-fashioned development plan to convert a lovely green and peaceful island into commercialised activities and entertainments of the sort which have failed elsewhere.** It is dressed up with words and terminology such as sustainable development, but which are applied contrary to their true meaning and intention. **The Digest does not meet the Terms of Reference set by Government as it does not deliver sustainable development.** The First Term Work Report of January 2016 which was not as biased in favour of business as usual, has been altered in favour of un-sustainable development and less compliance with principles. In the Digest, the term sustainable development is **not** applied to development proposals at all, but only applied to the so called conservation related proposals! There are little or no new or active initiatives for conservation and no genuine sustainability is achieved, it is basically non-sustainable land development as usual. **There will be commercial activities and infrastructure widespread in the guise of high impact types of tourism or recreation,** and when such ventures fail, the land will have become site formed, with slope works and access, and degraded sufficiently for it to be suitable for residential development. **This is a land grab.** **Several proposals may be linked to private ventures, so there must be full disclosure of proponents and their private interests.**
- 2. Upsetting the ‘balance’ which was achieved by developing the north coast.** Ordinary persons would normally consider that Lantau had suffered more than its fair share of ‘balanced’ development with the airport, road, bridge, new islands, new runway, railway and massive new town blocks on the north coast. Most right-thinking persons would be of the view that current and committed development with the noise, pollution and development already achieved was more than enough. Instead, this development plan shows more and worse and spread out into more areas as part of this dystopian nightmare for such a special place.
- 3. This plan gives “space for all” which are mostly non-feasible, damaging and expensive projects which will become billion dollar white elephants** partly paid for or subsidized by the tax payer, and for which Government Land is provided.

4. **Instead of providing room for affordable housing near transport and infrastructure, this plan intends to “splurge and indulge” and waste valuable land and our natural resources.**
5. **The Plan will prevent Hong Kong from carrying out its declared Policy of meeting its responsibilities under the Convention of Biological Diversity** whereby we are part of the world wide Strategic Plan of 2010 to reduce our impact on biological diversity and sustainably use our natural resources. China adopted this Strategic Plan and China then extended the Convention to Hong Kong in May 2011. **Instead, this Plan maximizes our impacts and increases our global footprint and responsibility for damaging regional biodiversity and aggravating climate change.**
6. **Lantau in Extinction** would be a more appropriate heading instead of “Lantau in Evolution”, having regard to the Digest. The Digest omits the previous policy under which Lantau was to be an ‘island in the sun’ for Hong Kong people who could have peace, quiet, practice their religious beliefs and enjoying nature after a short trip from crowded and polluted Hong Kong Island and Kowloon.
7. **The Vision is wrong.** The objective of developing Lantau in the conventional way proposed fails to mention that conservation of natural resources is essential for the long accepted definitions of sustainable development.
8. **The Vision is misleading.** Additionally, the whole content of the Digest contradicts the core of the Vision Statement as it **does not balance or enhance conservation.** The Plan further disturbs the balance of nature in Lantau and does not enhance conservation. Hence, the document is misleading and does not deliver what is expressed to be intended. The objective of developing Lantau even further will not balance conservation but will aggravate its loss.
9. **The assumption that Hong Kong society has a need and expectation for this plan is false.** There is no need and it is contrary to the expectations of right thinking persons. The Work Report Foreword p.2 states “Hong Kong people at large, including the younger generation, expressed strong desire for preserving the natural and heritage assets of Hong Kong.” Yet this Digest, after paying lip service to this, goes in the opposite direction and seeks to develop Lantau into another new town or Kowloon type development. This Digest is not forward looking and not in the overall interest of Hong Kong.
10. **Of the Four Strategic Positions, two are not needed.** There is no need for a new metropolis covering Mui Wo, etc. There is no need and no space in Hong Kong for a service hub for the PRD. The Container Port business is in decline, for example.
11. **The so called Major Planning Principles are flawed and based on false assumptions and are not even planning principles, but are declarations of intent. Hence planning is done without reference to Convention on Biological Diversity and obligations to meet its principles, the Strategic Plan of 2010 with its 5 Goals and 20 Targets.** This plan will prevent Hong Kong from complying with its

responsibilities and obligations and the Government Policy and seriously aggravate the damage being caused by Hong Kong and enlarge our ecological footprint.

12. **It is bad planning to develop Lantau Island into a copy of other developed areas of Hong Kong with more of the same or similar uses.** It is not sensible to plan Lantau to deliver legal and financial services like the rest of Hong Kong. Lantau should be kept unique and special, providing ecosystem services to the rest of Hong Kong. This would be better and appropriate planning following established principles.
13. **There is no need by the Lantau population** for these proposed developments. This is just the assumption of LanDAC.
14. **The Digest has nothing which makes Lantau a ‘smart or innovative’ hub.** There is nothing special or smart or innovative in the Digest. Except perhaps using electric buses. **There is nothing specific which is ‘low carbon’ as claimed. This will aggravate our high carbon impacts and emissions.** There is little or nothing about sustainable use of natural resources so as to have Lantau and Hong Kong being smart for future generations except protecting the buffalo and having a botanic garden. Hence, the principles for economy and livelihood are flawed. **Conservation of natural resources is the foundation for sustaining our future quality of life,** but this is not considered.
15. **No specific enhancements or strengthening of conservation are in the Digest.** There is no commitment for active or new or enhanced conservation other than what is going on at present. **Instead developments which are not “major” will be permitted.** There will be additional infrastructure which usually means roads and commercialized theme park type activity which is disruptive to conservation of the countryside and Country Parks. There is no commitment to protect the Country Parks. This demonstrates the lack of awareness and commitment to the CBD by the Development Bureau and or the committee, LanDAC.
16. **The Recreation and Tourism principle provides no protection to nature and heritage conservation as these resources and values will suffer when multiple facilities change Lantau into a commercialized high impact recreation and tourism joint venture.** Recreation and tourism must not collide and conflict with nature and heritage conservation and the beautiful peaceful nature of the island. It is bad planning to destroy the key attraction which is that Lantau Island is so quiet and peaceful and unpolluted by vehicles compared to developed Hong Kong and Kowloon, but LanDAC plans to destroy much of that special value to Hong Kong people. Has an SEA been done showing how many thousands of plants and trees will be affected by the proposed Recreation and Tourism, and how many hectares of countryside will be lost from this? No. **These impacts are caused by these widespread plans but not assessed. The public are thus misled and cannot give an opinion when Government fails to detail the problems with their plan**
17. **Traffic and transport is said to be a priority but More roads and road widening will mean less peace, more noise, less nature and more pollution.** This is defective and bad planning. There should be planning to reduce pollution, not maximize it. This will cause much vegetation cutting and slope works causing much damage. Has

there been any SEA showing the hundreds of thousands of plants and trees which will be affected and the thousands of hectares of green countryside, wet areas and streams and coastline which will be lost? No. **These impacts are caused by the grandiose plans but not assessed. Again the public will be misled and the consultation process is one sided, pro-development.**

18. **Major proposals.** Such major proposals require **Strategic Environmental Assessments** of the most thorough type, and cost benefit and social impact assessments. Cumulative impacts need to be assessed so the public know in advance of the damage to be inflicted and the cost. A Strategic Environmental Assessment of the most thorough type is required but has not been done. There have been no public assessments and the Plan is **seriously flawed. The public are kept in the dark over the impacts.**
19. Group 1 Spatial Planning and Land Use. North Lantau Corridor for Strategic Economic and Housing Development. The huge environmental impacts from the airport, road and town and the further expansion with the bridge and runway etc. are not considered. The cumulative impact of existing and committed projects has never been assessed.
20. Northeast Lantau node for leisure, entertainment and tourism development. This provides for theme parks and development leading to business as usual, nothing innovative nor smart. **A cost benefit analysis whether it is likely to make commercial sense is not provided despite the continuing decline of Disneyland and similar theme park type business.** This is the past. Hong Kong deserves something better. It is claimed at Work Report 3.1.2 this will promote tourism for the Outlying Islands, forgetting that they will be ruined by the multiple impacts from the old style Incinerator and the ELM below.
21. East Lantau Metropolis as long-term strategic growth area. There is no evidence to justify developing Mui Wo/Pui O into a 3rd central business district. It is neither central nor business, even in the Digest. There is no social benefit, only costs and impacts. The LanDAC assumptions are akin to propaganda. **The low carbon claims will be rubbished as a result of the high carbon emissions Incinerator.**
22. Dumping in a scenic sea, home to vulnerable sea creatures, thus putting them at further risk, is not necessary and aggravates our loss of natural resources. Instead of wasting new islands on “Splurge and Indulge” projects, those areas can be used for affordable housing for HK residents. **It is not prudent to build new towns next to an old technology Incinerator,** when the incinerator was moved out here because of objections from vested interests because of its pollution and other impacts.
23. **“Predominant part of Lantau for conservation leisure, cultural and green tourism.”** If only this were true. **These are empty words.** The proposal in the Work Report 3.2 to enhance conservation of natural woodlands, streams, coastal waters and habitats has *been deleted* from the Digest version! **It is objectionable to lump conservation together with commercialized tourism and other high impact activities but this is done to infiltrate commercial activities into the countryside.** Commercial activities in the countryside, especially Protected Areas or conservation

areas must be avoided or impacted by roads which will encourage more intensive or unauthorized works. **This Plan will take away countryside and coastlines for natural and low impact traditional recreation, the “space for all”, and sell the public space for mostly commercialized and high impact activities.**

24. The Digest only talks of avoiding large scale developments so that presumably medium scale type developments and other impacting activities will be allowed “in the vicinities of these areas as far as possible”. Conservation takes a back seat to commercialized activities. Again public is misled and no SEA and cumulative impacts not assessed. The so called Principles are for business as usual.
25. **A better Principle for a fair plan with genuine balance would be to enhance and promote conservation in Lantau, enhance and protect the Country Parks, the countryside and the coastlines from development and fully take forward the CBD’s Strategic Plan of 2010.**
26. Optimizing the use of Government land and development of caverns. What happens to the earth from the excavation of caverns is not stated. Presumably, this will be dumped into the sea to make more development possible near the old technology incinerator. The impact on the watersheds and streams and water systems is not assessed. What happens to the prisoners is not stated, presumably more greenfield scenic areas will be found for infrastructure, roads, sewage for this. Again, public is misled by no SEA.
27. **Group 2, Conservation. This reduces the countryside as developers shift the balance more towards widespread or sprawling infrastructure and development.** This states “to strike a balance between the needs for conservation and development, it is suggested to take forward the conservation concepts in two major directions: enhancement of conservation and better utilization of natural resources”. As stated before, a balance has already been struck in Lantau with **a major part already been taken up for intensive and the most polluting types of development, namely roads and airport.** The piecemeal and widespread development under this Digest will cause maximum damage and will not be balanced.
28. **There is no enhancement as claimed, nor any detail of any project which will actually enhance active conservation.** The Digest states “it is proposed to strengthen the preservation of sites of conservation value...” but nothing specific has been proposed for protecting Lantau or any other part of the countryside in the NT, which is always at risk of tree cutting and trash first when development profit is desired. This is thus more empty talk. Once tourism or related developments are authorized nearby, **then nearby there will be unauthorized activities to promote development and there will be no effective enforcement nor restoration of the damage.** There are dozens of examples all over the NT.
29. Enhancement of Heritage Conservation provides nothing which enhances or is active other than avoiding “major developments of these sites ...” This implies medium-sized developments will still be allowed where possible. Linkage and Themed Trails is a good idea but no specifics are given.

30. Enhancement of Landscape Conservation is limited only to current man-made tourist attractions, including the Airport and Bridge, not the rest of the wonderful natural landscape of mountains and sea of Lantau. The Airport is not an attraction, it is a blight on what was attractive landscape. This again misleads the public. **There needs to be a commitment to protect the natural landscape.**
31. **Fake sustainability.** “Better Utilization of Natural Resources” is **not** sustainable use of natural resources as required by CBD and our obligations. **This omits sustainable use of natural resources** and substitutes the LanDAC concept of “better utilization of natural resources”. This is not sustainable. The phrase “better” is subjective and is only seen through the eyes of the developers on LanDAC. It provides no protection and is a formula for unlimited development. **This is the recipe for business as usual under the cover of deceptive wording.**
32. Hence, Group 2 largely fails. There is nothing specific on how conservation is enhanced. It is mostly commercializing and privatizing the countryside. However, creating a marine park network and the promotion of farming and a religious conservation zone so as to protect the vegetation are worthwhile suggestions.
33. **Group 3, Strategic Traffic and Transport Infrastructure.** Using railways as the backbone is welcomed, but major roads are still planned which will still degrade the environment and make the railways less viable.
34. **The Strategic Road System, cutting up the island and the seas with the major Route H is not needed and will cause too much damage.** There are no SEA to inform the public of how much loss and damage will be caused. This Digest is thus misleading. The impact on vegetation, landscape, water, wet areas, streams, coast and sea is not assessed.
35. The North Lantau Corridor will need to be improved if there are major developments along there.
36. Other road arrangements etc. are not needed. **In particular, there is no need to widen the South Lantau Road and Keung Shan Road.** The number of plants affected, hectares of land, slopes to be affected or cut above and below, the streams and natural habitats affected is not assessed. There is no mention of compensation for the losses.
37. **It is bad transport planning to issue more permits for private cars.** Instead of increasing taxis, there should be increased frequency and use of electric buses. The principle to be adopted is to minimize use of private cars and taxis and hence remove the need for the highly damaging road widening.
38. **Group 4, Recreation and tourism.** This Digest intends to have a collision by **high impact types of commercialized activities** impacting on the peace and quiet and beauty of Lantau’s countryside. Whereas the Work Report 3.4 describes the abundance of natural resources and states many people are seeking opportunities to get close to nature and relax, **the Digest omits this** and instead favours high impact

tourist infrastructure and activities. This is misleading. **There is no match between what people want and what the developers of Lantau want.**

39. In particular, there is no need for wider roads or more roads. **Widening roads, allowing vehicle access plus widespread commercialized activities will destroy the peaceful and natural environment which is the main reason for visitors to Lantau.** The hectares of countryside to be affected, the number of plants affected, streams, and other habitats affected or lost has not been assessed. No compensation is yet considered for so much loss.
40. Concerns voiced by the public about the widespread high impact of commercializing of South Lantau have on 10<sup>th</sup> April 2016 belatedly led one LanDAC person to say they would respect biodiversity (ie NOT protect it) and there would be “moderate tourism” (whatever that means) and there was a need for a critical assessment of the tourist carrying capacity of South Lantau. **This reveals numerous errors and omissions by LanDAC.**
41. No general assessment of the impacts, NO SEA or EIA or other special assessments are contemplated, no cumulative impacts to be assessed.
42. Tourism not the only impact, but also infrastructure, roads and traffic.
43. Not only biodiversity but habitats, landscapes, peace and quiet, social values and recreational values would be lost.
44. Not only the South Lantau would be damaged, but much of Lantau.
45. **Recreation and Outdoor Activities, seeks to impose high impact activities and infrastructure into the countryside.** The Work Report page 19-21 shows how there is little or no match between the values of each place and what the public wants with what the developers want. This has been edited out of the Digest.
46. The Work Report states some areas are a popular venue for hiking and outings with rich or diverse ecology. This is omitted from the Digest. **There is no need to burden Mui Wo and Pui O/Chi Ma Wan and Shui Hau with a list of commercialized activities incompatible with the existing values.** These should be left to the traditional hiking and farming which are the current favoured uses.
47. **Splurge and Indulge is a waste of land.** Having said at 3.4 that people want something different from yet more shopping, this and more is proposed. **If there is no better use for reclaimed land, it should be used for affordable public housing for Hong Kong residents.** Use the land for that.
48. Ecology is promoted for Tai Ho Wan and Siu Ho Wan, Yi O and Sunset Peak. Again, there is no commitment to new or specific active conservation of existing biodiversity. **Instead of genuine conservation this promotes new infrastructure** which inevitably means loss of existing biodiversity in small and highly special and fragile habitats. These proposals in areas of high value and high scenic value are

totally inappropriate and demonstrate the bias towards development of LanDAC which thus lacks credibility.

49. A botanic garden must not mainly be a tourism hotspot, its main objective is a centre which promotes conservation of wild native plants. However, there is no indication that will be done.
50. Yi O should be protected to provide land to genuine farmers with security of tenure instead of commercialized recreation to reward the ‘trash first’ type of activities which have been complained of at Yi O currently. **Yi O is mostly private land and it is not seemly for a Government group to be favouring controversial private projects.**
51. **For Sunset Peak, there must be no infrastructure built which damages the delicate and special habitats with numerous rare plants**, some of which are in the grass around the summit. Unspoilt upland areas of this quality without destruction by antennae and ugly communications structures are rare. The path up is reasonable and provides a fitness challenge which is lost if wasteful ideas such as railways are carried out.
52. The Culture and Heritage ideas are generally better except there is probably no need for the Cable Car extension to Tai O. A cable car does not enhance culture and heritage, as it is for thrill seeking and is another high impact and expensive tourist project which will damage the landscape.
53. Relaxation as the Theme will not be promoted at Cheung Sha by more commercialized activities such as spa resort and wedding centre. **That relaxing place should be left as a freely accessible family place for ordinary families to enjoy** sea, land, sky and fresh air. It should not be privatized and commercialized.
54. The Soko Islands are also the wrong place for spas and resorts. This development plan has now encouraged CLP to look again at developing a LNG terminal allegedly off shore the Sokos, which will add to the cumulative marine impact planned by LanDAC all around the coast.
55. Group 5. Social Development. Attracting Talent for balanced employment is not helped by commercialized ventures such as tired and dated theme parks and related activities. With the limited population only about 31,000 people spread over most of Lantau, (apart from Tung Chung etc.) there is no need for this infrastructure. It is a bad planning intention to make Lantau into another similar built up place with new towns. **There is no assessment of the social cost and losses to be caused and how they will be compensated.** Such assessment should be done to all the Major Projects.
56. Transport Connections. Improvements should be limited to providing more and electrical buses rather than taxis and cars. Cars should be limited only to those who are full time residents or with ownership or tenancy of a property.



57. Catering for rural and remote areas should be limited to genuine needs. This should not provide sewage systems at public expense as this will promote the spread of small houses and more ecological damage as a result.
58. **Looking Ahead. The feasibility of most of the ideas in this Digest have not been argued nor demonstrated.** There is no cost benefit analysis. The Digest has not satisfied tests to enquire if there is enough social and environmental gain from commercializing the countryside. There is no SEA nor any cumulative impact assessment. The public have not been provided with information to make an informed choice. The Digest hence misleads. **The public is kept in the dark on the real damage** to be inflicted and the waste and expense.
59. The Quick Win projects should **not include widening** the South Lantau Road and Keung Shan Road. **This will open the eyes of the public to the destruction of hundreds of thousands of trees and massive construction from all the associated slope works which will scar the countryside** right across south Lantau, up through the Country Parks which are beautiful scenic areas with lovely roadside trees. **The public will then realize how misled they have been by this LanDAC** and the absence of SEA and cumulative impact assessment. The public will object to more private cars, more noise and pollution and the destruction of what makes Lantau a special place for Hong Kong people to relax.
60. **Basic errors in the LanDAC approach and the Digest are numerous and fundamental** and include as follows.
61. No reference to nor compliance with CBD, its principles, Hong Kong's Policy, or the Strategic Plan 2010, Goals and Targets is promised.
62. No reference to NGOs conservation plans, studies and maps.
63. No consideration or listing in the Digest of what makes Lantau unique, valuable, attractive to visitors, and its values to the 31,000 residents of the Island outside the Airport area.
64. No list of what HK people value in Lantau such as a place for nature and peaceful recreation.
65. No consideration of what HK people would see as a priority over ice rinks and malls and dated theme parks, such as perhaps land for affordable public housing for HK residents near transport.
66. **A better plan for Lantau should be the subject of a non development biased process and seek views on the following.**
67. **Development to be at or near the Airport and Bridge and its artificial island and Disney areas and with a priority for affordable public housing near transport.** Instead of Splurge and Indulge, if no sensible use can be found for some reclamation, it would better be used for EPD's Incinerator, which would now have road access and generate less emissions in waste transport.

68. The rest of Lantau be allowed to sustainably develop with **passive, natural and low impact** recreation, farming, and nature and heritage conservation and high quality tourism as the core principles.
69. **The sea and coast be protected**, as already about 30% of the Lantau coast was destroyed to make the Airport etc, so the only fair balance is to not permit more loss.
70. **No road widening but more efficient use of existing roads with electric buses.**
71. All this in compliance with the CBD and the norms for sustainable development.
72. **Conclusion. By contrast, the Digest Plan is the sort expected from interests which are not accountable to the public or accepted principles and who have not considered international norms such as the CBD.**
73. **The Digest has several specific proposals which may involve private interests but which are being promoted by LanDAC. What are the private interests or conflicts of interest behind these?** Yi O has already been damaged yet it is identified for a specific proposal. What commercial interests are directly or indirectly interested in this Digest? All the proponents of the specific proposals and the proposals with links to private interests must be made public with full information without delay.
74. **LanDAC bypasses professional and transparent normal planning processes** which enable the public to provide objections and evidence which must be considered before decisions are made. Instead the so called engagement process will just lead to rubber stamping of decisions made by LanDAC. This is not a systematic and professional Strategic Impact Assessment.
75. **The Plan result is LESS ‘space for all’, and more space for developers.** This is a development driven plan to sequester and privatize for private profit as much of the public owned countryside as possible. **It helps a land grab causing loss to the public.**
76. Public Engagement. LanDAC should not assume that their proposals are in the overall interest of Hong Kong when they are not. The Plan is focused on private interests which will commercialize the countryside. The Digest is based on a series of assumptions and subjective opinion. **This is not a valid basis for spending billions of dollars of public money and destroying the environment.**
77. Please could I have your response to this submission in due course.

Yours sincerely,

Ruy Barretto S.C.

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