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**tpbpd/PLAND**

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寄件者: Toco Planning Consultants Ltd TOCO [REDACTED]  
寄件日期: 2026年03月11日星期三 15:06  
收件者: tpbpd/PLAND  
主旨: Representation in Respect of Draft Plan made under Section 6(1) of the Town Planning Ordinance - Draft Sha Tin Outline Zoning Plan No. S/ST/39 <Amendment Item A>  
附件: TPB Letter 20260311.pdf; scanned authorisation letter.pdf; S6 form.pdf  
類別: Internet Email

**Submission Number:**

**TPB/R/S/ST/39- S2**

**Representation Number:**

**TPB/R/S/ST/39-R1**

Dear Town Planning Board Secretariat,

Please find attached a copy of our letter for your attention. The true copy will be delivered to your office by hand today.

Regards,  
Toco Planning Consultants Ltd.



The Secretary,  
Town Planning Board  
15/F, North Point Government Offices,  
333 Java Road,  
North Point, Hong Kong  
(Attn. Ms. Leticia LEUNG)



Dear Sir/ Madam,

11 March 2026

**Representation in Respect of Draft Plan made under Section 6(1) of the Town  
Planning  
Ordinance - Draft Sha Tin Outline Zoning Plan No. S/ST/39 <Amendment Item A>**

We submit herein, on behalf of Sai Lam (Salvation) Foundation Limited (the Representer), a Representation in respect of Draft Sha Tin Outline Zoning Plan No. S/ST/39, which was gazetted by the Town Planning Board (TPB) on 16.1.2026. The Representer strongly supports Amendment Item A for the following reasons:

- (a) Amendment Item A reflects the TPB's previous decision on 18.7.2025 to approve the section 12A application No. Y/ST/60 ("rezoning application") for rezoning the Lots 63 and 296 (Part) in D.D.185 from "Village Type Development" to "Government, Institution or Community (1)";
- (b) The submission of the "rezoning application" is aimed at regularising the Pre-cut-off Columbarium for Sai Lam Temple, which is in line with the spirit of Private Columbaria Ordinance to resolve the existing columbarium under a pragmatic and sensitive approach. It is also in line with the Government's intention to relieve part of the urgent demand for columbarium niche spaces in Hong Kong;
- (c) The subject use is small scale in nature and various technical assessments had been carried out by the Applicant. Concerned government departments eventually had no objection/comment on the "rezoning application" on traffic, environmental, drainage, sewerage and geotechnical aspects.

— Please accept our justifications on supporting Amendment Item A, and a copy of Form No. S6 with authorisation letter is enclosed for your attention.

Yours faithfully,  
Toco Planning Consultants Ltd.

  
Ted Chan  
Managing Director



c.c.: Client

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	Date Received 收到日期	

- The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.  
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會(下稱「委員會」)提出, 填妥的表格及支持有關申述的文件(倘有), 必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Processing of Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong – Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters (PECs) of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.tpb.gov.hk/>.  
填寫此表格之前, 請先細閱有關「根據城市規劃條例提交及處理申述及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處(香港北角渣華道 333 號北角政府合署 15 樓 - 電話: 2231 4810 或 2231 4835 及規劃署的規劃資料查詢處(熱線: 2231 5000)(香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓)索取, 亦可從委員會的網頁下載(網址: <http://www.tpb.gov.hk/>)。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the PECs of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.  
此表格可從委員會的網頁下載, 亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出申述的人士須以打印方式或以正楷填寫表格, 填寫的資料宜中英文兼備。倘若未能提供所需資料, 則委員會可把有關申述視為不曾提出論。
- In accordance with the Town Planning Ordinance (the Ordinance), the Board will make available all representations received for public inspection as soon as reasonably practicable at the Board's website and the PECs. The representations will be available for public inspection until the Chief Executive in Council has made a decision on the plan in question under section 9 of the Ordinance.  
根據《城市規劃條例》(下稱「條例」), 委員會會在合理地切實可行的情況下, 盡快將所有收到的申述上載至委員會的網頁及存放於規劃資料查詢處供公眾查閱, 直至行政長官會同行政會議根據條例第 9 條就有關圖則作出決定為止。

**1. Person Making this Representation (known as "Representer" hereafter)  
提出此宗申述的人士(下稱「申述人」)**

Full Name 姓名 / 名稱 (Mr./Ms./Company/Organization\* 先生/女士/公司/機構\*)

Sai Lam (Salvation) Foundation Ltd.

西林(普眾)基金會有限公司

(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)  
(注意: 若個人提交, 須填上與香港身份證/護照所載的全名)

**2. Authorized Agent (if applicable) 獲授權代理人(如適用)**

Full Name 姓名 / 名稱 (Mr./Ms./Company/Organization\* 先生/女士/公司/機構\*)

Toco Planning Consultants Ltd.

達材都市規劃顧問有限公司

(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)  
(注意: 若個人提交, 須填上與香港身份證/護照所載的全名)

\* Delete as appropriate 請刪去不適用者

Please fill in "NA" for not applicable item 請在不適用的項目填寫「不適用」

## 3. Details of the Representation (use separate sheet if necessary)\*

## 申述詳情(如有需要, 請另頁說明)\*

The plan to which the representation relates (please specify the name and number of the plan)  
與申述相關的圖則 (請註明圖則名稱及編號)

Draft Sha Tin OZP No. S/ST/39

## Nature of and reasons for the representation 申述的性質及理由

Subject matters 有關事項 <sup>Ⓜ</sup>	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由 <sup>^</sup>
Item A	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	Please find attached reasons in the covering letter attached.
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	

Any proposed amendments to the plan? If yes, please specify the details.  
對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。

# If the representation contains more than 20 pages, or any page larger than A4 size, 4 hard copies and 1 soft copy are required to be provided for the submission. Provision of email address is also required.  
若申述超過 20 頁或有任何一頁大小超過 A4, 則須提交硬複本一式四份和一份軟複本。另須提供電郵地址。

Ⓜ Please describe the particular matter in the plan to which the representation relates. Where the representation relates to an amendment to a plan, please specify the amendment item number provided in the Schedule of Proposed Amendments. 請形容圖則內與申述有關的指定事項, 如申述與圖則的修訂有關, 請註明在修訂項目附表內的修訂項目編號。

^ Please also note that section 6(3A) of the Ordinance provides that any representation received under section 6(1) **may be treated as not having been made** if, in the opinion of the Board that, the reason for the representation is a reason concerning compensation or assistance relating to, or arising from resumption/acquisition/clearance/obtaining vacant possession of any land by the Government. The above matters should be dealt with in accordance with the relevant statutory provisions on compensation and/or promulgated policy on compensation. Should you have any views on compensation or assistance matters, you may separately raise your views to the Director of Lands or the relevant authority. 請注意, 條例第 6(3A)條訂明, 如委員會認為根據第 6(1)條收到的任何申述所提出的理由是與政府收回/徵用/清理/取得任何土地的空置管有權而引起的補償或援助有關, 則有關申述可被視為不曾提出。上述事項應該按照相關補償的法律條文和/或已公布的補償政策處理。如對補償或援助事宜有意見, 可另行向地政總署署長或有關當局提出。

Please fill "NA" for not applicable item 請在不適用的項目填寫「不適用」

☑ at the appropriate box 請在適當的方格內加上 ☑ 號

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Submission Number:  
TPB/R/S/ST/39- S3

**tpbpd/PLAND**

寄件者: mm1947 [REDACTED]  
寄件日期: 2026年03月16日星期一 14:10  
收件者: tpbpd/PLAND  
主旨: AMENDMENTS TO THE APPROVED SHA TIN OZP NO. S/ST/38  
類別: Internet Email

Representation Number:  
TPB/R/S/ST/39-R2

**AMENDMENTS TO THE APPROVED SHA TIN OZP NO. S/ST/38**

Dear TPB Members,

**Item A:** about 0.15ha. Rezoning of a site at Sheung Wo Che from "V" to "G/IC(1)" to regularise the current religious institution and columbarium uses. No new buildings or niches are proposed and all the existing facilities at the Site will remain unchanged. All sold but only 3.618 occupied.

**STRONG OBJECTIONS**

This application is nothing about religion but all about exploitation of the term.

Y/ST/60 approved 18 July 2025 Sai Lam Temple

Lots 63 and 296 (Part) in D.D. 185, Sheung Wo Che, Sha Tin

Site Area: About 1,482m2

Planned development: 10,960 Niches / PR 0.72 / BH three storeys / Parking ??

During the meeting of 18 July members failed to question if any religious activities take place at the site. Do any monks/nuns live there? How come the religious function is a very small feature of the development, see Drawing 1b.

The original SLT had occupied the site in the 1920's and the current applicant claimed it had been providing columbarium service since 1936. BUT **"for the current application, the applicant did not provide any evidence to demonstrate that the columbarium use was in existence before the publication in the Gazette of the notice of the first statutory plan covering Sha Tin area in 1961."**

**"the applicant's representative, explained that the Site was in a dilapidated condition when the applicant acquired it and took over the operation of SLT around 2006. While many urns were found in SLT during restoration works, no relevant supporting documentation was available to prove the continued existence of the columbarium use."**

**"The applicant subsequently submitted a section 16 application for redevelopment of the existing religious institution (Temple) (i.e. application No. A/ST/656), which was rejected by the Committee in 2007. The applicant then undertook rehabilitation and renovation works at SLT, which were**

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*completed in 2009. In response to the Chairperson's follow-up question, Mr Wei said that **the temple was vacated before 2006.***

Company Name (English): SAI LAM (SALVATION) FOUNDATION LIMITED

Company Name (Chinese): 西林(普众)基金有限公司

Company Registration Number: [REDACTED]

Company Registration Date: [REDACTED]

Company Type: [REDACTED]

Company Status: Still Registered

996co.com/hk/company/[REDACTED] Company is in the funeral business

So effectively this company is not related to the founders of the institution and has merely adopted the name to facilitate its commercial interests.

That the project was launched in 2006 is no coincidence. Discussion had been initiated on the proposed changes to the operations of private columbaria. Many operators making similar applications commenced setting up columbaria at the same time to take advantage of loopholes as this is a lucrative business.

No indications as to who the directors of the company are and if they have any links with the original management of the site.

**“The applicant is not a “current land owner”. So why did members not inquire as to who actually owns the site?”**

Note also that the operation was originally planned for 3,000 niches.

Unlike other columbaria with sufficient car parking facilities or convenient access to public transport, SLT had no vehicular access, and visitors could only arrive on foot. As such, closure of SLT on Chung Yeung and Ching Ming Festival days was proposed to address the potential traffic impact arising from the columbarium under the current application.

Such a proposal is preposterous and would clearly be abandoned in view of public aspirations and traditions. To ensure compliance would require that government officers be assigned to monitor the site on each and every festival.

“sewage from portable chemical toilets and wastewater from the smokeless joss paper burner will be tankered away off-site by licensed collector regularly.”

But there is no vehicular access.

It is quite clear that this operation does not qualify under

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Compliance with the Town Planning Ordinance (Cap. 131), either being an "always permitted" use, covered by planning permission, **or verified as an existing use before the first zoning plan.**

Nor was columbarium use approved at any point since then. However no enforcement action was taken when the columbarium operation was launched in 2009 apart from "warning letter dated 31.3.2016 for the breach of conditions governing Lot 296 against the deposit of human remains was already registered in Land Registry on 27.6.2016".

In addition, there is the issue of unapproved buildings erected on the site.

It is also interesting to note that no images have been provided to show the extent of development pre 2006. This would indicate the extent of Destroy to Build activity.

No mention of compliance with the conditions that under the Private Columbaria Ordinance (Cap. 630) in Hong Kong, private columbaria that are granted a licence must establish a trust fund to ensure long-term maintenance and operation, particularly when niche sales decrease. In this case the niches have already been flogged but the operator is not the site owner and could abandon the operation at any time.

***"SLT is a social service organisation involved in many charity works"***

But no record found to verify this statement.

TPB members erred in approving the Sect 12 application and failing to ensure that the guidelines were effectively adhered to. They also erred in failure to look into the actual nature of the applicant's status.

In taking into consideration the built condition of the commercial enterprise both TPB and government departments are effectively endorsing Destroy to Build and rewarding operators who develop operations that undermine the intent of government policy and measures to control inappropriate development.

### **Amendments to the Notes of the Plan**

(c) 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.

**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**

(d) Incorporation of 'Field Study/Education/Visitor Centre' under Col 2 of the Notes for "V" zone

**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**

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TO JUSTIFY THE DEVELOPMENT OF COMMERCIAL OPERATIONS UNDER THE GUISE  
OF SERVICE CENTRES.

Mary Mulvihill

