



香港地貌岩石保育協會  
Association for Geoconservation, Hong Kong

## South East New Territories (SENT) Landfill Extension – Environmental Impact Assessment Report

Association for Geoconservation, Hong Kong (“AGHK”) would like to express our concern with regards to the SENT Landfill Extension. We refer to captioned report and have the following comments:-

### Section 10 Landscape and Visual Impacts

- 1) Encroachment on Country Park –it is stated that “only 5 ha out of the total 50 ha of the extension encroached into the Country Park will in the short term conflict with the country park objectives relating to “nature conservation”. In the long term when the extension is restored and landscaped, the landscape quality would be improved and the conflict with the country park objective will diminish”. However, such argument fully reflected that EIA has totally neglected **Natural Landscape is under “Nature Conservation”**. The upper and lower ridge east of TKO Area 137 and the Clear Water Bay Peninsula Coastal Uplands are highly sensitive to change. The mitigation measures will never restore their natural landscape character. The visual impact will also be adversely affected. **There is no justification if our nature landscape would be damaged and lost forever no matter how small the percentage.**

Substantial part of the natural coastline of Clear Water Bay Country Park had already been lost due to the development of the SENT Landfill and the reclamation of TKO Area 137. The extension indicates that the Government has been repeatedly setting very bad example of progressive adversely impacting our environment.

- 2) Total neglect of geological conservation – in the Literature Review of Ecological Characteristics of the Study Area and the Environmental Legislation and Guidelines, the EIA has not mentioned about the study of geological impact of the construction of the extension. The only description about geology is in 10.5.1, the EIA briefly describes “the study area lies on volcanic rocks (mainly acid lavas and tuffs) of the Repulse Bay formation during the Mesozoic period.”

Fissure vents have been recognised in the southern part of the Clear Water Bay Peninsula. They are defined as the opening at earth’s surface of a volcanic conduit having the form of a crack or fissure (Source: Memoir No. 4, Geology of Sai Kung and Clear Water Bay, HK Geological, GCO 1990). The Hong Kong Geological Map, 2001 edition also mark the volcanic fissure vents in the western shore of Tai Miu Wan, near Tin Ha Au. Volcano associated quartz monzonite dyke intrusions, extending in a linear form from west to east to the shore near Clear Water Bay Golf Club, are present. EIA has not considered whether the construction of the extension would have



any impact on the geological heritage, not to say drawing the public attention. These features depict Hong Kong geological history, once destroyed, they could never be restored.

### Section 2.3.2 Options Evaluation

- 3) Cost Effectiveness – the EIA does not provide adequate information on the calculation of estimated construction cost and additional lifespan. Detailed explanation has not been given on the reasons why the estimated construction cost (HKD per tonne of waste).of Option 1a and 1b is 7x (HKD350) and 4x (HKD200) higher than Option 3b (HKD50). The presentation tends to induce readers to conclude Option 3b is the best option.
- 4) Additional Landtake in TKO Area 137 – it is stated that due to high demand of land in TKO Area 137, additional allocation of land is not feasible. The survey failed to fill the information gaps of why there is high demand of land in the area. Our population only grew by 0.8% to 6.9 million in 2007 (Source: Feb. 2008, Census and Statistics Department: Population Growth by Component). Population is projected to grow by 1.08% to 7.5 million in 2017, a further 1.08% to 8.2 million in 2027 and then 1.05% to 8.6 million in 2036. (Source: July 2007, Census and Statistics Department: Projected mid-year Population by Age Group and Sex 2007-2036) In addition, according to the Indices of Industrial Production by Industry Group - All manufacturing industries, the year on-year % change of Q3 of 2007 is -2.1% (Source: Mar. 2008, Census and Statistics Department). EIA's Further Development of Tseung Kwan O, July 2005 ("the Project") also stated the preferred development option is to consider reduced residential density in TKO and the remaining area of TKOL. Furthermore, it is preferred to trim down the ultimate population at TKO to around 450,000 as compared to around 480,000 as outlined in the current OZP.

Based on these announced figures, is the actual demand of land in TKO as high as originally estimated? Can the Government consider diversifying the planned industrial development (which requires marine access) to other area e.g. the Tai Po Industrial Estate and the Science Park and spare the land for landfill extension?

### Conclusion

AGHK viewed that as a matter of principle, the Government must not set further bad example of sacrificing our country park for any development. As an alternative, option 2 together with taking the entire TKO Area 137 as landfill extension would be better than Option 3b. EIA should also assess the geological and geomorphological impact in their feasibility study. Implementation of the Policy Framework for the Management of Municipal Solid Waste must be expedited.



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