

**Submission in respect of the Proposed Development of
the Lamma Ex-Quarry by the Planning Department & CEDD
5th February 2013**

Preamble

We have witnessed a series of “community-based” pressure groups and individuals standing up to oppose and address ill-conceived schemes that damage or despoil Hong Kong, whilst equally supporting the Government’s visionary “Outline Zone Plan” for the island. These stakeholders are not “Anti-Development”! They accept that development, in its widest sense, is an essential part of social, economic, cultural and environmental progress. However, for development to be successful and sustainable it must be “appropriate”, it must be in balance with the aspirations of the community as a whole – not just powerful vested interests, it must augment our future generations aspirations and opportunities, not leave us without viable alternatives. It must enhance our living experience not detract from it, and that is perhaps one of the greatest skills possessed by proactive, innovative and responsible planners. Unfortunately as we will explain in this document the current proposal is neither visionary nor appropriate when judged against the opportunities available and the Government’s stated intent to provide essential Public Housing and in hand with sensitive, responsible stewardship of the SAR’s environmental assets.

1. Introduction

Hong Kong has a land area of some 1,104 sq km of which some 50 sq km is water, much of the land is hilly making building a challenge and resulting in the premium placed on flat land, whether natural, reclaimed or, as in this case, rehabilitated. The population of Hong Kong is some seven million, mostly living in high-rise buildings close to transport links, but a not insubstantial number have been identified as living in undesirable, even squalid conditions and that is a matter of concern for both Government and the community as a whole. The Chief Executive highlighted the pressing need to provide greater access to “Public Housing” for

those who need it, and we support that aspiration. We also support the needs and aspirations of the community to be able to escape the concrete jungle that many live in, experience clean (cleaner) air, open spaces and an opportunity to experience nature. Chinese teachings are often about balance, balance within the body, balance and alignment within a building and equally important, balance between the gain through development and the loss of environment and the closely linked “quality” of life.

2. The Ex-Quarry Site

Before quarrying works started in 1978 the current site was a rocky hillside, a natural resource with abundant flora and fauna. Quarrying was carried out between 1978 and 1995, a cement works was built, stone removed and the area was stripped of life. The Government then decided to rehabilitate the site starting in 1995, initially by planting trees and bushes, non-indigenous species were introduced (because they initially grew more successfully on the poor soil) – interestingly this is now being used to downgrade the ecological importance of the area! Rehabilitation works essentially ceased in 2002 and the area was largely abandoned resulting in a profusion of life including the endangered Romer’s Tree Frog, numerous butterflies, raptors, wading birds, small mammals and sensitive human usage in the form of bird watchers, ramblers and photographers. The area has become an accessible natural resource for the people of Hong Kong.

3. The need for housing on Lamma

The current Outline Zoning Plan (OZP) is for needs-based rural village development, interestingly the Government figure quoted for population in the year 2000 was 6,000 people and in the 2011 census that had “fallen” to 5,900! No obvious local housing demand evident there, equally interesting the estimate in 2000 for the population in 2016 (three years away) was 16,000 people. Alongside that we have to take into account the empty properties (“Lamma 1” at Nga Kau Wan – a development empty for some 7 years) and existing approved developments – Tai Wan To a development of some 100 houses (~300 apartments).

4. Is Lamma the right place for Public Housing?

Government statistics have consistently shown the Islands District to have some of the lowest per household income rates and lowest household employment rates in the SAR. In addition the transport links to the islands are by ferries (a relatively expensive and polluting mode of transport and one Government has repeatedly refused to subsidise).

- Yung Shue Wan, which has an estimated population of some 5,000 (based on the 2011 Census), has for considerable periods each day an hourly service (unlike areas served by MTRC or bus routes), a frequency that is likely to be comparable with the proposed route from the Ex-Quarry site.
- The current weekday single fare for the Sok Kwu Wan to Central route is HK\$19.40 (or ~HK\$1,000 pcm per person), compared to, for example, the Tsuen Wan to Central MTRC fare of HK\$11.50 flat rate.
- Providing alternatives to the ferry service to lower transportation costs would be prohibitive in terms of capital expenditure for the current or proposed population:
 - A bridge over the Lamma Channel for 8,700 to 12,900 people?
 - An MTR station (normal catchment area ~25,000 people)?
- If a population sufficient to justify either a bridge or MTR station was envisaged then the planning intent and minimal security provided to areas such as South Lamma through the SSSI, Green Belt, Coastal Protection and Conservation areas would have been abandoned.

5. The Government's imperative for Housing

Government has made it a clear focus and imperative to address the perceived issue of Public Housing. Some of the obvious criteria for selecting sites for such housing should be:

- Proximity to employment;
- Transportation costs and viability of existing networks;
- Availability of infrastructural support (water, sewerage, electricity, gas, emergency services, social and cultural facilities), at a viable cost per capita;

- Integration potential within the existing social and cultural environment;
- Impact on the ecology, environment and pre-existing lifestyle within and around proposed development sites.

With that imperative in mind the utilisation of precious planning, engineering, transportation and general labour resources appears illogical and at this stage an inappropriate use of public funds. The obvious issues are:

- With a target capacity of 2,800 to 7,000 people (1,000 to 2,800 apartments) the development will have minimal impact on the availability of housing in Hong Kong;
- Government has already accepted that the site is inappropriate for Public Housing (its stated priority);
- Government proposes to provide the infrastructure (at considerable cost) for a site containing some “Subsidised” housing, with the balance of the land being sold for “Private” housing;
- There does not appear to be a fundamental shortfall of available or planned accommodation in Lamma.

6. The history of the Public Consultation Process:

- 23rd May 2011 a meeting was held between Government, professional Institutes, Community and “Green groups”, but no proposals were outlined;
- July 2011 the Environmental Impact Assessment (EIA) Study Brief was issued, it was considered deficient and objections were lodged. Areas of particular note being under “Public Concerns”;
 - Section 1.11 Does the information indentify and address the main concerns of the general public and special interest groups (clubs, societies etc.) who may be affected by the project; and
 - Section 1.12 Does the information take account of the main concerns of the relevant statutory or advisory bodies;
- 19th March 2012 a further meeting between Government (Planning and CEDD), PlanArch and Arup (project consultants), professional Institutes, Community and Green groups, but once more no proposals were presented;

- It was requested that it be minuted that “no acceptance of, or acquiescence to any project proceeding had been given by those present as no proposal had been presented.”
- 7th December 2012 a single proposal for residential development with three variations based on population and facilities (marina, hotel, commercial outlets);
- Two month public consultation period 7th December 2012 until 6th February 2013;
- Community Workshop held on 5th January 2013 at Sok Kwu Wan, eight tables, of which five opposed a development of the nature proposed and the remaining three tables insisted the environment was a priority, but broadly supported development;
- Community Forum held on 12th January 2013 at Yung Shue Wan, all bar two people present questioned the process, its validity, the paucity of evidential reporting in support of the proposal, the lack of answers to questions raised and the lack of alternatives to the residential proposal;
- Public Forum held 19th January 2013 in Central, in a full venue (150-200 people) all bar some six or seven people decried the consultation process as:
 - Lacking supporting evidence for the proposal;
 - Failing to address alternative, but viable options;
 - Failing to look at the site and Lamma with its other proposed developments in a holistic manner;
 - Failing to address community concerns over proposed facilities and the limited enhancement the proposed development would bring.

7. Fatal flaws in the consultation process

Clear initial indications from the meetings in May 2011 and March 2012 were that usage consideration for the site would be open to a range of concepts that would benefit Lamma residents and the Hong Kong community at large (policy outlined in the reports referred to below), however:

- The only proposal for public consultation is for residential housing, the variables being merely in the scale of the planned development;

- The proposal has reached the consultative phase without the benefit of supporting evidential reports, making reasoned and informed decisions impossible for the community, thus disenfranchising the democratic process and stifling informed community engagement;
 - The EIA has not been published;
 - No reports on the ecology of the area;
 - No reports on the local demand for housing or the price point for such housing;
 - No reports on the viability of transport costs and links for the target market;
 - No reports on the impact, socially, economically and environmentally of potentially more than doubling the population of the island (not just the Sok Kwu Wan area);
 - No reports on the potential infrastructure costs in either gross or per capita terms of placing a self contained population at the site;
 - No indication of the cost of laying a new undersea fresh water pipe if the population exceeds 5,000;
 - No reports on the cumulative impact of this proposal in light of the proposed artificial island reclamations adjacent to Sok Kwu Wan and Yung Shue Wan, or the ongoing attempt to develop the Shek Pai Wan area by the Baroque consortium;
 - No report detailing why the proposed development should be allowed to breach the OZP height limit or visionary development intent.
- The reports relied upon by Arup (consultants), Planning Department and CEDD, all of which are outdated, but contain relevant policy decisions, are:
 - The South West New Territories Development Strategy Review Public Consultation Report dated July 2001 (before the Ex-Quarry was rehabilitated);
 - The South West New Territories Development Strategy Review Recommended Development Strategy Final Report dated July 2001 (before the Ex-Quarry was rehabilitated);
 - The Hong Kong 2030 Planning Vision and Strategy Final Report dated October 2007.

- The lack of tangible report-based evidence to support the proposed development risks the disenfranchisement of stakeholders on a matter where policy may be set by precedent for drastic and far reaching amendments to the OZP. In addition this decision may directly impact the policy for the entire New Territories area by allowing developers to apply pressure to the Town Planning Board (TPB) to waive existing restrictions.

8. Policy ignored or avoided in the project proposal

The South West New Territories Development Strategy Review Public Consultation Report dated July 2001:

- Section 4.6.1 – Under the DRS (Draft Recommended Strategy), there would be no major urban development on Lamma Island.
- Section 4.6.1 – The initial findings are that major urban development in Lamma is not anticipated. – *A 47-118% increase in overall population must be considered major in terms of local impact!*
- Section 4.6.2 – A major part of South Lamma is rich in bio-diversity and ecological resources and is hence proposed as a conservation area in the DRS. Urban development is considered incompatible with this planning intention.
- Section 4.6.2 – For the quarry site, the DRS has suggested it for strategic sewage treatment facilities, the feasibility of which is still being investigated by the Government. – *No mention of residential development.*
- Section 6.1.10 – A large part of North Lamma is proposed for conservation under the DRS.
- Section 11.3.3 – The decision making process is made known to the public and their interests will not be undermined. – *Denial of information upon which to base decisions must undermine the validity of those decisions and therefore public interests.*

The South West New Territories Development Strategy Review Recommended Development Strategy Final Report:

- Section 2.2.1 – In view of the natural attributes, ecological diversity and landscape qualities, large areas in the sub-region have been recommended for conservation in the 1993 IRS. The need of conservation has been re-affirmed in the 1998 TDSR recommendations. In the TDSR Broad Conservation Strategy, Central Lantau, South Lamma ... are highlighted as Significant Land Conservation Areas. The water bodies in Southwest Lantau and South Lamma are designated as Unique Marine Conservation Areas ... Whilst the boundaries of these conservation areas are indicative only, and the conservation value and the detailed boundaries of respective areas would be subject to further investigation, these conservation areas form the basis for the formulation of the development strategy for the sub-region.
- Section 2.2.2 – Terrestrial and marine ecology in the SWNT shows a great diversity and abundance of species/habitats. There are already ten designated Sites of Special Scientific Interest (SSSI) and a number of designated sites of conservation importance. Apart from the designated ecological sites, large areas in the sub-region have been recommended for conservation in order to provide overall protection to the natural habitats and a range of species.
- Section 2.3.1.1 – Apart from conservation and landscape considerations, the level of development for the sub-region, which comprises Lantau and other outlying islands, needs to be assessed in the light of availability and capacity of external transport links.
- Section 2.3.1.11 – Ferry services have long been the main mode of external transport in the SWNT sub-region. Whilst Lantau Island is now connected by roads and railway with the Metropolitan Area, all outlying islands have to rely on ferry and kaito services running on regular schedule with additional services during weekends and public holidays to cater for recreational trips. The existing ferry services in terms of speed limit, frequency, quality and piers locations is one of the considerations in the further development of these outlying islands.
- Section 2.4.2.1 – SWNT sub-region is endowed with great tourist/recreational opportunities which are intrinsically related to the predominantly undisturbed natural landscape and spectacular countryside

character in particular the country scenery, passive recreation facilities in the Country Parks areas as well as the rocky coastline and rugged relief of the outlying islands. The long history of some of the rural villages in the sub-region provides a few hundreds of archaeological and historical interests.

- Section 2.4.2.5 – In recognition of such development trend, the 1993 IRS identified four areas with potential for tourist/recreation attractions, namely Tai O/Ngong Ping, South Lantau Coast, Tai A Chau and Siu A Chau as well as the Lamma Quarry site. For the Lamma Quarry site, the recreational potential is yet to be determined and assessed against the need and feasibility for other uses, possibly sewage treatment facilities, in the 'Planning and Development Study on Hong Kong Island South and Lamma Island.
- Section 2.5.1.2 – Outside North Lantau New Town, modest growth, through an area-by-area approach, has been recommended for the existing development nodes including Discovery Bay, Mui Wo, Tai O, Cheung Chau, Peng Chau and Lamma. The developments in these areas would need to take into account the local conditions and the available capacity of the existing and planned infrastructure.
- Section 3.2.5.2 – The tourism and recreation proposals recommended in the DRS have taken into account the development constraints and opportunities of the respective areas. They are meant to be compatible with the surrounding landscape and sustainable in environmental terms. Appropriate and sustainable tourism and recreation themes have been adopted for different tourism/recreation nodes so as to capitalize on the features, resources and heritage unique to those areas.
- Section 4.5.1.11 – Whilst the planning intention for South Lamma is to protect the ecological and environmentally important/sensitive areas by the designation of potential Country Park, SSSI and Potential Marine Reserve/Park, there may be possibility for some further compatible developments in North Lamma. The potential for tourism/recreation developments in this area is being examined in 'Planning and Development Study on Hong Kong Island and Lamma Island'. Apart from this, the ex-Lamma quarry site is proposed as a potential site for strategic sewage treatment facilities and other G/IC uses of territorial significance in the long

term. The feasibility, detailed design and implementation programme are still subject to separate investigation.

The Hong Kong 2030 Planning Vision and Strategy Final Report:

- Section 2.3.1(d) – Extensive and Proactive Public Involvement – Under the HK2030 Study, public consultation exercises have been conducted throughout the entire study process at a broad scale. This ensures that the findings or recommendations at each of the stages are responsive to public expectations before proceeding to a further stage. Allowing revisions and adjustments during the process based on the public comments will help build consensus on the broad planning directions, as well as promoting ownership amongst the community. – *The vast majority of those attending the three meetings have opposed development of the scale and nature proposed, and supported sensitive protection and appropriate, in character development, yet this is not accurately reflected by the project's interim summary.*
- Section 2.3.1(e) – Also various assessments in accordance with the sustainability criteria were conducted not only at the tail-end of the study, but also at the option selection stage. This had ensured that sustainable development concerns would come in at the early stage of proposal formulation so that there would be more room to improve the proposals.
- Section 2.5.5 – Third, we have been committed to conduct a series of detailed impact assessments on the preferred option, including a strategic environmental assessment. However, growing community aspirations for a better environment require that more substantiation be given to demonstrate that our environment will not be ruined by our future growth. We need to, rightfully, conduct deeper investigations on the potential environmental impacts of the preferred option in a quantitative manner, for instance, by means of computer modelling. – *Community acquiescence has been sort without data being adequately presented or reported.*
- Section 13.3.1 – The HK2030 Study is not meant to provide quick-wins or band-aid solutions to immediate issues. Rather, it serves to formulate a holistic and cohesive planning strategy that could lead ultimately to our vision and long-term objectives. In the absence of instant results, this

strategy must be set out as a pathway with clear signage to indicate where it is taking us; milestones (or checkpoints) to monitor progress; and escape routes (or response plans) to allow us to slide easily into an alternative path when needed.

- Section 13.4.16 – Stated as our nature conservation policy is “to regulate, protect and manage natural resources that are important for the conservation of biodiversity of Hong Kong in a sustainable manner, taking into account social and economic considerations, for the benefit and enjoyment of the present and future generations of the community.” To better protect Hong Kong’s rich biodiversity, further efforts are needed, including the efficient management of our development footprint and sensible use of non-urbanised land for development.
- Section 13.4.28 – We should continue to contain our urban growth with prudent use of undeveloped land and avoid intrusion onto “no go areas”.
- Section 13.5.22 – Earlier in 2001, the Planning Department completed a “Review of Rural Land Uses in Northern New Territories”. One of the recommendations was the introduction of the “Other Specified Uses” annotated “Rural Use” (“OU(RU)”) zone, with the main objective to preserve the rural landscape/character and to provide land for small-scale rural and passive recreational uses.
- Section 13.5.23 – We have instituted the policy framework and planning mechanism to achieve better preservation of our rural areas.

9. Address by the Chief Executive The Honourable C. Y. Leung on the 16th January 2013:

- Section 63(vii) – Since the latest income limit for subsidised housing is capped at HK\$40,000 a month ... – *Under the proposal the “private” part of the development will logically target purchasers with incomes in excess of HK\$40,000 pcm, sharply in contrast to the Government stated median income of HK\$12,000 pcm.*
- Section 73(x) – We will develop the former Diamond Hill Squatter Areas (Tai Hom Village), former Cha Kwo Ling Kaolin Mine, former Lamma Quarry and Anderson Road Quarry, which do not involve land resumption. –

With the exception of the Lamma Ex-Quarry the sites are all in urban/ industrial areas where redevelopment could be in-character rather than intrusive and environmentally disruptive, and where transportation and infrastructure links are well developed, cost efficient and convenient.

10. Statutory Outline Zoning Plan for Lamma Island

The general planning intention is to conserve the natural landscape, the rural character and car-free environment of Lamma Island; to retain Luk Chau in its natural state; and to enhance the role of Lamma Island as a leisure destination. The ecologically and environmentally sensitive areas including the Sham Wan SSSI, the South Lamma Island SSSI, mountain uplands, woodland and the undisturbed natural coastlines should be protected. Future growth of the settlement is limited to the existing villages and development nodes. The existing low-rise, low-density character of the traditional villages and other residential areas should be retained. Supporting Government, institution and community and open space facilities have been allowed for. Opportunities have also been provided for the enhancement of the waterfront of Yung Shue Wan and integrating recreational and visitor attractions. It is also the planning intention to preserve the cultural heritage of Lamma Island, which is one of the most ancient settlements in the territory. The heritage sites could also serve as visitor attractions to enhance the role of the island for conservation and as a leisure destination.

11. Initial Public Views collected in March to April 2012:

- Conserve the natural landscape, the rural character and the “car-free” environment of Lamma;
- Preserve the 5ha man-made lake for public enjoyment;
- Extensive housing not supported, though public housing could be explored – *Public Housing not economically viable given the infrastructure and travel costs;*
- Provide public and private housing – *The meeting of the 19th March 2013 concluded that “no acceptance of, or acquiescence to any project*

proceeding had been given by those present as no proposal had been presented.”

- Integrate the Study Site with the adjacent “Comprehensive Development Area” zone – *Part of this zone is understood to be owned by Bobby Li (the self styled “King of Lamma”) and/or the King Wong Development which reputedly owns some 3m sq ft of land on Lamma and is a major partner in the Baroque on Lamma project with Agile Property Holdings. The CEO of Baroque on Lamma, Cheng Yan-kee, is a long time TPB member and member of the Rural and New Town Planning Committee, yet he continues to oversee an application that challenges the entire raison d’être of the Lamma OZP.*

12. Community Engagement Activities in December 2012 to date – Summary of Major Views:

- Support for more intensive housing development for over 5,000 people, with affordable housing and supporting infrastructure facilities – *This statement is misleading in the extreme as a first response, the vast majority at each meeting opposed development of the type and scale proposed;*
- Also objection for housing development – *This was the majority view throughout;*
- Developed into an environmentally friendly community and respect local fishing culture;
- Hotel development is supported and some advocated for holiday camp type, with eco-education components – *Hotel development was supported by a small group at one of the three meetings – interestingly the same group who supported the discredited proposed development at Shek Pai Wan. Holiday camp activities were advocated by the YMCA, who hold an exclusive lease for that type of activity in the study area;*
- Reservation on marina – *The major objection to the marina concept came from the Rural Committee Chairman who labelled it “for rich people we don’t want here” and stated the pollution from visiting yachts would harm the fish culture zones (no mention was made of the impact from a massively*

increased ferry frequency and associated polluting sampan services plying from the site to Sok Kwu Wan);

- *The lake was a unique feature that should be protected – Unique? Doubtful as it's man made, but after 10 years it has ecological and environmental value as a freshwater feeding ground/resting area/watering hole;*
- *Improve access from the Study Site to Lo So Shing – This was advocated by those seeking the start of 'road building' on an island famous for its tranquil road-free environment. Interestingly it resonates with the application for Baroque which incorporated 136 car parking spaces, together with bus and lorry spaces, and even visitors spaces on an island with effectively no roads;*
- *Adhere to the sustainability principle and the Study should demonstrate that it is met – The word "sustainability" and the phrase "environmental protection" were bandied around by every group even those suggesting a far more extensive concrete pouring and building frenzy, although doubts were raised about their understanding of the words or the context of their use;*
- *Inadequate technical information and the public consultation period is too short and in holiday season – The complete absence of relevant, comprehensive, site specific reports on any of the fundamental issues to be addressed for this type of project make the consultation process a farce. The notice of the consultation period and the "marketing/sales pamphlet" were issued on the 7th December 2012 without forewarning of its contents despite continued requests. The period encompassed both the Christmas and New Year holidays and ends immediately prior to the Lunar New Year holidays, all periods when community attention is focused on family and in many cases overseas trips.*

13. Government has created a schism within the community on future land use in Lamma:

- *There is a clear disconnect between the aspirations of the community at large and those of the "community representatives", this was seen over the Baroque on Lamma proposal where the South Lamma Rural Committee was in favour and the population clearly opposed the development (the TPD*

decided in favour of those opposed to the project). That disconnect seems to be repeated over the issue of the Ex-Quarry site.

- The community representatives (Rural Committee and District Council members) are in part motivated by laudable aims:
 - The need to enhance medical facilities;
 - The desire to educate their children at Sok Kwu Wan (the school at Mo Tat has fallen into disuse);
 - The desire for diversified or alternative employment in an area dominated by a single restaurant group (Rainbow).
- Equally the community representatives appear motivated by false assumptions:
 - Hospitals – *they seem under the impression they will get a hospital at Sok Kwu Wan if the population is increased by virtue of this project. However, that will not be the case under the existing criteria since the average population per Health Authority hospital is 142,000, way beyond the 2,800-7,000 proposed;*
 - Employment – *5 and 6 star hotels don't employ vast numbers of 40-65 year old career fishermen, construction workers are likely to be imported onto Lamma, most other workers will be linked to big business not the Rural Committee;*
 - Massive increases in local business – *Unlike Yung Shue Wan, which has diverse attractions and retail facilities, Sok Kwu Wan has focused almost exclusively on one linked industry fish farming and seafood restaurants. If people don't want to regularly cross the bay from their self-contained retail, social and dining outlets in the project enclave, which is likely, then the financial gain from the development will be negligible for businesses.*

Conclusions

- The Chief Executive's Policy Address highlighted the priority to provide essential low cost housing where appropriate, whilst emphasising the importance being placed on territory-wide environmental protection;
- Lamma because of its total reliance on ferries, lack of major pre-existing infrastructure and its visionary OZP is fundamentally unsuitable for large scale (relative to its current structure) low cost development;
- Having stated the priority is for low cost housing and having ruled such housing out as an option on Lamma, it ill-behoves the Government to utilise resources on Lamma for a low priority development when those same resources could be directed to facilitate the housing of our most vulnerable citizens;
- Policy guidelines set out in the South West New Territories Development Strategy Review Public Consultation Report dated July 2001, the South West New Territories Development Strategy Review Recommended Development Strategy Final Report dated July 2001 and the Hong Kong 2030 Planning Vision and Strategy Final Report dated October 2007 have not been complied with or appropriately complied with;
- The decision to proceed to a public consultation based on three variations of a single concept in the absence of supporting evidence that it is viable economically, socially, ecologically or environmentally is fundamentally wrong. It disenfranchises those involved in the consultation and constitutes a manipulation of those involved to achieve a pre-determined result;
- The decision to conduct the public consultations over the Christmas and New Year Period was at least prejudicial to open dialogue and at worst an attempt at perverting the process by securing acquiescence by absence to a proposal that is flawed;
- The reporting of the consultation meetings has been disingenuous in that the implication from the summary is that there is significant support for the project. This is clearly untrue based on attendance and comments at the three community/public meetings all of which were recorded;
- Once more excessive reliance has been placed on the views expressed by the Rural Committees and District Council during the consultation despite the

fact that it is apparent these groups are clearly not representative. This is compounded by the fact that the representatives do not consult widely in an attempt to rectify the misalignment between their views and those of the community, and Government, despite being on notice regarding the disparity of views fails to address the issue by ensuring all stakeholders are treated equally;

- The only equitable and safe course of action is to restart the process and ensure these and future decisions made are proactively evidence-based, rather than retrospectively aligned to a predetermined result.

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