

Aug. 8, 2008

Studies and Research Section Planning Department 16/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

Dear Sir,

Ref: Planning Department CE 60/2005 (TP) Land Use Planning for the Frontier Closed Area

Association for Geoconservation, Hong Kong ("AGHK") agrees and supports the overall vision of the draft concept plan through the three main theme of 1) Strengthen Nature Conservation; 2) Conserve Cultural Heritage and 3) Promote Sustainable Uses.

Nevertheless, the feasibility study once again exemplified the Government's neglect of geoconservation in their formulation of policy and planning development. The importance of geological heritage has not been addressed and taken into consideration for justifying and assessing key issues of any specific land use framework in the study area. In the Summary of Final SEA Baseline and Key Issues Report - only ecology, cultural heritage, air quality, noise, water quality, solid waste, land contamination and hazardous facilities and installation are being examined as the major environmental issues.

In the feasibility study working paper no. 1 - the geotechnical conditions are briefly mentioned with no detailed reference to or study of the geological significance of the 354 to 280 million years Carboniferous rocks – the Lok Ma Chau formation. The formation consists of "metamorphosed sandstone and carbonaceous siltstone with graphitic inter-beds and conglomerate". It covers the frontier closed area of Man Kam To, Lo Wu, Mai Po, Yuen Long and the Brothers. The outcrops at Man Kam To, Lo Wu and Lok Ma Chau within the closed area contain rocky escarpment features. Such metamorphosed rocks only constitute less than 1% of the total area of Hong Kong. Attention is needed to be paid to any development or construction projects that may destroy or cause any adverse impacts on their outcrops. AGHK proposes setting up of one to two geological displays or windows in Tai Shek Mo or Ma Cho Lung displaying the representative outcrops of these

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metamorphosed rocks together with interpretive signs and boards for preservation and public

education.

The unique geologically significant Lin Ma Hang lead mine and the aesthetic Lin Ma Hang stream

and San Kwei Tin seasonal waterfall should also, in addition to Robin's Nest, be included in the

high valued key landscape zones - No Go areas.

The development of Lin Ma Hang mine into an education site such as an open mining museum is

suggested to be part of the promotion of cultural heritage and geo-tourism. The mine itself is a

significant geological heritage which records the important mining industry in the last century. Its

contribution to the early Hong Kong's economy cannot be ignored. Apart from being the most

important lead mine in Hong Kong, it was also the only mine in Hong Kong which had a good

record of gold and silver production. A more thorough protection plan is essential to avoid any

adverse impacts caused by the development of the FCA project.

To conclude, the closed area consists of a number of geological heritages which should be

incorporated into conservation strategies together with ecological sites. The Government should

conduct further studies, draw up an inventory and derive suitable measures for their protection.

Typical measures include avoidance of destruction of outcrops, avoidance of visual obscurities from

viewpoints, and appropriate education enhancement.

For more details, please contact AGHK: Cindy Choi (9370-4914, Julian Kwong (9191-3149) or

Young Ng (9327-5880)

Yours sincerely,

Choi Mo Ching Cindy

Convener: Publicity/Public Relationship

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