

Director of Environmental Protection
Environmental Protection Department
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23rd May 2011

Re: Comments on EIA Report Reference 0116093 - ESB229/2011
The Baroque on Lamma: Project Profile May 2011

Living Lamma promotes environmental improvement and sustainable development on Lamma Island. Our group currently has more than 300 members and many more supporters in the community.

We believe that the impact assessment, submitted by ERM on behalf of their client BoL Limited, has been written with little understanding many of the real environmental challenges facing Lamma. Critically, it fails to question the track record of the developer, which has no proven ability in designing and implementing environmentally sensitive projects.

Living Lamma is strongly opposed to this project for the following reasons:

1. The proposed development contradicts the Planning Department's statement on South Lamma, which Living Lamma supports:

"The natural coastline, vegetated areas, conservation areas and sites of archaeological and historical interests would be conserved as far as possible particularly in South Lamma."

"Our plans also acknowledge the importance of protecting the coastal waters of South Lamma as marine parks/reserves, with a view to preserving the ecologically sensitive habitats for important species of flora and fauna for both conservation and educational purpose." (Planning Department's website)

2. The identification of the coastal waters off South Lamma as "potential Marine Parks/Reserves" is repeated on the EPD's website. Though it is further noted that these waters may be used for sustainable water-based recreation activities, we do not believe that the proposed development under discussion would be appropriate in either scale or scope, and in fact will just add to Hong Kong's environmental problems.

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3. The proposed development submitted by BoL Limited to the Town Planning Board include 900 flats, a hotel, a 500-berth marina, 30,000 square feet of commercial space and 135 private car parking spaces, 20 coach parking spaces, 6 lorry parking spaces, 2 maintenance vehicle parking spaces, 3 staff parking spaces and 2 guest parking spaces. We do not believe the environmental and landscape impact of this development can be “mitigated” to an acceptable level. South Lamma’s ecological and landscape is too valuable to be developed in this way. The fact that Lamma is a car-free environment demonstrates the insensitivity of the company’s proposal.
4. The company attempts to “greenwash” its presentation by inserting pictures of Portofino in Italy and elsewhere, which have nothing to do with the developer. Computer generated photographs and pictures of other places also dominate the company’s website. We would urge government to look closely at the company’s track record of development for evidence of environmental friendliness and sustainability. We believe the developer has no proven ability in designing and implementing environmentally sensitive projects.
5. Lamma residents have lived with another of the company’s developments on the north side of Lamma. This has been more than 10 years in development and can be viewed as a failed attempt to create luxury housing on Lamma. These properties are lacking in environmentally friendly features. In addition, during the last 10 years, residents have witnessed the dumping of construction materials, workers lunch boxes and other rubbish on the neighbouring beach.
6. Indeed, ERM’s project profile claims:

“With the implementation of general good construction site practices and proposed waste management initiatives, it is envisaged that the construction and operation of the Project will not cause adverse waste management.”

Over the last 2 years, Living Lamma has investigated waste management practices on Lamma and found them to be one of the major causes of environmental problems. Incidences of dumping of construction waste continue to rise and, wherever construction is found, litter is left behind.

Our group conducts clean ups along the side of paths where contractors have been at work and regularly finds bottles of water (often mostly full), cigarette packets, lunch boxes tied in plastic bags, used buckets with cement, batteries and even old boots that have been tossed down the hillside.

We have found that reporting such activity so far has little impact. The government department responsible or the company will blame the contractors, but little positive action is taken. In one case, when the littering was reported we found that the contractors had simply gone back and thrown the waste further down the bank making it impossible to retrieve safely.

Even the daily operation of removing the significant amount of waste that will be generated by this development is “not envisaged as a key concern.” This is unrealistic. Lamma (and indeed Hong Kong) does not have the infrastructure or the practices in place for this not to be a chief concern.

7. The value of South Lamma as a natural resource for Hong Kong residents and visitors far outweighs the benefits that this project claims to bring. South Lamma is well-known for its animal and birdlife, its vegetation and geological features. Though the company claims that it will not impact on sensitive ecology, the scale of the project leaves no doubt that neighbouring habitats will be affected by its construction and operation.
8. Hong Kong already has woeful problems with pollution on the land and at sea. We hope the government will not add to these problems by supporting a project that will destroy existing habitats, ruin beautiful landscape and further exacerbate marine pollution.

Should you require any further information, please contact us. Our contact details are included at the bottom of the page.

Yours sincerely

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Chairperson
Living Lamma