

**APPLICATION FOR PERMISSION**  
**UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE**

**APPLICATION NO. A/SK-TMT/84**

- Applicant** : Mr. Douglas Paul Marshall represented by Ms. Marshall Lam Yui Ming
- Site** : Various Lots in D.D. 216, Long Keng, Sai Kung, New Territories
- Site Area** : About 5,420 m<sup>2</sup>
- Land Status** : Block Government Lease (demised for agricultural use)
- Plan** : Approved Tai Mong Tsai and Tsam Chuk Wan Outline Zoning Plan No. S/SK-TMT/4
- Zoning** : “Green Belt” (“GB”)
- Application** : Proposed Place of Recreation, Sports or Culture (Golf Putting Range) with Ancillary Facilities and Associated Filling and Excavation of Land

**1. The Proposal**

- 1.1 The applicant seeks planning permission for proposed place of recreation, sports or culture (golf putting range) with ancillary facilities and associated filling and excavation of land at the application site (the Site), which falls within an area zoned “GB” on the approved Tai Mong Tsai and Tsam Chuk Wan OZP No. S/SK-TMT/4 (**Plan A-1**). According to the Notes of the OZP, ‘Place of Recreation, Sports or Culture’ and filling and excavation of land within the “GB” zone require permission from the Town Planning Board (the Board). Surrounded by woodland and natural slopes and immediately adjoining to a stream, the Site is a low-lying and relatively flat area currently covered with trees and vegetation, and deposited with a metal-framed tent, solar panels and miscellaneous items. A mud track and a grave are found within the Site (**Plans A-2, A-3b and A-4c**).
- 1.2 The Site is accessible via a narrow local track connecting Tai Mong Tsai Road with the ingress/egress located at the northeastern part of the Site (**Plans A-2 and A-4b**). The proposed development mainly comprises 12 outdoor golf putting areas of various sizes and 9 roofed-structures (with a total floor area of about 774.8m<sup>2</sup> and all are of one storey and not more than 4m in height) for indoor golf training and various ancillary facilities including resting areas, an equipment storage room, a reception/guard room, a parking area and a toilet facility. The proposed golf

putting range will be managed by a group of local and foreign professional coaches for provision of golf training experiences, which will operate daily from 7:00 a.m. to 9:00 p.m. The Site can accommodate about 20 visitors at a time and advanced booking is required for visitors. Car parking spaces on the Site will be designated exclusively for golf instructors, while visitors will primarily arrive on foot or by taxi. Transportation services through a seven-seater vehicle will also be provided for visitors traveling between the Site and Sai Kung Town. No tree survey, landscape proposal, detailed sewerage and drainage arrangement and environmental management measures have been provided by the applicant.

- 1.3 Site formation and levelling works are required to stabilise the roofed structures and form an undulating terrain with level differences for the outdoor golf putting areas at 12 different locations within the Site (**Drawing A-1**). The proposed excavation and filling works will occupy an area of about 3,775m<sup>2</sup> (equivalent to about 70% of the site area) with depths ranging from 1m to 2m. Parts of the ground surface would be paved with white organic sand and stones as illustrated at **Drawings A-2a** and **A-2b**. However, the terrain configuration, and exact location of the proposed excavation and filling works are not provided in the planning submission. The layout would be subject to change upon detailed site inspection. The layout plan and conceptual diagrams submitted by the applicant are at **Drawings A-1** and **A-2b**, and the key development parameters are summarised in the table below:

<b>Site Area</b>	About 5,420m <sup>2</sup>
<b>Total Floor Area</b>	About 774.8m <sup>2</sup>
<b>Plot Ratio</b>	0.143
<b>Site Coverage</b>	About 14%
<b>No. of Structures and Covered Area</b>  <b>(Drawing A-1)</b>	<p>9 roofed structures</p> <p>Structure (4): 1 indoor golf projection room (119.2m<sup>2</sup>)</p> <p>Structure (7): 1 indoor putting training room (119.2m<sup>2</sup>)</p> <p>Structure (6): 1 equipment storage room (119.2m<sup>2</sup>)</p> <p>Structure (8): 1 indoor resting area (89.4m<sup>2</sup>)</p> <p>Structures (5) and (9): 2 outdoor resting areas (59.6m<sup>2</sup> each)</p> <p>Structure (1): 1 reception/guard room (59.6m<sup>2</sup>)</p> <p>Structure (3): 1 covered parking area (89.4m<sup>2</sup>)</p> <p>Structure (2): 1 toilet facility (59.6m<sup>2</sup>)</p>
<b>Building Height</b>	Not more than 4m (one storey)
<b>Parking and Loading/unloading (L/UL) Space</b>	<p>Parking: 6</p> <ul style="list-style-type: none"> <li>- Private Cars: 4</li> <li>- Motorcycle: 2</li> </ul> <p>L/UL: 2</p> <ul style="list-style-type: none"> <li>- Taxi: 1</li> <li>- Light Goods Vehicle (LGV): 1</li> </ul>
<b>Excavation and Filling Area</b>	<p>About 3,775m<sup>2</sup> (about 70% of the site area)</p> <ul style="list-style-type: none"> <li>- Excavation of land: 1,775m<sup>2</sup> (about 33% of the site area)</li> <li>- Filling of land: 2,000m<sup>2</sup> (about 37% of the site area)</li> </ul>

1.4 In support of the application, the applicant has submitted the following documents:

- (a) Application Form with attachments received on 15.7.2025 **(Appendix I)**
- (b) Supplementary Information (SI) received on 24.7.2025 **(Appendix Ia)**
- (b) Further Information (FI) received on 15.10.2025\* **(Appendix Ib)**
- (c) FI received on 22.10.2025\* **(Appendix Ic)**

*\* accepted and exempted from publication and recounting requirements*

1.5 On 5.9.2025, the Rural and New Town Planning Committee (the Committee) of the Board agreed to defer making a decision on the application for two months as requested by the applicant.

## **2. Justifications from the Applicant**

The justifications put forth by the applicant in support of the application are detailed in **Appendices I to Ic**, and are summarised as follows:

- (a) the proposed development will benefit the well-being of the community and help promote the local economy of Sai Kung while also strengthening Sai Kung's image as a popular tourist destination by offering alternative family-friendly activities beyond hiking;
- (b) supports have been obtained from two Sai Kung District Council (SKDC) Members and a Long Keng Resident Representative (RR) (also a Sai Kung Area Committee (SKAC) Member) in view of the lack of professional golf training facilities in Sai Kung District and the proposed development could help make better use of idle land resources to promote local sports development;
- (c) the proposed golf putting range will be the first golf training place in the area which will be managed by a group of local and foreign professional coaches to help provide the best training experiences available and nurture promising young players;
- (d) the proposal does not include a visitor car park. Trainees will primarily arrive on foot or by taxi to avoid generating excessive vehicular traffic;
- (e) the proposed golf putting range will focus on short-distance static putting practice with no machinery or high-decibel activities involved, which will produce little noise and is expected to have limited impacts on nearby residents;
- (f) there are examples of private sports facilities (i.e. padel courts and ancillary facilities in Sha Kok Mei, Sai Kung) which are in operation notwithstanding their proximity to village houses and watercourses;
- (g) the applicant proposes to plant new and healthy trees to enhance the overall landscape. No adverse impacts on the surrounding environment are anticipated; and

- (h) the applicant undertakes to comply with relevant guidelines and regulations.

**3. Compliance with the “Owner’s Consent/Notification” Requirements**

The applicant is not one of the “current land owners”. In respect of the other “current land owner(s)”, the applicant has complied with the requirements as set out in the “Town Planning Board Guidelines on Satisfying the ‘Owner’s Consent/Notification’ Requirements under Sections 12A and 16 of the Town Planning Ordinance” (TPB PG-No. 31B) by publishing newspaper notices and sending notice to Sai Kung Rural Committee. Detailed information would be deposited at the meeting for Member’s inspection.

**4. Town Planning Board Guidelines**

The Town Planning Board Guidelines No. 10 for Application for Development within “GB” Zone under Section 16 of the Town Planning Ordinance (TPB PG-No. 10) is relevant to the application. The relevant assessment criteria are at **Appendix II**.

**5. Background**

The Site is currently not subject to any active planning enforcement action.

**6. Previous Applications**

- 6.1 The Site is the subject of three previous applications submitted by applicants different from the current application for temporary holiday camp and tent camping ground and/or filling of land.
- 6.2 The southern and southwestern portions of the Site form part of the subject site of a previous application (No. A/SK-TMT/75) for proposed temporary holiday camp and tent camping ground for a period of three years and associated filling and excavation of land which was approved with conditions by the Committee in 2022 mainly on sympathetic considerations that the proposed uses were temporary in nature, the site would be reinstated upon expiry of planning permission as proposed by the applicant, and the proposed uses generally complied with TPB PG-No. 10 in that the proposed design and layout were considered compatible with the surrounding area and all technical issues were addressed by the applicant. The planning permission was revoked on 9.6.2024 due to non-compliance with approval conditions in relation to the implementation of mitigation and preventive measures in the risk assessment report, fire services installations proposal and landscape proposal.
- 6.3 The eastern portions of the Site form part of the subject sites of the two previous applications for filling of land for permitted agricultural use (No. A/SK-TMT/52 and A/SK-TMT/61) which were rejected by the Committee in 2016 and by the Board upon review in 2018 respectively mainly on the grounds that the applicants failed to demonstrate that the proposed filling of land would not cause adverse

drainage and landscape impacts on the surrounding areas and there was insufficient information to justify the need of the land filling for agricultural use at the sites.

- 6.4 Details of the previous applications are summarised at **Appendix III** and their locations are shown on **Plan A-2**.

## **7. Similar Application**

There is no similar application for ‘Place of Recreation, Sports or Culture’ use within the “GB” zone on the OZP.

## **8. The Site and Its Surrounding Areas (Plans A-1 and A-2, aerial photo on Plan A-3b, and site photos on Plans A-4a to A-4c)**

### **8.1 The Site is:**

- (a) a low-lying area located within the water gathering ground (WGG) and village ‘environs’ (‘VE’) of Long Keng with natural slopes immediately adjoining to its western and southwestern portions;
- (b) relatively flat which is currently covered with trees and vegetation, and deposited with a metal-framed tent, solar panels and miscellaneous items. A mud track and a grave are found within the Site; and
- (c) accessible via a narrow single-lane for two-way traffic local track which was not formed as a proper vehicular access, leading to Tai Mong Tsai Road about 500m to the south.

8.2 The surrounding areas are predominantly rural in character with woodland and grassland to the north, west and south, and scattered temporary structures and village houses clusters of Long Keng and Wo Liu to the southeast and further north. An existing stream flows from north to south adjacent to the southwestern boundary of the Site leading to the Long Keng Lowland Raw Water Pumping Station operated by Water Supplies Department (WSD) which is located to the immediate south of the Site.

## **9. Planning Intention**

- 9.1 The planning intention of the “GB” zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.
- 9.2 As stated in the Explanatory Statement (ES) of the OZP, as filling or excavation of land may cause adverse drainage impacts on the adjacent areas and adverse impacts on the natural environment, permission from the Board is required for such works and related activities in the “GB” zone.

## **10. Comments from Relevant Government Departments**

10.1 The following government departments have been consulted and their views on the application are summarised as follows:

### **Land Administration**

10.1.1 Comments of the District Lands Officer/Sai Kung, Lands Department (DLO/SK, LandsD):

- (a) no objection to the application;
- (b) neither excavation permit nor Letter of Approval for erecting structures at the Site has been processed/approved by her office;
- (c) the Site falls within the 'VE' of Long Keng and WGG. The Site may interfere with the Engineering Reserve relating to WSD's Long Keng Lowland Raw Water Pumping Station; and
- (d) other detailed comments and advisory comments are at **Appendices IV and V**.

### **Traffic**

10.1.2 Comments of Commissioner for Transport (C for T):

- (a) the track leading to the Site is not under Transport Department's management;
- (b) the applicant has not provided the requested information regarding (i) capacity of the proposed development, e.g. number of staff to be accommodated; and (ii) the internal road layout of the parking spaces and L/UL area for his consideration; and
- (c) given that information on (b) above is not adequately provided in the application, there is insufficient information to demonstrate that the proposed development would not generate adverse traffic impact on the area.

10.1.3 Comments of Chief Engineer/New Territories East, Highways Department (CHE/NTE, HyD):

no comment on the application from highway maintenance point of view as the track leading to the Site falls outside the maintenance jurisdiction of HyD.

### **Water Supplies**

10.1.4 Comments of Chief Engineer/Construction (CE/C), WSD:

- (a) object to the application;
- (b) it is anticipated that the proposed development would pose high risks of contamination to the WGG due to construction activities, traffic generation, sewage discharge as well as intentional and unintentional contamination from human activities including but not limited to vehicle parking, horticultural and recreational activities. The information submitted by the applicant without technical assessments is considered insufficient to prove and demonstrate that the proposed development would cause no material increase in pollution effect within the WGG; and
- (c) a very small portion of the Site at its southern end encroaches onto the Waterworks Reserve for Long Keng Lowland Raw Water Pumping Station;
- (d) the padel courts in Sha Kok Mei mentioned by the applicant (in **Appendix Ic**) do not fall within the WGG and there are no waterworks in the vicinity; and
- (e) advisory comments are at **Appendix V**.

### **Drainage and Sewerage**

#### 10.1.5 Comments of Chief Engineer/Mainland South, Drainage Services Department (CE/MS, DSD):

##### *Drainage*

- (a) while there is no flooding complaint or case reported in the vicinity of the Site, it is noted that the Site is situated at local low-lying areas with natural slopes to its north and west. When there is an inclement weather, it is envisaged that a large amount of surface runoff received from these natural slopes might flow down to the Site, causing flooding;
- (b) based on the drainage record, there is no DSD's drainage facility found within the Site. Hence, it is doubtful if sufficient drainage measures have been / would be implemented to deal with such a large amount of surface runoff received from the Site and its upstream catchments;
- (c) in view of potential change of topography due to the proposed development, the applicant should provide a Drainage Impact Assessment (DIA) for his further review, and clarify whether the Site will be paved and how surface runoff can be collected after the proposed development. The proponent of a private project (i.e. the Applicant) is responsible for implementing all measures necessary to mitigate adverse drainage impacts identified by the DIA;

- (d) the applicant did not provide information on whether there are drainage mitigation measures being implemented surrounding the Site or if underground drainage system has been installed underneath the Site to deal with the surface runoff during the inclement weather. Hence, his office could not conclude whether that there are potential flooding risks to surrounding area and whether such activities are considered acceptable or not from drainage perspective;

#### *Sewerage*

- (e) the application needs to meet the full satisfaction of Environmental Protection Department (EPD), the planning authority of sewerage infrastructure. DSD's views on sewerage aspect are subject to views and agreement of EPD; and
- (f) since there is no sewerage facilities and network in the vicinity of the Site and no septic tanks would be provided, his office is not in a position to provide comment on sewerage aspect.

### **Environment**

#### 10.1.6 Comments of Director of Environmental Protection (DEP):

- (a) it is noted that the proposed development would involve operation of golf putting range and on-site toilet facility which would have potential to cause adverse environmental impact. However, the applicant has yet to provide the following requested information for his consideration;
  - (i) the arrangement for collection, handling and disposal of sewage arising from the on-site toilet facility;
  - (ii) whether the operation/maintenance of the proposed golf putting range would involve the use or storage of agrochemicals such as fertilizer/pesticide/herbicides;
  - (iii) whether suitable water management system would be implemented for surface runoff management and avoid uncontrolled discharge of residual agrochemicals, if applied; and
  - (iv) whether there would loudspeaker or public announcement system at the outdoor activities area and the relevant noise control measures proposed to avoid potential noise nuisance; and
- (b) therefore, he considers that the applicant has not provided sufficient information to demonstrate the environmental acceptability of the proposed development and he cannot render support to the application at this stage.

### **Urban Design, Visual and Landscape**

#### 10.1.7 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

##### *Urban Design and Visual*

- (a) it is noted that the height of the proposed nine structures will be around 4m. As the proposed structures are relatively small scale in nature, significant adverse visual impact is not anticipated. As such, she has no adverse comment on the proposal from urban design and visual impact perspectives;

##### *Landscape*

- (b) with reference to the aerial photo of 2024 (**Plan A-3b**), the Site is situated in an area of settled valley landscape character predominated by woodland, grassland, scattered village houses and temporary structures;
- (c) it is observed that the Site is largely covered with vegetation and existing trees, but no trees information and proposed treatment has been provided in the application;
- (d) by comparing the aerial photos of 2022 and 2024 with the site photos taken in July and August 2025 (**Plans A-3a to Plan A-4c**), it can be observed that trees removal within the Site has taken place, existing landscape resource has been adversely impacted; and
- (e) the applicant has not submitted any information on existing vegetation and associated mitigation measures, if any, to demonstrate that the proposed development will not have any adverse impact on the existing trees.

### **Nature Conservation**

#### 10.1.8 Comments of the Director of Agriculture, Conservation and Fisheries (DAFC):

in view that the Site is covered with common plant species, he has no particular comment on the application. However, in view that the proposed development will involve excavation and backfilling, the applicant should be reminded to review whether tree removal is required.

### **Building Matters**

#### 10.1.9 Comments of the Chief Building Surveyor/New Territories East 2 and Rail, Buildings Department:

- (a) no in-principle objection under the Buildings Ordinance to the

application;

- (b) there is no outstanding statutory orders issued requiring removal of unauthorized building works in the Site; and
- (c) other detailed comments are at **Appendix IV**.

### **Fire Safety**

10.1.10 Comments of the Director of Fire Services (D of FS):

- (a) no in-principle objection to the application subject to fire services installations and water supplies for firefighting being provided to the satisfaction of the D of FS; and
- (b) other detailed comments are at **Appendix IV**.

### **District Officer's Comments**

10.1.11 Comments of the District Officer (Sai Kung), Home Affairs Department (DO(SK), HAD):

- (a) no comment on the application;
- (b) the application has been circulated to the SKAC Members and displayed at the Home Affairs Enquiry Centre (Sai Kung). No adverse comment has been received by her office so far;
- (c) it is noted that the applicant has gained support on the application from two SKDC members including Mr. Chan Kuen-kwan, MH and Mr. Li Tin-chi, and Ms. Wong Shin-yee, a RR of Long Keng Village and a member of the SKAC (**Appendix I**); and
- (d) no works project or facilities of SKDO will be affected by the application.

10.2 The following government departments have no objection to or no comment on the application, and their advisory comments, if any, are at **Appendix V**:

- (a) Project Manager (East), Civil Engineering and Development Department (CEDD);
- (b) Head of Geotechnical Engineering Office (H(GEO)), CEDD;
- (c) Director of Electrical and Mechanical Services (DEMS); and
- (d) Director of Food and Environmental Hygiene.

## **11. Public Comments Received During Statutory Publication Period**

On 25.7.2025, the application was published for public inspection. During the statutory

publication period, four public comments were received (**Appendix VI**). One comment is from the registered owners of the private lots within the Site (i.e. Lots 420, 426 RP and 428 in D.D. 216) objecting to the application mainly on the grounds that consent was not given to the applicant to proceed with the planning application and approval of the proposed development would jeopardize the development rights of the concerned lots. The remaining three comments are from Kadoorie Farm and Botanic Garden Corporation and two individuals objecting to the application mainly on the grounds that the proposed development is not in line with the planning intention of “GB” zone; would raise traffic safety concerns given the single-lane vehicular access leading to the Site is steep and narrow; lacks sufficient information on the extent of excavation, potential tree felling, and sewerage and drainage facilities; and it would be more appropriate for the proposed golf putting range to be located in brownfield areas or closer to urban areas.

## **12. Planning Considerations and Assessments**

- 12.1 The application is for proposed place of recreation, sports or culture (golf putting range) with ancillary facilities and associated filling and excavation of land within an area zoned “GB” on the OZP. The planning intention of the “GB” zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone. The proposed development is not in line with the planning intention of the “GB” zone and there is also no strong planning justification in the submission for a departure from the planning intention of the “GB” zone.
- 12.2 According to TPB PG-No. 10, an application for new development in a “GB” zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The scale and intensity of the proposed development should be compatible with the character of surrounding areas. The proposed development mainly comprises 12 outdoor golf putting areas of various sizes and 9 roofed-structures for indoor golf training and ancillary facilities. The proposed outdoor golf putting range with filling and excavation of land of an area of about 3,775m<sup>2</sup> accounting for 70% of the whole site is considered not compatible with the surrounding area which is predominantly rural in character with woodland, grassland, scattered temporary structures and village houses.
- 12.3 The Site is accessible via a narrow local track which was not formed as a proper vehicular access, connecting Tai Mong Tsai Road about 500m to the south. Car parking spaces and L/UL area will be provided at the site designated exclusively for golf instructors while visitors will primarily arrive on foot or by taxi. In view that the applicant has not provided the information regarding capacity of the proposed development, e.g. number of staff to be accommodated and the internal road layout of the parking spaces and L/UL area, C for T considers there is insufficient information to demonstrate that the proposed development would not generate adverse traffic impact on the area.
- 12.4 The Site is located within WGG and close to a stream leading to WSD’s raw water pumping station. CE/C, WSD objects to the application having considered that the proposed development would pose high risks of contamination to the WGG due to construction activities, traffic generation, sewage discharge as well as

contamination from human activities such as vehicle parking, horticultural and recreational activities arising from the proposed development, and the applicant has not made any submission including technical assessments to demonstrate that the proposed development would cause no material increase in pollution effect within the WGG. DEP is unable to support the application at this stage given that the applicant has not provided sufficient information to clarify the arrangement for collection, handling and disposal of sewage from the on-site toilet facility, the use or storage of agrochemicals, and implementation of water management system and noise control measures (if any) at the Site to demonstrate the environmental acceptability of the proposed development.

- 12.5 Trees and vegetation are found within the Site and the surrounding area of the Site is mainly a rural area predominated by woodland, grassland, scattered village houses and temporary structures. DAFC has no comment on the application as the Site is covered with common plant species. However, the applicant has not clarified whether there will be tree removal associated with proposed development. According to CTP/UD&L, PlanD, by comparing the aerial photos of 2022 and 2024 with the site photos taken in July and August 2025 (**Plans 3a to 4c**), it can be observed that trees removal within the Site has taken place. The existing landscape resource has been adversely impacted. As the applicant did not provide any information on tree removal proposal and landscape proposal, there is insufficient information to demonstrate that the proposed development would not generate adverse impact on the existing vegetation.
- 12.6 According to TPB PG-No. 10, the application should not adversely affect the natural landscape, drainage, overstrain infrastructure and aggravate flooding in the area. As the applicant did not provide the requested information including traffic arrangement, risk assessment on WGG, tree survey, landscape proposal, sewerage and drainage arrangement and environmental management measures in the submission to demonstrate no adverse impact would be induced by the proposed development, the application is not in line with TPB PG-No. 10.
- 12.7 According to the ES of the OZP, excavation and filling of land within the “GB” zone requires planning permission from the Board as it may cause adverse drainage and environmental impacts on the adjacent areas and the natural environment. To stabilise the roofed structures and form an undulating terrain with level difference for the outdoor golf putting areas, excavation and filling works are required covering an area of about 3,775m<sup>2</sup> (equivalent to about 70% of the site area) with depths ranging from 1m to 2m (**Drawing A-1**). The Site is a low-lying area which is not served by the public drainage system and adjoins natural slopes to the north and west. In view of the Site’s geographical characteristics, CE/MS, DSD envisages that a large amount of surface runoff from these natural slopes could flow down to the Site during inclement weather, causing flooding. Regarding the anticipated change in topography resulting from the proposed land excavation and filling works, the applicant has failed to provide the required DIA nor demonstrated that sufficient drainage measures have been/will be implemented to collect the increased surface runoff received from the Site and its upstream catchments. There is insufficient information for CE/MS, DSD to assess the potential flooding risks to surrounding area and the drainage acceptability of the proposed development.

- 12.8 Other concerned government departments including D of FS, H(GEO), CEDD and DEMS have no objection to or no comment on the application from fire safety, geotechnical and electricity supply safety aspects respectively.
- 12.9 The applicant quotes an example of private sports facilities in Sai Kung to support the application. However, the sport facilities are situated in different zoning and under different planning circumstances (e.g. not within WGG). Planning applications should be assessed on individual merits.
- 12.10 The planning circumstances of the current application are largely similar to those of the two previous rejected applications as mentioned in paragraphs 6.1 and 6.3 above in that the applicants failed to demonstrate that the proposed developments would not cause adverse impacts on the surrounding areas and there was insufficient information to justify the need of the proposed developments at the sites. In contrast, the planning circumstances of current application are different from the previous application approved by the Committee mainly on the sympathetic considerations as detailed in paragraphs 6.1 and 6.2 above. Rejection of the current application is in line with the Committee's previous decisions.
- 12.11 Regarding the public comments objecting to the application as detailed in paragraph 11 above, the departmental comments in paragraph 10 and planning assessments in paragraphs 12.1 to 12.10 above are relevant.

### **13. Planning Department's Views**

- 13.1 Based on the assessments made in paragraph 12 and having taken into account the public comments in paragraph 11, the Planning Department does not support the application for the following reasons:
- (a) the proposed development is not in line with the planning intention of the "Green Belt" zone which is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is no strong planning justification in the submission for a departure from the planning intention; and
  - (b) the proposed development is not in line with the Town Planning Board Guidelines No. 10 for 'Application for Development within "Green Belt" Zone' in that there are no exceptional circumstances or strong planning grounds to justify the application, the proposed development does not comply with the development controls and restrictions of areas designated as water gathering grounds and the applicant fails to demonstrate that the proposed development with excavation and filling of land is compatible with the surrounding area and would not generate adverse water supplies, sewerage, drainage, environmental, traffic and landscape impacts on the application site and the surrounding area.
- 13.2 Alternatively, should the Committee decide to approve the application, it is suggested that the permission shall be valid until 5.12.2029, and after the said date,

the permission shall cease to have effect unless before the said date, the development permitted is commenced or the permission is renewed. The following conditions of approval and advisory clauses are suggested for Members' reference:

Approval Conditions

- (a) the design and provision of parking and loading/unloading facilities for the proposed development to the satisfaction of the Commissioner for Transport or of the Town Planning Board;
- (b) the submission of a risk assessment report to prove and demonstrate no material increase in pollution effect resulting from the proposal and the implementation of the mitigation and preventive measures identified therein to the satisfaction of the Director of Water Supplies or of the Town Planning Board;
- (c) the submission of a fire service installations proposal and the implementation of fire service installations and water supplies for firefighting to the satisfaction of the Director of Fire Services or of the Town Planning Board;
- (d) the submission of a Drainage Impact Assessment and the implementation of the mitigation measures identified therein to the satisfaction of the Director of Drainage Services or of the Town Planning Board;
- (e) the submission of a Water Quality Impact Assessment to demonstrate that the final design and operation of the golf putting range would not adversely impact the water sensitive uses in the vicinity and implementation of mitigation measures identified therein to the satisfaction of the Director of Environmental Protection or of the Town Planning Board;
- (f) the submission and implementation of a landscape proposal to the satisfaction of the Director of Planning or of the Town Planning Board; and
- (g) if any of the above planning conditions (a), (b), (c), (d), (e) or (f) is not complied with before the operation of the use, the approval hereby given shall cease to have effect and shall on the same date be revoked without further notice.

Recommended Advisory Clauses

The recommended advisory clauses are attached at **Appendix V**.

**14. Decision Sought**

- 14.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 14.2 Should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.

14.3 Alternatively, should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the date when the validity of the permission should expire.

## **15. Attachments**

<b>Appendix I</b>	Application Form with attachments received on 15.7.2025
<b>Appendix Ia</b>	SI received on 24.7.2025
<b>Appendix Ib</b>	FI received on 15.10.2025
<b>Appendix Ic</b>	FI received on 22.10.2025
<b>Appendix II</b>	Relevant Extracts of TPB-PG No. 10
<b>Appendix III</b>	Previous Applications
<b>Appendix IV</b>	Government Departments' General Comments
<b>Appendix V</b>	Recommended Advisory Clauses
<b>Appendix VI</b>	Public Comments
<b>Drawing A-1</b>	Layout Plan
<b>Drawings A-2a and A-2b</b>	Conceptual Diagrams of the Proposed Development
<b>Plan A-1</b>	Location Plan
<b>Plan A-2</b>	Site Plan
<b>Plans A-3a and A-3b</b>	Aerial Photos of 2022 and 2024
<b>Plans A-4a to A-4c</b>	Site Photos

**PLANNING DEPARTMENT  
DECEMBER 2025**