Response-to-Comment (RtC)

Proposed Temporary Holiday Camp, Place of Recreation, Sports or Culture
(Barbecue Site and Hobby Farm) and Eating Place with Ancillary Facilities for a Period of 3 Years
and Associated Filling of Land in "Agriculture" and "Open Space" Zones and Area shown as 'Road',

<u>Various Lots in D.D. 17 and Adjoining Government Land, Ting Kok, Tai Po, New Territories</u>

(Application No. A/NE-TK/832)

(i) A RtC Table:

1. Comments of the Director of Environmental Protection (DEP) Considering also the past environmental (a) complaint record, please be reminded (i) to follow the relevant mitigation measures and requirements in COP and to meet the statutory requirements under relevant pollution control ordinances (ii) to follow the requirements of the ProPECC PN 2/24 and ProPECC PN 1/23 to properly handle the construction runoff and sewage produced from the development, (iii) to implement the noise mitigation measures as proposed by the applicant to avoid causing nuisance to nearby surroundings and (iv) to carry out pollution abatement measures in relevant Guidelines, including "Control of Oily Fume and Cooking Odour from Restaurants and Food Business".

Departmental Comments

Applicant's Responses

The applicant will follow relevant mitigation measures and requirement in the 'Code of Practice on Handling the Environmental

Aspects of Temporary Uses and Open Storage Sites' and meet the statutory requirements under relevant pollution control ordinances.

The applicant will also follow the requirements in the *Professional Persons Environmental Consultative Committee Practice Notes* (*ProPECC PNs*) 1/23 and 2/24 to properly handle the construction runoff and sewage produced from the proposed development.

The applicant will implement the proposed noise mitigation measures to avoid causing nuisance to nearby surroundings.

The applicant will carry out pollution abatement measures in relevant guidelines, including "Control of Oily Fume and Cooking Odour from Restaurants and Food Business".



Departmental Comments Applicant's Responses 2. Comments of the District Lands Officer/Tai Po, Lands Department (DLO/TP, LandsD) There are unauthorized structures within the Noted. The applicant will submit an application private lots as shown on the Site Plan to DLO/TP, LandsD for Short Term Waiver previously attached not covered by the (STW) for the erection of the proposed subject planning application. The lot owners structures at the application site (the Site) as should immediately rectify the lease shown on the layout plan upon obtaining the breaches and this office reserves the rights to planning permission from the Town Planning take necessary lease enforcement action Board (the Board). against the breaches without further notice. This office shall only consider application for a Short Term Waiver to cover structures within the Site approved by Town Planning Board. 3. Comments of the Director of Fire Services Licensing requirements, if any, would be Noted. upon receipt of formal formulated application via the Licensing Authority. However, the applicant is reminded that if the (b) proposed structures are required to comply with the Buildings Ordinance (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans.



Departmental Comments	Applicant's Responses				
4. Comments of the Director of Leisure and Cultural Services (DLCS)					
(a) Tai Po District Leisure Services Office Our comment on the submission for compliance with approval conditions (h) and (j) under Application No. A/NE-TK/678 is still valid for Planning Application No. A/NE-TK/832 and we have no further comment please.	will reinstate the affected area at his own cost to the satisfaction of DLCS upon completion of the proposed work. The applicant will also follow Development				
(b) NTE Tree Team As indicated in the location plan of which are proposed to be occupied as works area, the work site contains trees under LCSD's maintenance. Apart from submission of the detailed tree survey and tree preservation and removal proposal (TPRP) in accordance with DEVB TC(W) No. 4/2020, the consultant should also take over the trees in the works area and provide a proper tree protection zone for the trees during the works period plus one year defect liability period before handing over the trees to LCSD. We reserve comment until a detailed tree survey and TPRP are provided for consideration.	Services Department to formulate a Tree Preservation and Removal Proposal at design stage or as soon as practicable.				



	Departmental Comments	Applicant's Responses		
5. (Comments of the Chief Town Planner/Urban De	esign and Landscape, Planning Department		
(CTP/UL&L, PlanD)			
(a)	The applicant has not provided information on the existing landscape resources including broad brush tree survey and associated treatment. The landscape information provided is considered insufficient to facilitate the consideration of planning application.	The site inspection conducted on 23.05.2025 identified 63 existing trees, including 11 dead trees within the Site. No old or valuable tree was found. The tree survey report is enclosed at Annex 1 . Among the existing trees, 4 <i>Podocarpus macrophyllus</i> will be transplanted within the		
(b)	According to Annex 3 - landscape plan, 157 nos. of new trees, shrubs, groundcover and lawn are proposed. The applicant is suggested to provide more native species to mitigate the loss of existing vegetation, and to enhance the landscape quality and biodiversity.	Site, whilst 11 dead trees will be removed. The remaining 48 trees are to be felled, as they are in conflict with the development scheme. In order to mitigate the potential landscape impact that would have arisen from the proposed development, the applicant proposes to plant 182 new trees at the Site on a 3:1 ratio in terms of numbers, with a view to compensating for the 11 dead trees to be removed and 48 trees of common species to be felled. The applicant also proposes to provide trees of 7 native species to enhance the landscape quality and biodiversity of the surrounding area. Please refer to the revised Landscape Plan enclosed at Annex 2 .		
(c)	The applicant is reminded to preserve the existing trees within/in close proximity to the site as far as practicable and excavation/land filling works near the tree should not be carried out to avoid damage of tree roots.	Noted.		
(d)	The applicant should be advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling under lease. The applicant is reminded to seek approval for any proposed tree works form relevant departments prior to commencement of the works.			



	Departmental Comments	Applicant's Responses
6. (Comments of the District Planning Officer/Sha 1	Fin, Tai Po and North (DPO/STN), PlanD
(a)	Please provide a plan indicating (i) the locations of existing water mains at the northwestern edge of the Site and (ii) proposed measures to protect the existing water mains for reference.	Please refer to the plan showing the locations of existing water mains at the northwestern edge of the Site provided by your office on 27.01.2025 alongside with the comments from the Chief Engineer/Construction, Water Supplies Department (CE/C, WSD).
		The proposed measures to protect the existing water mains were provided in the applicant's response to CE/C, WSD in the Further Information dated 14.04.2025, namely: - no site formation will be conducted within 1.5 m from the centre line(s) of the existing water mains; - no erection of structure and storage of materials within 1.5 m from the centre line(s) of the existing water mains; - free access will be guaranteed at all times for staff of the Director of Water Supplies or their contractor to carry out construction, inspection, operation, maintenance and repair works; and - no trees/shrubs will be planted in the vicinity of the existing water mains.
(b)	Please advise whether the application site (the Site) will be fenced off for the proposed development. If yes, please clarify (i) whether the proposed free accesses to the existing electricity poles at the southern portion of the Site and Lots 566, 609 and 649 in D.D. 17 not covered by the Site would be excluded from the fenced-off area and (ii) indicate the proposed free accesses on relevant plan(s).	Given that overnight camping activities will take place at the Site, the vehicular ingress/egress and pedestrian entrance/exit at the northern part of the Site will be open 24-hour daily. The existing electricity poles and Lot Nos. 566, 609 and 649 in D.D. 17 not covered by the Site can be accessed from the said vehicular and/or pedestrian accesses. Please refer to Annex 3 for the revised Layout Plan with the illustration of the proposed free accesses. Except for the lot owner(s) and their authorised parties, visitors of the Site will be barred from entering the area of Lot Nos. 566, 609 and 649 in D.D. 17 not covered by the Site. Signage will be placed along the lot boundaries by the applicant to ensure no trespassing would take



(c)	It is noted that the number of proposed trees has been provided. Please also advise (i) the number of existing trees; and (ii) the proposed number of trees to be felled within the Site.	Please refer to the applicant's response to CTP/UD&L, PlanD in Part 5 of this RtC table.
(d)	It is noted that the run-in/out and pedestrian crossing proposals under the approval conditions (h) and (j) of the planning permission under previous application No. A/NE-TK/678 (accepted by the Director of Highways and the Commissioner of Transport respectively in 2022) will be implemented under the current application No. A/NE-TK/832. According to the compliance letter dated 9.9.2022 issued by our office regarding the above-mentioned approval conditions, the Director of Leisure and Cultural Services (DLCS) had provided comments on any affected roadside trees and shrubs/ vegetation maintained by the Leisure and Cultural Services Department as proposed in the run-in/out and pedestrian crossing proposals. Please advise how the comments from DLCS would be addressed.	Please refer to the applicant's response to DLCS in Part 4 of this RtC table.
(e)	Response-to-Comment, Annex 3 Landscape Plan — (1) the site area should be about 38,338 m² as stated in the application form received on 3.1.2025, please revise the information at the top left-hand corner of the plan for consistency; (2) there are 157 no. of proposed trees indicated on the plan, please revise the information at the top left-hand corner of the plan for consistency; and (3) please update Plan 4 of the Planning Statement in accordance with the Landscape Plan regarding the locations of proposed trees.	Regarding (1) and (2), please refer to the revised Landscape Plan at Annex 2. Regarding (3), for the avoidance of doubt, given that the locations of the proposed structures have overlapped with the area of the proposed filling of land, the revised Landscape Plan is considered sufficient to demonstrate the relation between the locations of the proposed structures (portion of the shared area) and proposed trees.

(f) Table 1, Planning Statement – It is noted that the planning permission under the previous application No. A/NE-TK/678 (submitted by the same applicant as the current application No. A/NE-TK/832) for proposed temporary place of recreation, sports or culture (hobby farm) with ancillary facilities and canteen for a period of 5 years and partial filling of land, was revoked due to non-compliance with the approval conditions (e), (g), (i) and (k) (in relation to the implementation of drainage, fire service installations, run-in/out and pedestrian crossing proposals respectively). While the submissions of DIA, run-in/out proposal and pedestrian crossing proposal have been made under the current application, please also provide the fire service installations proposal to show the efforts in avoiding future revocation, should the application be approved by the Rural and New Town Planning Committee Meeting of the Board.

Please refer to the fire service installations proposal enclosed at **Annex 4**.

(g) Section 3.7, Planning Statement – Please advise the reasons of failing to obtain the approvals for STW and Short Term Tenancy from LandsD with respect to the previous application No. A/NE-TK/832.

The applicant submitted an application for STW in December 2020, which is still under processing by DLO/TP, LandsD. As of the submission date of the current application, the applicant is still waiting for DLO/TP, LandsD to advise the current situation of the application for STW. Hence, the applicant has not been able to implement relevant proposals under the previous application No. A/NE-TK/678.

(h) Section 4.12, Planning Statement – Please (i) advise the details of proposed septic tank and soakaway (e.g. whether the provision will be within the Site and dimensions of the proposed septic tank) and (ii) indicate their locations on relevant plan(s).

The exact location of the proposed septic tank and soakaway system is yet to be confirmed. Nonetheless, the applicant confirms that the design and construction of the septic tank and soakaway system will strictly follow relevant *ProPECC PNs*, as well as relevant guidelines, including but not limited to the "Guidelines for Soakaway System" and ""Guidelines for the Design of Small Sewage Treatment Plants" published by the Environmental Protection Department.

(i)	Plan 4 – Please advise whether the height of caravan should read as "2.8 m" instead of "2.8 m2".	Please refer to the revised Layout Plan at Annex 3.		
(j)	Plan 5 – The proposed floor-to-floor height of structure No. B2 for reception, agricultural education room, office and ancillary eating place is about 6 m (1-storey), which is much higher than the other structures (i.e. about 3 m to 4 m (1-storey)). Please clarify if structure No. B2 is not intended to accommodate 2 storeys and provide justifications for its floor-to-floor height of 6 m.	Given that sufficient air-conditioning and ventilation facilities will be required for the ancillary eating place, the applicant considers that a relatively higher headroom is required to meet the safety and operational need. The applicant has already clearly indicated on Plan 5 of the original submission that Structure B2 is a single-storey structure with building height of 6 m (about).		
(k)	Plan 6 – It seems that part of the proposed filling of land area may fall within the area shown as 'Road' on the approved Ting Kok Outline Zoning Plan No. S/NE-TK/19. In addition, the proposed filling of land area within "AGR" and "O" zones as stated on the plan is about 16,050 m² (i.e. 14,599 m² + 1,451 m²) in total by calculation, which is larger than the total area of proposed filling of land of about 15,970 m² stated on the plan and other relevant parts of the submission. Please check and review relevant parts in the submission for consistency, including but not limited to this plan and the DIA.	within "Agriculture" zone, "Open Space" zone and area shown as 'Road' are 14,384 m² (about), 1,451 m² (about) and 135 m² (about) respectively. Please refer to the revised Plan showing the proposed filling of land at Annex 3 .		
(1)	Plan 6 – The proposed filling of land area, soil ground/lawn area and farm area as stated on the plan are about 31,940 m² (i.e. 15,970 m² + 11,793 m² + 4,177 m²) in total by calculation, which are smaller than the site area of about 38,338 m² stated on the plan and other relevant parts of the submission. Please check and review relevant parts in the submission for consistency, including but not limited to this plan.	Whilst the area of the proposed filling of land and area for farming remain unchanged, the soil ground/lawn area is revised as 18,191 m² (about). Please refer to the revised Plan showing the proposed filling of land at Annex 3 .		



	Departmental Comments	Applicant's Responses			
7. (Comments of the Chief Engineer/Mainland North	th, Drainage Services Department			
(CE/MN, DSD)				
(a)	Please specify the maintenance party of the proposed stormwater drainage system in the Drainage Impact Assessment (DIA) report.	Noted. The proposed stormwater drainage system is to be maintained by the development. Please refer to the revised Drainage Impact Assessment (DIA) report at Annex 5 .			
(b)	Please specify in the DIA report that the proposed stormwater drainage system shall be completed prior to the commencement of other construction works, including site clearance and land filling works.	Noted. Please refer to the revised DIA report at Annex 5 .			
(c)	Please elaborate the maintenance requirement of the proposed stormwater drainage system in the DIA report.	, , , , , , , , , , , , , , , , , , , ,			



Departmental Comments

Applicant's Responses

8. Comments of the Commissioner for Transport (C for T)

FI1 RtC 5(a)

- (a) The survey in February 2025 is not the seasonal peak for this kind of recreation facilities. The adoption of the survey data shall be justified and properly adjusted if required.
 - The applicant shall elaborate how the surveys were carried out and the modal splits were representative. In particular, the model split may underestimate the parking demand for the proposed development due to the following –
 - there are no parking spaces in adjacent to the Chung Pui Campsite and only 14 private car parking spaces at Tai Mo Shan Road carpark which is about 400 m away from Tsuen Kam Campsite. The limited parking spaces in the adjacent area may affect the modal split of visitors to the two campsites; and
 - the illegal parking arising from the referenced campsites shall be catered for.
 - The applicant shall thoroughly review the parking demand of the proposed development and the demand shall be addressed within the development site.
 The proposed development shall not burden the adjacent parking facilities.

The concerns on the seasonal peak of this kind of recreation facilities are well noted. Upon further review, the surveyed modal split is still considered as on the conservative side and is representative based on the following reasons:

- The choice on transportation mode is more likely to be made by the origin and destination location, public transportation accessibility, ownership of a private car, convenience of parking, etc.; while the seasoning factor would not very much affect the modal split ratio.
- 2) The illegal parking and pick-up/drop-off by private cars have already been catered for in the survey results, and the ratio of using private car is on the conservative side.

For Tsuen Kam Campsite, it is a campsite which needs advance reservation with limited spaces. The check-in time is 14:00-20:00. An interview survey was conducted on 22.02.2025 (Saturday) over the time period of 14:00–20:00 (covering the full check-in time) at the entrance of the campsite. It was noted that all camping spaces have been fully booked on the survey day. The booking record is shown at **Annex 6**.

Visitors were interviewed about their visiting destination and choices on transportation mode. The responses from visitors were summarised and analysed. It is noted that 18% of the visitors travelled by private car. The illegal parking activities (if any) have been counted in the interview survey. For those who solely used private car for pick-



up/drop-off are also counted in the ratio of 18%, which means the actual parking demand would be less than the ratio of 18%, and the adoption of 18% is on the conservative side.

For Chung Pui Campsite, a monitoring survey over 08:00-20:00 on a Sunday in February 2025 was carried out around the campsite entrance, while all parking and pick-up/drop-off in the vicinity were recorded. In other words, private car roadside pick-up/drop-off and illegal parking (if any) have all been counted in the ratio of using private cars, and the ratio of using private car is therefore on the conservative side. It is observed that 12% of the visitors of Chung Pui Campsite travelled by private cars.

- 3) The surveyed modal split should make good reference due to similarities with the Site. Similar to the Site, the reference sites sit in rural area offering similar facilities, and with accessible public transport services. Especially for the reference site at Chung Pui Campsite, it locates only 3 km away (5-minutes' drive) from the Site, and the modal split would be more representative. Based on observations, about 12% of the visitors travelled to Chung Pui Campsite by private cars while 18% of the visitors travelled to Tsuen Kam Campsite by private cars. The adoption of the rate from Tsuen Kam Campsite survey is already on the conservative side of analysis.
- 4) More public transport services are available for the location at the proposed development than at Chung Pui Campsite, and the driving demand would be less.



5) Sensitivity test:

The applicant will strictly constrain the daily visitor number to be not more than 400 visitors per day.

By adopting the figure of 18% of visitors travelling by private car (including both parking and pick-up/drop-off demand), it is estimated that 72 (=400x18%) of them will get access to the Site by private cars. With the average occupancy of 3.5 persons/private car, the parking and pick-up/drop-off demand for private cars would be 21 vehicles daily. With 42 visitor parking spaces (2 additional spaces) provided within site, it is considered sufficient to cope with the traffic demand. For details, please refer to the updated carpark layout and swept path analysis at **Annex 6**).

Sensitivity test is carried out by adopting a factor of 200% on the ratio who travel by private cars as a conservative method, i.e., assuming 36% of the visitors will travel by private cars.

By adopting the figure of 36%, it is estimated that 144 (=400x36%) of them will travel by private cars. With average occupancy of 3.5 persons/private car, the parking and pick-up/drop-off demand of private cars would be about 41 vehicles daily. The provision of 42 visitor parking spaces car park is still sufficient to cope with the daily traffic demand of the proposed development.

Therefore, it is considered that sufficient parking spaces have been provided within the proposed development and would not burden the adjacent parking facilities. Furthermore, as prior appointment shall be made for reserving a parking space, the



number of vehicles accessing the Site
could be well-regulated and be ensured
not to exceed the reception capacity of
the proposed development.

FI1 RtC 5(b)

 Similar to response to FI1 RtC 5(b), please review the reliability of the survey data from the two campsites. Please refer to the justifications on the parking demand in (a) above.

Concern on the underestimation on trip generations due to seasonal factor and limited parking spaces is well noted. Upon further review, the following modifications have been made:

Based on the observation at Chung Pui Campsite on Sunday during 08:00 - 20:00, a total of 622 incoming visitors and 625 outgoing visitors were observed; and the peak vehicular trips occurred during 14:00-15:00 on Sunday with peak hour trip generation of 19 vehicles (10 in and 9 out) observed.

For the proposed development, the daily visitor number would always be limited to 400, which shall also apply on seasonal peak holidays. The estimated peak trip generations of the proposed site are considered as comparable but less than that of Chung Pui Campsite.

A factor of 200% has been applied on the adopted trip rates to the Site for a more conservative estimation. The estimated trip rates are listed in the following table:

Site	Peak Ho (vehicl	erved our Trips es / hr) -15:00	Observed Peak Hour Trip Rates (vehicles / hr / 100m²)		Adjusted Peak Hour Trip Rates (vehicles / hr / 100m²)	
	ln	Out	ln	Out	ln	Out
Chung Pui Barbecue Site and Campsite (Approx. 10200m²)	10	9	0.0980	0.0882	0.1960	0.1764

By applying the peak hour trip rates onto the proposed development, the estimated peak hour vehicular traffic trips are shown in the following table:



Site	Estimated Peak Hour Visitor Trips (vehicles / hr)		
	ln .	Out	
Proposed Development	20	40	
(Barbecue and campsite area approx. 9700 m ²)	20	18	

It is estimated that the proposed development would induce total two-way traffic of 38 vehicles (20 in and 18 out) during peak hour.

FI1 RtC 5(d)

- For the banning of rightturn from Ting Kok Road to the Site, the applicant shall inform its visitors of the traffic arrangement and implement management plans to avoid queuing at public road.
 - For the banning of righturn from the site to Ting Kok Road eastbound, please review the detour and if it is necessary.

Noted. The visitors will be informed about the traffic arrangement upon reservation.

As the travel demand to Ting Kok Road eastbound would be significantly low, the banning of right turn from the Site to Ting Kok Road will not be proposed. The illustration of the revised traffic sign is enclosed at **Annex 6**.

- (ii) The applicant provides the following supplementary information in response to the local comments on the application received by the Home Affairs Department:
 - in response to the comments from DPO/STN, PlanD, the applicant has provided 24-hour free assesses with reasonable width for the lot owner(s) of Lot Nos. 566, 609 and 649 in D.D. 17 (hereafter referred to as "the concerned Lots") and their authorised party(ies). Given that overnight camping activities will take place at the Site, the vehicular ingress/egress and pedestrian entrance/exit at the northern part of the Site will be open 24-hour daily. The concerned Lots which are not covered by the Site can be freely accessed from the said uninterrupted, undisturbed and unrestricted accesses. As such, the concerned Lots shall not be considered as isolated. Please refer to the applicant's response to DPO/STN, PlanD in Part 6 of the above RtC table, and Annex 3 for the revised Layout Plan showing the free accesses; and
 - with reference to the proposed layout as shown in Annex 3, neither any part of the hobby farm area nor the proposed structure B11 have encroached onto any part of Lot No. 609 in D.D. 17 i.e. outside the boundary of the Site. The applicant reaffirms that, albeit stated in the Further Information dated 14.04.2025, all construction, development or operation (including filling of land) activities will only take place within the boundary of the Site. The applicant also reaffirms that signage will be placed near the boundaries of the concerned Lots, ensuring that no trespassing by visitors would be allowed. The concerned Lots will remain undisturbed.
- (iii) The applicant provides the revised pages of <u>Form No. S16-III</u> and <u>Planning Statement</u> to reflect the additional 2 private car parking spaces as mentioned in Part 8(a)of the above RtC table in response to the comments from C for T. Please refer to **Annex 7** for details.

