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27th June 2011

Re: Planning and Engineering Study on Future Land Use at Ex-Lamma Quarry Area at Sok Kwu Wan, Lamma Island – Feasibility Study

We are writing to object to the scope of the “Planning and Engineering Study on Future Land Use at Ex-Lamma Quarry Area at Sok Kwu Wan, Lamma Island – Feasibility Study” project profile under inspection from 15/06/11 to 28/06/11.

On 23rd May, Living Lamma and other environmental and design concern groups met with CEDD and the Planning Department (the panel) regarding this study. At that meeting, the panel denied that the study would be focused on housing development, despite specifically being asked if this was the intention. Instead, they said that the project was at the preliminary stage and that alternative uses would be considered, “which might include residential development.”

This position is set out in IDC Paper 32/2011, which states: “The overall objective of the study is to examine the future land use of the ex-Lamma quarry area **including residential and other compatible uses.**”

The project profile submitted to the EPD now states: "Planning Department (PlanD) and CEDD will jointly commission the Study to examine the development potential of the Study Site for **predominantly residential use with compatible developments.**"

We have since spoke with Ivan Chung, District Planning Officer/SK&Is, who restated that the study scope was open to all uses and not for “predominantly residential use.” We have alerted him and David Lo, Chief Engineer/Islands that the EIA project profile, therefore, contains a serious error, which should be rectified.

Living Lamma raised other concerns about the intended scope and organization of the study and we are still in discussion with CEDD on these

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points. Living Lamma draws on experience from other ill-conceived projects that have resulted in the erosion of the natural environment and rural character of Lamma. These concerns are relevant to the application of an EIA study and are repeated here:

1. Planning Intention

Lamma is currently under significant development pressure, which could seriously damage the natural environment and rural character of the island. We would therefore ask that any future possible uses of the quarry be measured against the stated planning intention for Lamma, which is:

“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.”

(Statutory Outline Zoning Plan for Lamma Island)

Following these guidelines, it is questionable whether the development of the quarry site for residential purposes would be permissible. It is a significant walk from the nearest existing village and a large portion is covered in woodland. Though there is a CDA within the quarry, which currently has commercial buildings associated with the site, this does not constitute a village. Though the OZP does stipulate that land zoned as CDA is intended for low-rise, low-density development, it would be unrealistic to assume that this would equate to public housing. Public housing should, therefore, not be considered in any study on the future use of the quarry.

2. Supporting and Enhancing Rehabilitation

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Viewed from Sok Kwu Wan, CEDD has done a fine job rehabilitating the quarry site. Visitors look across the bay to see a small forest. We hope any study on the future use of the Quarry will be bound by the intention expressed on CEDD's website:

"In the course of quarry rehabilitation, the slopes are re-vegetated extensively with suitable vegetation with a long-term objective of creating anticipated climax vegetation communities that will blend ecologically and aesthetically with the surrounding natural vegetation and providing favourable habitats for wildlife."

Other uses that conflict with this intention should be excluded by the study. We have received information from other green groups that government planted mainly exotic "pioneer" species with low conservation value on the site. These are necessary to secure the soil for further planting of local species, which would fulfill the intention of the quarry rehabilitation as stated in the CEDD's statement above.

3. Project Leadership and Approach

There have been many government projects carried out on Lamma in recent years, which have resulted in eyesores and created environmental problems on Lamma. The replacement of a stream with a stinking, ugly, concrete nullah that has defaced the harbourfront and caused silt to back up into the Yung Shue Long valley and the removal of public seating for an unsightly, large digital clock are two examples. The approach to bike parking problems (pouring concrete over the last remaining bit of natural shoreline in Yung Shue Wan) and the insensitivity of the reclamation proposal has shocked the community. Government's inability to respond well to community requests for better design and environmental improvement has not inspired confidence that CEDD and Planning are suitable project leaders of the quarry study.

We have yet to see any evidence that government is able to conceive of development projects that could enhance the role of Lamma Island as a leisure destination and provide for the enhancement of the waterfront of Yung Shue Wan, while retaining its rural character. So far, we have seen little evidence that government is able to respond to suggestions for more sensitive, rural design. Indeed, the approach has been to pour concrete regardless of existing features or uses.

Any study on the quarry should, therefore, stipulate that future development

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should be based on principles of sustainable, rural design. This commitment should be supported by ensuring that those involved in commissioning the study and in undertaking it have relevant experience in sustainable design and development in rural areas. We do not believe that CEDD and Planning have demonstrated the right skills and experience to lead the study on the quarry. Rather there should be a study committee made up of representatives from Sports Development, Tourism, Conservation, Planning and CEDD, and perhaps HAD. The chair of the committee should have experience in sensitive rural development

4. Example of Previous Feasibility Study

We provided CEDD/PlanD with a previous feasibility study on developing part of the Quarry as a cricket ground. Lamma Cricket Club commissioned the study in 2006, and though the plan was found to be feasible, it was unable to go ahead because of the 3-year tenancy allowed by the Lands Department. We would guess that for the area to be properly developed for recreational use, a long-term arrangement would be necessary. It would, therefore, be advisable to involve the Lands Department at an early stage as restrictions on tenancy terms could prevent suitable development of the site. All bureaucratic restrictions to quarry development and usage should be made public at an early stage of the study, so that efforts can be made where necessary to approach the appropriate policy heads

5. Dumping and Rubbish

Finally, we provide an observation on the use of the term "low ecological value", which was used in relation to the quarry site. In the last few years, incidences of dumping have increased on Lamma. Our group has also closely monitored littering off the pathways by contractors and others. Though we have organised many clean ups, the litter reappears as there is a general presumption that vegetation has no value unless it is marked as a site of special scientific interest.

We face an upward struggle to clean up Lamma's environment and we would caution the labelling of areas as low in ecological value as this provides a green light for behaviour that is detrimental to Lamma's environment as a whole. Contractors seem to regard any green space as suitable for dumping, and as we discovered with the Yung Shue Long case, which dumped rubble and other waste on agricultural land containing Romer's tree frogs, it is impossible to rehabilitate the land once dumping has taken place.

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We hope EPD finds these comments useful in consideration of the EIA study brief for the Planning and Engineering Study on Future Land Use at Ex-Lamma Quarry Area at Sok Kwu Wan, Lamma Island – Feasibility Study. We have asked CEDD and PlanD to address these concerns. While we have had a partial response from David Lo, Chief Engineer/Islands, these have yet to translate into appropriate commitments. We hope their application for an EIA study brief will be amended to reflect these concerns.

Living Lamma
June 2011

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