



長春社 since 1968

The Conservancy Association

會址：香港九龍吳松街 191-197 號突破中心 9 樓

Add.: 9/F., Breakthrough Centre, Woosung Street, Kowloon, Hong Kong

電話 Tel.: (852)2728 6781 傳真 Fax.: (852) 2728 5538

27th May 2011

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam

RE: Comments on the Section 12A Application No. Y/I-LI/1

The Conservancy Association (CA) strongly OBJECTS to Section 12A Application No. Y/I-LI/1. Building 900 residential units together with hotel and other marina facilities under plot ratio of 0.5 in an ecologically sensitive area with high scenic beauty should not be considered with respect to the ever increasing demand on environmental conservation and countryside preservation from the public. The recently strong opposition to the proposed development in Tai Long Sai Wan and Nam Sang Wai from the public clearly shows this. Approving this application would set an extremely poor example of in-appropriate development in our countryside.

Planning Intention

The current application quoted the South West New Territories (SWNT) Development Strategy Review as one of the justifications for its plan but completely ignored the emphasis of this Development Strategy Review on conservation. We consider this is unacceptable. Both land and marine area of south Lamma Island, according to the SWNT Development Strategy Review study, had high potential for designating as country park and marine park respectively. Introducing such an enormous scale of comprehensive development would threaten the entire ecological environment of south Lamma. On the other hand, according to the Lamma Island OZP, "*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". These planning intentions in the Lamma Island OZP should be kept.

Another planning justification of this application referred to the secret Planning and Development Study on Hong Kong Island South and Lamma Island in 2004. However, some items in this planning study are subject to review, such as Ex-Lamma Quarry Site next to So Kwu Wan. Using this planning study to justify the current application is not appropriate.

Green Turtle

CA disagree with the suggestion in this application on the potential light disturbance on green turtle by claiming that "The major lighting sources will also be pointed inward and downwards" and "Non-essential lighting will also be switched off in the middle of the night" (Paragraph 7.1.61). Strong scientific evidences are required in assessing the impact of artificial lightings on nesting green turtles. Some tracking research has indicated that green turtles often utilize coastal areas during migration between nesting and foraging grounds¹, while evidence of foraging in inter-nesting areas might also be expected on some individuals². The proposed hotel development within 200m of the nesting site on Lamma would still pose great threats on green turtles. The current application provides no concrete data showing that there will be no impact on the nesting green turtles in Lamma.

Romer's Tree Frog

Another species of significant conservation concern that is known to occur in the proposed development site is the Romer's Tree Frog (*Liuixalus romeri*). It is endemic to Hong Kong and listed as endangered in the IUCN Red List of Threatened Species³. This species occurs widely on Lamma and would likely occur widely in forested areas of the proposed development site. Some woodlands are subject to clearance for the proposed development which may be important habitats for this frog species⁴. Even AFCD has reminded that "Most of the Romer's Tree Frog sites on Lamma Island fall within "Conservation Area" on the Lamma Island Outline Zoning Plan"⁵. As most of the secondary woodland and

¹ Song X, Wang H, Wang W, Gu H, Chan SKF, Jiang H (2002) Satellite tracking of post-nesting movements of green turtles, *Chelonia mydas*, from Gangkou Sea Turtle National Nature Reserve, China, 2001. *Marine Turtle Newsletter* 97: 8-9

² Tucker, A.D., Read, M.A., 2001. Frequency of foraging by gravid green turtles (*Chelonia mydas*) at Raine Island, Great Barrier Reef. *Journal of Herpetology* 35, 500-503.

³ Michael Wai Neng Lau, Zhao Ermi 2004. *Liuixalus romeri*. In: IUCN 2010. IUCN Red List of Threatened Species. Version 2010.4. <www.iucnredlist.org>. Downloaded on **23 May 2011**.

⁴ Lau, M. W. N. and D. Dudgeon (1999) Composition and distribution of Hong Kong Amphibian fauna. *Memoirs of the Hong Kong Natural History Society* 22: 1-80.

⁵ AFCD (2006). Conservation. *Romer's Tree Frog*.

http://www.afcd.gov.hk/english/conservation/con_fau/con_fau_rom/con_fau_rom_con/con_fau_rom_con.html

shrubland zoned as Conservation Area in the Lamma Island OZP are within the proposed residential blocks and hotels, the proposed project would pose severe threats to Romer's Tree Frog.

Marine Ecology

It should be highly alerted that the scale of the marina at the northern site and the pier in southern site would be large and cause disturbance on marine environment both before and after construction phase. Past research conducted by the Civil Engineering Department have once mentioned that hard coral communities of high conservation value could be identified in southern Lamma, particularly Sham Wan and Tung O Wan⁶. CA remained skeptic that the marina-associated work during construction phase would adversely affect the coral communities which indeed exhibit high supportive role on diverse marine flora and fauna.

Besides, finless porpoise (*Neophocaena phocaenoides*), listed as "Vulnerable" in the IUCN Red List of Threatened Species and CITES Appendix I, could be sighted in water area within or near Lamma Island like Tung O Wan, especially in spring⁷. Provision of 500 berths in marina together with other tourist facilities would further increase marine traffic, ranging from watersports activities to yacht, within or even outside the marina. CA cannot see from the planning application that how disturbance on marine environment could be mitigated under such huge development scale.

Conservation Corridor

CA challenges the effectiveness of the proposed Conservation Corridor which claimed to benefit terrestrial ecology as the northern part of the corridor would be finally surrounded by massive residential development. It would likely end up being a landscaping feature for the proposed development rather than a conservation corridor securing wildlife habitat.

The purposes of the Conservation Corridor, according to paragraph 5.5.9 of the planning statement, range from conservation, restoration, research, education, enjoyment, bio-digestion of wastes, but some of them are indeed conflicting to each other. Owing to such fact, CA doubts the effectiveness of the Corridor, especially the part covering the abandoned farmland near Sham Wan to protect the nesting site of green turtle. Meanwhile, it should be also noted that road construction work would be carried out in the Corridor to

⁶ Binnie Consultants Limited (1995). Fill Management Study- Phase IV: Investigation and development of marine burrow areas: Marine ecology of Hong Kong / Report on underwater dive surveys (Oct. 1991 - Nov. 1994), Vol. 1-2. Report to Civil Engineering Department, Geotechnical Engineering Office.

⁷ AFCD (2006). Distribution & Abundance. Finless Porpoise. *Conservation*.
http://www.afcd.gov.hk/english/conservation/con_mar/con_mar_fin/con_mar_fin_fin/con_mar_fin_fin_dis_is.html

provide linkage to the proposed hotel. CA worries that the associated land formation and excavation work during construction period would add environmental burden to the site, especially excessive traffic flow after project completion.

Interpretation of Green Lamma Island

The planning statement keeps on introducing green elements in the project, such as renewable energy, bio-digestion waste facilities, electric vehicles, organic farm, and so on. CA however would definitely not accept these green innovation measures at the expense of a large area of ecologically-important environment as the project proponent totally distorts the concept of environmental protection. We are of the view that South Lamma should be designated as a country park rather than for yet another residential development (under the disguise of a sport facility).

Yours faithfully

Ng Hei Man

Senior Campaign Officer



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29th June 2011

Ms. Wong Sean Yee, Anissa

Director of Environmental Protection

Environmental Protection Department

Environmental Impact Assessment Ordinance Register Office

By e-mail: reo@epd.gov.hk

Dear Ms. Wong

RE: Comments on The Baroque on Lamma Project Profile

The Conservancy Association (CA) would like to submit comments in response to additional information from project proponent.

1. Road construction

Figure 1 of the additional information has illustrated road network covering both northern and southern portion of the site with the width of 7-12m (Paragraph 2.2.1 of Project Profile). Since various sections of the road would encroach to the proposed Conservation Corridor, it becomes highly doubtful if the Conservation Corridor could still perform its ecological function. CA would therefore urge the project proponent to demonstrate how ecological impact could be prevented and mitigated under such large scale of road construction work. We believe that any road construction work should be prohibited because it must lead to direct habitat loss, especially on mature secondary woodland in northern site, in construction phase and vehicular disturbance in operation phase.

2. Woodland

The cross-section plan in Figure 2 would not ease worries on potential adverse environmental impact from site formation work as tree removal within secondary woodland would be highly inevitable. CA is also concerned if some plants of

conservation interest, such as Hong Kong Pavetta (*Pavetta hongkongensis*) which can be identified along the existing hiking trail in northern site, would be recorded in future development area. A detailed assessment on existing shrubland and secondary woodland would be necessary with special attention on plants of conservation interests.

Regarding to compensatory planting, if any, the general principle of compensating ecological function of habitat loss should be upheld. Compensatory planting of trees in terms of quantity only would not re-create an equivalent ecological value of a habitat suggested in EIAO Guidance Notes (GN 6/2010). Meanwhile, CA should highlight that woodland compensation should be a secondary and inferior option to “avoidance”.

3. Conservation Corridor

CA notices that eco-trail walk would be held along or within the proposed Conservation Corridor. It however remains questionable if it implies increasing human activities which might be further intensified after improving land transportation mentioned in point 5 of additional information, and causing disturbance to existing wildlife. CA thus further challenges the effectiveness of this Conservation Corridor in conserving and preserving ecological environment. Under such circumstance, the project proponent should even explicitly state direct and indirect loss of habitat components within the Conservation Corridor to reveal better scene of this conservation measure.

Yours sincerely,

Ng Hei Man

Senior Campaign Officer