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Submission Number:
TPB/R/S/SK-SKT/7-S6

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年06月24日星期三 22:43
收件者: tpbpd/PLAND
主旨: AMENDMENTS TO SAI KUNG TOWN OZP NO. S/SK-SKT/6
類別: Internet Email

Dear TPB Members,

AMENDMENTS TO SAI KUNG TOWN OZP NO. S/SK-SKT/6

Item A – about 1.15ha (20ha GL). Rezoning of a site in Sha Ha from (“VTD”) to “Res (Group B) 6” with BHR.

Y/SK-SKT/4 Partially approved 5 Dec 2025

Various Lots in D.D. 221 and Adjoining Government Land, Sha Ha, Sai Kung

Site Area: About 11,489sq.m (12,689sq.m) Includes Government Land of about 1,995 sq.m

Zoning: “VTD”

Proposed Amendment: Rezone to “Res (Group B) 6” / 3 Towers – 133 (164) Units / 14 Villas / 2 Clubhouse / PR 1.5 / 45.1 mPD / OS 427 (488sq.m) / 91 Vehicle Parking / 120 Public Vehicle Park

So, another deep pocket developer goes to JR and gets its way. As usual TPB caves in and manipulations trotted out to justify this.

Slight reduction in footprint and number of units in order to leave a small portion of the site to accommodate 5 NET houses. Going forward villagers with Ding Rights in the area are siphoned off to other villages “*Under the prevailing SH Policy, an indigenous villager could apply for SH within his village and in other villages within the same Heung. As Sha Ha was in the Sai Kung Heung, residents of Sha Ha could apply for SH developments in other villages within the Sai Kung Heung, though cross-village applications might attract objections from local villagers*”

However, the plan still provides NO COMMUNITY BENEFIT and still no bicycle parking despite the rural location. In reaching their decision in Dec, Members failed to consider the issue of the many community facilities that are in deficit in the district despite the inclusion of almost 2,000sq.mts of GL. See HKPSG table.

With regard to the stepped profile issue, I fully support the Representations of R1, R2 and R3 whose local knowledge permits them to provide more detailed outline than I can and are in line with the objections made during the Sect 12 stage, see below.

I note with alarm that it appears that the Applicant will not attend the meeting.

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This is a new trend, previously the Applicants for private developments always sent at least a consultant to the meeting SO THAT THERE WOULD BE SOMEONE THERE TO ANSWER MEMBER'S QUESTIONS.

At the Tsuen Wan meeting on 12 June there were also no representers from the developers.

IN THEIR ABSENCE, PLAND RESPONDED TO QUESTIONS ON THEIR BEHALF.

THIS IS SHOCKING AS

Core Responsibilities of PlanD in the Planning Process

- **Policy & Research:** The department creates long-term territorial and local plans. It updates planning standards to balance housing, transport, and green spaces
- **Drafting Plans:** It prepares statutory and non-statutory maps (like Outline Zoning Plans) that dictate exactly what type of building or activity is allowed on specific plots of land.
- **Processing Applications:** It reviews applications for planning permission (e.g., changing land use or building something new) and advises decision-making boards.
- **Public Engagement:** It runs public consultations, exhibitions, and focus groups so the community can share feedback on proposed city blueprints.
- **Enforcement:** It acts as an inspector, taking action against unauthorized land developments or zoning violations.
- **Technical Support:** It provides the data, mapping, and secretariat work necessary for planning boards to make legal decision

Regarding its relationship with TPB, The **Planning Department (PlanD)** acts as the main executive and technical arm of the **Town Planning Board (TPB)**. PlanD turns TPB policies into official maps, prepares planning rules, handles daily paperwork, and checks if developers follow building rules.

THERE IS ABSOLUTELY NO INDICATION THAT IT IS IT'S ROLE TO REPRESENT DEVELOPERS AT THE OZP MEETINGS. IN FACT, WHILE IT CAN SUPPORT PLANS, IT SHOULD REMAIN NEUTRAL WHEN IT COMES TO THE FUNCTION OF THE MEETINGS, PUBLIC FORUMS THAT ALLOW BOTH THE APPLICANT AND MEMBERS OF THE PUBLIC TO PRESENT THEIR VIEWS AND ANSWER QUESTIONS FROM THE MEMBERS.

So why are Applicant's no longer attending the meetings?

HAVE THEY BEEN ASSURED THAT THE PLAN WILL BE APPROVED AND THERE IS NO NEED TO BE PRESENT EVEN THOUGH THIS IS A MEETING OF THE FULL BOARD?

IS IT A FURTHER STREAMLINING MEASURE TO SAVE THE 10 MINS THE DEVELOPER'S AGENT SPENDS ON ITS SPIEL.

5 Dec 2025: Applicants' Representatives

Wisdom Glory Limited and Salechoice Properties Limited – Applicants

Mr Remus Wong Mr William Yip

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Ove Arup & Partners Hong Kong Limited

Ms Theresa Yeung Ms Catherine Kwong

King & Wood Mallesons

Ms Y.S. Man Ms P.Y. Cheng

Barristers

Mr Y.H. Lee Mr Eric Chim

LLA Consultancy Limited

Mr S.L. Ng

But it appears that there will be no representative at the Sai Kung OZP. I have tracked the 2026 OZP meetings to date and for the first 5 months the Applicant always provided a representative. In the case of Govt initiated plans reps from various depts and consultant were present.

2026	OZP	APPLICANT
12-June	Tsuen Wan	NONE
15-May	Ma Tau Kok	R1
24-Apr	Sha Tin	R1
20-Mar	Tung Chung Valley	R1
18-Mar	Ho Man Tin	Govt Consultant
6-Mar	Cha Kwo Ling	Govt Consultant
	Ngau Tam Mei	Govt Consultant
	Shek Kong	R1
13-Feb	Ping Shan	R1
30-Jan	Clearwater Bay	R1
16-Jan	Hung Hom	URA
2-Jan	Kwun Tong South	R1

THIS IS A MATTER OF BOTH PROPRIETY AND PROCEDURE.

PLAND CANNOT REPRESENT THE APPLICANT AND MEMBERS ERRED AT THE 12 JUNE MEETING IN ALLOWING IT TO TAKE ON THIS ROLE. PLAND MUST MAINTAIN NEUTRALITY IN VIEW OF THE EXECUTIVE AND SECRETARIAL ROLE IT PLAYS IN THE TPB ROCESS

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Item B – about 1.5ha. Rezoning of a site at Tai Mong Tsai Road from “Comprehensive Development Area (2)” to “Res (Group B) 7” (“R(B)7”) with BHR

The Mediterranean a medium-density residential development completed in 2017 which is zoned “CDA(2)” on the OZP. PR of 1.5 and a maximum BH of 8 storeys

to reflect the completed residential development.

HOUSEKEEPING

Item C1 – about 0.63ha in total. Rezoning of four strips of land at Hiram’s Highway and Hong Ting Road from “**Green Belt**” and areas shown as ‘Road’ to “Res (Group E) 1”

Strong Objections to rezoning of the strip of ‘GB’ bordering Hiram’s Highway that is compatible with the Planning Intention: *The general planning intentions of the Plan are to strengthen the role of Sai Kung Town as a ‘Tourism Gateway’ and a centre for the provision of commercial, recreational and GIC facilities for residents in the Sai Kung district; to improve the environmental quality; and to retain features of landscape and heritage significance*

Item C2 – Rezoning of a site at the junction of Chui Tong Road and Hong Nin Path from “**GB**”, “R(E)1” and an area shown as ‘Road’ to “Open Space”. Strong Objections rezoning of “GB”. Are there any plans to build a park on the proposed ‘Open Space’. None mentioned in the paper. ‘OS’ provides even less protection against tree felling than “GB”. The strip should be completely rezoned to “GB”.

Strong Objections rezoning of “GB”. Are there any plans to build a park on the proposed ‘Open Space’. None mentioned in the paper. ‘OS’ provides even less protection against tree felling than “GB”. The strip should be completely rezoned to “GB”.

Item C3 – Rezoning of two pieces of land occupied by Hong Ting Road, Hong Nin Path and near Hiram’s Highway from “R(E)1” and “**GB**” to areas shown as ‘Road’. Deletion of the five annotations ‘Road Junction (Subject to Detailed Design)’ and ‘Proposed Road (Form and Alignment Subject to Detailed Design)’ along Tai Mong Tsai Road, Po Tung Road and Hiram’s Highway.

Objection to ‘GB’ rezoning. This is part of C1, the entire strip should be conserved and protected under “GB” zoning to conform with the district Planning Intention and to provide at least a semblance of a rural community to visitors.

Amendments to the Notes of the Plan

(a) Revision to paragraph (7)(a) of the covering Notes to allow provision, maintenance or repair of small unmanned aircraft take-off and landing facilities on land falling within the boundaries of the Plan except where the uses or developments are specified in Col 2 of the Notes of individual zones.

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STRONG OBJECTIONS. USE OF DRONES SHOULD BE STRICTLY CONTAINED. ALLOWING PEOPLE WHO ARE TOO LAZY TO WALK TO THE NEAREST OUTLET TO HAVE ITEMS DELIVERED BY DRONE WOULD EFFECTIVELY ALLOW COMMERCIAL ACTIVITIES TO TAKE OVER OUR PARKS, ETC. HAVING LOW RISE DRONES ETC OPERATE FREELY ON COMMON AREAS WOULD GENERATE NOISE POLLUTION AND CREATE HAZARDS. OUR PARKS ARE ALREADY BEING WALLED IN SO AT LEAST THE SKIES SHOULD BE KEPT CLEAR. SCHOOLS ARE ANOTHER AREA OF CONCERN. HAVING DRONES HOVERING WITHIN RANGE OF HOMES STRIPS CITIZENS OF THEIR RIGHT TO PRIVACY AND THE ENJOYMENT OF THEIR OWN HOME.

(f) Incorporation of 'Government Use' under Col 1, and 'Shop and Services' and 'Eating Place' under Col 2 of the Notes for "OU(Pier)" zone; and corresponding deletion of 'Government Use' under Col 2 of the Notes for "OU(Pier)" zone.

OBJECT. WHAT GOVERNMENT USE? THIS BROAD BRUSH AMENDMENT COULD BE USED TO OPEN CITIZEN MONITORING POSTS AT EVERY FERRY PIER ENTRANCE.

(k) Incorporation of 'Government Refuse Collection Point' and 'Public Convenience' under Col 1 of the Notes for "V" zone; and corresponding deletion of 'Government Refuse Collection Point' and 'Public Convenience' under Col 2 of the Notes for "V" zone in accordance with the MSN.

OBJECT. COL 2 ENSURES THAT THE UTILITY IS SUBJECT TO PUBLIC SCRUTINY AND THAT LOCATION AND DESIGN ARE NOT INTRUSIVE, TOO BULKY OR AN EYE SORE. CITIZENS ARE BEING STRIPPED OF EVEN THE MOST MUNDANE RIGHT TO HAVE A SAY IN WHAT IS PLANNED FOR THEIR NEIGHBOURHOOD

(l) Incorporation of 'Field Study/Education/Visitor Centre' under Column 2 of the Notes for "V" zone in accordance with the MSN

OBJECT. THE PLANNING INTENTION OF "V" ZONE IS TO PROVIDE FAMILY HOMES FOR INDIGENOUS VILLAGERS. THE PROPOSED AMENDMENTS ENCOURAGE THE ALREADY RAMPANT ABUSE OF THE NTEH POLICY THAT HAS RESULTED IN MOST OF THE RECENT DEVELOPMENTS BEING ACTUALLY UNITS FOR SALE TO OUTSIDERS AND WILL BE ABUSED TO JUSTIFY THE DEVELOPMENT OF COMMERCIAL OPERATIONS UNDER THE GUISE OF SERVICE CENTRES

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Thursday, 16 October 2025 1:48 AM HKT
Subject: Re: Y/SK-SKT/4 Rezone DD 221 Sha Ha VTD

Y/SK-SKT/4

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Various Lots in D.D. 221 and Adjoining Government Land, Sha Ha, Sai Kung

Site Area: About 11,489sq.m (12,689sq.m) Includes Government Land of about 1,995 sq.m

Zoning: "VTD" ⌈

Proposed Amendment: Rezone to "Res (Group B) 6" / 3 Towers – 133 (164) Units / 14 Villas / Clubhouse / PR 1.5 / 45.1 mPD / OS 427 (488sq.m) / 91 Vehicle Parking / 120 Public Vehicle Park

Dear TPB Members,

So another deep pocket developer goes to JR and gets its way.

Slight reduction in footprint and number of units in order to leave a small portion of the site to accommodate 5 NET houses..

However the plan still provides NO COMMUNITY BENEFIT and still no bicycle parking despite the rural location and the height of the towers is incompatible with the location.

Previous objections relevant and upheld.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Sunday, 3 December 2023 2:32 PM HKT
Subject: Re: Y/SK-SKT/4 Rezone DD 221 Sha Ha VTD

Dear TPB Members,

While PlanD, and some TPB members, mention time and again that views are not protected apart from the handful of locations designated to retain the views to Victoria Peak and the ridgelines on the Kowloon side, and even these are considered expendable to facilitate the so called 'iconic' buildings, for districts like Sai Kung that are popular escapes for the community from the wall effect of urban areas, the impact of the towers on the enjoyment of the general community should be considered. Tall walls on the waterfront would certainly impact the views not only from residences but also those of commuters, pedestrians, cyclists and folk enjoying a walk around the area that should have an uninterrupted view of the scenic harbour.

Again any development on the site should be confined to low rise blocks as envisaged in the 'V' zoning.

Previous objections upheld.

Mary Mulvihill

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From [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Friday, 4 August 2023 3:22 AM HKT
Subject: Y/SK-SKT/4 Rezone DD 221 Sha Ha VTD

Y/SK-SKT/4

Various Lots in D.D. 221 and Adjoining Government Land, Sha Ha, Sai Kung

Site Area: About 12,689sq.m Includes Government Land of about 1,995sq.m

Zoning: "VTD" □

Proposed Amendment: Rezone to "Res (Group B) 6" / 3 Towers – 164 Units / 14 Villas / Clubhouse / PR 1.5 / 45 mPD / OS 488sq.m / 135 Vehicle Parking / 120 Public Vehicle Park

Dear TPB Members,

Application 3 was rejected:

“(a) the application site falls within an area zoned “Village Type Development” (“V”) and the ‘village environs’ of Sha Ha. There is no strong planning justification for rezoning the application site from “V” to “Res (Group B) 6” to make provision for non-Small House developments. The current “V” zone for the application site is considered appropriate and should be retained to reserve land for meeting the demand for Small House development and village expansion; and

(b) the applicants fail to demonstrate that the proposed rezoning would not have adverse archaeological impacts on the Sha Ha Site of Archaeological Interest.”

So in response the developer has come back with an even more ambitious plan with a significant increase in the number of units and the now overtaken by circumstances mantra of "Government's all along aspiration for increasing housing supply"

Now the territory is facing a glut in the supply of private residential units. Sales at new developments have limited response and the secondary market is recording single digit sales per week.

Preliminary Archaeological Impact Assessment mentioned but not provided.

No benefit to the community for the proposed ceding of almost 2,000sq.m of Government Land.

No bicycle parking. The OS is mostly under cover of the towers and therefore not genuine.

Previous objections upheld.

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Members should again reject the application.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Thursday, 22 July 2021 3:01 AM CST
Subject: Re: Y/SK-SKT/3 Rezone DD 221 Sha Ha VTD

Dear TPB Members,

The various assessments provided are irrelevant when the applicant is contrary to stated government policies, includes government land and deprives the community of full enjoyment of a public beach and its environs.

Mary Mulvihill

From: [REDACTED]
To: "tpbpd" <tpbpd@pland.gov.hk>
Sent: Friday, February 5, 2021 4:16:48 AM
Subject: Y/SK-SKT/3 Rezone DD 221 Sha Ha VTD

Y/SK-SKT/3

Various Lots in D.D. 221 and adjoining Government Land, Sha Ha, Sai Kung
Site area : About 13,230sq.m includes Government land of about 1,989sq.m

Zoning : "VTD"

Proposed Amendment : Rezone to "Res (Group B)6" - 26 Houses / 2 blocks of Flats – 128 Units /

Clubhouse / 34.6mPD / OS 490sq.m / 136 Vehicle Parking

Dear TPB Members,

This is a very audacious application. The lots are zoned "V". NET house sites vary in size but taking an average of 150sq.m the lots would accommodate around 90 houses. Then there is the issue of additional height, even the proposed club house exceeds the maximum allowed.

As stipulated in the *Buildings Ordinance (Application to the New Territories) Ordinance* (Cap. 121), small houses must not contain more than three storeys and **exceed a height of 8.23 metres**, with a maximum roofed-over area not exceeding 700 sq ft.

The lots are adjacent to OU Government Land, planning intention Beach Related Leisure Use, as befits a strip of land bordering a very popular public beach. A gated community with some buildings of over 30mPD would have a drastic impact on the public enjoyment of views of the beach from nearby roads.

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Then there is the zoning intention. NT villagers claim that every male has a right to build a small house.

Clearly the lots are intended to provide for both current and future demand of the local villagers. But they have been sold to developers. So if the lots are rezoned villagers some years down the road will demand that the government provide alternative land so that they can exercise their Ding rights. No data has been provided with regard to the Net House demand. This is clearly unacceptable to the rest of the community.

In addition almost 2,000sq.mts is government land. Google Maps show that the lots are used for brownfield parking site. There is no record that the parking has been approved by TPB. The government land would require a STT for such use. Members must question why no enforcement action has been taken.

As the villagers have sold "V" zoned land then the public land should be rezoned to community use, for instance recreational facilities that enhance the beach and recreational focus of the district.

The application is effectively a form of 'backdoor listing' to avoid the legal implications re the sale of Ding rights. However this is contrary to the Small House policy as laid out by then Secretary of Development Paul Chan at Legco Q&A in 2013. <https://www.info.gov.hk/gia/general/201310/30/P201310300373.htm>

Q: d) whether the Government will reconsider releasing some of the Village Type Development sites for other residential development uses; if it will, of the total area of the lands expected to be released; if not, the reasons for that;

A: Merely turning part of the land in a particular "V" zone to residential development with a relatively higher density is inappropriate in respect of planning, infrastructure and ancillary facilities.

The location close to a public beach, the inadequacies of the local sewerage system and the well documented traffic issues are a prime consideration.

Members must reject this application.

Mary Mulvihill