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Kary Ka Wai HO/PLAND

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主旨: RE: s.16 planning application No. A/SK-PL/4 – Departmental Comments
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Dear Ms Ho,
Please find attached further information submission for your action. Thanks.

*Regards,
Brian Chow
Project Manager
First Join Development Limited, Tuenbo Group*

[REDACTED]
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Further Information (FI) Submission

Response to Departmental Comments Issued on 4 September 2026

Planning Application No.: A/SK-PL/4

**Proposed Temporary Holiday Camp with Ancillary Facilities for a Period of 3 Years
at Various Lots in D.D. 368, Pak Lap, Sai Kung**

1. Response to Drainage Services Department (DSD)

A) Regarding Drainage Impact Assessment (DIA) Report

The proposed holiday camp is on a temporary basis for a period of 3 years. All equipment and facilities are temporary installations placed directly on the existing grass surface, without any permanent structures, concrete paving, earth filling, or excavation works. Consequently, the project will have zero potential adverse drainage impacts on the surroundings. The specific engineering justifications are detailed below:

- **1.1 Zero Increase in Impervious Area:**

The core design philosophy of this 3-year temporary tent camp ground is "Zero Concrete Hardening ". All camping facilities and tents will be erected on elevated wooden platforms, completely preserving the original topography. The entire campsite, tent areas will fully maintain the existing natural grassland character and geomorphological attributes. As a result, the runoff coefficient before and after the development remains completely unchanged. The peak runoff rate and surface runoff hydrograph will be identical to the baseline condition, imposing absolutely zero additional hydraulic burden on the surrounding drainage systems.

- **1.2 Zero Interference to Natural Watercourses:**

All temporary tents and ancillary facilities within the campsite are strategically setback and maintain a safe buffer distance from the neighboring natural streams, shrublands, and overland flow paths. The scheme strictly excludes any form of site formation, excavation, or land filling works, and will not involve the construction of any cross-river or permanent structures. Therefore, the project will definitely not obstruct, alter, or interfere with the existing natural watercourses, nor will it reduce the inherent flood storage capacity of the local catchment area.

- **1.3 Temporary Nature with Minimal Disturbance:**

The project is restricted to a temporary duration of 3 years, and all camp

facilities are fully demountable, portable, and reversible in nature, causing zero permanent structural damage to the topsoil. Its potential adverse drainage impact is extremely limited, fully aligning with the exemption criteria stipulated under Clause 4.11(a) of *DSD Advice Note No. 1*.

For the reasons stated above, this project will not cause any adverse effects on the existing drainage regime, nor will it lead to an unacceptable increase in flooding risks in the upstream, adjacent, or downstream areas.

Detailed Responses to the Seven Trigger Conditions under Clause 4.4 of DSD Advice Note No. 1

The Applicant has conducted a comprehensive engineering review of the proposed project against the technical screening criteria set out in Clause 4.4 of *DSD Advice Note No. 1*. The answers to all seven trigger conditions for a mandatory DIA are "No", supported by the following engineering arguments:

- **Condition (a) Whether the development will affect a watercourse or drainage path, thereby increasing flooding risk?**
 - **[Response: NO]** All tent spaces and temporary facilities within the proposed campsite will maintain a safe distance from the adjacent natural streams and existing surface drainage pathways. No permanent structures will be erected, and absolutely no river training or flow diversion works will be carried out. Thus, the existing natural drainage paths and stream capacities will be 100% intact, with zero increase in flood risks.
- **Condition (b) Whether there will be a significant increase in the impervious area of the development site, leading to a significant increase in runoff from the site or a change in the runoff characteristics?**
 - **[Response: NO]** The project adopts an eco-friendly, green design. No concrete or cement paving, nor any impervious hardened surface, will be laid within the site boundary. All camp zones and footpaths will fully retain their existing natural grass state. With zero growth in impervious area, the runoff coefficient before and after development remains completely identical. The peak runoff during heavy rainstorms will be no different from the baseline state, ensuring no change in runoff characteristics.

- **Condition (c) Whether the development will require reclamation or earth filling for site formation?**
 - **[Response: NO]** The core operational principle of this 3-year temporary camp site is to blend with nature. The project requires absolutely no site formation, large-scale excavation, or any form of land/earth filling works. All temporary wooden platforms will be placed directly on top of the existing grass, ensuring that the physical micro-topography and natural ground levels are fully maintained in their original state.
- **Condition (d) Whether the drainage system downstream of the development site will need to be upgraded to convey runoff from the site?**
 - **[Response: NO]** As established above, a "net-zero growth" in runoff volume and flow velocity is achieved before and after development. The total stormwater discharge into the external natural environment remains exactly the same as the existing condition. Therefore, it will not impose any extra hydraulic load on the natural downstream environment or existing channels in Pak Lap, completely eliminating the need for downstream drainage upgrades.
- **Condition (e) Whether the development site is located in a flood-prone area (flooding blackspot)?**
 - **[Response: NO]** Based on the latest "Flood-Prone Areas" registry and historical flooding records published by the DSD, the subject site is not designated as a flooding blackspot, nor is it situated in a high-risk, low-lying coastal zone vulnerable to tidal inundation. The site naturally possesses favorable topography and surface drainage resilience.
- **Condition (f) Whether temporary works (e.g. scaffolding or falsework for a bridge) or any diversion measures expected to be implemented during construction or operation will cause an adverse effect on the performance of the drainage system?**
 - **[Response: NO]** The site layout and setup are highly lightweight during both the initial assembly and operational phases. No heavy engineering works, such as the erection of cross-river bridges, scaffolding, falsework, or temporary stream diversions, will take place. The camp operates solely with elevated wooden platforms, demountable tents, and temporary portable washrooms, which will definitely not cause any physical

obstruction or adverse interference to the natural drainage flow during the rainy season.

- **Condition (g) Whether there will be a significant reduction in flood storage capacity of the surroundings during or after construction?**
 - **[Response: NO]** Adhering to the "Zero Earth Filling and Zero Permanent Building" mandate, no natural low-lying grounds, grasslands, or wetlands within or outside the site will be filled up. Consequently, there will be no reduction or disruption to the existing natural flood storage capacity of the wider Pak Lap catchment basin during either the preparation or operational stages.

Conclusion on DIA Exemption:

As the proposed development yields a definitive "No" to all technical screening criteria under Clause 4.4 of *DSD Advice Note No. 1*, the statutory and technical triggers for a mandatory DIA are not met.

Operational Management and Safety Protection Measures for Participants Under Adverse Weather

The Applicant fully understands and cooperates with the government's concerns regarding on-site safety and emergency preparedness. A comprehensive "Emergency Response and Evacuation Plan" has been formulated across the following four dimensions to guarantee the absolute safety of all camp participants, fully complying with the emergency preparedness guidelines under *DSD Practice Note No. 2/2023 (Guidelines on Flood Resilience)*:

- **1 Strict Adverse Weather Trigger & Closure Mechanism:**

Camping is inherently an outdoor activity that is unsuitable for unstable weather conditions. The Applicant has established a proactive notification mechanism. Upon the issuance of any Tropical Cyclone Warning Signals (Typhoon Signals), Red/Black Rainstorm Warning Signals by the Hong Kong Observatory, or a formal forecast of extreme adverse weather, the campsite will be completely closed. The management team will notify all participants at least 1 day in advance to cancel their bookings and reschedule their stays, effectively eliminating the risk of tourists being stranded in remote rural areas (in line with the early warning principles in Clause 5.1 of DSD PN No. 2/2023).
- **2 Adopting "Elevated Platform" for Wet Floodproofing:**

Making reference to Clause 4.2.1.1 of *DSD Practice Note No. 2/2023* regarding

elevating entrances and structures to mitigate overland flow risks, all temporary tents in the camp will be pitched on top of elevated wooden platforms raised approximately 450 mm above the ground. This non-structural wet floodproofing approach preserves the 100% natural water infiltration capacity of the underlying grass soil while ensuring that the tents remain completely unaffected by any localized surface water accumulation or minor overland flow during light-to-moderate rain.

- **3 Established Emergency Shelter Coordination with Pak Lap Village Office:**
Should a sudden, unexpected weather deterioration or continuous torrential rain occur during camp operations, the Applicant has established a formal mutual-aid agreement and communications channel with the Village Head and local villagers of Pak Lap Village. Upon activation of the emergency plan, all on-site participants will be guided immediately by camp staff to the **Pak Lap Village Office** for temporary shelter. The Village Office offers a spacious interior with robust structural building protection, providing more than enough capacity to safely accommodate all camp participants (fully complying with the pre-planned shelter requirements in Clause 5.1 of DSD PN No. 2/2023).
- **4 Performance Monitoring & Drainage Maintenance:**
Full-time management personnel will be stationed on-site. During the rainy season, the staff will perform regular inspections of the campsite boundaries and adjacent natural flow channels to ensure they are free from any temporary debris or blockage. This ensures that natural overland flow is maintained to the highest standard, fulfilling the performance monitoring duties required by Clause 5.2 and Appendix II of *DSD Advice Note No. 1*.

B) Regarding the Request for a Sewerage Impact Assessment (SIA)

The Applicant has conducted a detailed engineering evaluation regarding the sewerage requirements and the DSD's request for an SIA. Given that the project possesses the distinct technical characteristic of having "Zero Hydraulic Load on the Public Sewerage Network", we respectfully request a waiver for a SIA report based on the following civil engineering arguments:

1. **100% Disconnected from Public Infrastructure:**
 - The Applicant is fully aware that there is no public communal sewerage network in Pak Lap. The proposed temporary camp will adopt a completely self-

sufficient, closed-loop waste management system. All temporary restrooms on-site will utilize fully sealed, leak-proof portable toilets (Portable WCs) integrated with self-contained holding tanks. This project will absolutely not construct, nor does it require connection to, any public sewers, manholes, pumping stations, or collection systems managed by the DSD.

- **No Technical Basis for Hydraulic Capacity Simulation:** Because all sewage generated on-site will be completely contained and tankered away by private wastewater management contractor, the wastewater volume entering any existing public or downstream drainage/sewerage infrastructure is **absolute zero**. From a hydraulic engineering perspective, the project carries zero risk of causing overflows or surcharges in government sewerage facilities. Therefore, there is no technical basis or empirical need to conduct mathematical hydraulic network modeling or capacity assessments of public sewers.

2. Privately Tankering Operation via Licensed Wastewater Management Contractor :

- During the operational phase, the Applicant will employ a licensed and registered wastewater management contractor. The contractor will dispatch professional vacuum tankers to Man Yee Road on a regular schedule to pump out and collect all wastewater from the toilet holding tanks. The collected waste will be transported directly to a designated government sewage treatment works for proper off-site disposal.
- **Recurrent Consequences Fully Absorbed by Proponent:**
All recurrent logistical and operational expenses associated with this tankering scheme will be fully absorbed internally by the Applicant. It will not consume any public resources or public funds designated for government sewer maintenance, desilting, or asset management. This aligns perfectly with the "polluter-pays" principle and sustainable planning practices.

Conclusion & Proposed Approval Condition:

In light of the net-zero impact on public sewerage infrastructure, the Applicant proposes that the DSD waives the pre-requisite SIA report.

2. Response to Environmental Protection Department (EPD)

A) Regarding Noise Control Measures

Regarding the noise issue, thank you for your reminder. We will comply with your requirements and the noise reduction clauses outlined in the proposal.

3. Response to Transport Department (TD)

- **A) Clarification on Waterborne Transportation vs. Ferry Service:**

The Applicant appreciates the TD's comments. We would like to reiterate that the project will independently arrange two licensed, and certified vessels to transport our camp participants. This marine transport service is completely free of charge for all registered camp guests, and no separate fares will be levied. In essence, this constitutes a private guest shuttle service rather than a commercial ferry service.

- **B) Integration with Kaito Service SKW8:**

We note that the ferry service SKW8 operates specifically on Saturdays, Sundays, and Public Holidays. This aligns perfectly with our camp's operational dynamics, as weekends and public holidays are designated as peak occupancy periods. Participants traveling during holidays will be encouraged to utilize the SKW8 ferry service. Conversely, weekday guest traffic is expected to be minimal, during which the camp's two private licensed vessels will serve as the primary transport mode. Detailed service hours and timetables for both options will be explicitly stated on booking forms and pre-arrival information sheets to ensure participants are fully informed prior to their trip.

- **C) Access Control and Prevention of Unauthorized Landbound Influx:**

To eliminate traffic impacts on the restricted landside roads (Man Yee Road), the Applicant enforces a mandatory marine-access-only policy. All participants must travel via the two designated waterborne methods to High Island (Leung Shuen Wan) Pier, followed by a walk along the footpaths to the temporary holiday camp. This strict requirement will be prominently embedded as a mandatory clause in the booking Terms and Conditions. Any guests requesting alternative landward vehicular access will be refused booking or entry. To enforce this, a security and reception checkpoint will be established at the sole entrance of the campsite. Upon arrival, staff will verify guests' identities and check their marine transit records, such as Tsui Wah ferry tickets, Octopus payment logs, or

timestamped photos taken onboard the vessels on the same day. Once marine transit proof is verified, guests will be issued a distinct paper wristband. Only participants wearing the wristband will be granted access to the camp facilities, ensuring effective enforcement of the traffic mitigation scheme.

4. Response to Marine Department (MD)

A) Compliance with Marine Regulations

The Applicant acknowledges the MD's professional reminders. We will ensure compliance with the relevant requirements.

5. Response to Agriculture, Fisheries and Conservation Department (AFCD)

A) Zero Discharge Sewerage Logistics Scheme

Following comprehensive technical consultations with our qualified wastewater management contractor, the Applicant will procure specialized portable toilets equipped with holding tanks. When a sewage tank reaches its designated capacity threshold, camp staff will notify the contractor, and the tank will be detached and hermetically sealed with a heavy-duty airtight lid on-site. Workers will manually transport the sealed tanks from the campsite up to the vehicular access point on Man Yee Road. The contractor's vacuum tanker will park at Man Yee Road to safely pump out the wastewater from the sealed holding tanks, after which the sanitized tanks will be transported back to the Pak Lap campsite for continuous reuse. This operational protocol ensures zero environmental discharge and prevents any manual waste spillages within the rural area.

6. Response to Food and Environmental Hygiene Department (FEHD)

A) Municipal Solid Waste Management Protocol

The waste will be transported to the Fuk Man Road garbage collection station in Sai Kung, which is the government garbage collection station opposite the Tang Shiu Kin Sports Ground in Sai Kung, for processing.

7. Response to Home Affairs Department (HAD) / Sai Kung District Office

A) Community Engagement and Local Village Support

The Applicant attaches great importance to local community relations and has maintained close, transparent communication with the local residents and stakeholders of Pak Lap. The local villagers are highly supportive of this temporary holiday camp initiative. In fact, the Pak Lap Village has officially issued a **Letter of Support** endorsing our application, which was submitted as an integral attachment to our initial planning application on 31 July 2026 (Please refer to the original application attachments).

Through interactive dialogue, the Applicant has addressed potential concerns regarding noise, light pollution, environmental hygiene, and visitor crowd management. The villagers are fully satisfied with our proposed mitigation measures and operational protocols. As highlighted in the Village's Support Letter, the local community recognizes that this project will effectively revitalize Pak Lap Village, attract quality eco-tourists, stimulate the local rural economy, create employment opportunities, foster community cohesion, elevate the overall quality of visitors, suppress illegal random camping, and enhance local environmental hygiene management. Therefore, the local village community wholeheartedly endorses this planning application.