

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/NE-TKLN/122

- Applicant** : Income Mail Limited represented by LCH Planning & Development Consultants Limited
- Site** : Lots 21 (Part) and 22 (Part) in D.D. 80, Ta Kwu Ling North
- Site Area** : About 1,356m²
- Lease** : Block Government Lease (demised for agricultural use)
- Plan** : Approved Ta Kwu Ling North Outline Zoning Plan (OZP) No. S/NE-TKLN/2
- Zoning** : “Green Belt” (“GB”)
- Application** : Temporary Holiday Camp for a Period of Three Years

1. The Proposal

- 1.1 The applicant seeks planning permission for temporary holiday camp for a period of three years at the application site (the Site) falling within an area zoned “GB” on the OZP (**Plan A-1**). According to the Notes of the OZP for “GB” zone, ‘Holiday Camp’ is a Column 2 use, which requires planning permission from the Town Planning Board (the Board). The Site is largely covered with grass and partly fenced-off, and currently occupied by some caravans without valid planning permission.
- 1.2 According to the applicant, the Site forms part of an existing holiday camp operated by the applicant (**Plans A-2 and 4a**)¹. The applied use comprises six caravans/tents², with a height of not more than one storey or 3.5m and a total covered area of not more than 188.9m². Three of the caravans/tents fall entirely within the Site, while the other three fall partly within the Site and partly within the adjoining existing holiday camp zoned “REC”. The remaining portion of the Site is served as a landscape area. No structure will be constructed and no filling or excavation of land will be carried out at the Site³. The operation hours are 24 hours from Mondays to Sundays, including public holidays. Reservation is required for camping at the Site. The layout plan submitted by the applicant is shown in **Drawing A-1**.

¹ The entire holiday camp falls within “Recreation” (“REC”) (about 81.6%) and “GB” (about 18.4%) zones. The current application covers the part of the holiday camp (i.e. about 18.4%) falling within the “GB” zone. For the remaining part within the “REC” zone, ‘holiday camp’ is always permitted and no planning permission is required.

² Apart from caravans, the application also includes provision of tents at the Site to allow flexibility for meeting changing needs of the customers.

³ Some caravans are supported by stands with concrete footings attached to the ground.

- 1.3 The Site is accessible from Lin Ma Hang Road through the existing holiday camp site zoned “REC” on the south and via a local access road on the southwest. No parking space will be provided at the Site and the parking facilities of the existing holiday camp adjoining the Site will be utilised. Campers are encouraged to use public transport and walk to the holiday camp. Septic tanks within the existing holiday camp site will be used for sewage treatment. Audio amplification system will be avoided as far as possible. If unavoidable, it will only be used during daytime (i.e. 9:00 a.m. to 7:00 p.m.) on occasional periods only with some noise mitigation measures such as orientating the system away from the nearby noise sensitive receivers.
- 1.4 The applicant submits a planting proposal in support of the application. Existing trees at the Site will be retained. Four new trees, shrub and grass will be planted at the Site to enhance the landscape area as well as providing habitat for native birds/insects. The planting proposal submitted by the applicant is shown in **Drawing A-2**.
- 1.5 The major development parameters of the applied use and the entire holiday camp are summarised as follows:

	Applied use under the current application (No. A/NE-TKLN/122)	Entire holiday camp (including the applied use)
Site area	About 1,356m ² (about 18.4% of the entire holiday camp)	About 7,385m ²
No. of caravans/ tents	6 caravans/tents	17 caravans/tents
Height of caravans/tents	Not more than one storey or 3.5m	Not more than one storey or 3.5m
Covered area of caravans/tents	Not more than 188.9m ² (about 13.9% of the Site)	Not more than 661.5m ²
No. of buildings/ structures	N/A	14 (not exceeding 830.5m ² of built over area and a height of 6m/ 2 storeys)
Maximum no. of campers	About 28	Not more than 80
Parking provision	N/A	- Two private car parking spaces for staff only - One light bus pick-up/drop-off space for visitor (upon reservation only)

- 1.6 The Site is the subject of a previous application (No. A/NE-TKLN/96) submitted by the same applicant as the current application for the same use, which was rejected by the Rural and New Town Planning Committee (the Committee) of the Board and on review by the Board in 2025. Details of the rejected previous application are set out in paragraph 6 below. Compared with the rejected previous application, the current application involves a smaller area and reduced number of caravans/tents. The rejected previous application consisted of two portions with one in the east and one in the west of the existing holiday camp site for placing seven and five caravans/tents/camps respectively (**Drawing A-3**). The current application only involves the portion in the east of the existing holiday camp site to accommodate six caravans/tents, with three of them falling

entirely within the Site and the other three falling partly within the Site and partly within the adjoining existing holiday camp site zoned “REC”. According to the applicant, the one caravan/tent in the east and all the five caravans/tents in the west of the existing holiday camp site originally encroaching onto the “GB” zone in the rejected previous application are now proposed to be placed entirely within the “REC” zone⁴. A comparison of the rejected previous application and the current application is summarised as follows (**Drawing A-3**):

	Rejected Application No. A/NE-TKLN/96 (a)	Current Application No. A/NE-TKLN/122 (b)	Difference (b) – (a)
Site area	about 1,902m ² (two portions with one in the east and one in the west of the existing holiday camp)	about 1,356m ² (only the portion in the east of the existing holiday camp)	-546m ² / -28.7%
No. of caravans/tents	12 (eastern portion: 7 western portion: 5)	6 (within eastern portion)	-6 /-50%
Height of caravans/tents	Not more than one storey or 3.5m	Not more than one storey or 3.5m	No change
Covered area of caravans/tents	Not more than 283.5m ²	Not more than 188.9m ²	-94.6m ² / -33.4%
Maximum no. of campers	About 36	About 28	-8 /-22.2%
Proposed landscape	- 19 at-grade planting of Variegated Fagraea	- 4 Madagascar Almond - 22 Red Azalea - 10 Chinese Asparagus - 700m ² Carpetgrass Lawn	Increase in quantity and variety of plantings proposed

1.7 In support of the application, the applicant has submitted the following documents:

- (a) Application Form with attachments received on 6.3.2026 **(Appendix I)**
- (b) Supplementary Information (SI) received on 9.3.2026 **(Appendix Ia)**
- (c) Further Information (FI) received on 8.4.2026* **(Appendix Ib)**
- (d) FIs received on 10.4.2026 and 13.4.2026* **(Appendix Ic)**

* *accepted and exempted from publication and recounting requirements*

2. **Justifications from the Applicant**

The justifications put forth by the applicant in support of the application are detailed in the Application Form, SI and FIs at **Appendices I to Ic**, as summarised below:

⁴ According to the applicant, the one caravan in the east and five in the west of the existing holiday camp site, which are currently encroaching onto the “GB” zone, will be placed within the “REC” zone upon approval of the current application. Also, for the five caravans in the west, as four are covered by a Guesthouse (Holiday Camp) Licence, the applicant will also need to discuss with the Home Affairs Department (HAD) regarding the modification of the approved licence before relocating them to the “REC” zone.

- (a) to address feedbacks from the campers to enlarge the camping ground area to create a spacious atmosphere, the applicant intends to utilise the remaining private land for slight extension of the holiday camp operation area to the “GB” zone;
- (b) the applied use, forming part of the existing holiday camp, is intended to provide eco-tourism opportunity. It is in line with the Government’s direction of ‘Tourism is Everywhere in Hong Kong’ as well as echoing the Northern Metropolis Action Agenda to support eco-tourism opportunities and the boundary economy of Heung Yuen Wai Boundary Control Point (HYW BCP);
- (c) taking into account the departmental comments and concerns of the Board during the review of the previous application (No. A/NE-TKLN/96), the current proposal has reduced the number of caravans, optimised the configuration of caravans and minimised the extent of site area encroaching onto the “GB” zone. The current proposal demonstrates the applicant’s genuine effort to address planning concerns. The enhanced layout achieves a better balance between development needs and landscape preservation and reflects the applicant’s commitment to adhere to sustainable planning principle and align with the underlying planning intentions of the “REC” and “GB” zones;
- (d) the rationale of extending the holiday camp into the adjoining “GB” zone rather than not confining all caravans within the “REC” zone arises from site constraints and practical considerations, including that (i) the area in the existing holiday camp currently occupied by the Emergency Vehicle Access (EVA) is the only flat platform available for providing unobstructed access and maneuvering of emergency vehicles⁵. Although it is not the Fire Services Department’s requirement, the applicant opts to provide an EVA in the holiday camp site with a view to providing a high level of fire safety standards⁶. Also, according to HAD’s ‘Guide to Licence Applications for Guesthouse (Holiday Camp) – Caravan Camp Site under the Hotel and Guesthouse Accommodation Ordinance, Cap. 349’, provision of a vehicular access to allow emergency vehicles reaching within 30m of a caravan camp site would be required. The existing EVA is included in the approved Guesthouse (Holiday Camp) Licence covering part of the existing holiday camp site; (ii) there is a licensing requirement of a minimum 5m-wide unobstructed space on any sides of a caravan and its annex under HAD; (iii) the two existing trees retained at the existing holiday camp would pose constraints for placing caravans/tents (**Drawing A-2**); and (iv) the southern part of the holiday camp would be affected by the proposed Food Control Facilities (FCF) of the Food and Environmental Hygiene Department (FEHD);
- (e) to provide a tranquil environment for the campsite users, location of the caravans/tents is carefully designed to place, which is away from Lin Ma Hang Road. The proposal has also adopted good accommodation design to provide spacious atmosphere for the campsite users;
- (f) the Site was previously covered by weeds. Since the operation of the applied use at the Site in 2022, the applicant has undertaken weed control and regular maintenance of the Site to prevent hill fire. No tree removal will be involved and the Site will continue to be

⁵ An alternative layout of the EVA surrounding the caravans/tents, instead of locating the EVA at the centre of the holiday camp site, has been considered by the applicant. However, given that the holiday camp site is surrounded by slopy terrain and the presence of two existing trees, the applicant considers that this option would require extensive site formation works and tree felling for the construction of the EVA, which would often lead to erosion and adversely affect the natural areas around it. On the other hand, the EVA at the centre of the holiday camp site is situated on the existing flat land and requires relatively smaller amount of site formation works, resulting in less alteration to the existing slopes.

⁶ According to the applicant, the EVA could also serve as an infrastructure to support rapid response of emergency events (e.g. fire incident) in the adjacent Pak Fu Shan.

covered by grass with regular maintenance by the applicant. Vegetation beneath the caravans will be retained to facilitate land reinstatement upon expiry of the planning permission. There is no loss in the landscape area but enhancement to be brought by the applied use;

- (g) given that the applied use is small in scale and the intensity and use can optimise land resources for passive recreational purposes while being compatible with the surrounding environment, it complies with the Town Planning Board Guidelines No. 10. Approval of the application on a temporary basis would not jeopardise the long-term planning intention of the “GB” zone;
- (h) there are approved planning applications for temporary holiday camp, recreational or leisure uses within the “GB”, “Agriculture” or “REC” zones in Ta Kwu Ling North, Ta Kwu Ling, Man Uk Pin, Tai Po, Ting Kok or Lai Chi Wo areas; and
- (i) the Site and the existing holiday camp zoned “REC” are covered by a Short Term Waiver (STW) No. 1638. The traffic and drainage impacts have been addressed upon approval of the STW. The applicant will follow the ‘Code of Practices on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites’ (‘COP’) issued by the Environmental Protection Department (EPD) as well as the Noise Control Ordinance and there is no ecological importance identified at the Site. No adverse traffic, environmental and drainage impacts are anticipated. The holiday camp is visually compatible with the surrounding environment. Upon approval of the application, the applicant will liaise with HAD regarding modification of the approved licence to include all existing/applied caravans in the licence.

3. Compliance with the “Owner’s Consent/Notification” Requirements

The applicant is not a “current land owner” but has complied with the requirements as set out in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31B) by obtaining consent from the ‘current land owner’. Detailed information would be deposited at the meeting for Members’ inspection.

4. Town Planning Board Guidelines

The Town Planning Board Guidelines No. 10 for Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance (TPB PG-No. 10) is relevant to the application. Relevant extracts of the Guidelines are attached at **Appendix II**.

5. Background

The Site falls partly within an active planning enforcement case (No. E/NE-TKLN/93) regarding unauthorized recreation use (including use for holiday camp) and storage use (**Plan A-2**). Enforcement Notice was issued on 26.3.2025 requiring discontinuation of the unauthorized development (UD) by 26.4.2025. As the UD was not discontinued upon EN expiry, relevant parties were convicted on 4.2.2026. According to the latest site inspection, the UD was not discontinued. The Site is under monitoring according to current planning enforcement procedures.

6. Previous Application

- 6.1 The Site is the subject of a previous application No. A/NE-TKLN/96 submitted by the same applicant as the current application for the same use, which was rejected by the Committee on 11.4.2025 mainly on the ground that there was no strong planning justification for a departure from the planning intention of the “GB” zone. Besides, the Chief Town Planner/Urban Design and Landscape of Planning Department (CTP/UD&L, PlanD) raised concern on the application from landscape planning perspective as approval of the application may alter the landscape character and further degrade the landscape quality of the “GB” zone.
- 6.2 On 22.8.2025, the Board rejected the review application on the same ground as mentioned in paragraph 6.1 above. At the review meeting, while the Board generally expressed concerns that the applicant failed to demonstrate why caravans could not be all accommodated within the “REC” portion of the existing holiday camp site, some Members considered that if encroachment onto the “GB” zone was unavoidable after further review by the applicant, when submitting a fresh application, the applicant should provide strong justifications for proposed holiday camp use in the “GB” zone, including concrete proposals about the measures to preserve the character of the “GB” zone and minimise/mitigate the impacts on the “GB” zone.
- 6.3 Details of the previous application are summarised at **Appendix III** and its location is shown on **Plan A-1**.

7. Similar Application

There is no similar application within the same “GB” zone in the vicinity of the Site in the past five years.

8. The Site and Its Surrounding Areas (Plans A-1 to A-4b)

- 8.1 The Site is:
- (a) forming part of an existing holiday camp and covering the remaining private lots of the existing holiday camp site (i.e. Lot 21 and 22 in D.D. 80 (**Plan A-2**));
 - (b) largely covered with grass and partly fenced-off, and currently occupied by some caravans without valid planning permission; and
 - (c) accessible from the existing holiday camp which falls within the “REC” zone and is connected to Lin Ma Hang Road on the south and via a local access road on the southwest.
- 8.2 The surrounding areas are of rural character mainly comprising the holiday camp, vehicle parks and vacant land. Lin Ma Hang Road and HYW BCP are located to the further south and southwest of the Site respectively (**Plan A-1**).

9. Planning Intention

The planning intention of the “GB” zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.

10. Comments from Relevant Government Departments

All government departments consulted have no objection to or no adverse comment on the application. Their general comments on the application and advisory comments in the Recommended Advisory Clauses are provided at **Appendices IV** and **V** respectively.

11. Public Comments Received During Statutory Publication Period

On 13.3.2026, the application was published for public inspection. During the statutory public inspection period, two comments were received from Kadoorie Farm & Botanic Garden Corporation and an individual objecting to the application mainly on the grounds that the applied use is not in line with the planning intention of the “GB” zone; the extension of the existing operation into “GB” zone is not appropriate; and there is no justification to approve further degradation of the territories to accommodate holiday camp (**Appendix VI**).

12. Planning Considerations and Assessments

12.1 The application is for temporary holiday camp for a period of three years at the Site zoned “GB” on the OZP. The planning intention of the “GB” zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets, and there is a general presumption against development within the “GB” zone. While the applied use is not entirely in line with the planning intention of the “GB” zone, limited developments may be permitted if they are justified on strong planning grounds. Taking into account the planning assessments below, there is no objection to the applied use on a temporary basis of three years.

12.2 The application involves placing six caravans/tents in the Site zoned “GB”, with three caravans/tents falling entirely within the Site and the other three falling partly within the Site and partly within the adjoining existing holiday camp zoned “REC”. The Site is located at the fringe of the “GB” zone and at the foot of the adjoining vegetated slope. The applicant intends to utilise the Site, which covers the remaining private lots of the existing holiday camp site (i.e. Lot 21 and 22 in D.D. 80 (**Plan A-2**)), to slightly extend the holiday camp operation. According to the applicant, about 188.9m² or 13.9% of the Site will be used for placing six caravans/tents with a height of not more than one storey or 3.5m, and the remaining portion of the Site will be used as a landscape area. Given its small scale, the applied use, with the proposed new trees, shrubs and grass in the submitted planting proposal, is considered not entirely incompatible with the surrounding area.

12.3 The Site is the subject of a previous application (No. A/NE-TKLN/96) submitted by the same applicant as the current application for the same use, which was rejected by the Committee and the Board on review in 2025 as detailed in paragraph 6 above. The Board considered that if a fresh application is submitted, strong justifications for holiday camp use in the “GB” zone and measures to minimise/mitigate the impacts on the “GB” zone should be provided. According to the applicant, the applied use under the current

application has taken into account the concerns of the Board by revising the site layout and planting proposal to minimise potential impacts on the “GB” zone. The applicant explains that extending the existing holiday camp to the adjoining “GB” zone to accommodate the caravans/tents is mainly due to the site constraints and practical considerations, including the need to maintain the EVA, to comply with licencing requirements (including a minimum 5m-wide unobstructed space on any sides of a caravan and its annex), and to avoid affecting the two existing trees (**Drawing A-2**), etc. as mentioned in paragraph 2(d) above. The area and number of caravans/tents encroaching onto the “GB” zone in the current application have been reduced by about 28.7% and 50% respectively when compared with the rejected previous application as stated in paragraph 1.5 above. In particular, the one caravan/tent in the east and five caravans/tents in the west of the existing holiday camp site originally encroaching onto the “GB” zone in the rejected previous application are now proposed to be placed entirely within the “REC” zone. The current application only involves the portion in the east of the existing holiday camp site to accommodate six caravans/tents. Also, a planting proposal including planting of four new trees, shrub and grass at the Site is submitted by the applicant to enhance the landscape value as well as provide habitat for native birds/insects. In view of the above, the planning considerations of the rejected previous application are not applicable to the current application.

- 12.4 According to TPB PG-No.10, an application for new development within the “GB” zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The scale and intensity as well as the design and layout of the proposed development should be compatible with the character of surrounding areas. Passive recreational uses which are compatible with the character of surrounding areas may be given sympathetic consideration. In view that the current application involves a slight extension of the existing holiday camp to the adjoining “GB” zone, and given its small scale and development intensity with the planting proposal to minimise the possible impacts on the “GB” zone as stated in paragraph 12.2 above, the applied use is considered not entirely incompatible with the character of the surrounding areas. While CTP/UD&L, PlanD reckons that approval of application may slightly alter the landscape character of the areas, she has no adverse comments in principle on the application from landscape planning perspective and advises that significant adverse landscape impact arising from the application is not anticipated. As such, sympathetic consideration may be given to the current application.
- 12.5 Other relevant government departments consulted, including the Commissioner for Transport, Director of Fire Services, Chief Engineer/Mainland North of Drainage Services Department, Director of Agriculture, Fisheries and Conservation and Director of Environmental Protection have no objection to or no adverse comment on the application. To address technical requirements of concerned government departments, relevant approval conditions are recommended in paragraph 13.2 below. As the Site is zoned “GB”, an approval condition requiring the reinstatement of the Site upon expiry of the planning permission so as to uphold the planning intention of the “GB” zone and restore the greenery of the area is recommended should the Committee decide to approve the application. The applicant will also be advised to follow the ‘COP’ to minimise any possible environmental nuisance.
- 12.6 Regarding the public comments on the application as detailed in paragraph 11 above, the government departments’ comments and planning assessments above are relevant.

13. Planning Department's Views

- 13.1 Based on the assessments made in paragraph 12 and having taken into account the public comments in paragraph 11 above, PlanD has no objection the application.
- 13.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid on a temporary basis for a period of three years until 17.4.2029. The following conditions of approval and advisory clauses are suggested for Members' reference:

Approval Conditions

- (a) the submission of a condition record of the existing drainage facilities within 3 months from the date of planning approval to the satisfaction of the Director of Drainage Services or of the Town Planning Board by 17.7.2026;
- (b) the existing drainage facilities on the Site shall be maintained at all times during the planning approval period;
- (c) the submission of a fire service installations proposal within 6 months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 17.10.2026;
- (d) in relation to (c) above, the implementation of the fire service installations proposal within 9 months from the date of planning approval to the satisfaction of the Director of Fire Services or of the Town Planning Board by 17.1.2027;
- (e) if the above planning condition (b) is not complied with during the planning approval period, the approval hereby given shall cease to have effect and shall be revoked immediately without further notice;
- (f) if any of the above planning condition (a), (c) or (d) is not complied with by the specified date, the approval hereby given shall cease to have effect and shall on the same date be revoked without further notice; and
- (g) upon the expiry of the planning permission, the reinstatement of the Site, including the removal of hard-paving, and grassing of the Site to the satisfaction of the Director of Planning or of the Town Planning Board.

Advisory Clauses

The Recommended Advisory Clauses are at **Appendix V**.

- 13.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Members' reference:

the applied use is not in line with the planning intention of the "GB" zone which is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone. There is no strong planning justification in the submission for a departure from the planning intention, even on a temporary basis.

14. Decision Sought

- 14.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant the permission.
- 14.2 Should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the period of which the permission should be valid on a temporary basis.
- 14.3 Alternatively, should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.

15. Attachments

Appendix I	Application Form with Attachments received on 6.3.2026
Appendix Ia	SI received on 9.3.2026
Appendix Ib	FI received on 8.4.2026
Appendix Ic	FIs received on 10.4.2026 and 13.4.2026
Appendix II	Relevant Extracts of TPB PG-No. 10
Appendix III	Previous Application
Appendix IV	Government Departments' General Comments
Appendix V	Recommended Advisory Clauses
Appendix VI	Public Comments
Drawing A-1	Layout Plan
Drawing A-2	Planting Proposal
Drawing A-3	Comparison of Layouts of Current and Previous Applications
Plan A-1	Location Plan
Plan A-2	Site Plan
Plans A-3a to A-3b	Aerial Photos
Plans A-4a to A-4b	Site Photos

**PLANNING DEPARTMENT
APRIL 2026**