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Your ref:

29 June 2010

Clerk to Subcommittee on Country Parks
(Designation) (Consolidation) (Amendment) Order 2010
Legislative Council Secretariat
3/F Citibank Tower
3 Garden Road
Central, Hong Kong

By Fax (2869 6794) & By Post

Dear Sir/Madam,

The Legislative Council of Hong Kong Administrative Region
Submission to the Subcommittee on Country Parks (Designation) (Consolidation)
(Amendment) Order 2010

In response to the Subcommittee's invitation, the Corporation, as the company responsible for the LOHAS Park development, which will provide housing for a population of about 58,000 close to the South East New Territories (SENT) Landfill site at a distance of only 850 metres, makes this submission to object to the excise of 5 ha of land of the Clear Water Bay Country Park for the extension of the existing SENT Landfill, effectively extending the operation of the SENT Landfill for another 6 years from 2013.

Nature and Reasons for Objection(1) Protection of the Country Park

The excise of 5ha of land from the Country Park for landfill purpose is clearly against the principle of preserving the Country Park land for recreation, tourism and protection of vegetation and wild life as stipulated in the Country Parks Ordinance. It is also against growing public aspiration for a greener environment. We understand from the press that the then Country and Marine Parks Board Chairman Professor Chau Kwai-cheong, after the decision was made to excise the concerned 5 ha, was quoted as saying, "none of us like to see this happen as we all know this is detrimental to our environment and country park ecology." (See report in *The Standard*, 27 May 2007).

If this principle of protecting land in the Country Park is violated for landfill purpose, it may set a bad precedent and open the floodgate for future encroachment of the Country Park by further landfill extensions and other undesirable development activities.

(2) Proximity of SENT Landfill to Populated Area

Compared with other major landfill sites in Hong Kong, including the West New Territories (WENT) Landfill and the North East New Territories (NENT) Landfill which are situated in rural, sparsely populated areas, SENT landfill has the potential to cause greater environmental concerns as it is located within an urban, densely populated Tseung Kwan O new town of about 445,000 persons upon full development.

Given the nature of the landfill operation, environmental nuisance in terms of odour due to close proximity to the residential and working communities is inevitable. We understand that many complaints have been lodged by local residents to Environmental Protection Department and this issue of landfill odour is constantly on Sai Kung District Council's agenda as a major community concern.

As TKO has grown from a small population to currently a sizeable new town of over 350,000 persons, the impacts of SENT landfill on people's livelihood become more significant and this nuisance should not be allowed to continue into the future. This is a reasonable expectation of local residents and an appropriate decision of the Government when the existing SENT Landfill ends its operating life in 2013 as originally planned.

Noting that odour nuisance is difficult to control and remedy, the proposal to extend the landfill operation for a further 6 years, by extending the SENT Landfill into the Country Park and consumption of formed industrial land, will expose the already large, and fast growing population to the environmental nuisance for a prolonged period which is highly undesirable.

(3) Nuisance from Transportation of Waste

Without any bypassing route, high volume of refuse collection vehicles carrying waste from different places in Hong Kong pass straight through the core of the TKO new town to reach the SENT landfill site everyday. Transportation of waste inevitably causes environmental nuisance, such as odour and dropping of waste, to sensitive receivers en-route, including nearby residents and workers, schools, community facilities, etc. In addition, associated environmental impacts such as increased traffic movements, vehicular emissions and traffic noise are also caused to the new town. Extension of the SENT Landfill partly as a result of the excise of the Country Park land will mean that such adverse impacts on a large population in the new town from the transportation of waste will continue for another 6 years.

(4) Against Government's Objective of Quality Planning in Tseung Kwan O

TKO New Town forms part of Sai Kung which is characterized by its natural greenery and scenic environment thus long been regarded as "the back garden of Hong Kong". As part of the effort to capitalise on the natural landscape setting, Government in 2005 completed a major urban design study for the remaining new development areas in the TKO Town Centre South, Tiu Keng Leng and Pak Shing Kok areas with sweeping planning changes "appropriate to the unique development context of a waterfront and valley setting of the New Town..." introduced to "...promote a positive public image of the New Town" (extracted from Section 7 of the Explanatory Statement of the Outline Zoning Plan). These changes to improve the living environment and image of TKO were generally supported by the community and subsequently incorporated into the OZP for implementation.

The proposed extension of the SENT Landfill by taking away 5 ha from the Country Park and converting 15 ha of valuable industrial land will work against these efforts to achieve better planning for the new town and provide a more pleasant living environment for its residents.

(5) Better Solution for Waste Disposal Needed

In “A Policy Framework for the Management of Municipal Solid Waste in Hong Kong” presented to Legislative Council Panel on Environmental Affairs on 15 December 2005, Environmental Protection Department recognised that “using landfills as the only means of disposal of municipal solid waste is clearly not sustainable” and a comprehensive strategy for solid waste management including waste reduction, recovery and new method of disposal was recommended as the suitable solution to the waste problem. We expect the related waste management measures to be put into effective implementation.

While landfills are, understandably, still needed as the final means of disposal, we consider that Government should be very careful in making decisions on extending existing landfills, and identify new potential landfill sites when necessary, with due regard to their site characteristics as well as waste transportation route, so that the people affected will be kept to the minimum. SENT Landfill, in close proximity to populated housing estates in TKO with refuse collection vehicles plying through the new town, is clearly not an acceptable choice.

In view of the above reasons, we object to the excise of 5ha land of the Country Park as part of the SENT Landfill extension. EPD is requested to investigate other alternatives.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Steve C. Yiu'.

Steve C. Yiu
Head of Town Planning