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**Adrian Tsz Hin TAM/PLAND**

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寄件者: [REDACTED]  
寄件日期: 2026年04月08日星期三 16:34  
收件者: tpbpd/PLAND  
副本: Adrian Tsz Hin TAM/PLAND; Timothy Wai Pui WU/PLAND; Ivy Cho Wa WONG/PLAND;  
junior@lchgroup.com  
主旨: RE: Planning Application No. A/NE-TKLN/122 - Further Information  
附件: A\_NE-TKLN\_122\_FI.pdf  
類別: Internet Email

Dear Sir/Madam,

This email serves to supersede our previous submission dated 8 April 2026 4:17 pm.

Enclosed please find the further information for your processing.

Should you have any queries, please do not hesitate to contact the undersigned or Junior Ho at 2290 1737.

Regards,  
Larissa Wong

LCH (Asia-Pacific) Surveyors Limited | LCH Planning & Development Consultants Limited

[REDACTED]

Office: [REDACTED] | Fax: [REDACTED]  
E-mail: [REDACTED] | Website: [www.lchgroup.com](http://www.lchgroup.com)

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Our Ref.: PD2406001/12  
Your Ref.: A/NE-TKLN/122

8 April 2026

By Email

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

Dear Sir/ Madam,

**APPLICATION FOR PERMISSION**  
**UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE**  
**TEMPORARY HOLIDAY CAMP FOR A PERIOD OF 3 YEARS**  
**AT LOT NOS. 21 (PART) AND 22 (PART) IN DEMARCATION DISTRICT NO. 80**

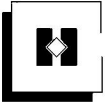
**Further Information**

We refer to departmental comments received regarding the captioned application.

Attached our response to departmental comments, updated Planning Statement and figures and replacement pages of planting proposal for consideration of the Town Planning Board (**Annexes 1 to 3**).

To clarify, the western portion of the Site, where five caravans were previously located, the Applicant will relocate them fully inwards to fall entirely within the "REC" zone upon obtaining planning approval and discussion with Home Affairs Department regarding the modification of the approved guesthouse (holiday camp) license. While one caravan locates in the eastern portion of the Site will be relocated to the "REC" zone upon approval of this planning application.

Since this Further Information only involve responses to comments without changing the scheme, according to TPB PG-No. 32B this Further Information should be exempted from publication and recounting requirements. Should you require further information or have any query, please feel free to contact the undersigned or Larissa Wong at [REDACTED].



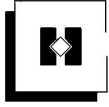
Yours faithfully,  
For and on behalf of  
**LCH Planning & Development Consultants Limited**

**Junior Ho**  
Director

Encl.

- Annex 1 - Responses to Departmental Comments
- Annex 2 - Updated Planning Statement and Figures
- Annex 3 - Replacement pages of Planting Proposal

c.c. the Applicant



## **ANNEX 1**

# **RESPONSE TO DEPARTMENTAL COMMENTS**




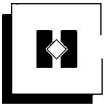
**Section 16 Planning Application No. A/NE-TKLN/122**

**Response to Departmental Comments Table**

No.	Comments Received	Our Responses
<p>A. <i>Comments from District Land Office, North, of Lands Department (Contact Person: Mr. MAN Ho Chung, Tel: 2675 1546)</i></p>		
1.	he objects to the application;	
2.	the Site comprises Old Schedule Agricultural Lot held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government;	Noted.
3.	the application lots together with Lots 24, 28, 31, 33 and 37 all in D.D. 80 are covered by a Short Term Waiver (STW) No. 1638 for the purpose of holiday camp with associated facilities. The type of structures which has been taken into account in the said STW however does not involve the tent/camp/caravans proposed by the applicant in the planning application. Besides, two non-exclusive right-of-ways are granted under the STW;	Noted. Para. 2.5.2 of the planning statement report is updated.
4.	his office reserves the rights under lease as to whether the concerned tent/camp/caravan is considered permissible under the STW by taking into account, inter alia, the applicant's elaboration of the nature of such tent/camp/caravan;	Noted.
5.	<p>the following irregularities covered by the planning application have been detected by his office:</p> <p><u>unlawful occupation of GL not covered by the planning application</u></p> <p>The GL adjoining Lot 21 in D.D. 80 has been fenced-off without permission. Any occupation of GL without</p>	<p>Noted, there is no illegal occupation of the Government Land. Please find the latest site photos below.</p>



No.	Comments Received	Our Responses
	<p>Government's prior approval is an offence under Cap. 28. LandsD objects to the planning application since there is illegal occupation of GL which regularisation would not be considered according to the prevailing land policy. The lot owner(s) should immediately cease the illegal occupation of GL as demanded by LandsD. His office reserves the rights to take necessary land control action against the illegal occupation of GL without further notice;</p>	
6.	the lot owner(s)/applicant shall cease the illegal occupation of the GL not covered by the planning application immediately and subject to the approval of the Board to the planning	Noted, there is no illegal occupation of the Government Land.



No.	Comments Received	Our Responses
	<p>application which shall have reflected the rectification or amendment as aforesaid required, apply to his office for modification of the STW conditions as appropriate. The application for modification (if required) will be considered by LandsD in its capacity as a landlord and there is no guarantee that it will be approved. The modification, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of back-dated waiver fee from the first date of when the unauthorised structures were erected as well as administrative fee as considered appropriate by LandsD. Besides, given the applied use is temporary in nature, only erection of temporary structure(s) will be considered; and</p>	
7.	<p>unless and until the unlawful occupation of GL is duly rectified by the lot owner(s)/ applicant, his office's objection to the application must be brought to the attention of the Board when they consider the application</p>	<p>Noted, there is no illegal occupation of the Government Land.</p>
<p><b>B. Comments from District Land Office, North, of Lands Department (Contact Person: Mr. WU Chun Fai, Andy, Tel: 2881 7030)</b></p>		
1.	<p>according to the Hotel and Guesthouse Accommodation Ordinance (Cap. 349) ("HAGAO"), "hotel" and "guesthouse" means any premises whose occupiers, proprietor or tenant holds out that, to the extent of his available accommodation, he will provide sleeping accommodation at a fee for any person presenting himself at the premises, unless all accommodation in the premises is provided for a period of 28 consecutive days or more for each letting which is exempted under the Hotel and Guesthouse Accommodation (Exclusion) Order (Cap. 349C)</p>	<p>Noted.</p>
2.	<p>if the mode of operation falls within the definition of "hotel" or "guesthouse" under the HAGAO, a licence under HAGAO must be obtained before operation;</p>	<p>Noted.</p>



No.	Comments Received	Our Responses
3.	for any structure which constitutes as “building works” or “building” under the Buildings Ordinance to be included into the licence, the applicant should submit a copy of either an occupation permit issued by the Building Authority or a Certificate of Compliance issued by the Lands Department when making an application under the HAGAO;	Noted.
4.	the Guesthouse (Holiday Camp) Licence, licence No. H/6756, at Lots 20 RP, 23, 24, 25, 28 and 31 in D.D. 80, Ta Kwu Ling, New Territories, has been issued by the Licensing Authority on 11.8.2025. The licence area does not cover the Site and only four caravans within the licensing area. Should the licensee intend to operate more tents/camps/caravans under HAGAO, revised proposal/new application should be submitted to the Licensing Office for approval; and	Noted. Upon approval of this application, the applicant will further liaise with HAD regarding modification of the approved guesthouse (holiday camp) license to include all the existing/applied caravans in the license.
5.	the licence No. H/6678 for “Park Nature” has been expired and cancelled	Noted.