

The Secretary,
Town Planning Board Secretariat,
15/F, North Point Government Offices,
333 Java Road, North Point, Hong Kong

1st June, 2026

Dear Secretary,



Objection to Proposed Amendment Item A – Draft Sai Kung Town Outline Zoning Plan No. S/SK-SKT/7: Rezoning of Site in Sha Ha from “Village Type Development” (“V”) to “Residential (Group B) 6” (“R(B)6”)

We write on behalf of residents of Hunlicar Garden to lodge a formal objection to Amendment Item A of the draft Sai Kung Town Outline Zoning Plan (“OZP”) No. S/SK-SKT/7, exhibited under Section 5 of the Town Planning Ordinance (Cap. 131) on 24 April 2026. This is the third occasion on which we have been compelled to object to successive incarnations of the same fundamentally flawed proposal, having previously submitted representations in April 2021 and July 2023 in relation to planning application Y/SK-SKT/4. Copies of those letters are enclosed. We regret that, despite those earlier representations, we have never received any substantive response from the Planning Department addressing the core planning arguments raised therein.

The proposed amendment would rezone a beachfront site in Sha Ha from “Village Type Development” (“V”) to “Residential (Group B) 6” (“R(B)6”) and introduce building height (“BH”) restrictions permitting up to **10 storeys** on the western, inland-facing portion of the site and up to **3 storeys** on the eastern, seaward-facing portion. The site occupies a direct frontage onto the Sha Ha beachfront and the adjacent pedestrian promenade.

We object to this amendment in the strongest possible terms. The proposed 10-storey BH restriction is not merely inconsistent with established waterfront planning principles – it is, as we demonstrate below, **more permissive than the building height restrictions applying to the inland residential sites on the opposite side of Wai Man Road**. That a beachfront site should be permitted to rise higher than the inland development zone that separates it from the town centre is, as a matter of planning principle, wholly indefensible and without precedent in any rational coastal planning framework.

1. The Proposed 10-Storey Height Exceeds Even the Permitted Height on the Adjacent Inland CDA Site – A Fundamental Inversion of Proper Planning Principles

The draft OZP No. S/SK-SKT/7 clearly shows the following building height restrictions in the immediate vicinity of the subject site:

- (a) **CDA(1) – “The Mediterranean”** (inland site, opposite side of Wai Man Road and Mei Yuen Street): **8 storeys**;
- (b) **R(B)6 – the subject site (Sha Ha beachfront)**: **10 storeys** (western/inland portion) and **3 storeys** (eastern/seaward portion); and

(c) **WM Hotel (“OU” annotated site, immediately adjacent on the waterfront):** an existing 3-storey structure with no elevated BH restriction shown on the OZP, consistent with the low-rise character appropriate to a waterfront site.

These figures speak for themselves. The proposed amendment would permit **10-storey development on a beachfront site separated from the sea only by a pedestrian promenade and a beach**, whilst the inland residential development zone behind Wai Man Road is restricted to only **8 storeys**. The proposed beachfront towers would therefore be **taller than the buildings on the inland side of the road**. This is not a matter of degree; it is a complete and fundamental inversion of the planning principle governing the relationship between coastal and inland development zones.

The Board is invited to consider the visual and planning absurdity of this proposition: a person standing on the Sha Ha promenade would look inland past a 10-storey residential tower to the “inland” CDA site, which would be the **lower** of the two developments. The height profile of the coastal zone would be higher than the profile of the town behind it. This is precisely the outcome that coherent waterfront planning is designed to prevent and is wholly unjustifiable.

2. Violation of the Established Planning Principle for Waterfront Sites

It is a well-established and consistently applied principle of Hong Kong town planning that building heights on waterfront sites should be kept low and should step down towards the sea rather than away from it. This principle is reflected in the Hong Kong Planning Standards and Guidelines (“HKPSG”), which emphasise the importance of preserving visual permeability and access from inland areas to harbour and coastal frontages, and of avoiding the creation of a wall effect along the waterfront.

The subject site sits directly on the Sha Ha beachfront. It does not lie to the rear of an intervening development zone; it fronts directly onto the promenade and the beach. Permitting 10-storey development on such a site – in excess of the height permitted on the inland development zone – is diametrically opposed to every tenet of responsible coastal planning. The proposed 10-storey BH restriction would create an oppressive and dominant visual wall that blocks views of the Inner Port Shelter, overwhelms the pedestrian promenade, and permanently and irreversibly destroys the open coastal character that defines Sai Kung Town.

3. The WM Hotel: The Correct and Applicable Local Precedent

The immediately adjacent “OU” annotated WM Hotel site provides the most direct, relevant and correct precedent for development on a waterfront site in this location. The WM Hotel is a 3-storey structure consistent with the principle that coastal frontage sites should be developed at a scale that respects their setting. No elevated BH restriction is shown for that site on the draft OZP.

Any proposed development on the subject site that does not conform to the same low-rise standard as the WM Hotel is not only inconsistent with that immediate precedent but would create a visually jarring and structurally incongruous juxtaposition between two directly adjacent waterfront sites – one 3 storeys and one 10 storeys. Such an outcome would be entirely unacceptable from an urban design perspective and could not be justified under any reasonable planning assessment.

4. The “Stepped Height” Argument is Inapplicable and Doubly Misconceived in Light of the 10-Storey Proposal

The stepped building height concept is applicable to large inland development sites of significant depth, where development is graduated with taller blocks set well back from the waterfront stepping progressively down toward the coast. It is not applicable where, as here, **the entire site lies on the seaward side of Wai Man Road within the coastal frontage zone**.

Moreover, the proposed amendment renders this argument even more transparently untenable than it was in prior iterations. The “step” now proposed moves from 10 storeys on the inland portion to 3 storeys on the seaward portion – a difference of 7 storeys within a single beachfront plot of limited

overall depth. This is not a genuine graduated step; it is a device for maximising development on the part of the site furthest from the promenade whilst offering a token concession at the water's edge.

Furthermore, the “step” moves in the wrong direction: the 10-storey inland portion of the beachfront site would be **taller than the 8-storey CDA(1) site on the true inland side of Wai Man Road**. There is therefore no genuine stepping effect across the critical Wai Man Road boundary; the beachfront site simply rises above its inland neighbour.

5. Wai Man Road as the Defining Boundary Between Coastal and Inland Zones

Wai Man Road and Mei Yuen Street constitute the logical, clear and visually appropriate boundary between the inland development zone – where medium-rise and higher-density residential development may be accommodated within the CDA(1) and R(B)7 zones – and the low-rise waterfront zone that borders the promenade and beach. This demarcation reflects the different character, sensitivity and function of the two areas.

Sites to the seaward side of Wai Man Road, fronting directly onto the pedestrian promenade and the beach, should be subject to a maximum building height restriction of 3 storeys, consistent with the WM Hotel site standard. The proposed 10-storey BH restriction on the subject site would wholly extinguish this boundary as a meaningful planning constraint, with permanent and irreversible consequences for the coastal character of Sai Kung.

6. Visual Impact and the Requirement for a Visual Impact Assessment

The proposed 10-storey component would constitute an overwhelmingly dominant and intrusive visual element when viewed from the promenade, from the beach, from Wai Man Road, from Mei Yuen Street, and from properties throughout the Sai Kung coastal area. At 10 storeys, the proposed towers would be visible from considerable distances across the Inner Port Shelter, fundamentally altering the skyline and character of the Sha Ha and Sai Kung waterfront.

A Visual Impact Assessment (“VIA”) conducted in accordance with the HKPSG should be required before any building height in excess of 3 storeys is considered for any part of this site and with reference to height restrictions imposed under “V” zone. In the absence of such an assessment, the Board cannot be satisfied that a 10-storey BH restriction – which, as demonstrated above, exceeds even the permitted height of the adjacent inland CDA site – is remotely appropriate or capable of justification.

7. Precedent and the Character of Sai Kung Town

Sai Kung is recognised as a unique coastal town with a distinctive low-rise, leisure and tourism character. Its waterfront, promenade and beach are its defining assets. The introduction of 10-storey residential towers on what is effectively the last undeveloped waterfront site in this part of Sai Kung would irreversibly damage that character and set a precedent that, once established, could be exploited by future applicants to justify comparable over-development on other sensitive coastal sites throughout Hong Kong.

We would also draw the Board's attention to the fact that the subject site retains in its lower portion an “OU” zone annotated for beach related leisure uses and commercial and tourism related uses. This is entirely consistent with the low-rise coastal character of the site and the function it serves for the wider community. A 10-storey residential tower on the same site is wholly inconsistent with that ancillary open space and leisure character.

8. Absence of Material Change in Circumstances Justifying a Departure from Previous Objections

This OZP amendment represents the third attempt by the developer to secure planning approval for high-rise residential development on this site. Our objections in 2021 and 2023 raised precisely the same fundamental concerns. The changes made to the scheme in the intervening period do not

address those concerns – and in one critical respect they **aggravate** them: whereas our earlier objections were directed against a scheme described as reaching 8 to 9 storeys, the proposed BH restriction now before the Board is **10 storeys**, which as demonstrated above actually **exceeds** the 8-storey restriction on the adjacent inland CDA(1) site. The proposal has become more extreme, not less, in successive iterations.

In the absence of any material change in planning circumstances justifying a departure, and in the face of a proposal that has become more architecturally aggressive with each iteration, the Board should decline to approve this amendment.

9. Absence of Deliberation on the Merits of Representations: A Matter of Statutory Record

We draw the Board’s attention to a matter of fundamental procedural significance which arises directly from the Board’s own published record.

The published minutes of the Rural and New Town Planning Committee (“the Committee”) meetings of 26 January 2024 and 5 December 2025 – at which planning application Y/SK-SKT/4 was considered and reconsidered respectively – reveal that the planning merit objections raised in the opposing public representations, including those relating to building height, visual impact, coastal character, the relationship between the proposed development and the adjacent inland development zones, and consistency with the Hong Kong Planning Standards and Guidelines, do **not indicate that they were deliberated upon at either meeting**. On both occasions, the Committee’s deliberations were confined exclusively to the question of Small House demand. The planning merit of the proposed development – including the very objections we have consistently raised since 2021 – formed no part of the Committee’s deliberation at any stage of the application process.

We make no further submission at this stage as to the reasons for or consequences of this occurrence, save to note that the statutory duty imposed by Section 6(5) of the Town Planning Ordinance requires the Board to **consider** every representation received. In the context of that obligation, “consider” connotes genuine and substantive engagement with the matters raised, rather than receipt or acknowledgment thereof. The matter then extends to whether that obligation has been discharged in respect of the opposing representations submitted in connection with application Y/SK-SKT/4 based on published records.

We trust you will uphold your statutory duty under Section 6(5) that the planning merit objections raised in the representations submitted during the current exhibition period shall be genuinely and substantively deliberated upon and considered. We respectfully submit that anything less would constitute a further failure of your statutory duty, and we reserve all rights in that regard accordingly.

10. Our Proposed Amendment to the Proposed Amendment

Should the Board be minded to approve a rezoning of this site from “V” to “R(B)6”, we respectfully submit that the building height restriction for the **entire site** should be limited to **3 storeys**, consistent with:

- (a) the building height standard applicable to the adjacent “OU” WM Hotel waterfront site;
- (b) the 3-storey BH restriction already proposed for the eastern/seaward portion of the subject site;
- (c) the established principle that waterfront sites should be restricted to low-rise development; and
- (d) the requirement that beachfront development must not exceed – and should fall well below – the height permitted on adjacent inland sites.

A 10-storey BH restriction on any part of this beachfront site is wholly unjustified, exceeds the height restrictions on the adjacent inland zones, is contrary to all relevant planning principles, and must be removed from the proposed amendment.

11. Request for a Substantive Response

We renew our request – made in both 2021 and 2023 without any response – that the Planning Department provide a detailed written response explaining:

- (a) why the low-rise waterfront planning principle does not apply to this site;
- (b) why a 10-storey BH restriction on a beachfront site is considered appropriate when the adjacent inland CDA(1) site is restricted to only 8 storeys; and
- (c) what planning justification exists for permitting a coastal frontage site to be developed to a greater height than the inland residential development zone that lies behind Wai Man Road.

These are not rhetorical questions. They go to the heart of the coherence and rationality of the Board's approach to coastal planning in Sai Kung, and the public is entitled to a clear and substantive answer.

We would welcome the opportunity to appear before the Board to elaborate upon these objections. The undersigned may be contacted by telephone at [REDACTED] or by email at [REDACTED]

Please acknowledge safe receipt of this letter and confirm that it has been duly registered as a formal representation under Section 6 of the Town Planning Ordinance.

Yours faithfully,


Stephen G. Spurr

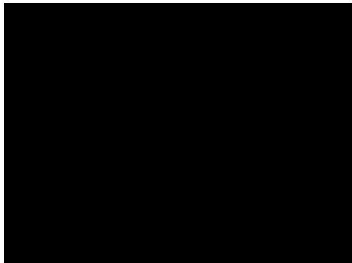
HKID: [REDACTED]

Resident of Hunlicar Garden, Sai Kung

Enclosures:

1. Letter of objection dated 7 April 2021 (planning application Y/SK-SKT/4)
2. Letter of objection dated 23 July 2023 (planning application Y/SK-SKT/4)

c.c. The Office of the Chief Executive of Hong Kong



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April 7th, 2021

The Town Planning Board,
15th Floor,
North Point Government Offices,
333 Java Road,
North Point,
Hong Kong

Dear Sirs,

Development Proposal in Respect of Application No. Y/SK-SKT/3

We are writing in respect of the captioned as Owners and long term residents of [REDACTED] [REDACTED] directly affected by the proposed rezoning application from Village Type Development to Residential (Group B) 6 of the various lots in D.D. 221 and Adjoining Government Land, Sha

We have a number of a number of objections and concerns regarding the above application, principally relating to building heights and the development density or volume of said proposal:

1. Firstly, the amendment is not in line with the OZP which envisaged a stepped development from the CDA (1) Zone on Wai Man Road to the low rise Village or V Zone within this area---and certainly not the sudden introduction of two 7 storey apartment blocks that create a "wall" which destroys the frontal views from Chuk Yeung Road.
2. The principle was that zoning in this area should not exceed the height of a three storey village house (typically 8.23m high) throughout, thus creating a stepping down effect towards the shoreline and along the coast to the Country Park. However, the proposed development is excessive for the site which adjoins the waterfront. The previous zoning for "Village Type Development" limited the building height to 3 storeys with a maximum height of 27 feet. Any rezoning should maintain the low rise nature of the development on whole of this waterfront site.

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3. Whilst I do not object in principle to a rezoning to "Residential (Group B) as this form of development will ensure proper car parking another services and also ensure future management through a DMC, the proposed development is excessive. The proposed R(B)6 zone should limit development to a maximum of 40% and a maximum of 4 storeys.
4. In addition to the imposition of a maximum 4 storeys there should also be a restriction of the maximum floor to floor height. The current proposal for the Houses to have a floor to floor height of 4.5 metres would permit houses significantly higher than the Village Type houses permitted under the current zoning and will encourage unauthorised building works with the construction of mezzanine floors. For the proposed houses a maximum floor to floor height of 3.5 metres should be imposed and for the 4 storey blocks of flats, a maximum floor to floor height of 3.15 should be imposed.
5. From the cross section of the proposed development it seems that the car park is to be provided in the form of semi-basement which is in effect a podium. Any basement should be a full basement to remove any podium and to lower the overall development height.
6. What we have instead is a raised development that exploits the absence of an mPD restriction (surely a planning oversight?) with only a storey limit, that enables a developer to destroy the outlook intended by the OZP and exaggerate the heights of its buildings.
7. We therefore submit that the existing site level should be at ground not road level. Again, it should not be a semi basement akin to podium style developments as they are inappropriate to this area.
8. As shown, the heights afforded by the semi basement, create apartment blocks (34.6 m high) and town houses (21.6m high) that are considerably taller than the typical village house and in terms of mass dwarf the existing residential properties in the immediate vicinity.
9. On a personal note, the line of the townhouse rooftops will overlook our property and intrude upon our privacy, as well as creating noise nuisances and disturbances. Noise from rooftop social gatherings and BBQ's on such rooftops will be particularly acute and pervasive, and are greater and more intrusive than any other point on a building.
10. Though perhaps outside the ambit of this application, we question the future of the Sha Ha Beach BBQ site as it is integral to the application, and to linking cross pedestrian traffic across and around the entire site.
11. Will the BBQ site remain a 2 storey structure? Will residents in the new high rise project welcome the noise and lights of the Beach BBQ which is currently open on all three sides? Is the introduction of an acoustic wall to contain the noise and light pollution justified or double glazing so that this important community and tourist leisure amenity continues unabated?
12. What provision can the Planning Authority impose upon the Developer for improving the present dilapidated waterfront walkway crossing? Can a cycle track be introduced across

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Dear Sirs,

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the new site so that the many bicyclists who currently use it for crossing continue to do so?

- 13. Unfortunately, the development application fails to strike a balance among reasonable uses—visual, landscape, environmental conservation, recreational access, and the public spiritedness that was implicit in the OZP. What is presented here is a high class residential luxury gated community which is short on any ties to the community and blocks sight lines at street level. Pedestrians will be excluded. Boundary walls surround. A semi basement forms a wall. Planting strips will be no substitute for the present vegetation and trees. Noise impacts will increase. Traffic suffers. In short, it destroys the character and rural charms of the area.
- 14. Is there a proposal to conserve the magnificent trees on the north and southern borders of the site?

Finally, and most seriously, we are concerned the overall development intensity overloads an already stressed infrastructure and road system.

As we have just experienced over the Easter holiday, traffic conditions to Sai Kung Town, Hong Kong's "tourist gateway" are appalling, and with the loss of this open air car park, bound to degenerate further.

It therefore seems logical to additionally propose a moratorium on further private housing until the strategic road network and the surrounding community needs are in place to support a residential project of this kind.

The undersigned would be happy to meet with your Office at your convenience to discuss the situation further, and his contact number is [REDACTED] if you prefer to do this by telephone.

Your faithfully,

For and on behalf of
PACIFIC DEVELOPMENT LIMITED



Authorised

S.G. Spurr (Mr.)

Director



Secretary,

The Town Planning Board,

15th Floor, North Point Government Offices,

333 Java Road,

North Point,


Hong Kong

July 25th, 2023

Dear Secretary of the Board,

Application Number Y/SK-SKT/4 in respect of Various Lots in D.D. 221 and Adjoining Government Land, Sha Ha, Sai Kung, New Territories to rezone the site from "Village Type Development" to "Residential (Group B) 6" and to amend the Notes of the zone applicable to the site

We write in respect of the captioned application and attach our previous letter dated April 21st 2021 (Pacific Sunshine Ltd/ Town Planning Board) setting out our objections to the Indicative Scheme at the Application Site.

Being long term residents and owners of  Sai Kung we continue to feel concerned that the basic issues of building height and density are still not being addressed, nor has the revised scheme alleviated a number of the concerns which we expressed to you previously.

We therefore set out below our original and further objections to planning application Y/SK-SKT/4:

The first is the **major conflict with planning policy** which the application represents.

1.The development is in an area currently zoned "V" on the Sai Kung Outline Zoning Plan (OZP) which limits development to a **maximum building height of 3 storeys and 8.23 metres.**

2.Such building height is consistent with the guiding principles of the OZP to limit building heights on land that is close to the sea front. If the form of development within the V zone is to be changed to allow **luxury residential development** this should not result in a development that is any higher than the OZP intended for this waterfront site.

3.A consistent low rise development on waterfront land is both important from a visual perspective and in order to maintain the integrity of the key principles of the OZP. Moreover, the application site is a waterfront site in just the same way as the adjoining OU zone - "Commercial and Tourism related uses (including hotel)1".

4.The permitted development height for this OU zone is **3 storey (excluding basements).** The height of the existing development on this site should be the absolute maximum permitted on the application site. The actual use of the land is not relevant to the principle of low rise development on waterfront sites.

5. The applicant has mistakenly adopted the planning guidelines for the CDA(1) zone. This CDA zone is not a waterfront site being separated from the waterfront by Wai Man Road. The Maximum building height for the CDA(1) zone is **8 storeys** excluding basements and whilst this may be **appropriate** for an **inland site** it is **not appropriate** for a **waterfront site**.

6. The argument that the applicant has made for a stepped development is also **misguided** because the stepped building height concept is applicable to large inland sites with building heights stepping down towards the waterfront. It is not applicable to waterfront sites such as the current V and OU zones.

7. **Wai Man Road** is the **dividing line** between **inland sites** where medium height developments are permitted and **waterfront sites** (sites that have a frontage to the pedestrian promenade) where the maximum building height is and should remain 3 storeys.

As to the application to rezone, we also note with concern:

8. According to the 6 existing R(B) zones on the Town Planning Board website, all have a maximum site coverage of 40%. To increase the applicant's coverage to 44% is **overdevelopment** and incompatible with the planning intention.

9. We reiterate that the application conflicts with the pattern of development intended for the area, ignoring the stepped height design proposed in the Outline Zoning Plan whereby the building storeys would reduce in height from the CDA/1 site, and were indeed to be kept low in height on the V Site so as to prevent a visually blocking effect along the long shoreline which extended to the Sai Kung Country Park.

10. Unfortunately, what continues to be pressed in the application is excessive in terms of building height, mass and form. It is a scheme that is visually damaging to the setting, creating a **wall effect** not just from Chuk Yeung Road but also to north, south, east and west, with 2 Towers of 9 and 10 storeys measuring 45:1 m and 45: 6 m, a third Tower of 20.6m in height plus 14 townhouses measuring 21:6 m that actually face the waterfront promenade and obstruct the magnificent views of both mountain and shoreline.

Therefore, any rezoning must still retain the **low rise** nature of the development on the whole of the V Site.

11. As to the development. We have argued before about the encroachment on privacy and the generation of noise, disturbance and pollution it will cause (especially during construction). But we wish to highlight four other points:

a. The introduction of a public car park with 120 car spaces is purely notional. It will do little to alleviate parking problems, unless there is an ombudsman to ensure parking fees are kept fair and in line with the market, and that parking is accessible to non- residents at all times. We have to ensure that luxury housing is not at the expense of good infrastructure.

The obverse of this would have been a Village or NTHE development providing significantly less numbers of private vehicle parking spaces and stress on the roads.

b. Towers 2 and 3 will dwarf, and be out of character with, the rural character and scale of the properties in the neighbourhood.. Nor do they have any architectural merit.

c. The application fails to engage with the surrounding environment. No attempt is made to re-activate the dilapidated condition of the promenade, or any connections from this luxury gated community to the adjoining low-rise coastal properties and outdoor open-air public spaces which still require good pedestrian circulation.

In short, the application contributes nothing to the "Garden of Hong Kong" concept or to the rural township.

d. The Landscaping Plan is superficial. Planting strips are no substitute and, the loss of important trees on the eastern and southern boundaries is significant.

11. Further, and following on from the recognition of the site's low rise development, plus the imposition of a maximum 4 storeys with a 40% site coverage, we propose there should be a **restriction on the maximum floor to floor height**. The current proposal for the Houses to have a floor to floor height of 4.5 metres would permit houses significantly higher than the Village Type houses permitted under the current zoning and can only encourage unauthorised building works with the construction of mezzanine floors.

12. For the proposed houses a maximum floor to floor height of 3.5 metres should be imposed and for the 4 storey blocks of flats, a maximum floor to floor height of 3.15 should be imposed.

13. In pointing to the need for a reduction in the application's building height, and therefore the density of the site, we also refer you to the district's overstretched transport links and its growing traffic congestion problems to which this scheme only adds.

In summary these are our objections for rejecting the planning application and our request instead that the site remains as a low rise development opportunity.

Naturally, the undersigned would be very happy to meet with your Office at your convenience to expand on any of these issues, or comment further should the Applicant respond, or endeavour to submit added information or justification for the proposed amendment.

He can be contacted on telephone number [REDACTED] by email on [REDACTED]

I should be grateful for acknowledgement of receipt of this letter.

Yours truly, for and on behalf of

Pacific Sunshine Ltd.,

For and on behalf of
PACIFIC SUNSHINE LIMITED


.....
Authorised Signatory

Stephan G. Spurr (Mr.)

Director

cc Secretary for Planning and Environment
Office of the Chief Executive
Secretary of Housing and Transport.