



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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Secretary, Town Planning Board
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333 Java Road, North Point, Hong Kong
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26 May 2011

Dear Sir/Madam,

Objection on Application for Amendment of Plan on Lamma Island (Y/I-LI/1)

The Hong Kong Bird Watching Society (HKBWS) would like to raise our objection in the strongest terms on the Application for Amendment of Plan on Lamma Island (Y/I-LI/1) based on the following reasons:

1. Justification for the rezoning

1.1. The applicant claims that the proposed development aims to “protect local biodiversity”¹. However, The proposed development would:

- a) Destroy 260,000 m² of terrestrial habitat (currently zoned as “Conservation Area” and “Coastal Protection Area”) of recognized high ecological value² and high scenic value³;
- b) Destroy 430,000 m² of marine habitat;
- c) Cause a significant degradation of ecological value of 163,520 m² of land currently zone as “Agriculture”;
- d) Result in 853,520 m² of largely natural and sensitive habitats being turned to land zoned for development, affecting many species of conservation interest;
- e) Thus cause significant and unacceptable ecological impacts to the area and surrounding (including SSSIs) that are under-estimated or not even addressed by the applicant (refer to below).

This is contradictory to the claim in the planning statement of the proposal and contradictory to the general planning intention of Lamma island OZP which is

¹ Refer to 1.1.(c) of the Planning Study

² Approved Lamma Island Outline Zoning Plan No. S/I-LI/9, 8.11.2

³ Approved Lamma Island Outline Zoning Plan No. S/I-LI/9, 8.12.2

“to conserve the natural landscape, the rural character and car-free environment of Lamma Island; ...The ecologically and environmentally sensitive areas including the Sham Wan SSSI, the South Lamma SSSI, mountain uplands, woodland and the undisturbed natural coastlines should be protected”.⁴

- 1.2. The applicant provided a site selection study which identified several potential sites for the proposed development⁵. Thus, there is no strong justification for a proposed rezoning on the suggested location which deviates from the original planning intention of the Lamma Island OZP;
- 1.3. The Planning Intention of the “Conservation Area” was “to protect and retain the existing natural landscape, ecological or topographical features of the area for conservation, education and research purposes” and to “separate sensitive natural environment such as Site of Special Scientific Interest from adverse effects of development”⁶. “CA” is the most suitable zoning for acting the purpose of protecting the Sham Wan Site of Special Scientific Interest (SSSI) as well as the natural environment. A development zoning (“Comprehensive Development Area”) just next to a sensitive SSSI is inappropriate;
- 1.4. The proposed rezoning would encroach into proposed land area for potential Country Park⁷;
- 1.5. In conclusion, the suggested rezoning is not compatible with the surrounding and is not in line with the general planning intention of Lamma Island.

2. Unacceptable Environmental Impacts

- 2.1. The proposed development would lead to a loss of 690,000 m² of natural habitats of recognized ecological/landscape value and significant degradation of ecological value of 163,520 m² of agricultural land;
- 2.2. The proposed “Conservation Corridor” was originally land zoned as “Agriculture” and has a higher ecological value as claimed by the applicant. However, the proposed development is completely surrounding the “Corridor”, leading to significant habitat isolation by 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. However, the impact of habitat fragmentation was suggested to be “minimal” by the consultant⁸. With the loss of land with recognised ecological and landscape

⁴ Approved Lamma Island Outline Zoning Plan No. S/I-LI/9, 7.1

⁵ P. 16 of the “HKSAR wide Marina Site Search”.

⁶ Approved Lamma Island Outline Zoning Plan No. S/I-LI/9

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

⁸ Section 7.8.3 of the ecological assessment supplied by the applicant

- value, the claim is totally inconsistent with the impacts easily foreseeable;
- 2.3. It is also anticipated that the biodiversity in the area would be subject to human disturbance, light disturbance, road kill, water pollution and damage caused by weed and insect control in addition to habitat fragmentation and isolation. All of these suggest the proposed development is completely unacceptable as it would cause significant and unacceptable ecological damage in various means;
 - 2.4. The bird list provided by the consultant⁹ was poorly prepared and presented with species duplicating, misspelling and outdated nomenclature. There is also a confusing and incomprehensible statement in the main text “the survey identified 44 and 51 species”, which is not in line with the bird list in the Annex. Moreover, the consultant claimed that they have referred to records from HKBWS but it did not state what records they have made reference to. According to the preliminary bird record prepared by HKBWS, at least 117 species has been recorded in the area which is about 2 times of the number recorded by the consultant;
 - 2.5. White-bellied Sea Eagle, a species of regional concern¹⁰, utilizes South Lamma² and breeding activities has been reported. The breeding success of the species is threatened by the cumulative impacts of developments on outlying islands and shorelines, including the proposed waste treatment facilities at Shek Kwu Chau and the off-shore wind farms;
 - 2.6. To conserve an area of ecological concern, a buffer area should be set around the core area to minimize disturbance and offer better protection. The current proposal is suggesting the reverse, which is proposing a large-scale residential development completely surrounding the “Corridor” and adjacent to the Sham Wan SSSI;
 - 2.7. The Sham Wan SSSI would be subject to disturbances such as light, and disturbance by increased visitors to the beach during non-breeding seasons when entrance is not restricted;
 - 2.8. It is also unclear how a terrestrial “conservation corridor” would help conservation of breeding green turtles;
 - 2.9. Thus, the proposed development and associated rezoning would destroy the landscape value and ecological value of the site and the nearby, harming vast public interest.

⁹ Table 4, Annex A-20-21 of the ecological assessment

¹⁰ 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.

Based on the above reasons, the HKBWS respectfully request the Town Planning Board to reject the proposed change of zoning and proposed development. Thank you for your attention.