



長春社 Since 1968

The Conservancy Association

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9th August 2017

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 Draft Lok Ma Chau Loop Outline Zoning Plan (No. S/LMCL/1)

The Conservancy Association OBJECTS to Draft Lok Ma Chau Loop Outline Zoning Plan (OZP) (No. S/LMCL/1).

1. Development scale

LMC Loop is an important migratory bird corridor and also a habitat for Eurasian Otters. As such, CA would like to reiterate that the development intensity of the site is too high. The plot ratio is still maintained in 1.37, but the proposed/ planned plot ratio for development within the Deep Bay area is usually very lower than 0.4, such as the development site in Wing Kei Tsuen, Wo Sang Wai development, Lin Barn Tsuen, and so on. We cannot be convinced that 1.37 is acceptable in such an important ecological area.

It is doubtful whether the compensation and mitigation measures as stipulated in the EIA report can achieve what the project proponent claimed that the project could strike a balance between conservation and development. There were still flight lines

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above the core Loop area, and the flight lines being affected ranged from 4% to a maximum of 41%¹. We opine that the building height should be significantly reduced.

2. Buffer zone

With reference to Figure 4 of this Draft OZP, the 50m-wide buffer zone does not fully extend to the southern fringe of Planning Area 6 and 10 abutting the proposed Ecological Area (EA). The maximum height of the G/IC zones in Planning Area 6 and 10 are 15 and 25mPD respectively, and they will be highly exposed to the EA. Another OU (Sewage treatment work) in Planning Area 4, with maximum height of less than 15mPD, also shares the same condition. We worry that without any buffer zones for the 2 G/IC zones and the OU zone (Sewage treatment work), the flight corridor of migratory birds would be adversely affected.

Despite provision of the 50m-wide buffer zone, we are doubtful of its effectiveness. The internal 25m buffer zone would allow buildings and their height will be restricted to 14mPD. The EIA report of the Development of LMC Loop claimed that birds could tolerate building height of 14mPD² as birds fly over village buildings of similar height; but it also admitted that *“the proximity of LMC Spur Line also provides a considerable disturbance impact”*³ despite provision of ecological compensation to mitigate the impact. Given that the height of the LMC Spur Line viaduct is only 9m to 10m, the impact of the buildings in the buffer zone could be underestimated. Even the report stated that *“As birds are currently able to tolerate such development at Ha Wan Tsuen, it is reasonable to suppose the same will apply in areas bordering the Ecological Area”*⁴, the source and nature of disturbance are different and we do not agree that the case in Ha Wan Tsuen is fully applicable in LMC Loop.

The EIA report has argued the reason of no buffer zone for that particular G/IC zone in Planning Area 6 by stating that *“Given that the width of natural habitat between there and the existing boundary fence road is wider at this point than elsewhere along this section of LMC Meander, it is considered any impact from a higher building height will be offset by the greater width of undisturbed adjacent habitat available”*⁵.

¹ Please refer to Table 12.67d, Development of Lok Ma Chau Loop EIA Report

² Section 12.7.7.1, Development of Lok Ma Chau Loop EIA Report

³ Section 12.7.10.1, Development of Lok Ma Chau Loop EIA Report

⁴ Section 12.7.7.1, Development of Lok Ma Chau Loop EIA Report

⁵ Section 12.7.7.1, Development of Lok Ma Chau Loop EIA Report

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However, what the EIA did not take into consideration is the loss of fishponds within the buffer due to unauthorized development. Recently pond filling activities had been observed in the ponds just next to the boundary road (Figure 1). This would narrow the flight path and cause disturbance to migratory birds. In this case, a wider buffer zone is important to ensure greater undisturbed flight path.

We suggest that (Figure 2):

1. Buffer zone should be extended to all lands abutting the proposed EA, including OU(Research & Development, Education, Cultural & Creative Industries), OU(Sewage treatment works), O and G/IC zones
2. No buildings should be allowed in the buffer zone, including the internal 25m buffer zone

Yours faithfully,

Ng Hei Man

Campaign Manager

Figure 1 Recently pond filling activities had been observed in the ponds just next to the boundary fence road

要聞 港聞 經濟 娛樂 社評 觀點 中國 國際 教育 體育 副刊 英文 作家專欄 深度報導

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2017年7月31日 星期一 下一篇 ▶

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Figure 2 The buffer zone should be extended (marked in red). No buildings should be allowed in the buffer zone, including the internal 25m buffer zone



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