

Your Ref. : A/SK-TMT/84  
Our Ref. : PR240614  
Date : 21 January 2026

Town Planning Board Secretariat  
15/F, North Point Government Offices  
333 Java Road, North Point, Hong Kong



By Hand

**RE: Proposed Place of Recreation, Sports or Culture (Golf Driving Range) with Ancillary Facilities and Associated Filling and Excavation of Land at Various Lots in DD216, Long Keng, Sai Kung, New Territories (Application for Review on Planning Application No. A/SK-TMT/84 under Section 17 of Town Planning Ordinance)**

We, ASSET EMPIRE LIMITED, GRACEFUL CHINA DEVELOPMENT LIMITED and MELLINK INVESTMENT LIMITED, registered owners of shares of [REDACTED] (the Subject Land Lots) (**Plan 1**), hereby write to object to the subject review application.

The Subject Land Lots are enclosed in application boundary of the planning application (No. A/SK-TMT/84) for proposed golf driving range development lodged by Douglas Paul Marshall (the applicant) on 15 July 2025 under Section 16 of Town Planning Ordinance (**Plans 2 & 3**). It is noted that the subject S.16 planning application was rejected by the Town Planning Board on 5 December 2025 for the reasons, inter alia, that the applicant failed to provide technical assessments to demonstrate the proposed development would not generate adverse water supplies, sewage, drainage, environmental, traffic and landscape impacts on the application site and the surrounding areas. The applicant lodged application for review under S.17 of Town Planning Ordinance on 5 January 2026 without submission of the required technical assessments.

As registered owners of shares of the Subject Land Lots, we would like to reiterate that we have never given consent to the applicant to proceed the subject planning application. Approval of the proposed golf driving range shall jeopardize the proper use and development right of the Subject Land Lots, we strongly disagree with approval of the subject application by the Town Planning Board.

Should you have any queries on the above, please feel free to contact our Mr Keith Chan at [REDACTED]

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Your faithfully,  
For and on behalf of  
ASSET EMPIRE LIMITED

张雪琼



Authorized Signature

For and on behalf of  
GRACEFUL CHINA DEVELOPMENT LIMITED

张雪琼



Authorized Signature

For and on behalf of  
MELLINK INVESTMENT LIMITED



张雪琼

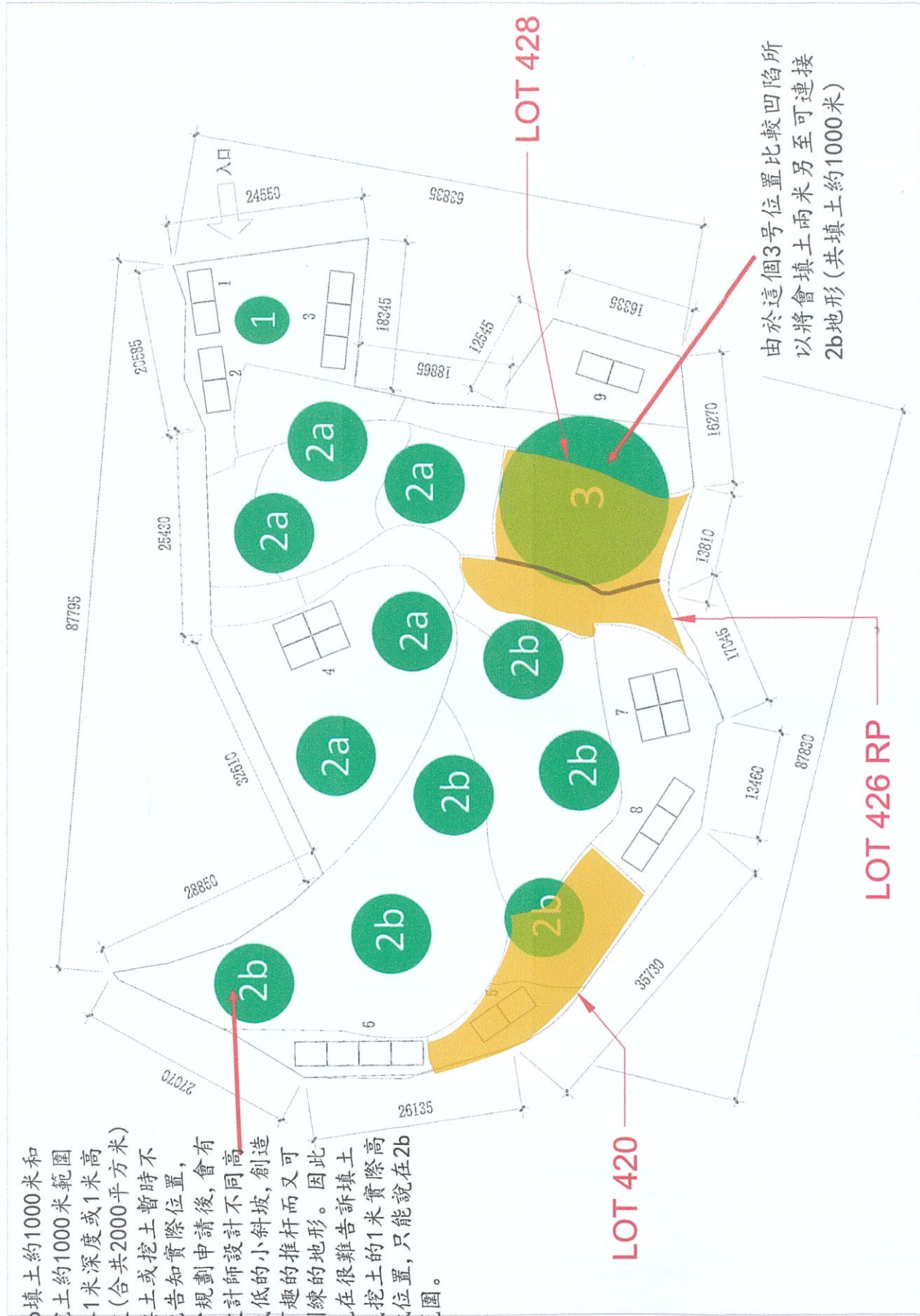
Authorized Signature





# DD216申請用地的布局圖及上蓋面積和挖土填土資料說明

2b填土約1000米和挖土約1000米範圍各1米深度或1米高(合共2000平方米)填土或挖土暫時不能告知實際位置,當規劃申請後,會有設計師設計不同高或低的小斜坡,創造有趣味的推杆而又可訓練的地形。因此現在很難告訴填土或挖土的1米實際高低位置,只能說在2b範圍。



由於這個3号位置比較凹陷所以將會填土兩米另至可連接2b地形(共填土約1000米)

寄件者: [REDACTED]  
寄件日期: 2026年02月05日星期四 11:16  
收件者: tpbpd/PLAND  
主旨: KFBG's comments on SIX planning applications  
附件: 260205 s16 SK 447.pdf; 260205 s16 TT 763, 764 & 765.pdf; 260205 s16 PH 1103.pdf; 260205 s17 TMT 84.pdf

類別: [REDACTED]

Dear Sir/ Madam,

Attached please see our comments regarding SIX applications. There are FOUR pdf files attached to this email. If you cannot see/ download/ open these files, please notify us through email.

Please do not disclose our email address.

Thank You and Best Regards,

Ecological Advisory Programme  
Kadoorie Farm and Botanic Garden

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The Secretary,  
Town Planning Board,  
15/F, North Point Government Offices,  
333, Java Road, North Point,  
Hong Kong.  
(Email: tpbpd@pland.gov.hk)

5th February, 2026.

By email only

Dear Sir/ Madam,

**Proposed Place of Recreation, Sports or Culture (Golf Putting Range) with Ancillary  
Facilities and Associated Filling and Excavation of Land**  
**(A/SK-TMT/84)**  
**(Review under Section 17)**

1. We refer to the captioned.
2. The application site is within Green Belt (GB) zone. The planning intention of this zone is as follows:

*‘The planning intention of this 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.’<sup>1</sup>*

3. We urge the Board to seriously consider whether the proposed use is in line with the planning intention of the GB zone.
4. Thank you for your attention.

Ecological Advisory Programme  
Kadoorie Farm and Botanic Garden

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<sup>1</sup> <https://www.ozp.tpb.gov.hk/api/Plan/PlanNote?planNo=S%2fSK-TMT%2f4&lang=EN&ext=pdf&dType=in>

tpbpd/PLAND

寄件者: [REDACTED]  
 寄件日期: 2026年02月06日星期五 3:44  
 收件者: tpbpd/PLAND  
 主旨: Re: A/SK-TMT/84 DD 216 Long Ken Golf Driving Range GB  
 類別: [REDACTED]

Dear TPB Members,

The three examples of similar approved use are not compatible  
 Jordan Valley Park Model Car Racing Circuit  
 Kwai Chung Park  
 Ngau Chi Wan Park  
 are all zoned 'OS' and are public facilities where structures that support recreational use are allowed

The proposed Driving Golf Range is on 'GB' and is commercial in nature.

Mary Mulvihill

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**From:** [REDACTED]  
**To:** tpbpd <[tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk)>  
**Date:** Thursday, 14 August 2025 3:35 AM HKT  
**Subject:** A/SK-TMT/84 DD 216 Long Ken Golf Driving Range GB

A/SK-TMT/84

Lots no. 402, 403RP, 408, 409SA, 410, 411, 412, 427, 413, 416RP, 416SB, 416SA, 430RP, 431RP, 419,424RP in D.D. 216, Long Keng, Sai Kung

Site area: 5,420sq.m

Zoning: "Green Belt"

Applied development: Golf Driving Range / 8 Vehcile Parking / **Filling and Excavation of Land**

Dear TPB Members,

Strongest Objections. The site overlaps with part of the footprint of the holiday camp approved under 75 in 2022 but subsequently revoked for failure to fulfil conditions.

The extent of excavation carried out for that plan is not clear, and neither whether more trees were chopped down in the process.

According to Applicant the site is "on a piece of **neglected green land** in Long Keng Village DD216, adjacent to Sai Kung. Our aim is to transform this site into a multifunctional sporting venue that benefits the physical and mental well-being of the community."

I would point out that all genuine GB is neglected in the sense that the purpose of the zoning is to encourage nature to do its own thing.

The application provides no details on the extent of the planned excavation, number of trees to be felled, toilets, drainage, etc.

The presumption now is that there be no further development on GB. Recent heavy rainfall and the expected impacts of climate change underline the importance of retaining slopes and trees.

A golf driving range is an activity best suited to be developed on closed landfills or lots impacted by brownfield operations. Unlike a golf course, there is no requirement that there be a green as the players are just whacking balls. In fact this is a recreational activity more suited to proximity to urban areas.

The application must be rejected and lessons learned from the unwise decision to grant approval of the holiday camp site.

Mary Mulvihill