

Our Ref. : DD135 Lot 24 RP & VL
Your Ref. : TPB/A/YL-PN/88

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

By Email

10 December 2025

Dear Sir,

1st Further Information

**Proposed Temporary Place of Recreation, Sports or Culture (Hobby Farm and Fishing Ground),
Holiday Camp, Barbecue Site and Animal Boarding Establishment with Ancillary Facilities and
Associated Filling of Land for a Period of 3 Years in "Agriculture" Zone,
Various Lots in D.D.135 and Adjoining Government Land, Pak Nai, Yuen Long, New Territories**

(S.16 Planning Application No. A/YL-PN/88)

We are writing to submit further information to address departmental comments of the subject application (**Appendix I**).

Should you require more information regarding the application, please contact our Mr. Danny NG at [REDACTED] or the undersigned at your convenience. Thank you for your kind attention.

Yours faithfully,

For and on behalf of
R-riches Planning Limited



Louis TSE
Town Planner

cc DPO/TMYLW, PlanD

(Attn.: Mr. Wilfred CHU

email: wkhchu@pland.gov.hk)



Responses-to-Comments

**Proposed Temporary Place of Recreation, Sports or Culture (Hobby Farm and Fishing Ground),
Holiday Camp, Barbecue Site and Animal Boarding Establishment with Ancillary Facilities and
Associated Filling of Land for a Period of 3 Years in "Agriculture" Zone,
Various Lots in D.D.135 and Adjoining Government Land, Pak Nai, Yuen Long, New Territories**

(Application No. A/YL-PN/88)

(i) A RtoC Table:

Departmental Comments		Applicant's Responses
1. Comments of the Antiquities and Monuments Office (AMO) (Contact Person: Ms. Kelly LAU; Tel: 2208 4462)		
(a)	<p>The application site falls within the Sheung Pak Nai Site of Archaeological Interest. During the site visit conducted by AMO on 3 September 2025, it is noted that site formation works and excavations had been carried out in the site without consulting AMO. AMO deeply regrets that those works were undertaken without our permission and might have already caused adverse and irreversible damage to the archaeological potential of the site. AMO demands an investigation of the case and cease any further excavation and site formation work, if any, before remedial action is proposed for consideration and agreed by AMO. The applicant is demanded to provide the following information for our further assessment:</p> <ul style="list-style-type: none"> - all the information related to the site formation work on the subject site; with details of the original, existing and proposed ground levels for filling of land; 	<p>Portion of the application site (the Site) (i.e. 5,801m², 36% of the Site) is proposed to be filled with concrete of not more than 0.1m for site formation of structures and circulation space. The proposed structures are steel-frame structures with no foundation (i.e. excavation work is not required). Other than the proposed drainage work, no other ground excavation works will be carried out. Subject to the final approval of the Drainage Authority, peripheral drainage u-channels of not more than 1 m in depth will be proposed along the site boundary to collect the surface run-off to minimise the adverse drainage impact to the surrounding area.</p>

	<ul style="list-style-type: none"> - photos on the subject site prior to and during the site formation works showing the condition of the site; - details of the excavation work carried at private land Lot 35 and clarify if any further excavation will be proposed to be carried out at the remaining Lots of the application; and - to clarify with AMO whether there is any drainage works proposed for the development. If affirmative, the applicant is required to provide details of the proposed drainage works, e.g. the location, extent and depth of the proposed ground excavation for AMO's further comment. 	
2. Comments of the Director of Agriculture, Fisheries and Conservation (DAFC) (Contact Person: Dr. Azaria WONG; Tel: 2150 6932)		
(a)	There are ponds and watercourses in the vicinity of the site. The applicant should provide more information on how to minimize disturbances and polluting the nearby waterbodies.	All the proposed works are at least 3m away from the top of the bank of the existing watercourses. 2.5 m high solid metal boundary fencing will be erected along the entire site boundary to separate the Site and the existing ponds and watercourses.
(b)	<p>The subject address has NO licence boarding establishment granted by this department. And we have NO licensed premises within DD 135.</p> <p>Under the Public Health (Animals) (Boarding Establishment) Regulations, Cap. 139I, any person who provides food and accommodation for animals in return for a fee paid by the owner must apply for a Boarding Establishment Licence from this department. The applicant should also be reminded that the establishment and ancillary facilities which is licensed under the Cap 139I Public</p>	The applicant will apply for relevant licence to rectify the proposed development after planning permission has been obtained from the Town Planning Board (the Board).

	Health(Animals)(Boarding Establishment) Regulations must always fulfill the criteria listed in the Regulations. The dogs kept by the applicant should also be properly licensed as in accordance with the Rabies Ordinance, Cap. 421, and he is reminded to observe the Prevention of Cruelty to Animals Ordinance, Cap 169, at all times. We will provide detail information and guidance on Animal Boarding Establishment when the applicant submits licence application to us.	
3. Comments of the District Planning Officer/Fanling, Sheung Shui & Yuen Long East Office, Planning Department (DPO/FSYLE, PlanD) (Contact Person: Ms. Jessie LAU; Tel: 3168 4037)		
(a)	Please provide more information on the height and layout of the proposed fencing.	2.5 m high solid metal boundary fencing will be erected along the entire site boundary. The boundary wall will be installed by properly by licensed contractor to prevent misalignment of walls, to ensure that there is no gap or slit on the boundary wall.
(b)	Please clarify whether part of the Site would be used as Animal Boarding Establishment (following Town Planning Board's Definition of Terms and the Cap 139I Public Health (Animals) (Boarding Establishment) Regulations). In particular, please provide more information on the operation for the accommodation for dogs, i.e. whether it is an animal boarding establishment under the Cap 139I in which food and accommodation would be provided for animals in return for a fee paid by the owner. Also, please clarify whether the keeping of farm animals at structure B2 should be part of the hobby farm use rather than animal boarding establishment. If so, please revise the relevant parts in the application form, planning statement and layout plan.	Portions of the Site (structures B6 and B7) will be used as animal boarding establishment within the Site. The applied animal boarding establishment is proposed to provide temporary shelter for stray animals (dogs). A total of not more than 40 dogs will be kept at structures B6 and B7 within the Site. Structure B2 will be designated as the animals internation zone for a variety of adorable farm animal, such as little bunnies, sheep and pigs, which is part of the hobby farm use.

4. Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD) (Contact Person: Ms. May CHAN; Tel: 3565 3949)		
(a)	With reference to the aerial photo of 2024, the Site is located in an area of rural landscape dominated by temporary structures, vacant land, ponds, tree clutters and woodland. From the photos taken by DPO on 22.8.2025 and 3.9.2025, the Site is covered by bare soil with existing trees/vegetation observed at the periphery of the Site. Compared with the aerial photo of 2023, trees/vegetation removal has already been undertaken.	All existing trees/vegetation within the Site will be retained by the applicant.
(b)	In the submission, no information on existing trees within Site is provided. The applicant should provide a broad-brush tree survey for remaining existing trees on Site and a landscape proposal with mitigation measures to demonstrate that the applied uses would not have adverse landscape impact on the Site and the surrounding areas.	
(c)	We would reserve our comment upon receipt of the required landscape technical information in accordance with “Guidance notes on the application for permission under Section 16 of the Town Planning Ordinance (Cap. 131)”.	
5. Comments of the Chief Engineer/Mainland North, Drainge Services Department (CE/MN, DSD) (Contact Person: Mr. Daniel CHAN; Tel: 2332 2471)		
(a)	I have reservation on the subject application unless the applicant could submit Drainage Impact Assessment (DIA) to the satisfaction of this Division.	Drainge Impact Assessment will be submitted by the applicant after planning permission has been obtained from the Board.
6. Comments of the Commissioner of Police (C of P)		
(a)	Comprehensive traffic assessment shall be required to ensure the planning aligns with traffic patterns and public transport integration including analysis of	Noted. Comprehensive traffic assessment will be carried out by the applicant after planning permission has been obtained from

S.16 Planning Application No. A/YL-PN/88

	potential impacts on local public transport networks regarding the great number of potential visitors.	the Board. The applicant will also apply for relevant licenses to rectify the proposed development.
(b)	As the application may involve barbecue site and the place of recreation, the applicant or subsequent operator shall obtain relevant licenses from appropriate authorities, such as Food and Environmental Hygiene Department.	
(c)	While the captioned proposal is still subject to change design stage, this office has no objection in principle. Should your office have any further significant information on the captioned development, please do not hesitate to let us know.	