16 Dec 2020

Secretary

By e-mail : tpbd@pland.gov.hk

Town Planning Board

15/F, North Point Government Offices, 333 Java Road
North Point, Hong Kong

Dear sir,

**Amendments to the Approved Ma On Shan Outline Zoning Plan No. S/MOS/22**

Refer to captioned OZP Plan No. S/MOS/22, our Association strongly objects to the rezoning of large areas of green belt for the proposed development of both public and private housing to provide a total population of 20,430 people as well as the construction of primary schools and water work facilities to support the residential development. Reasons for our objections are the followings.

1. **Significantly change of the countryside character of the Ma On Shan upland valley**
   The development cover land many times larger than the area to be covered with flats which include significant infrastructure works such as road widening and slope stabilisation. These developments will lead to an urban environment incompatible with the surrounding serene countryside. This would have widespread implications on the view and experience for visitors in the vast surrounding country park areas. The development opens up the way for further progressive urbanisation and development in the entire valley.

2. **Undermining the experience of access to the Ma On Shan Country Park**
   The proposed rezoning is only 15m away from the Ma On Shan Country Park. At present, the country park can be directly accessed on foot, a popular hiking trail from the Ma On Shan urban area via the one lane Ma On Shan Road which has relatively very light traffic. The proposed development will result in visitors walking alongside traffic on a footpath. An analogy is the access from Wong Nai Chung Gap to the Tai Tam Country Park. After construction of Parkview, access via the narrow footpath of Tai Tam Reservoir Road is unattractive and offers a poor experience for visitors.
3. **Damage to the integrity of significant geological heritage**
   - Fragmentation, disturbance and degradation of the Ma On Shan mining heritage;
   - Demolition or damage to the currently lightly protected mining heritage;
   - Masking or incompatible artificial constructions with the dramatic natural landscape of Tiu Sau Ngam

4. **Natural hazard mitigation measures**
   Increasing encroachment of developments at fringe areas of Ma On Shan Country Park would require extensive natural terrain hazard mitigation measures with impacts on the spectacular mountain slopes and valley bottoms, both with and within country park. Such artificial works would have an adverse impact on scenery, geoheritage and biodiversity.

5. **Small plots of land along the valley inappropriate for residential development**
   The sites are small agglomerations of land along the valley which have dense vegetation, licensed squatter huts and farm fields built on government land since 1950, forming an integral part of the green belt in protecting the Ma On Shan Country Park. Once approved, it will set an undesirable precedent for other similar developments.

**Conclusion**
Ma On Shan not only showcases the unique dramatic landscape of horse saddle, but also the importance of geodiversity and geoheritage of Hong Kong. It is not common that a mountain as Ma On Shan consists of all three types of rocks of the earth - sedimentary, igneous and metamorphic rocks of 370 million and 140 million years old respectively. The iron ore body with abundant and varied minerals formed in the skarn zone enables Hong Kong to develop the prominent iron mining industry and its respective history and culture. Ma On Shan bears the remarkable mining heritage of Hong Kong which exhibits the importance of economic geology as well as the impact of geology on ecology and culture. We urge the Government **NOT TO REZONE THE GREEN BELT** but to treasure and imminently develop a comprehensive policy to sustainably conserve the valuable mining heritage and its surrounding natural environment.

Regards,
Cindy Choi (as signed)
Chairman
Association for Geoconservation, Hong Kong
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