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Dates Yat Ching YEUNG/PLAND

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主旨: Further information for A/SLC/191
附件: JK to TPD futher information 250618.pdf
類別: Internet Email

Dear Sir,

Please find our further information for A/SLC/191 as per attached & feel free to contact me at [REDACTED] at any time if you have any questions.

Best Regards

Tj

To Town Planning Board

Ref. No.: A/SLC/191

Reply to Town Planning Comments (1) on 17/6/2025

TP's comments :	Our reply :
<p>(i) Noting from the chapter 1 of the justification (Appendix 3), please advise with supporting documents to demonstrate the establishment of the "Cheung Sha Recreational OBC" is authorized by Outward Bound Hong Kong (OBHK) or the contractual agreement between the applicant and OBHK.</p>	<p>(i) 與 OBHK 的關係：本申請與香港外展隊 (Outward Bound Hong Kong · OBHK) 並無任何隸屬或合作關係，項目由本機構獨立營運和推行。如有任何商標或名稱涉權問題，我們將配合修改名稱，避免混淆。</p>
<p>(ii) In the chapter 1 of the justification (Appendix 3), it is mentioned that "a further area extension of this OBC might be possible". Please explain whether it refers to the current application site only, or the areas outside of the current application site. Meanwhile, please elaborate on whether the impact assessment(s) conducted for the current application has covered any area outside the current application site.</p>	<p>(ii) 未來擴展計劃：我們現階段僅專注於申請範圍內的臨時設施營運。未來如出現適合的鄰近土地且獲相關部門批准，我們有意擴充營地規模，但任何擴展計劃將嚴格遵循法定程序，另行申請所需的規劃許可後方可實施。</p>
<p>(iii) In the chapter 4 of the justification (Appendix 3), four types of accommodation options have been listed out. The applicant is required to provide justifications to demonstrate the prefabricated Space Cabin type camps (a less common type of camping setting) is a more preferred option amongst others, considering the surroundings and the purpose of the accommodation.</p>	<p>(iii) 環境影響及「海岸保護區」規劃意向：本計劃屬小型臨時性質，所有構築物和設施均以可拆卸和非永久方式建置，對天然地形和海岸生態的干擾將減至最低。我們深明「海岸保護區」地帶的規劃意向在於保育、保護和保留天然海岸線及環境，因此營地的設置強調低密度和低強度，不會改變海岸線外觀，建築發展維持在最低水平。場地內並無發現受保護物種或重要生境，我們將採取措施確保施工和運營過程不對周邊生態造成不良影響 (例如盡量使用環保材料)。在營運期滿後，所有設施均可迅速拆除，場地將恢復原貌，確保對環境的影響可逆且受控。「Space Cabin」屬模組化臨時建築，採用可拆卸構造，對地形干擾最小，無需大規模基礎工程，建成後可快速拆除，完全符合「可逆性」原則，</p>

	有利於保護自然景觀與生態。同時，其結構可應對極端天氣，較其他選項更安全。
(iv) In the chapter 5 of the justification (Appendix 3), it is mentioned that a new electricity main box will be installed. Please confirm if the required installation works for the provision of public utility installation (electricity cables) is within the application site. If those building, engineering and other operations incidental to and all uses directly related and ancillary to the proposed use within the same “Coastal Protection Area” (“CPA”) zone, separate applications to the Town Planning Board on the proposed use and installation are not recommended.	(iv) 電力供應安排：本計劃所需電力將由場地內的主電箱供給，所有相關供電設施和電纜鋪設工程均位於申請地界範圍之內，不會牽涉鄰近用地或對外部造成影響。
(v) In the chapter 6(a) of the justification (Appendix 3), with regards to the planning intention of the subject “CPA” zone, which is “intended to conserve, protect and retain the natural coastlines and the sensitive coastal natural environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological value, with a minimum of built development. There is a general presumption against development in this zone. In general, only developments that are needed to support the conservation of the existing natural landscape or scenic quality of the area or are essential infrastructure projects with overriding public interest may be permitted”, the applicant is required to provide additional justifications to substantiate the proposal that it is in line with the planning intention of the subject “CPA” zone.	(v) 景觀與綠化措施：我們非常重視營地與周圍景觀的協調。我們已提交園境設計圖，確保現有樹木和植被（如有）將予以保留，同時計劃在場地周邊種植本地品種灌木等綠化以屏蔽營地設施，柔化視覺效果，減低對周邊景觀的影響。所有臨時建築物均為單層結構，高度不超過約 4.5 米，且外觀選用較天然的色調，務求與周圍自然環境相融合，項目結束後將完全清拆，場地可回復自然原貌，不破壞鄰近海岸的整體景致。
(vi) In the chapter 6(a) of the justification (Appendix 3), it is mentioned that “generate	(vi) 營地使用者限制：營地僅供我們的會員、預先登記的學校團體及相關人士使用，並不向一般公眾

<p>local employment opportunities for the locals to serve the tourists, the Eco attractions, recreational users and stakeholders". Please advise whether the accommodation is only to serve the members of OBHK or public in general, and any other management measures to ensure the least nuisance to the nearby villagers. Please also advise whether the proposal has received the support and participation from the South Lantau locals.</p>	<p>即場開放。此安排有助我們有效管理使用人數和活動質素，確保營運秩序和安全。目前我們亦有與部分南大嶼居民初步接觸，將積極聽取其意見，並提供優先就業機會。</p>
<p>(vii) While in the chapter 6(c), there is a proposed refreshment kiosk to serve as "a coffee shop only for the enjoyment of our members". Please clarify if the proposed kiosk would serve either the applicant's members or general public and tourists or both of them. Please also clarify if the proposal involves "Shop and Services" use in addition to the claimed "Holiday Camp" use, if so, the applicant is required to rectify the application since the subject "CPA" zone has no provision for the "Shop and Services" use. According to the Covering Notes of the SLC OZP, temporary use or development of land or building exceeding three years requires permission from the Town Planning Board in accordance with the terms of the OZP.</p>	<p>(vii) 商業用途界定：本申請不涉及任何「商店及服務業」用途。營地內不會設置對外營業的零售商店、餐廳或類似商業設施，確保土地用途符合申請範圍且不會演變為純商業經營。</p>
<p>(viii) Also, as stated in the same chapter 6(d), "the catering will be provided by the associated restaurants in the Village". Please advise if these restaurants are part of the application site.</p>	<p>(viii) 餐飲服務安排：申請文件中提及的會員專屬餐飲服務是村內持牌食肆，提供配套（例如外送餐飲），並非在申請地點。</p>
<p>(ix) While in the chapter 6(g), it is mentioned that "there are no steep slopes nor steep terraces within the site". According to the site visit, a notice board erected by the Geotechnical Engineering Office (GEO) of</p>	<p>(ix) 地質安全措施：我們高度重視場地的地質及結構安全。回覆請參閱附 - Responses to GEO/ CEDD</p>

<p>CEDD has been found in proximity to the application site indicating that the areas in the vicinity of the notice board are subject to landslip risk. The applicant is reminded to note the comments from GEO and take necessary actions or assessments accordingly.</p>	
<p>(x) Noting from the chapter 6(h), it is stated that “customers are encouraged to use public transport to reach the camp site. No parking facility will be provided”. Please elaborate on how the camp site can be operated without the parking provision and confirm if there is any vehicular access to the Site. Also, as stated in the chapter 6(b) that “these tanks will be further connected to two soakaway pits or trenches for further soakaway”, please advise on how the residue is being collected from the septic tank to prevent overflow, in particular if there is no vehicular access to the site upon confirmation on the above.</p>	<p>(x) 交通及泊車安排：長沙下村交通配套良好，營地距離最近的巴士站僅約 3-5 分鐘步行路程，遊客一向以公共交通工具往返。因此營地內無需提供泊車位，以免增加區內交通負荷。所有物資與殘渣處理將透過輕型貨車至村口，再以小型拖運工具送至營地，避免交通壓力。化糞池事宜，請參閱 (xi) 的回覆。</p>
<p>(xi) If it is confirmed no vehicular access for the subject site, it also comes to our question on how the prefabricated space cabin could be transported and installed at designated locations, and other construction works at the application site, including the installation of septic tank system expected to be delivered to site by mid-size lorry as mentioned in the chapter (c) of Sewage Treatment STS Proposal (Appendix 10).</p>	<p>(xi) 污水處理方案：營地將設置密封的化糞池作為污水處理設施，並確保其容量和設計符合相關環境及衛生標準。所有污水（包括沖廁及淋浴廢水）會經化糞系統妥善處理，不會直接排放影響周邊環境。我們將按照全村一貫採用的做法，定期聘請持牌吸糞車清理化糞池中的污物，確保系統有效運作和維持環境衛生。此安排在該區已行之有效，可滿足營地運作需求且不會對環境造成不良影響。</p> <p>施工及運輸車輛：本計劃所需的各項設施均以組件化形式預製，例如宿營用的預製艙（俗稱「太空艙」）及污水處理系統等，可以透過輕型貨車分批運輸至現場再進行拼裝安裝，無需使用大型重型工程車進出施工。此安排將大幅減低施工期間對鄉村道路的壓力及對周邊環境的干擾，也確保日常營運和補給過程中不會有重型車輛進出，維持村內交通秩序和道路安全。</p>

<p>(xii) Besides, the applicant is advised to respond to the public comments received on the captioned application. The followings are the part of the extract of public comments received:</p>	
<p>(a) The proposed use does not conform to the planning intention of the subject “CPA” zone;</p>	<p>(a) 有關申請用途與「海岸保護區 (CPA)」規劃意向不符的意見：</p> <p>我們是一個小型的戶外活動中心，營運模式以低密度、低影響為原則。申請地點內並無大規模永久性建設，僅涉及挖設少量化糞池作基本衛生用途，其餘設施（如露營車、太空艙）均為可移動式組件，不會破壞地貌，也不涉及土地硬化。</p> <p>值得一提的是，申請地點目前已存在三個持牌建築物，並合法用作培養蘑菇之用，可見該地早已有實際用途，並非處於未曾開發或原始狀態。</p> <p>此外，申請地點四周已被多幢村屋及別墅所包圍，周邊土地大多劃作「鄉村式發展地帶 (V Zone)」或「住宅 (丙) 類用途地帶 (RC)」。本址實際位於人類活動頻繁範圍之內，並非典型自然海岸線或生態敏感區。</p> <p>從海岸線步行至申請地點，途中需經過一個政府泳屋，以及兩至三排村屋，才可抵達本中心，可見本址並非直接位於海岸或具特殊視覺景觀的位置。</p> <p>綜合以上因素，我們認為本項目並不違反海岸保護區的規劃原意。反而，我們所提出的有管理、有組織的低密度活動設施，將為當區提供良好的教育與環境保育平台，有助提升整體管理質素與地區秩序，亦有助減低未經規劃的野營或濫用土地的風險。</p>
<p>(b) The proposed use may create nuisance to the nearby Cheung Sha Lower Village, for instance, the noise from the holiday camp users during operation. A Social Impact Assessment should be prepared to assess the impact to the existing villagers and identify mitigation measures;</p>	<p>(b) 有關項目可能造成噪音滋擾的意見：長沙下村所在區域是一個已刊憲的公眾海灘，本身就是遊客區，村內住宅約 50 間，4 家餐廳、2 家咖啡店、3 家士多及 1 個水上活動中心供遊客使用。本申請項目選址於村後的小山丘上，遠離主要民居，因此不會對村民造成噪音滋擾。</p>

<p>(c) The environmental and ecological impact from the proposed use have not been assessed to demonstrate the proposed use would not create insurmountable impact;</p>	<p>(c) 有關要求提交社會影響評估的意見：發表該意見的人士可能未有親身考察現場，不了解長沙下村，實際上，長沙下村位於香港著名景點之一的長沙海灘（全港最長、最乾淨的海灘之一）。該區作為已刊憲海灘和遊客熱點，各項設施運作對社區的影響早有既定經驗。</p>
<p>(d) The drainage and sewerage impact from the proposed use, including the proposed location of the septic tank, may create pollution to the nearby stream and further to the beach to affect the natural environment and swimmers;</p>	<p>(d) 有關環境與生態影響評估的意見：目前項目尚未動工。若規劃申請獲批，申請方將按照部門要求進行詳細的環境及生態評估，並提交報告以滿足法定規定，確保環境影響得到適當評估和監管。</p> <p>所使用之化糞池為密封式設計，並安排持牌服務商定期抽清。污水絕不會排入鄰近溪流或明渠，並將設定防滲區與檢查井確保安全。</p>
<p>(e) The traffic impact of proposed use is in question due to the limited pedestrian access to the application site;</p>	<p>(e) 交通負擔與通行風險：所有施工與營運物資均採模組式分批運送，不使用大型工程車。進出安排將採步行與人力推運相結合，避免與原居民爭用道路。</p>
<p>(f) The capacity of the proposed use is underestimated that there are more visitors than what the applicant claimed, which may lead to nuisance to the nearby environment;</p>	<p>(f) 有關交通不便的意見：長沙下村交通相對便利，步行約 3-5 分鐘可達附近的巴士站（距離主要道路僅百餘米）。因此，營地毋須額外提供停車位；物資運輸可利用村內公共停車場進行裝卸，再以手推車等方式送達營地，減少對村內交通的影響。</p>
<p>(g) The proposed use will create adverse visual impact and destroy the agricultural land in a terraced field setting at the application site; and</p>	<p>(g) 視覺與梯田破壞疑慮：現場所見梯田已多年荒廢，並無活躍農耕。所有設施為可逆性建構物，底層不使用混凝土台，且周邊將配以原生植物綠化及草網鋪設，減少外觀衝擊。</p>
<p>(h) The proposed use will be an undesirable precedent to the surrounding development.</p>	<p>(h) 開創不良先例：本個案為教育與可持續發展用途，內容具公益及非牟利性質，並非純觀光或商業性申請。後續若有其他申請個案，政府仍會按其獨立條件審批，並無「自動豁免」或「一案通過多案」之情況。</p>

Department comments 請參閱附件1-4。

附件 1

15th Jun 2025

Responses to Director of EPD for A/SLC/191

Thank you for your comment.

Water quality

- A licenced waste collector will be employed to clean and maintain the chemical toilets on a regular basis. The sewage generated will be tanked away.
- The ST/S shall comply with the requirements of ProPECC PN 1/23 and the same will be certified by an AP.
- The minimum clearance requirements for the ST/S as depicted in ProPECC PN 1/23 will be met. Otherwise alternative method will be used and the sewerage generated will be tanked away periodically.
- The training pool will be maintained by a professional company with adequate licence. The pool water will be filtered and sterilized before recharge back to the pool. The materials used shall meet the requirements of EPD as advised by the professions.
- The sewage from the refreshment kiosk will be stored in the nearby existing ST/S and tanked away when full
- The maximum no. of campers + staff will be limited to 50 nos.

8 Cabins x 4 persons + 8 instructors + 2 staff = 42 persons

Noise

- No public announcement system, portable loudspeaker or any form of audio amplification system will be used within the Application Site at any time. Other administrative measures such education/posting of notices on camps. The closing time of the Camp is 11;00pm.
- The filtration room will be designed by professionals and associated pump will keep to a minimum horse power and design to comply with Noise Ordinance/Regulations..

附件 2

15th Jun 2025

Responses to Chief Town Planner of Urban Design & Landscape Section, Planning Department for A/SLC/191

Thank you for your comments:

- a) The proposed site is an abandoned farm lands for several years; but some farmers with the permission of the land owner will periodically come and clear the farm land for small crop/veg plantation annually;
- b) The proposed Space Cabins or similar type camps will be constructed above existing ground level by approx. 800mm so that the disturbance to the existing farm land is kept to a minimum;
- c) A tree survey will be carried out by an ALS with spotted levels shortly after Section 16 approval;
- d) A detailed Landscape Proposal with scale taken into accounts your Department's comments will submit to you for approval within the first three months designated period; and
- e) Some of the fruit trees will be relocated to a more suitable space for future growing since some of them are already shaded by more fast growing trees.

附件 3

15th Jun 2025

Responses to DLO/Is for A/SLC/191

Thank you for your comments

- a) A Short term Waiver will submit to Lands Dept. for approval to permit/regularise the structures erected within the Application Site;
- b) We understand that some of existing/new surface channels are located within Gov't Land; Excavation into G.L. permission will apply to Lands Dept for permission before the Construction Works; &
- c) As regards to the upgrading of the existing surface channels inside C2585; permission will be seek from Government/ Licence Owners with the help of LandsD.

16 Jun 2025

Responses to Head of the GEO, CEDD for A/SLC/191

Thank you for your comment.

We have carried out a preliminary study on a slope which is situated outside the Application Site namely 13NE-B/F 48.

A desk study on this said slope is reviewed:

- a) Slope Information System, Feature No. 13NE-B/F 48 Fig. 1
 - i. Max. Height : 6.3m
 - ii. Length : 50m
 - iii. Average Angle : 35deg.
 - iv. Type of Toe Facility : Lightly-used open area/facility
 - v. Type of Crest Facility : Road/footpath with moderate traffic density

- b) GEO Technical Guidance Note No. 15 (TGN 15)
 - i. Guidelines for Classification of Consequence-to-life

Calculations on the travel Angle as defined in Fig 2 & Fig.3

- a) The existing slope is a fill slope with debris volume less than 300cu.m when failure
- b) The travel angle shall control less than 20deg

- 1) The crest influence zone $D = 0.4 \times 6.3\text{m} = 2.52\text{m}$
- 2) The horizontal distance from the nearest Space Cabin to slope crest as measured on plan is 15m.
- 3) Crest influence zone + horizontal distance = $2.52 + 15 = 17.52\text{m}$
- 4) Then the travel angle = $\text{arc tan}(6.3/17.52) = 19.8 \text{ deg} < 20\text{deg}$ OK

Man-made Features

- Cut slopes
- Disturbed terrain
- Fill slopes
- NT defence measures
- NT stabilisation measures
- Retaining walls
- Slope Features

Division

Scale 1:500

Date 13/06/2025

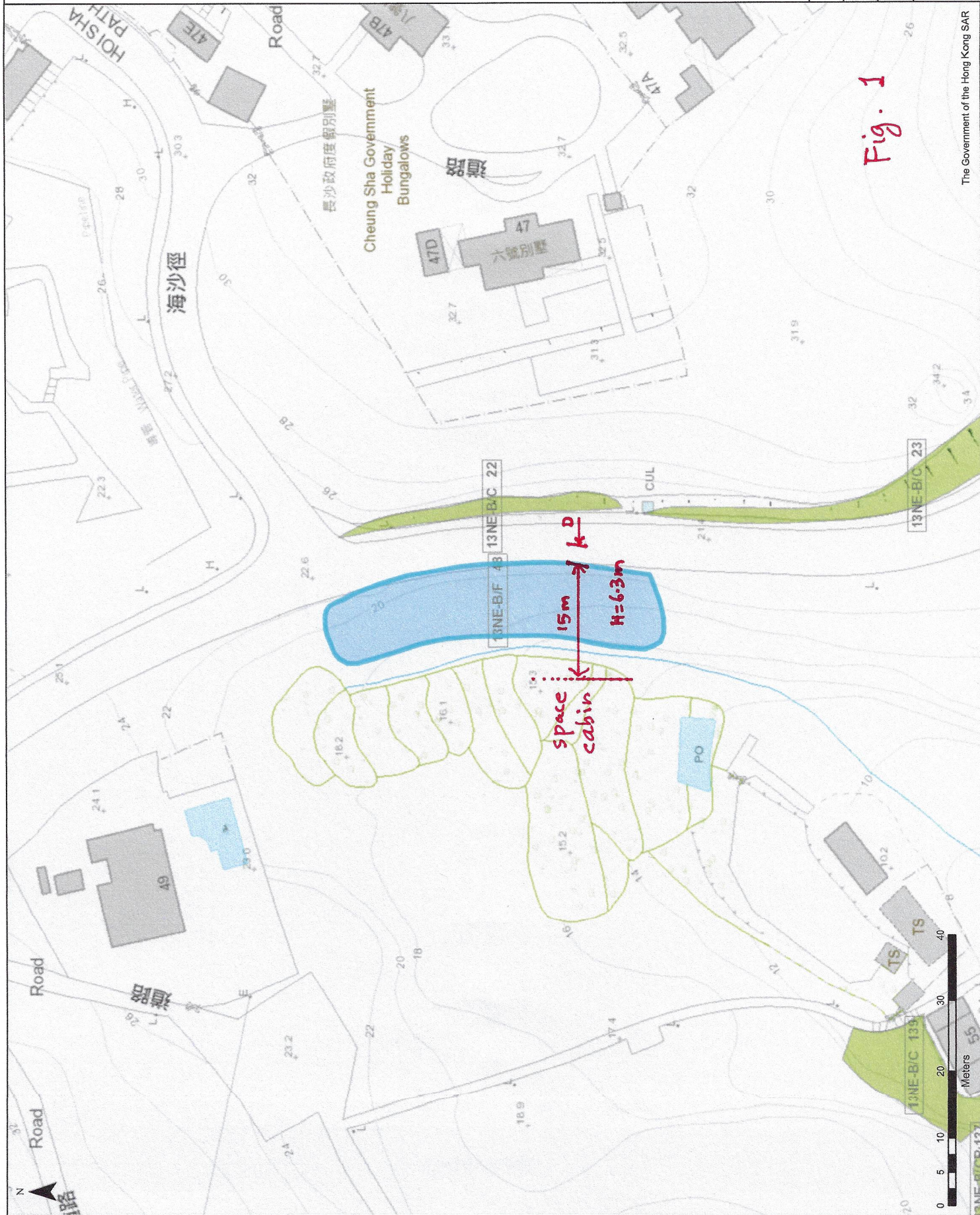


Fig. 1

GEO Technical Guidance Note No. 15 (TGN 15)
Guidelines for Classification of Consequence-to-Life
Category for Slope Features

Issue No.: 1	Revision: B	Date: 27.03.2007	Page: 8 of 14
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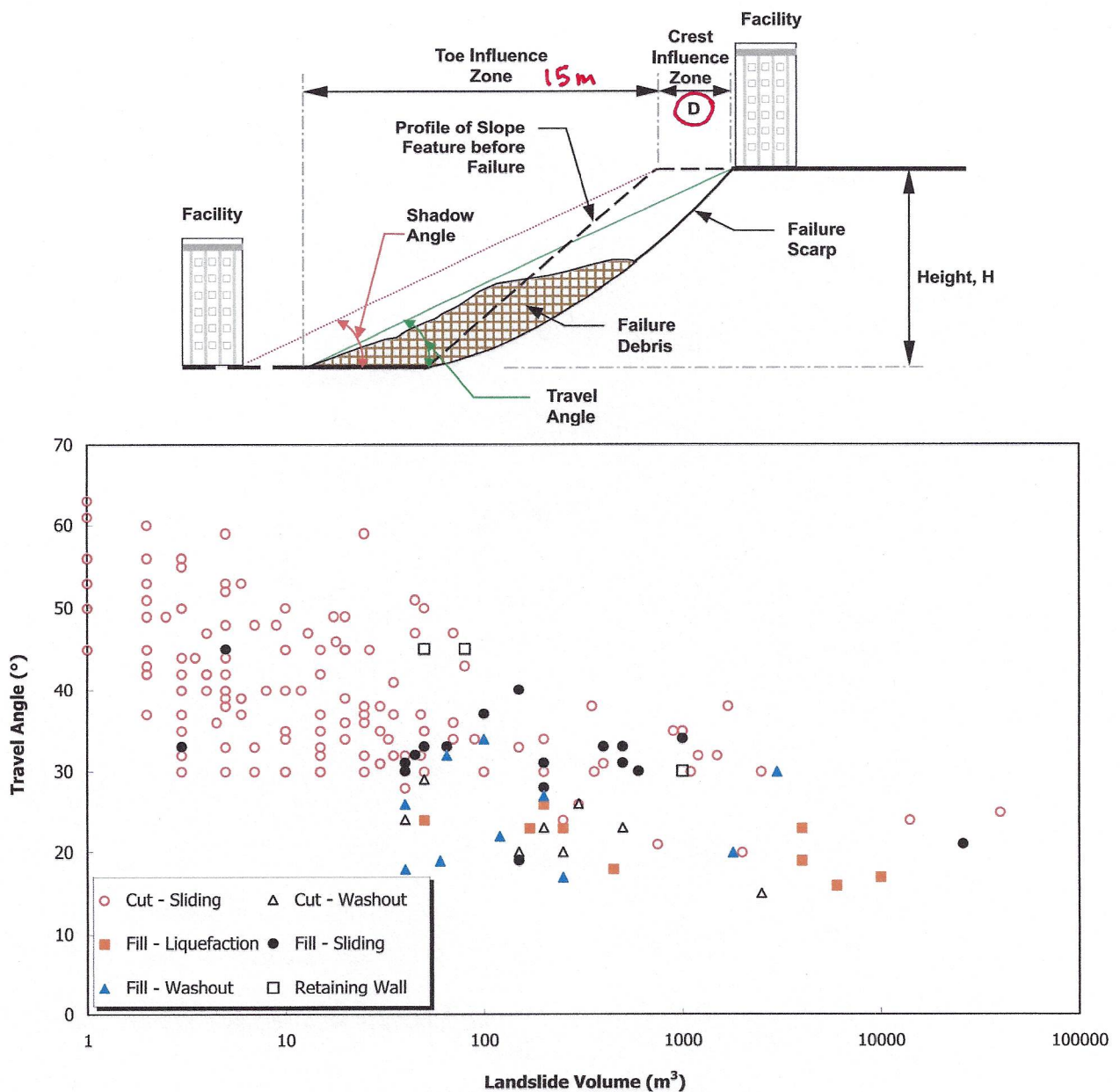


Figure 1 – Relationship between Travel Angle and Landslide Volume for Selected Slope Failures in Hong Kong

GEO Technical Guidance Note No. 15 (TGN 15)
Guidelines for Classification of Consequence-to-Life
Category for Slope Features

Issue No.: 1	Revision: B	Date: 27.03.2007	Page: 4 of 14
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Type of Feature	Travel Angle for Estimation of the Possible Extreme Travel Distance of Landslide Debris	
	Debris Volume $\leq 300 \text{ m}^3$	Debris Volume $> 300 \text{ m}^3$
Cut Slopes and Retaining Walls	30°	20°
<u>Fill Slopes</u>	20°	10°

- 5.2.3 The scale of failure depends on, among other things, the height of the slope feature. Past failure records (see Figure 2) indicate that those with volume of more than 300 m^3 mostly occurred in slope features with height greater than 10 m.
- 5.2.4 For high slope features (e.g. slope features higher than 15 m), users and occupants of facilities which lie outside the expected travel distance of debris could still be vulnerable to casualty from potential large-scale failures. When dealing with high slope features, extreme care should be exercised in assessing the consequence of failure before it is decided to downgrade the CTL category of the slope feature.
- 5.2.5 For gentle cut slopes whose gradient is less than the above recommended travel angles, the consideration of the expected travel distance of debris by means of travel angle alone may not be adequate in assessing their CTL category for cases where the feature can give rise to large failures and the toe facility lies very close to the feature. Under such circumstances, it is prudent to consider the presence of an adequate buffer space at the toe to accommodate debris before the CTL category can be downgraded (e.g. a 3 m wide buffer zone in front of a 10 m high cut slope is generally considered adequate).
- 5.2.6 In some cases, the height of a feature may vary along its length and the location of the affected facility may not coincide with the maximum feature height. Under such circumstances, the assessment of the CTL category for the feature should take account of the likely failure scenarios, site conditions and characteristics of that part of slope where debris from it could reach the facility. Where several facilities exist, the potential consequence of failure in relation to each facility should be assessed to determine which facility gives rise to the most severe situation.
- 5.3 **PROXIMITY OF FACILITIES AT THE FEATURE CREST AND EXTENT OF FAILURE**
- 5.3.1 The back scarp of a failure may extend beyond the crest of the slope feature thereby affecting the crest facility. Figure 3 shows the relationship between the crest