

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/TM/601

<u>Applicant</u>	: King Brave Limited represented by Lawson David & Sung Surveyors Limited
<u>Application Site</u>	: Tuen Mun Town Lot (TMTL) 550, Area 45, Tuen Mun, New Territories
<u>Site Area</u>	: About 1,852m ²
<u>Lease</u>	: Held under New Grant No. 22878 <ul style="list-style-type: none">- User: a holiday camp of not more than 14 guest rooms- Maximum gross floor area (GFA): 739m²- Maximum building height (BH): not exceeding 37.9mPD- Maximum number of storeys: not exceeding 2 storeys including any floor or space below the level of the ground- Non-exclusive right of way over Brown Area formed, upheld, maintained and repaired by the Grantee- Parking Space for motor vehicles: 4 spaces with size of 2.5m (width) x 5m (length) x 2.4m (height)
<u>Plan</u>	: Approved Tuen Mun Outline Zoning Plan (OZP) No. S/TM/41
<u>Zoning</u>	: “Recreation” (“REC”) <i>[Restricted to a maximum plot ratio (PR) of 0.4, a maximum site coverage (SC) of 20% and a maximum BH of 2 storeys (for development except residential development); restricted to a maximum PR of 0.2 and a maximum BH of 2 storeys (for residential development)]</i>
<u>Application</u>	: Proposed House

1. **The Proposal**

- 1.1 The applicant seeks planning permission to develop a house at the application site (the Site) zoned “REC” on the OZP (**Plan A-1**). According to the Notes of the OZP for the “REC” zone, ‘House’ is a Column 2 use which requires planning permission from the Town Planning Board (the Board). The Site is currently vacant and covered with vegetation (**Plans A-4a and A-4b**).
- 1.2 According to the applicant’s submission, the proposed development comprises one 2-storey house and one single-storey guardroom with a BH of 7m and 2.3m respectively. The proposed development has a PR of about 0.2 and a SC of about 11.8%. The vehicular run in/out and pedestrian entrance of the proposed

development will be located at the northern tip of the Site (**Drawing A-1**). Three private parking spaces (including one for disabled) and one loading/unloading space will be provided within the proposed development. The Master Layout Plan, floor plans, and sectional plans submitted by the applicant are at **Drawings A-1 to A-3** respectively.

1.3 The Site was involved in four previous applications¹, including two s.16 applications and two s.12A applications (**Plan A-2**) (detailed in paragraph 5 below). Among these, the last s.16 application (No. A/TM/469) for proposed holiday camp with a PR of 0.3984 and a BH of two storeys was approved with conditions by the Rural and New Town Planning Committee (the Committee) of the Board on 22.5.2015, while the last s.12A application (No. Y/TM/31) for rezoning the Site from “REC” to “Residential (Group C)” (“R(C)”) to facilitate the development of three 2-storey houses with a maximum PR of 0.4 was not agreed by the Committee on 16.2.2024. The major development parameters of the current application and the last approved s.16 application are summarised as follows:

Development Parameters	Last Approved s.16 Application (A/TM/469) (a)	Current Application (A/TM/601) (b)	Difference (b) – (a)
Proposed Use	Holiday Camp	House	Different Use
Site Area (about)	1,851.128m ²	1,852m ²	+0.872m ² (+0.05%)
Total GFA (about)	738.97m ²	370.4 m ²	-368.57m ² (-50%)
PR (about)	0.3984	0.2	-0.1984 (-50%)
SC (about)	20%	11.8%	-8.2%
No. of Blocks			
Holiday Camp/House	2	1	-1
Guardroom	1	1	0
BH			
Holiday Camp/House	7.15m	7m	-0.15m
Guardroom	2.5m	2.3m	-0.2m
No. of Storeys			
Holiday Camp/House		2	No Change
Guardroom		1	
Car Parking Spaces	6 (including 2 for minibus)	3 (including 1 for disabled)	-3
Greening Ratio	Not less than 30%		No Change

1.4 To demonstrate the technical feasibility of the proposed development, the applicant has submitted a Traffic Impact Assessment (TIA), Landscape Proposal

¹ While the previous s.12A application No. Y/TM/31 was submitted by the same applicant of the current application, the other three previous applications were submitted by the parent company of the applicant.

with Tree Survey Report (LP&TSR), Environmental Assessment (EA), Drainage Impact Assessment (DIA) and Geotechnical Planning Review Report (GPRR).

Vehicular Access and Transport Arrangement

1.5 The Site is currently accessible from San Shek Wan Road via a walking trail which falls within the adjoining “Other Specified Uses” annotated “Public Recreation and Sports Centre” (“OU(PRSC)”) zone (**Plan A-2**). The applicant proposes to widen the walking trail into a 6.1m-wide access road (i.e. a 4.5m wide vehicular access with a 1.6m wide footpath) connecting the Site with San Shek Wan Road, and to shift the existing passing bay at San Shek Wan Road about 20m westward (**Drawing A-5**). It is the shortest route between the Site and the existing road network with minimum impact on the adjacent landscape resources and will meet the emergency vehicular access (EVA) requirement. The applicant will be responsible for the construction, management and maintenance (M&M) of the proposed access road. While the proposed access road will intersect with the horse trail of the Tuen Mun Public Riding School (TMPRS), electronic gates will be installed on both sides of the intersecting point to ensure traffic safety and minimise impacts on horses and horse riders (**Drawing A-1**). Warning signs will also be erected to alert users and horse riders to pay attention at the intersecting point. The submitted TIA concludes that no adverse traffic impact on the surrounding road networks is anticipated.

Landscape Proposal and Tree Preservation

1.6 According to the LP&TSR, a total of 23 trees located near the Site are proposed to be felled², including four trees located on/close to the site boundary and 19 trees along the existing walking trail where the proposed access road will be built upon. The form, health and structural conditions of these affected trees are recorded as ‘fair’ or ‘poor’ and none of them are protected species nor ‘Old and Valuable Trees’. To create a green environment for the future residents, a total of 17 new trees of heavy standard will be planted within the Site (i.e. a compensatory ratio of 1:1) (**Drawing A-4**). Private open space, including a leisure lawn at the northern portion of the Site, will be provided for the enjoyment of the residents in accordance with the Hong Kong Planning Standards and Guidelines (HKPSG) (i.e. 1m² per person). Not less than 30% of the site area will be provided for greening in accordance with the Explanatory Statement (ES) of the OZP for the “REC” zone.

Environmental, Sewerage, Drainage and Geotechnical Aspects

1.7 According to the EA, the proposed development would not be subject to adverse railway noise nor traffic noise impacts. Regarding air quality, sufficient buffer distance from the surrounding road network and the proposed access road with reference to the HKPSG would be adopted to mitigate potential vehicular emission impact. Besides, with proper implementation of the recommended

² Including six *Leucaena leucocephala* (銀合歡) which is not required to be compensated according to the “Guidance Notes on Tree Preservation and Removal Proposals for Building Development in Private Projects” issued by Lands Department in June 2023.

mitigation measures and good site practices (e.g. provision of hoarding and earth buns at the site boundary to control surface runoff) in accordance with the relevant Practice Note for Professional Persons (ProPECC PN) published by the Environmental Protection Department, adverse water quality impact on the natural stream running away from the southwestern boundary of the Site is not expected. As no public sewerage connection is currently available at the Site, all sewage and wastewater generated from the proposed development would be treated by the proposed underground septic tank located at the northern tip of the Site (**Drawing A-1**).

- 1.8 According to the DIA, peripheral U-channels along the site boundary and the proposed access road will be constructed to collect the stormwater. As only minor land levelling works would be carried out at the Site, no adverse drainage impact on the surrounding areas is anticipated with the proposed drainage system. Besides, the GPRR concludes that the proposed development is considered geotechnically feasible. The applicant has committed to undertake a Natural Terrain Hazard Study (NTHS) with recommended mitigation measures as the proposed development proceeds.
- 1.9 In support of the application, the applicant has submitted the following documents:
 - (a) Application Form received on 2.9.2025 **(Appendix I)**
 - (b) Supplementary Planning Statement (SPS) received on **(Appendix Ia)** 2.9.2025
 - (c) Further Information (FI) received on 13.11.2025* **(Appendix Ib)**
 - (d) FI received on 11.12.2025* **(Appendix Ic)**
 - (e) FI received on 23.12.2025* **(Appendix Id)**

** accepted and exempted from publication and recounting requirements*

- 1.10 On 24.10.2025, the Committee 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 the SPS and FIs in **Appendices Ia to Id** respectively. They can be summarised as follows:

Change in Market Demand and Better Utilisation of Land Resources

- (a) the Site has been idled for over three decades. The applicant considers that the previously approved scheme for holiday camp is no longer viable due to various reasons, including the change in market demand for recreational facilities and hospitality services; the shift in consumption and leisure habits of Hong Kong people; and the increasing free flow of travellers between Hong Kong and

Chinese Mainland since the COVID-19 pandemic. The proposed house development can better utilise land resources and improve the existing environment, which avoids further land degradation of the Site due to prolonged abandonment;

In Line with Government Policy to Increase Housing Supply

- (b) the Government has adopted a multi-pronged approach in searching suitable land for residential developments over the past five years. The current application for residential development can foster housing supply in the market which supports the Government's housing initiatives and aligns with its policy direction;

Compatible and Suitable Scheme with Acceptable Intensity and Sensitive Design

- (c) the Site is situated within a neighbourhood with residential and recreational uses, in which a single low-rise house development could be considered as a compatible and suitable scheme. Adequate planting and open space will be introduced with a carefully designed interplay between soft landscape and built form to minimise visual impact and provide a pleasant living environment for residents;
- (d) the proposed development with a PR of about 0.2, a BH of two storeys, a SC of about 11.8% and a minimum greening ratio of 30% complies with the development restrictions of the “REC” zone for residential development. The proposed development intensity has been reduced when compared to the previously approved s.16 application No. A/TM/469 for proposed holiday camp, as well as the indicative scheme of the last rejected s.12A application No. Y/TM/31 for residential development;

Responding to Changing Planning Circumstances

- (e) the Government has been exploring the feasibility to develop under-utilised land in Tuen Mun, for example, the ongoing study of “Lung Kwu Tan Reclamation and the Re-planning of Tuen Mun West Area” and “Study for Developments of Tuen Mun East and Adjacent Green Belt Cluster - Feasibility Study”. Moreover, there is ongoing territorial-wide exercise to look for unused sites (e.g. in zonings such as “Green Belt” (“GB”), “Government, Institution or Community”, “Agricultural” and “REC”) that are suitable for residential developments. The current application is coherent with the changing planning circumstances and in line with the Committee’s previous decision on application No. Y/TM/31 to retain the “REC” zoning for the Site;

No Interface Problem

- (f) the proposed access road will intersect with the existing horse trail along the northern part of the Site. To ensure the safety of both horses and road users, safety measures (e.g. two electronic gates, a security guard, and warning signs) will be implemented. Noise and visual mitigation measures such as planting heavy standard trees and adopting sound absorbing wall close to horse trail will also be incorporated. The applicant will maintain ongoing communication and

meetings with the TMPRS and concerned government departments to address and handle any potential issues;

Technical Aspects

(g) various technical assessments have been conducted to ascertain the feasibility of the proposed development from traffic, landscape, environmental, sewerage, drainage and geotechnical aspects. With the implementation of the proposed mitigation measures, there would be no adverse impact from the proposed development on its surroundings during the construction and operation phases; and

Not an Undesirable Precedent

(h) the Site is located on a relatively small “REC” zone which is encircled by the Government land (GL) zoned “OU(PRSC)”. The current application involves a unique background which is difficult to be replicated in other applications, and should be considered an exceptional case. Approving the current application should not entail setting a precedent for other similar applications.

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

The applicant is the sole ‘current land owner’. Detailed information would be deposited at the meeting for Members’ inspection.

4. Background

4.1 The Site (originally Old Schedule Agricultural Lot) and its surrounding areas (mainly GL) were zoned “GB” on the first draft Tuen Mun OZP No. L/TM/2 exhibited on 29.7.1983. On 22.4.1994, the draft Tuen Mun OZP No. S/TM/8, incorporating the amendment to rezone the surrounding GL of the Site (i.e. excluding the Site and its adjoining Lot 34 in D.D. 300) from “GB” into “OU(PRSC)” for development of public recreation facilities by the then Regional Services Department, was gazetted and the approved Tuen Mun OZP No. S/TM/9 was exhibited on 6.6.1997. The “OU(PRSC)” zoning of the surrounding areas of the Site has remained unchanged since then.

4.2 On 25.10.2012, the parent company of the applicant of the current application submitted a s.12A application (No. Y/TM/11) for rezoning a larger site (including the Site and its adjoining land) from mainly “GB” (99.3% of the site) with minor encroachment on “OU(PRSC)” zone (0.7% of the site) to “REC” to facilitate a proposed holiday camp development. On 5.4.2013, the s.12A application was partially agreed by the Committee³. The draft Tuen Mun OZP No. S/TM/32

³ In order to ensure adequate statutory planning control on the building and landscape designs of the proposed holiday camp development, while agreeing to rezone the site from “GB” and “OU(PRSC)” to “REC”, ‘Holiday Camp’ use was put under Column 2 of the “REC” zone requiring the submission of s.16 application for the Board’s consideration.

incorporating the amendment⁴ was gazetted on 2.5.2014 and the approved Tuen Mun OZP No. S/TM/33 was exhibited on 13.2.2015. The “REC” zoning of the Site has remained unchanged since then. According to the Notes of the “REC” zone, any development (except residential development) is subject to a maximum PR of 0.4, a maximum SC of 20% and a maximum BH of two storeys, while residential development requires planning permission and is subject to a maximum PR of 0.2 and a maximum BH of two storeys.

- 4.3 Subsequently, the parent company of the applicant submitted a s.16 application (No. A/TM/469) for proposed holiday camp development at the Site. The application was approved with conditions by the Committee in 2015 and the land exchange for the proposed holiday camp was executed in 2021. However, due to the social unrest and COVID-19 pandemic in 2019, the applicant then considered the proposed holiday camp financially unviable and impractical and submitted a s.12A application No. Y/TM/31 for rezoning the Site from “REC” to “R(C)” to facilitate a residential development with a maximum PR of 0.4 and a maximum BH of two storeys. The application was not agreed by the Committee on 16.2.2024.
- 4.4 In response to the Committee’s decision on not agreeing to application No. Y/TM/31 and the changing consumption and leisure habits of Hong Kong people, the applicant submits the current application for a proposed house development which conforms to the PR restriction of 0.2 and the BH restriction of two storeys for residential development as stipulated in the Notes of the “REC” zone.

5. **Previous Applications**

- 5.1 The Site is the subject of four previous applications, including two s.16 applications (No. A/TM/399 and A/TM/469) and two s.12A applications (No. Y/TM/11 and Y/TM/31). The sites of Applications No. A/TM/399 and Y/TM/11 were zoned “GB” while those of No. A/TM/469 and No. Y/TM/31 were zoned “REC” at the time of application. The details of these applications are at **Appendix II** and the site boundaries are shown in **Plan A-2**.
- 5.2 Application No. A/TM/399 for proposed residential development comprising two 2-storey houses with a PR of 0.4 at the Site was rejected by the Committee on 10.9.2010 mainly for the reasons that the proposed development was not in line with the planning intention of the then “GB” zone; the proposed development did not comply with the Town Planning Board Guidelines for Application for Development within Green Belt Zone (No. TPB PG-No.10) in that the proposal involved extensive clearance of existing natural vegetation causing adverse landscape impact on the surrounding areas; and approval of the application would set an undesirable precedent for other similar applications within “GB” zone.
- 5.3 On 5.4.2013, application No. Y/TM/11 for rezoning a larger site from mainly “GB” (99.3% of the site) with minor encroachment on “OU(PRSC)” zone (0.7%

⁴ Besides rezoning the application site to the “REC” zone as agreed under the s.12A application No. Y/TM/11, the residual area of the “GB” zone in the surroundings was also incorporated into the “REC” zone as it had the same character with the site in the agreed application.

of the site) to “REC” to facilitate a proposed holiday camp development with a maximum BH of 38.5mPD and two storeys, a maximum PR of 0.4 and a maximum SC of 20% was partially agreed by the Committee³.

- 5.4 After the Site was rezoned to “REC” on the draft Tuen Mun OZP No. S/TM/32, the applicant submitted application No. A/TM/469 for proposed holiday camp development with a PR of 0.3984 and a BH of two storeys at the Site which was approved with conditions by the Committee on 22.5.2015. Subsequently, an application (No. A/TM/469-1) for extension of time for commencement of approved development proposal for the proposed holiday camp (i.e. extended to 22.5.2023) was approved by the Director of Planning under the delegated authority of the Board⁵. The considerations of this previous application are not relevant to the current application which involves a different use.
- 5.5 On 16.2.2024, application No. Y/TM/31 for rezoning the Site from “REC” to “R(C)” to facilitate a low-rise and low-density development for three 2-storey houses with a maximum PR of 0.4 and a maximum BH of two storeys was not agreed by the Committee on the considerations that it was appropriate to retain the “REC” zoning of the Site alongside “OU(PRSC)” for recreational developments for the use of the general public and there were no strong justifications for the proposed rezoning.

6. Similar Application

There is no similar s.16 application in the same “REC” zone on the OZP.

7. The Site and its Surrounding Areas (Plans A-1 to A-4b)

7.1 The Site is:

- (a) a piece of vacant land covered with vegetation which is located at the toe of a knoll to the east; and
- (b) not served by any vehicular access. There is a walking trail connected to San Shek Wan Road (**Plans A-2, A-4a and A-4b**).

7.2 The surrounding areas have the following characteristics:

- (a) the Site is encircled by GL zoned “OU(PRSC)” subject to a maximum BH of three storeys accommodating a number of public recreational facilities including the TMPRS, Tuen Mun Recreation and Sports Centre Archery cum Gateball Court (TMRSCAGC) and Hung Lau Sitting-out Area to the south and Tuen Mun Golf Centre to the north. ‘Hung Lau’ (a Grade I historic building) zoned “GB” is located to the south of the Site. This whole area is sandwiched by Lung Fu Road to the west and Lung Mun Road to the east;

⁵ The holiday camp development was commenced upon the execution of relevant land exchange in 2021.

- (b) the Site is mainly surrounded by hilly areas covered with woodland/vegetation with a horse trail meandering along the slopes abutting the Site (**Plan A-3**);
- (c) the Light Rail Transit - Butterfly Station is located further southeast of the Site (**Plan A-3**); and
- (d) to the east across Lung Mun Road are some existing high-rise residential developments including Siu Shan Court and Butterfly Estate, and Siu Wu Court currently under construction. To the west across Lung Fu Road is the existing village settlement of Tsing Shan Tsuen San Shek Wan South (**Plan A-3**).

8. Planning Intention

- 8.1 The planning intention of the “REC” zone is primarily for recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism. Uses in support of the recreational developments may be permitted subject to planning permission.
- 8.2 According to the ES of the OZP for the “REC” zone, to ensure adequate greenery provision to the site and no significant disturbance to existing landscape resources and character, tree felling should be minimised and a minimum greenery coverage of 30% is required.

9. Comments from Relevant Government Bureau/Departments

- 9.1 The following government bureau/departments have been consulted and their views on the application are summarised as follows:

Land Administration

9.1.1 Comments of the District Lands Officer/Tuen Mun, Lands Department (DLO/TM, LandsD):

- (a) according to the SPS and FI (**Appendices Ia and Ib**), the proposed road widening/improvement works to the existing walking trail connecting the Site to San Shek Wan Road and the proposed 1.5m toe wall along the northern part of the proposed access road will be constructed, managed and maintained by the applicant. It is noted that the proposed access road will fall mainly on GL adjacent to Slope No. 5SE-D/C76 with a minor portion falling on GL within Slope No. 5SE-D/C172, and its alignment differs from the right-of-way granted under the New Grant No. 22878. Besides, according to the revised TIA (Annex F of **Appendix Ib**) submitted, the existing passing bay at San Shek Wan Road will be shifted along Slope No. 5SE-D/C172. In this regard, comments from the Transport Department (TD), Highways Department (HyD) and the Geotechnical Engineering

Office of Civil and Engineering Development Department (CEDD) should be sought on the proposed access road, the shifted passing bay and the proposed toe wall. His office would reserve comment at this preliminary stage and details of the proposed right of way from and to the Site under lease including its extent and alignment and the proposed toe wall would be considered during the processing of the lease modification or land exchange application stage;

- (b) the proposed access road would affect a section of an existing horse trail currently maintained by the Leisure and Cultural Services Department (LCSD) in connection with the TMPRS, which is held under permanent Government land allocation No. GLA-TM296. The applicant has clarified that they will be responsible for the construction and future M&M of the proposed electronic gates and warning signs, and such proposed safety measures would not result in the exclusive use of the proposed access road or any part thereof by the lot owner. Pursuant to the New Grant No. 22878, the lot owner shall lay and form the Brown Area (i.e. where the proposed access road will be built upon) and provide and construct such associated street furniture, traffic aids, etc. and other structures thereon so that vehicular and pedestrian traffic may be carried on the Brown Area and horse-riding or leading may be carried on the Horse Trail - Brown Area. Subject to comments by TD and LCSD, details of the proposed safety measures would be considered during the processing of the lease modification or land exchange application stage;
- (c) the proposed private residential development including the proposed access road and the shifted passing bay does not comply with the lease conditions governing the lot, including but not limited to restrictions relating to user, right-of-way and parking requirements. If the application is approved by the Board, the lot owner will need to apply to LandsD for a lease modification or land exchange for the implementation of the proposal. The proposal will only be considered upon receipt of a formal application from the lot owner. However, there is no guarantee that the application, if received by LandsD, will be approved. The application will be considered by LandsD acting in the capacity of the landlord at its sole discretion. In the event that the application is approved, it will be subject to such terms and conditions as the Government shall consider appropriate, including, among others, payment of a premium and an administrative fee; and
- (d) his advisory comments are at **Appendix III**.

Interface with the Nearby Horse Trail

9.1.2 Comments of the Director of Leisure and Cultural Services (DLCS):

- (a) the proposed access road would affect a section of the existing horse trail currently used by the TMPRS of the Hong Kong Jockey Club Public Riding Schools Limited (HKJCPRS Ltd.). Interface is observed and may pose potential risks to the horse riders and horses by the proposed development, in particular by the occupants, the construction works, the vehicular traffic generated and the road widening/improvement works of the proposed access road. She has no objection to the application provided that:
 - (i) both LCSD and HKJCPRS Ltd. shall not hold responsibility for the liabilities and damages of any vehicle and injury of pedestrians/residents using and passing the horse trail of TMPRS. The project proponent must possess valid third-party insurance to protect both LCSD and HKJCPRS Ltd. against any potential claims that may arise incidentally in the future;
 - (ii) a detailed management/construction plan with regards to the safety of vehicles and pedestrians/residents must be provided and put in place to the satisfaction of LCSD and HKJCPRS Ltd. before any works commence. No noisy work that may impact the daily operation of TMPRS should be allowed as horses are sensitive animals susceptible to abrupt external environmental influence or changes. Any irrational behaviours of horses may therefore pose a serious threat to them and the riders alike; and
 - (iii) relevant mitigation measures to address the interfacing of the horse trail with the proposed access road should be included in the land lease for strict observance by the lot owner so as to safeguard safety in general.
- (b) her advisory comments are at **Appendix III**.

Traffic

9.1.3 Comments of the Commissioner for Transport (C for T):

she has no objection to the application from traffic engineering point of view subject to the implementation of appropriate traffic management measures on San Shek Wan Road and near the vehicular access point of the Site to her satisfaction.

9.1.4 Comments of the Chief Highway Engineer/New Territories West, HyD (CHE/NTW, HyD):

- (a) he has no comment on the application from the highway maintenance point of view; and
- (b) his advisory comments are at **Appendix III**.

Urban Design

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

being located in the southwestern urban fringe of the Tuen Mun New Town, the Site is situated at the foothills of vegetated slopes, which are interspersed with various low-rise recreational facilities, sandwiched between existing and planned high-rise residential developments to the east and the Castle Peak to the west. The proposed development conforms to the PR restriction of 0.2 and the BH restriction of two storeys for residential development as stipulated in the Notes of the “REC” zone of the OZP. In view of this and given its scale and low-rise nature, the proposed development is considered not incompatible with the surrounding context and no significant adverse visual impact is anticipated.

Landscape

9.1.6 Comments of the CTP/UD&L, PlanD:

according to the aerial photo taken in 2024, the Site is situated in an area of miscellaneous urban fringe landscapes character predominated by “OU(PRSC)”, “GB” and “REC” zones. It is observed from the aerial photo that the majority of the Site is well-vegetated and trees exist. Based on the submitted LP&TSR, a total of 17 new trees of heavy standard will be planted within the Site and significant adverse landscape impact arising from the proposed development is not anticipated. As such, she has no adverse comment on the application from landscape planning perspective. Her advisory comments are at **Appendix III**.

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

- (a) according to the LP&TSR submitted by the applicant, the trees proposed to be felled are common species and will be compensated in a ratio of 1:1 in terms of quantity. Therefore, he has no adverse comment on the application from the nature conservation perspective; and
- (b) his advisory comments are at **Appendix III**.

Environment

9.1.8 Comments of the Director of Environmental Protection (DEP):

- (a) there is no chimney identified within 200m from the Site and the recommended buffer distance requirement under HKPSG for Lung Fu Road, Lung Mun Road and San Shek Wan Road would be complied. Also, no air sensitive uses will be located within the buffer zone, including the 5m buffer distance of the proposed access road;
- (b) the direct line of sight between the proposed development and identified industrial noise and light rail (e.g. Butterfly Station) sources are blocked by natural terrain and with a long separation distance (>200m). Thus, no adverse industrial and railway noise impacts are anticipated. The road traffic noise impact assessment in the revised EA submitted by the applicant also shows a full compliance with HKPSG for residential units;
- (c) the Site falls outside of water gathering ground and public sewer is not available in the vicinity of the Site. The applicant can follow the ProPECC PN 1/23 to design, construct and operate the septic tank and soakaway system proposed for the development. Provisions should be made for future connections to public foul sewers when such is available in the vicinity;
- (d) having considered the above, he has no objection to the application from the environmental protection perspective; and
- (e) his advisory comments are at **Appendix III**.

Drainage

9.1.9 Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD):

- (a) with reference to the revised DIA submitted, he has no adverse comment on the application from the public drainage perspective; and
- (b) her advisory comments are at **Appendix III**.

Building Matters

9.1.10 Comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD):

he has no objection to the application under the Buildings Ordinance (BO) and his advisory comments are at **Appendix III**.

Fire Safety

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

- (a) he has no in-principle objection to the application subject to fire service installations being provided to his satisfaction. Detailed fire service requirements will be formulated upon receipt of formal general building plans submission under the BO or Building (Planning) Regulations; and
- (b) his advisory comments are at **Appendix III**.

Other Aspects

9.1.12 Comments of the Head of Geotechnical Engineering Office, CEDD (H(GEO), CEDD):

- (a) he has no adverse geotechnical comment on the application with reference to the GPRR and FI submitted by the applicant; and
- (b) his advisory comments are at **Appendix III**.

9.1.13 Comments of the Executive Secretary (Antiquities & Monuments) 1, Antiquities and Monuments Office, Development Bureau (ES(A&M)1, AMO, DevB):

- (a) the Site is located over 100m away from Hung Lau which is a Grade 1 historic building. While she has no adverse comment on the application, the applicant should ensure that Hung Lau would not be adversely affected, both visually and physically, by the proposed development if it is approved by the Board; and
- (b) her advisory comments are at **Appendix III**.

9.2 The following government departments have no objection to/no comment on the application, their advisory comments, if any, are at **Appendix III**:

- (a) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
- (b) Project Manager (West), CEDD (PM(W), CEDD);
- (c) Commissioner of Police (C of P);
- (d) Director of Food and Environmental Hygiene (DFEH);
- (e) Director of Electrical and Mechanical Services (DEMS); and
- (f) District Officer (Tuen Mun), Home Affairs Department (DO(TM), HAD).

10. Public Comments Received During Statutory Publication Period

On 12.9.2025, the application was published for public inspection. During the statutory public inspection period, two comments were received (**Appendix IV**). A comment from an individual objects to the application mainly on the grounds that the Site should be used for recreational development to meet the demand of the increasing population,

the proposed access road would interfere with the users of the existing horse trail, and the proposed development which comprises only one house will have no positive impact on housing supply. Another comment from Kadoorie Farm & Botanic Garden Corporation expresses concerns on the potential impacts of approving the application.

11. Planning Considerations and Assessments

Planning Intention and Site History

- 11.1 The application is for proposed house development at the Site zoned “REC” on the OZP. The proposed development (**Drawings A-1 to A-5**) comprises one 2-storey house and one single-storey guardroom with a PR of about 0.2, a SC of about 11.8% and a greenery coverage of not less than 30% within the Site. Whilst the proposed development is not entirely in line with the planning intention of the “REC” zone which is primarily for recreational developments for the use of the general public, the proposed development is in compliance with the development restrictions of the “REC” zone for residential development as well as the minimum greenery coverage requirement stipulated in the ES of the OZP for the “REC” zone.
- 11.2 The Site, together with the adjoining private lot (i.e. Lot 34 in D.D. 300), have been rezoned to “REC” since 2014 and are encircled by surrounding GL which has been rezoned to “OU(PRSC)” since 1994. Given the Site is wholly under private ownership, the planning intention of the “REC” zone could only be realised through private initiatives. Upon designation of the “REC” zoning in 2014, the parent company of the applicant had submitted a s.16 application (No. A/TM/469) for the development of a proposed holiday camp with a maximum PR of 0.4 and a BH of two storeys which was approved in 2015 with the related land exchange executed in 2021. However, the proposed holiday camp was not implemented. The applicant states in the current application that the holiday camp development is no longer viable due to various reasons, including the change in market demand for recreational facilities and hospitality services; the shift in consumption and leisure habits of Hong Kong people; and the increasing free flow of travellers between Hong Kong and Chinese Mainland since the COVID-19 pandemic. Taking into account the change in circumstances, the applicant considers residential development at the Site is the optimal solution to address its prolonged abandonment.
- 11.3 The applicant subsequently submitted a s.12A application (No. Y/TM/31) for rezoning the Site from “REC” to “R(C)” to facilitate a residential development of three houses with a maximum PR of 0.4 and a maximum BH of two storeys. However, it was not agreed by the Committee in 2024 mainly on the considerations that the “REC” zoning of the Site was considered appropriate to be retained alongside the “OU(PRSC)” zone for recreational developments for the use of the general public. In view of the above, the applicant submits the current application for a proposed house with development parameters conforming to the development restrictions for residential development in the “REC” zone with a view to better utilising scarce land resources and avoiding further degradation of the Site. Taking into account the history and background

of the Site and the planning assessments below, there is no objection to the proposed house development at the Site.

Land Use Compatibility and Development Intensity

11.4 The Site is located in the southwestern urban fringe of the Tuen Mun New Town and situated at the foothills of vegetated slopes, which are interspersed with various low-rise recreational facilities including TMPRS, TMRSCAGC and Hung Lau Sitting-out Area, and sandwiched between existing and planned high-rise residential developments including Siu Shan Court, Butterfly Estate and Siu Wu Court to the east, and the existing village settlement of Tsing Shan Tsuen San Shek Wan South and Castle Peak to the west. From the land use perspective, the proposed house is considered not incompatible with the surrounding areas.

11.5 In terms of development intensity, the proposed development complies with the development restrictions of the “REC” zone for residential development (i.e. a maximum PR of 0.2 and a maximum BH of two storeys). The proposed BH is also lower than that of the “OU(PRSC)” zone (i.e. maximum BH of three storeys) surrounding the “REC” zone. The proposed development is considered not incompatible with the existing developments in the “OU(PRSC)” zone. CTP/UD&L, PlanD has no adverse comment on the application from urban design and visual impact perspectives as the proposed house conforms to the development restrictions as stipulated on the OZP, and given its scale and low-rise nature, the proposed development is considered not incompatible with the surrounding context and no significant adverse visual impact is anticipated.

Technical Feasibility

11.6 The submitted TIA concludes that the junctions analysed are expected to operate within capacities during the peak hours with the proposed development, and no adverse traffic impact to the surrounding road network is anticipated. The Site will be connected to San Shek Wan Road via a 6.1m-wide proposed access road (i.e. 4.5m-wide vehicular access with 1.6m-wide footpath) (**Drawing A-5**). The applicant will be responsible for the construction and M&M of the proposed access road. C for T has no objection to the application from the traffic engineering point of view subject to the implementation of appropriate traffic management measures on San Shek Wan Road and near the vehicular access point of the Site as set out in paragraph 12.2 below. Other government departments also have no adverse comment on the proposed access road.

11.7 Regarding DLCS’s concerns about possible interface issues arising from the proposed access road intersecting with the horse trail of the TMPRS, the applicant proposes to install electronic gates on both sides of the intersecting point (**Drawing A-1**). Warning signs will also be erected at the intersecting point to alert users and horse riders for traffic safety and minimise impact on horses/horse riders. As explained by the applicant, similar arrangements had been proposed under the previously approved application No. A/TM/469 and were agreed by the relevant government departments during the land administration stage. Those arrangements can also be adopted in the lease modification or land exchange application for the proposed house development should the current application be approved by the Committee.

11.8 All the trees proposed to be felled as identified in the LP&TSR are not protected species nor 'Old and Valuable Trees', and all are in 'fair' to 'poor' health conditions. To compensate, a total of 17 new trees of heavy standard in a ratio of 1:1 in terms of quantity will be planted within the Site. To create a green environment for the future residents, private open space, including a leisure lawn at the northern portion of the Site, will be provided in accordance with the HKPSG and not less than 30% of the total area will be provided for greening in accordance with the requirement of the ES of the OZP. In this regard, CTP/UD&L, PlanD advises that the proposed development is considered not incompatible with the urban fringe landscape character in the surrounding context. Significant landscape impact arising from the proposed house development is not anticipated. DAFC also has no comment on the application from the nature conservation perspective.

11.9 For other technical considerations, with reference to the submitted EA, DEP has no adverse comment on the application from the environmental planning perspective. DEP also has no adverse comment on the proposed underground septic tank which will be provided in accordance with the requirements of ProPECC PN 1/23. CE/MN, DSD and H(GEO), CEDD have no adverse comment on the submitted DIA and GPRR respectively. All other government bureau/departments consulted have no objection to/no adverse comments on the application.

Public Comments

11.10 There are two public comments received with one objecting comment and another comment expressing concerns on the application as summarised in paragraph 10 above. The applicant's justifications in paragraph 2, the departmental comments in paragraph 9 and the planning considerations and assessments in paragraphs 11.1 to 11.9 above are relevant.

12. Planning Department's Views

12.1 Based on the assessments made in paragraph 11 and having taken into account the public comments in paragraph 10 above, the Planning Department has no objection to the application.

12.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until 9.1.2030, 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 condition of approval and advisory clauses are suggested for Members' reference:

Approval Condition

the implementation of appropriate traffic management measures to the satisfaction of the Commissioner for Transport or of the Town Planning Board.

Advisory Clauses

The recommended advisory clauses are at **Appendix III**.

12.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Members' reference:

the proposed development is not in line with the planning intention of the "Recreation" zone which is primarily for recreational developments for the use of the general public. No strong planning justification has been given in the submission for a departure from the planning intention.

13. Decision Sought

13.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.

13.2 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.

13.3 Alternatively, 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. Attachments

Appendix I	Application Form received on 2.9.2025
Appendix Ia	SPS received on 2.9.2025
Appendix Ib	FI received on 13.11.2025
Appendix Ic	FI received on 11.12.2025
Appendix Id	FI received on 23.12.2025
Appendix II	Previous Applications
Appendix III	Recommended Advisory Clauses
Appendix IV	Public Comments
Drawing A-1	Master Layout Plan
Drawing A-2	Floor Plans
Drawing A-3	Sectional Plans
Drawing A-4	Landscape Plan
Drawing A-5	Proposed Access Road
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4a and A-4b	Site Photos

**PLANNING DEPARTMENT
JANUARY 2026**