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From: Doug Marshall <[REDACTED]>
Sent: Monday, January 5, 2026 11:47 PM
To: TPB Submission/PLAND <tpbsubmission@pland.gov.hk>
Cc: [REDACTED]
Subject: Re: 規劃申請編號 A/SK-TMT/84

檔案編號：A/SK-TMT/84A

關於綠化地帶轉康樂用途(哥爾夫球推桿訓練場)審批標準不一之正式投訴和覆核申請函。

致相關規劃部門主管：

嚴正質疑貴部門審批標準存有系統性偏差和偏見，現列舉鐵證事實：

一、同類案例審批矛盾與雙重標準，本項目慘遭針對

城規會過往批准多項「綠轉康」項目，均涉及大規模動土與永久建築，且多位處近郊住宅區，包括：

葵涌公園（2025年批）：3.02公頃綠化地，建設觀景台、滑梯等設施，掘土深度逾2米。

牛池灣公園（2009年批）：4公頃堆填區轉建射箭場、健身角，動土範圍達80%地塊。

佐敦谷遙控車場（2010年批）：永久賽道與看台建築，改變原始地形。

對比本人申請項目：西貢DD216地段僅規劃離地貨櫃接待處、露天停車區及低強度推桿場，動土深度<1米，嚴格符合《規劃指引10》「經常准許」類別。更需強調的是，有關方面聲稱本項目「沒有環評報告或其他相關報告」，此乃全然不實之謊言。DD216多年來多個農主地段，不論申請何種用途，均按規定完整提交環評報告、道路規劃報告、噪音影響評估報告、水土保持方案等全套文件，資料齊備、論證充分，卻屢屢在審批最後一關，被集水區管理部門以毫無法理依據的「不成文規例」無理阻撓。

最令人憤慨的是，本項目是由一眾專業高爾夫教練聯合籌劃的公益訓練場，高爾夫推桿運動本身屬於靜態體育項目，無噪音、無劇烈動土，既契合特首提出的全球全港運動推廣號召，更能帶動西貢本地經濟效益，正是基於諸多利好價值，項目才獲得西貢鄉事會、轄區區議員的一致支持。我們並非一群企圖打壓香港政府的勢力，而是一心為香港市民謀福祉、為國際級教練創造就業機會，避免他們因訓練場地流失而失去謀生之本；更何況，本項目作為全港首創的高爾夫球推桿場，竟然不被集水區及城規部門看見其正面有益於市民福祉的本質，僅因部門自身的不成文規則、為規避工作負擔而橫加阻撓，如此審批態度實在令人齒冷，如此難得的民生利好項目，竟因集水區部門的一己之私慘遭否決，審批標準的雙重性與偏執性昭然若揭。

二、項目獨特價值與社會廣泛認可：遠離民居的公益康樂空間，彌補行業與民生缺口

地段優勢與民眾支持基礎

當下政府收回大量土地用於興建住宅，西貢DD216地段遠離居民聚居區，不會對周邊民眾生活造成噪音、環境等干擾，且該地段位置優越，遠離市區繁囂之餘，緊鄰交通樞紐，救護車、消防車均可順利進入，應對突發狀況毫無障礙；同時地段距離路邊巴士站不遠，項目運營後將鼓勵市民乘搭西貢公共交通工具前往，再步行入場，既減少私家車帶來的污染，又能讓市民享受郊野步行的樂趣，此類適合開發康樂項目的土地已屬稀缺資源。項目不僅獲得附近居民的一致贊同與支持，更收獲DD216浪徑村兩位鄉長、西貢鄉事委員會主席黃水生及轄區區議員的正式支持信函，充分證明項目具備紮實的民意基礎。

哥爾夫球推桿訓練場價值與就業帶動效應：

本項目規劃的高爾夫推桿場訓練場是香港唯一首創，將由專業教練團隊駐場教學。當前香港眾多高爾夫練習場因政府收地而消失，教練群體面臨「無場可教」的困境，本土學員也難尋合適訓練場地，尤其外籍教練無法帶領學生前往內地訓練，行業發展陷入瓶頸。本項目的落地，將直接為高爾夫教練群體創造就業崗位，同時為香港培育高爾夫運動新星提供場地支持，推動體育產業多元化發展。

社會公益屬性：覆蓋弱勢社群與親子活動的雙重價值

對比濠洲高爾夫場缺乏針對殘障人士、輕度弱智人士的專屬訓練配套，本項目將專門規劃友善訓練區域，並開設面向弱勢社群及貧窮市民的低收費或學生訓練課程，讓以往被高爾夫運動「門檻」隔離的群體，也能平等享受運動樂趣；同時，項目規劃的親子教學區域，能有效引導青少年遠離電子產品，培養健康運動習慣，真正踐行體育公益的社會責任。更為關鍵的是，本項目設施規模極具克制性，僅放置數個貨櫃用作辦公室、儲物房及室內訓練空間，配備兩個可移動式吸糞廁所，露天停車位僅供教練執教及物資運輸使用，室內空間更配備投影教學設備，確保炎夏或雨天時訓練活動正常開展。此類兼具產業價值與民生溫度的項目，絕非集水區部門口中所想成的「禍害」，而是名副其實的社會福祉項目。

三、集水區議題之荒謬本質：長期失管卻濫用職權，以「保護」之名行「懶政」之實

集水區管理部門執意以「項目影響集水區」為由否決申請，以下鐵證足以證明其理由全無理據，實屬隻手遮天、濫用職權，掩蓋自身數十年失職的醜陋真相：

數十年失管鐵證如山，最近才清理僅為應對投訴的虛偽作秀

該集水區過往十多年間從未得到官方正規維護，本人及周邊居民儲存的歷史相片清晰記錄(這些相片已曾附上)：另外每逢颶風下雨，雜物、枯枝、塑膠廢棄物淤積堵塞水道，垃圾堆積如山卻無人問津，水患隱患與日俱增。經我們強烈投訴後，集水區部門才近期開始清理積存多年的垃圾，如今河道因雜物清除終於流水正常，徹底解決了過去因垃圾堵塞水閘、大雨時污水倒流導致農地與附近居民屋舍被淹的嚴重問題。

最近集水區的職員突然的清理操作，無異於掩耳盜鈴、虛張聲勢，僅是為了應對投訴、掩蓋長期失職的事實，其背後根本目的，是希望該區域永遠荒廢無人問津，從而規避自身應承擔的維護職責。

荒廢地段環境惡化之源，正是集水區部門的所作為。

本地段申請前的荒廢期間，長期有野狗、野豬出沒遺留大量糞便，雜草叢生滋生蚊蟲疫病；更有行山愛好者擅自闖入私人農地範圍宿營生火，遺留大量食物殘渣、塑膠垃圾，每逢雨天這些廢棄物便

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隨雨水徑直流入集水區，加劇淤塞與污染。對此嚴重問題，本人及居民曾投訴反映，相關部門卻始終以「此地屬野生區域，人員闖入無法控制」為由敷衍回覆，從未採取任何實質性治理措施。請問集水區管理部門難道毫無衛生常識？難道不知道這些腐爛垃圾與野狗牛豬糞便會滋生蚊蟲、污染水體，對集水區造成毀滅性影響？如今項目主動平整土地、杜絕雜物進入，反而被指「破壞集水區」，實屬顛倒黑白、混淆是非。

項目生態保護措施嚴謹，對集水區百利而無一害

事實恰恰與集水區部門的謊言相反：自本人啟動項目平整地段、清理雜物後，私闖人員大幅減少，宿營垃圾問題得到根本遏制，衝入集水區的雜物數量直降90%，切實改善了集水區的生態環境。更何況，本項目全場域採用高滲水性生態泥土鋪設，雨水能快速滲入土壤，大幅減少地表逕流；即便是大雨天氣，流入集水區的也僅是乾淨雨水，與過往夾雜垃圾、糞便的髒水有天壤之別。卻對過去數十年堆積如山的垃圾視而不見，其論調荒謬至極。集水區管理部門理應平衡項目的利弊得失，而非僅憑一句空泛的「集水區第十條規劃」，就肆意打壓一個對社會、對生態皆有益處的項目。

審批雙標鐵證：違規項目放行，公益項目遭壓

同屬集水區範圍的沙角尾網球場項目，其化糞系統容量明顯超標，動土深度達1.5米，對集水區潛在污染風險遠高於本項目，卻順利獲批；而本項目僅為低強度推桿場，配套措施嚴謹，卻被以「莫須有」的理由否決。更為荒誕的是，無論我們附近農主在同一地段提交多少份環評、水土保持報告，證明項目對集水區毫無負面影響下，集水區部門都能隨意搬出某條「不成文的第十條規定」，以一句「影響集水區」輕易打壓！十多年來，同地段所有申請均遭如此對待，足見其早已形成一套針對民眾申請的「潛規則」，徹底淪為濫用職權的工具。

四、正式訴求與後續行動

要求公開近十年「綠轉康」項目的動土深度、植被影響、集水區評估之核驗紀錄，並對比本項目審批標準，釐清執法一致性。

要求集水區管理部門向公眾正式公開本項目及歷年同地段申請的具體阻撓理由，詳細列明所謂「影響集水區」的條文編號、科學數據與實地驗證報告；同時必須向公眾解釋，為何數十年間對集水區放任失管，垃圾堆積如山卻不處理，僅在本申請時，投訴後才進行象徵性清理。

要求集水區管理部門提供核心證據與數據支撐，證明本項目「影響集水區」的說法，供專業環保機構與公眾評估其決策合理性。

要求覆核此前不合理否決決定，重新審議西貢DD216地段綠化地轉康樂用途申請，並就審批矛盾點可給予書面答覆。

希望集水區與相關政府部門，能夠以誠懇負責的態度審視本次申請，別再用敷衍怠慢的方式對待。我方申請的項目，完全不是你們所說的那種會破壞環境生態的項目。

說實話，過去十幾二十年，就DD216水集區從來沒有對水閘做過正規的維護保養。反倒是近年，附近農主已忍無可忍陸續開平整地段後，這一帶的水患和垃圾問題，都有了很明顯的減少。現在的問題癥結，其實就是你們集水區長期沒有進行清理整治。

如果你们要用不公平的方式處理這次申請，那我只能尋求公眾和相關部門的幫助，來維護應有的公道。畢竟凡事都要以理服人，現今社會再不能靠官官相衛、一手遮天的做法，並打壓我們這種為香港市民謀求康樂福祉的申請。

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我們並不是偷建濫造的違法分子，更不會虛報申請內容、背後另搞一套。我們是真心實意想要打造全港首創的一個高爾夫球推桿訓練場地。要是你們需要和教練團隊當面溝通，我們隨時都可以安排會面。

此致

香港特別行政區/規劃署

申請覆核人：Marshall Douglas Paul

聯絡方式：[REDACTED]

日期：2026年1月5日

File Reference: A/SK-TMT/84A

Formal Complaint and Application for Reconsideration Regarding Inconsistent Approval Criteria for Conversion of Green Belt to Recreational Use (Golf Putting Range)

To the Head of the Relevant Planning Authority,
Planning Department,
Government of the Hong Kong Special Administrative Region

I am writing to formally challenge the systematic bias and inconsistencies in your department's approval criteria, supported by the following irrefutable facts:

I. Contradictions and Double Standards in Approval of Similar Cases: Targeted Rejection of Our Project

The Town Planning Board (TPB) has approved numerous “green belt to recreational use” projects in the past, all involving large-scale excavation, permanent structures, and many located in suburban residential areas:

- Kwai Chung Park (Approved 2025): 3.02 hectares of green belt developed with viewing platforms, slides, and other facilities, with excavation exceeding 2 metres in depth.
- Ngau Chi Wan Park (Approved 2009): 4 hectares of landfill converted into an archery range and fitness corner, with 80% of the site subject to excavation.
- Jordan Valley Remote Control Car Track (Approved 2010): Permanent race track and spectator stands constructed, altering the original terrain.

In stark contrast, our proposed project at Sai Kung DD216 involves only elevated container reception facilities, an open-air car park, and a low-intensity putting range, with excavation depth of less than 1 metre—fully complying with the “Ordinarily Permitted” category under Planning Guideline 10.

The claim that our project “lacks an Environmental Impact Assessment (EIA) report or other relevant documents” is completely false. Over the years, multiple farmers and applicants for the same DD216 site have submitted a full set of professional documents, including EIA reports, road planning reports, noise impact assessments, and soil and water conservation plans. All records are readily accessible in your internal system. However, our applications have repeatedly been unreasonably blocked at the final approval stage by the Watershed Management Authority, citing unwritten rules with no legal basis.

Most outrageously, our project is a charitable training facility initiated by a group of professional golf coaches. Golf putting is a static sport with no noise or intensive excavation, fully aligning with the Chief

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Executive's initiative to promote sports locally and globally, while boosting local economic activity in Sai Kung. The project has received unanimous support from the Sai Kung Heung Yee Kuk and the local District Councillor.

We are not a force seeking to undermine the Hong Kong Government; instead, we are committed to promoting public welfare, creating employment opportunities for international coaches (to prevent them from losing their livelihoods due to lack of training venues), and establishing Hong Kong's first dedicated golf putting range. It is deeply disheartening that the Watershed Management Authority and the Planning Department have failed to recognise the project's public benefits, and instead obstructed it with unwritten rules to avoid their own workload. This unjust rejection, driven by self-interest, exposes the glaring double standards and irrationality in your approval process.

II. Unique Value of the Project and Broad Public Recognition: A Charitable Recreational Space Away from Residential Areas, Addressing Industry and Community Gaps

Site Advantages and Strong Public Support

Amid the Government's large-scale land resumption for housing development, the Sai Kung DD216 site is far from residential areas, ensuring no noise or environmental disruption to nearby residents. It is strategically located—away from urban chaos yet close to transport hubs—allowing easy access for ambulances and fire engines in case of emergencies. The site is also within walking distance of a nearby bus stop; we will encourage visitors to use public transport, reducing pollution from private vehicles while allowing them to enjoy a walk in the countryside. Such land suitable for recreational development is now scarce.

Since we cleared and levelled the DD216 site, unauthorised intrusions have dropped significantly, camping waste has been eradicated, and debris flowing into the watershed has decreased by 90%, effectively improving the ecological environment. The entire site will be paved with highly permeable ecological soil, enabling rapid rainwater infiltration and minimising surface runoff. Even during heavy rain, only clean rainwater will flow into the watershed—vastly different from the previous polluted water mixed with garbage and faeces. It is absurd that the Watershed Management Authority ignores decades of accumulated garbage in the area, yet uses a vague reference to “Watershed Regulation 10” to arbitrarily suppress a project that benefits both society and the environment.

Irrefutable Evidence of Double Standards: Unauthorised Projects Approved, Charitable Projects Suppressed

The Shak Kok Mei Tennis Court, also located within the watershed, has an overcapacity septic system and excavation depth of 1.5 metres—posing far greater potential pollution risks to the watershed than our project—yet it was approved without issue. In contrast, our low-intensity putting range with rigorous supporting measures has been rejected on trumped-up charges.

Even after multiple farmers submitted countless EIA and soil and water conservation reports proving no negative impact on the watershed, the Watershed Management Authority continues to invoke an “unwritten Rule 10” and dismiss our applications with the vague claim of “affecting the watershed”. For over a decade, all applications for the same site have faced this treatment, demonstrating the existence of a hidden rule targeting public applications—a tool for abuse of power.

IV. Formal Demands and Follow-Up Actions

Disclose verification records of excavation depth, vegetation impact, and watershed assessments for all “green belt to recreational use” projects approved in the past 10 years; compare these with the approval criteria applied to our project to ensure consistent law enforcement.

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Require the Watershed Management Authority to publicly disclose the specific reasons for blocking our project and all previous applications for the same site, including detailed legal provisions, scientific data, and on-site verification reports cited to support the claim of “affecting the watershed”. It must also explain why it has neglected watershed management for decades—allowing garbage to pile up without intervention—and only conducted symbolic cleaning after our complaints.

Require the Watershed Management Authority to provide core evidence and data to substantiate its claim that our project “affects the watershed”, for review by professional environmental organisations and the public to assess the rationality of its decision-making.

Require a reconsideration of the unreasonable rejection and a fresh review of our application for converting the Sai Kung DD216 green belt to recreational use, with a written response to the inconsistencies in the approval process.

We hope the Drainage Basin Office and the relevant government departments will review this application with a sincere and responsible attitude, and stop treating it with perfunctory indifference. The project we have applied for is not, as you claim, one that would damage the environment or local ecology.

To be frank, over the past ten to twenty years the DD216 water catchment has never had any formal maintenance or servicing of its sluice gates. In contrast, in recent years local farmers, having reached the end of their patience, have gradually levelled and cleared plots, and there has been a noticeable reduction in flooding and litter in the area. The root of the present problem is, in fact, the long-term lack of clearance and maintenance by your catchment office.

If you insist on handling this application unfairly, I will have no choice but to seek assistance from the public and the relevant authorities to uphold what is right. Matters must be decided on their merits; in today’s society we can no longer tolerate protectionism, opaque decision-making, or the suppression of applications such as ours that seek to promote recreation and well-being for Hong Kong residents.

We are not illegal builders, nor are we submitting false information or concealing ulterior motives. We genuinely intend to create Hong Kong’s first dedicated golf putting training facility. If you need to discuss this in person with our coaching team, we can arrange a meeting at any time.

Attention Planning Department, Government of the Hong Kong Special Administrative Region

Sincerely

Applicant for review: Marshall Douglas Paul

Contact: [REDACTED]

Date: 01/05/2026

在 2025年12月19日 週五 15:42，TPB Submission/PLAND <tpbsubmission@pland.gov.hk> 寫道：

先生/女士：

隨電郵附上城市規劃委員會有關題述規劃申請的信函。

城市規劃委員會秘書處

[See attachment "Extracted Minutes in Chinese.pdf"] [See attachment "Extracted Minutes.pdf"] [See attachment "Letter - A_SK-TMT_84.pdf"] [See attachment "RNTPC Paper in Chinese.pdf"]

From: Doug Marshall <[REDACTED]>

Sent: Wednesday, January 7, 2026 12:56 PM

To: skisdpo/PLAND <skisdpo@pland.gov.hk>

Cc: [REDACTED]

[REDACTED] TPB Submission/PLAND <tpbsubmission@pland.gov.hk>

Subject: Re: 規劃申請編號 A/SK-TMT/84

回覆規劃署：反駁雙重標準，回覆紅圈規劃署文字

致規劃署：

就貴署有關沙角美的 Tennis Club場所的含糊回應如下

以「集水區」借着「綠化地帶」為由否決本項目規劃申請，並要求「提供具體發展方向」一事，現明確回應如下，直指貴署論調的矛盾與不公，同時詳述項目具體規劃，以證其社會價值：

一、先回應「具體發展方向」：項目規劃完全符合公益與康樂屬性

貴署聲稱「需看到具體發展」，實則本項目規劃清晰、影響正面，完全契合《香港規劃標準與準則》中「康樂設施應回應公眾身心發展需求」的核心原則，具體發展內容如下：

公益屬性為核心：本項目並非商業會所，而是由專業教練主理的香港首創高爾夫推桿訓練基地，核心目標是培育體育新星——推桿作為高爾夫核心技術，基地將向青少年開放基礎訓練課程，填補本地相關基礎體育教育的空白；

社會效益全覆蓋：設立親子訓練區，促進家庭互動；劃分弱勢社群友善區，為殘障人士、基層家庭提供平等參與體育的機會，這與貴署支持的「普惠性康樂服務」理念完全一致；

零負面影響保障：項目不設大型設備、不舉行高強度競賽，全程無噪音污染，且訓練場以草坪為主，硬化面積極小，不僅不會破壞生態，反而能通過草坪養護強化水土保持，與「綠化地帶」生態功能兼容；

額外社會價值：項目將聘請專業教練、管理人員，直接製造就業機會，同時帶動周邊相關服務業發展，為社區帶來經濟活力，這是普通私人會所難以比擬的公共效益。更得到西貢鄉事會，區議員和當區村民和鄉長的支持。

請問貴署：這樣「不擾民、育人才、惠弱勢、創就業」的具體發展，難道不比僅服務少數人的私人會所更值得支持？難道不符合「康樂用途」的核心定義？

二、質疑貴署雙重標準：同為康樂用途，為何厚此薄彼？

□Urgent □Return receipt □Expand Group □Restricted □Prevent Copy

貴署稱沙角尾私人體育設施因「非集水區」「康樂用途」，附近有一條河流。你們有實地採訪嗎？這個不是由水系區所申延的嗎？但以上原因就可獲批，卻將本項目歸為「綠化地帶」禁止開展，這是典型的選擇性執行：

- 根據《香港規劃標準與準則》，康樂用途的界定核心是「是否回應公眾需求、是否帶來社會效益」，而非「是否位於集水區」；

- 事實上，政府早已開放配水庫上蓋等敏感區域作體育訓練、休憩等康樂用途，並明確「只要不影響核心功能，可多元利用土地」，為何本項目在「無噪音、保綠化、公益屬性更強」的前提下，反而被「集水區」標籤否決？

- 貴署不僅忽略本項目與私人會所的本質區別，更刻意回避「對有利益關聯的申請快速批准，對外籍人士或無關係者則搬弄條文」的質疑——難道規劃審批的標準不是項目本身的價值，而是申請者是否對貴署「有私人益處」？

三、反駁「集水區」擋箭牌：水閘失修在先，規則豈能雙重適用？

貴署以「項目位於集水區」為由拒批，卻對該區域「水閘長期失修」的事實視而不見，這一邏輯完全站不住腳：

根據《土地排水條例》（Land Drainage Ordinance），政府有法定責任維護水庫、水閘等排水設施，確保集水功能正常——貴署未履行維護義務，導致集水區核心設施失效，反而以此作為否決公眾康樂項目的理由，這是典型的「行政失責反轉為民眾負擔」；

請貴署出示相關法例：哪一章哪一條規定「集水區內絕對不可開展康樂項目」？又哪一章哪一條規定「政府未維護好水閘等設施，無需承擔任何責任」？

若貴署堅稱「集水區只能用於種菜」，難道所有購買集水區內農地的市民，都只能放棄公益規劃、被迫耕種？這不僅違背土地多元利用的原則，更浪費了培育社會效益的機會——集水區的核心功能是蓄水防澇，而非阻擋有益於市民的康樂項目，貴署豈能將其異化為「否決申請的工具」？

四、總結：公眾輿論之下，公平審批不容回避

現今社會早已不是「一隻手遮天」的時代，公眾輿論會監督每一個行政決定的公平性。本項目已明確具體發展方向，其社會效益、生態兼容性均符合規劃要求，且完全區不同於商業會所；先前的回覆也說明會控制訓練人流。貴署以「集水區」「綠化地帶」為由拒批，不僅忽視項目價值，更暴露了行政失責與雙重標準。

懇請貴署放棄「搬弄條文掩蓋自身問題」的做法，依據《香港規劃標準與準則》的公平原則，客觀評估本項目的公益價值，撤回不合理的否決理由，重新審批申請。若貴署仍堅持現有立場，請出具明確的法例依據，回應上述所有質疑，接受公眾監督，為何一個私人康樂會所可以在鬧市成立，無需受監管。一個遠離市區，墳墓地帶，住戶數量少。反而諸多刁難。本人明確說清楚不是要沙角尾的網球會所添麻煩。而是籍著他的位置告訴特首規劃署審批時的雙重標準，現時申請需為綠化地。但將來作出的貢獻和效益比規劃署或水閘區所說成的含糊打來得明確。我們一定會持續爭取不要讓一班可能可收有利益才可以申請的不公平現象，全面勇敢告知。這種不公平現象，識部門的高層才可以申請，才可以很多事情豁免，才容易過關完全不是看實際申請內容或市民福祉而審批。這些不公平的現象已經持續多年了，再也忍無可忍，那管今天成敗與否必要公平公開。

此致

一班熱心公益的哥爾夫球教練送上回覆



出覆核申請，本署將按既定程序處理。

關於來信提及的沙角尾私人體育設施，該用地在另一大綱圖上劃作「康樂」用途，並且位於集水區以外。因此，其規劃情況與規劃申請編號A/SK-TMT/84涉及的「綠化地帶」用地有別。城規會將根據具體發展情況，個別考慮規劃申請的審批。

如有任何疑問或需要進一步協助，請與本信代行人聯絡(電話號碼：2158 6165)。

規劃署

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