



香港觀鳥會有限公司
THE HONG KONG BIRD WATCHING SOCIETY Limited

認可公共性質慈善機構 Approved Charitable Institution of Public Character

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Director of Environmental Protection
Environmental Protection Department
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Wanchai, Hong Kong
(Email: eiaocomment@epd.gov.hk)

25 May 2011

Dear Director,

Comments on Project Profile for The Baroque on Lamma (ESB-229/2011)

The Hong Kong Bird Watching Society (HKBWS) would like to address our concerns and comments regarding the Project Profile for the Baroque on Lamma.

1. Ecological impacts

- 1.1. The proposed development would lead to a loss of 690,000 m² of natural habitats (zoned under “Conservation Area” and “Coastal Protection Area”) and significant degradation of ecological value of 163,520 m² of land (zoned as “Agriculture”). The Conservation Area was stated by the Government as having “high ecological value”¹. The EIA report needs to prove that whether the impacts would be avoided by considering real alternatives (e.g. potential sites identified by the applicant in its TPB submission)², as well as measures to minimize the impact. It should also prove that adequate habitat compensation can be done to compensate for the loss of the land zoned “Conservation Area” which is of high ecological value³. The EIA report should also fulfil the requirements of EIAO-TM which states “Areas and/or habitats of ecological importance shall be conserved as far as possible”⁴
- 1.2. The proposed development (according to the information supplied in its Section 12A application under the Town Planning Ordinance) is completely surrounding the proposed “Conservation Corridor”, leading to significant habitat isolation by

¹ Approved Lamma Island Outline Zoning Plan No. S/I-LI/9, 8.11.2

² P. 16 of the “HKSAR wide Marina Site Search” provided by the applicant in its TPB application

³ EIAO-TM, Annex 16, Section 5.4

⁴ EIAO-TM, Annex 16, Section 3.1

cutting the ecological linkage between the proposed “Corridor” and surrounding hill sides. Several Roads are also proposed to be built across the “Corridor”, causing further habitat fragmentation. The EIA report needs to account for the impact due to habitat isolation comprehensively;

- 1.3. It is also anticipated that the biodiversity in the area would be subject to human disturbance, light disturbance, noise disturbance, road kill, water pollution and damage caused by weed and insect control in addition to habitat fragmentation and isolation, which needs to be assessed in the EIA report;
- 1.4. The proposed project would also limit the natural succession in the area, causing further loss of biodiversity in the future. The impact should be addressed by the applicant and a projected baseline condition should be provided.
- 1.5. The EIA report should include a comprehensive study of White-bellied Sea Eagle, a species of regional concern and high conservation interest⁵ which utilizes South Lamma and breeding activities has been observed. The breeding success of the species is threatened by the cumulative impacts of developments on outlying islands and shorelines, including the proposed waste treatment facilitates and offshore windfarms.

2. Need of project and Site Selection

- 2.1. The applicant provided a site selection study in its application under Town Planning Ordinance, which identified several potential sites for the proposed development². All potential sites should be included in the EIA report as a part of consideration of alternative sites based on the precautionary principle of EIAO⁶;
- 2.2. The proposed development is very close to a Site of Special Scientific Interest and would encroach into proposed land area for potential Country Park⁷, and affecting habitats for species of conservation interest (e.g. Romer’s Tree Frog);
- 2.3. It should also be noted that the proposed project do not involve overriding public interest.

The HKBWS respectfully requests the Environmental Protection Department to consider our comments above, and include appropriate requirements in the study brief to be issued. Thank you for your attention.

⁵ Fellow, J. R. et al. (2002). Wild animals to watch: terrestrial and freshwater fauna of conservation concern in Hong Kong. In Hodgkiss, I.J. (ed.). Memoirs of the Hong Kong Natural History Society, No. 19, Hong Kong. pp.123-159.

⁶ EIAO Guidance Note No. 1/2002

⁷ Planning Department, 2001, SWNT DSR Recommended Development Strategy;