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**Submission Number:**

**TPB/R/S/SK-HC/12- S2**

**From:** [REDACTED]  
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**To:** tpbpd/PLAND <tpbpd@pland.gov.hk>  
**Subject:** PROPOSED AMENDMENTS TO THE APPROVED HO CHUNG  
OZP NO. S/SK-HC/11

## **PROPOSED AMENDMENTS TO THE APPROVED HO CHUNG OZP NO. S/SK-HC/11**

Dear TPB Members,

**Item A** – (about 0.012 ha) Rezoning of a site in Wang Che from “Conservation Area” (“CA”) to “VTD”. Y/SK-HC/5 Approved 17/3/23

Strong objections, the “V” zone element is minuscule, less than 10%, half the site is Government Land and the Application Site falls within water gathering grounds, hence its zoning.

There is land available for about 66 Small House sites in the “V” zone. Lands Dept advised that there were 7 outstanding Small House applications within the ‘VE’ of Kai Ham (including Wang Che), but no figure on the 10-year Small House demand

forecast had been provided. Therefore, land available within the “V” zone could fully meet not only the outstanding Small House applications but also all legitimate NET House application for many years to come.

*The Site is located within WGG, the use of a septic tank and soakaway system*

*has to be avoided. The sewage generated from the proposed Small House would be stored in an underground holding tank which would be regularly cleared by a licensed contractor for further treatment outside the WGG.*

So proper disposal is effectively at the discretion of the applicant. Bearing in the mind the number of illegal structures, occupation of government land and number other offences that are rampant in villages, it is unacceptable that the application was approved when there is abundant land available in the village, some of it being used for parking.

In addition, soil nailing of a slope zoned ca and on Government Land close to the proposed development is required for slope stabilization and this would impact a number of trees both on and outside the site. That a detailed Tree Survey Report is required is indicative of the impact the development would have on the local flora. The cumulative impact and probability of damage to some of the trees is far too great to justify for the construction of a single dwelling.

**Item B** – (about 0.32 ha) Rezoning of a site comprising two land parcels at Ho Chung North Road from “Res (Group D)”, “Res (Group E)” and an area shown as ‘Road’ to “Res (Group C) 3” and addition of a symbol for linking up the two land parcels. Y/SK-HC/6 Approved 2/8/24 8 Villas / 16 Vehicle Parking / 12mts

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Object to inclusion of government land as it appears to be part of the public passage and should be excluded from site. The minutes of the meeting fail to adequately address the issue of land swap and management.

Object to height. Parking should be underground and the height of the villas the same of that of village houses, 8.23mts, to retain the rural landscape and reduce impact on the views of the mountains. Note that while the prevalent PR for the district is 0.75, surrounding homes are not as high as the proposed 4 floors.

Layout is appalling waste of land, effectively almost 50% of the site devoted to roads. This greatly reduces the amount of green coverage. Entrance to homes bordering road should be directly from the road, why create additional road surface. Obviously, no lessons taken from recent weather events and the folly of cementing over vast tracts of land at the expense of trees and plants.

Question the data provided re trees on the site. Has PlanD made an independent assessment? According to the Applicant *"two dead trees are proposed to be felled while the remaining four trees will be retained. The Applicant also proposes to plant a total of 29 new trees as compensatory trees."* This indicates that there are in fact many more trees on the site than 6 as developers never over compensate.

*"Overall planting design will be consisted of a mix of practicable, ornamental trees, evergreen hedges, and flowering shrubs"*, in other words any planting will be ornamental trees and shrubs.

That the administration continues to support rezoning to residential in an area with no public sewerage system should be questioned. Why are more people being encouraged to live in districts that do not have adequate public facilities?

**Item C** – (about 0.66 ha) Rezoning of a site at Wo Mei Hung Min Road from "Green Belt" to "Res (Group C) 4" and designation of the land in the middle as non-building area. Y/SK-HC/7 Approved 7/6/24 17 3-storey houses + Clubhouse

Strong Objections. The rezoning will effectively eliminate the current buffer that borders the highway. This is Sai Kung not MKK. Expectations are that the district would continue to provide a more rural aspect. The S.12 was submitted after the amendments to the process whereby public participation is excluded so we were deprived of the opportunity to question why would GB be rezoned to Res when the CE had announced in the 2023 Policy Address that:

*"As we have already identified **enough land for housing**, industry and other developments for the coming 30 years, the Government has no plan for the time being to further use the "Green Belt" areas for large-scale development."*

There are hundreds of vacant units, particularly in districts that are popular with expats, like Ho Chung. There is no justification for approval of plans like this that include the felling of a substantial number of trees, in this instance 100.

It is troubling to note that not a single member brought up this issue. This underlines that the planning process by now excluding the public is ultra vires as it is contrary to the intention of

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the ordinance that is based like a stool on four legs, the applicant, PlanD, members and the community.

Plan 4C is misleading. It shows the GB intact while 4B clearly includes it in the development area.

Object also to the height, this should be capped at the same height as village houses. Moreover, the justifications to increase height to 4 floors "*subject to a maximum PR of 0.75 and a maximum BH of 12m with 3 storeys over 1 storey of carport*" is contradicted by the statement "*parking spaces in front of individual house*". That "*the proposed development will blend in well*" is misleading.

**Item D** – (about 0.32 ha) Rezoning of a site at Ho Chung Road from "Res (Group E)" and "GB" to "G/IC" Che Kung Temple Grade 1 to reserve land for complementary development to the temple.

OBJECT TO THE INCORPORATION OF THE LARGER GREEN AREA, ANNOTATED VACANT TO THE LEFT. ANY FURTHER DEVELOPMENT OF THE TEMPLE CAN BE ACHIEVED ON THE STRIP CLOSE TO THE JUNCTION AND CURRENT FOOTPRINT.

**Item E** – (about 0.15 ha) Rezoning of a site occupied by Ho Chung Lowland Raw Water Pumping Station from "Agriculture" to "G/IC"

To reflect as built status.

HOWEVER, THE STRIP OF LAND IS BASICALLY RIVER BANK AND SHOULD BE CLEARED AND REPLANTED WITH TREES IN ORDER TO PROVIDE RECREATIONAL SPACE FOR THE VILLAGE ACROSS THE ROAD. IT SHOULD BE POSSIBLE TO CONNECT IT TO THE WATERFRONT CLOSE TO THE SECOND BRIDGE. OTHERWISE, REZONE TO 'OS' TO ADDRESS THE DEFICIT IN LOCAL OS.

THESE OZPS ARE ALWAYS ABOUT DEVELOPMENT AND COMMERCIALIZATION, NEVER ABOUT INCORPORATING FACILITIES THAT COULD ADDRESS THE LACK OF RECREATIONAL AND COMMUNITY FACILITIES IN THE OFTEN OVERBUILT VILLAGES

**Item F** – (about 0.58 ha) Rezoning of a site at the junction of Hiram's Highway and Luk Mei Tsuen Road from "**GB**" and an area shown as 'Road' to "Res (Group E)".

It is proposed to rezone this area together with original road reserve from "GB" and an area shown as 'Road' to "R(E)" to integrate with the adjoining "R(E)" zone for phasing out incompatible/temporary uses through redevelopment for residential use.

OBJECT. AGAIN AT LEAST A WIDE STRIP ALONGSIDE THE ROAD SHOULD BE RETAINED AS 'GB' ZONING SO THAT WHEN REDEVELOPMENT IS PLANNED A TREE LINED BUFFER IS PROVIDED ALONG THE ROAD. AGAIN, THE OZP FAILS TO

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DELIVER A PLANNING VISION THAT WOULD PROVIDE A MORE PLEASANT OUTLOOK ALONG OUR ROADS THAN ROWS OF CONCRETE BOXES.

THERE ARE EXAMPLES OF THIS IN URBAN AREAS, FOR EXAMPLE THE STRIP BETWEEN POLYU AND CHATHAM ROAD SOUTH IS ZONED OS. HOWEVER, GB IS MORE APPROPRIATE AS IT IS FENCED OFF AND THEREFORE DOES NOT PROVIDE ANY RECREATIONAL VALUE.

## **POS AND GIC FACILITIES**

The above developments in addition to other approved projects and the unknown number of units to be developed on rezoned lots and sites like Asia TV put a strain on local community services. This district is deficient in OS and many services. The response is to say that services are provided within the larger district, including TKO. This is unacceptable as TKO is a long way from Ho Chung.

Sai Kung on the other side, like TKO, is also deficient in many services. **The HKPSG for the larger area should be attached to the paper as it is far too easy to mislead gullible members with vague references to the general provision.**

**Item G4** – (about 0.08 ha) Rezoning of two sites separately at Ho Chung River and to the southeast of Nam Pin Wai from areas shown as ‘Road’ to “GB”.

SUPPORT THE ONLY POSITIVE ITEM ON THE AGENDA

**Item G1** – (about 0.05 ha) Rezoning of a site to the north of Ho Chung North Road from an area shown as ‘Road’ to “Res (Group D)”.

**Item G2** – (about 0.07 ha) Rezoning of a site at the junction of Ho Chung Road and Ho Chung North Road from an area shown as ‘Road’ to “Res (Group E)”.

**Item G3** – (about 0.92 ha) Rezoning of four sites separately at the junction of Ho Chung North Road and Ho Chung Road, Ho Chung Village and Mok Tse Che from

areas shown as ‘Road’ to “V”.

**Item G5** – (about 0.13 ha) Rezoning of a site to the southeast of Nam Pin Wai from an area shown as ‘Road’ to “Res (Group C) 1”.

G1 – G5 (excl G4): NUMEROUS SEPARATE LOCATIONS LUMPED UNDER ONE NUMBER SO DIFFICULT TO DISSECT.

OBJECT – WHERE POSSIBLE THE STRIPS BORDERING ROADS SHOULD BE ZONED GB. TREES PLANTED AND SERVE AS A BUFFER ZONE BETWEEN THE RESIDENCES

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AND THE ROADS IN LINE WITH G4. THEY COULD THEN BE INCORPORATED INTO FUTURE DEVELOPMENTS BUT THE ZONING WOULD ENSURE THAT A BUFFER IS PROVIDED BETWEEN RESIDENCES AND BUSY ROAD. THIS PROVIDES BETTER LIVING CONDITIONS; HELPS ABSORB POLLUTANTS GENERATED BY TRAFFIC AND PROVIDES A MORE PLEASANT STREETScape.

BUT THIS IS HK, ALL ABOUT EXPLOITING EVERY LAST INCH OF LAND.

**Item H** – (about 0.69 ha) Rezoning of four sections of Hiram's Highway, Luk Mei Tsuen Road and Ho Chung North Road from "V", "GB" and "Res (Group E)" to areas shown as 'Road'.

To reflect the alignment of these completed roads.

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

(d) Incorporation of 'Government Refuse Collection Point' and 'Public Convenience' under Column 1 of the Notes for "V" zone; and corresponding deletion of 'Government Refuse Collection Point' and 'Public Convenience' under Column 2 of the Notes for "V" zone.

OBJECT – DEPRIVES THE COMMUNITY OF HAVING A SAY IN BOTH THE LOCATION AND DESIGN OF THESE FACILITIES

(e) Incorporation of 'Field Study/Education/Visitor Centre' under Column 2 of the Notes for "V" zone.

OBJECT – THE INTENTION OF V ZONE IS TO PROVIDE HOUSING. THE PROPOSED USES CAN BE EXPLOITED TO PROVIDE A FRONT FOR COMMERCIAL OPERATIONS

(f) Revision to the Remarks of the Notes for "CA", "Coastal Protection Area" and "Site of Special Scientific Interest" zones on filling of land/pond or excavation of land clause in accordance with the Master Schedule of Notes to Statutory Plans.

STRONGEST OBJECTIONS – THIS ALLOWS UNFETTERED EXCAVATION OF

LAND ON BOTH ZONES. UNDER THIS EXEMPTION GOVERNMENT DEPTS CAN DEVELOP WHATEVER THEY WISH ON WHAT IARESUPPOSED TO BE PROTECTED SENSITIVE ECOLOGICAL AND CULTURAL SITES.

BY APPROVING ELIMINATION OF THESE PROTECTIVE CLAUSES, THE BOARD IS EFFECTIVELY RELINQUISHING ITS ROLE IN MONITORING DEVELOPMENTS THAT CAN HAVE DEVASTING IMPACT ON THE LAND AND NATURAL RESOURCES.

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Mary Mulvihill

