



Our Ref.: PD2402001/03

Your Ref.:

22 October 2024

By Email.

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

Dear Sir/ Madam,


APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE
TEMPORARY HOLIDAY CAMP AT DEMARCATION DISTRICT NO. 80
LOT NO. 20 RP (PART), 21 (PART), 22 (PART), 23 (PART) AND 25 (PART)
FOR A PERIOD OF 3 YEARS

We refer to the comments in regard to the captioned application.

Please find attached the replacement pages of p.5 to 22 of the Planning Statement.

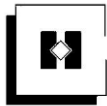
Should you require further information or have any query, please feel free to contact the undersigned or our Larissa Wong [REDACTED].

Yours faithfully,
For and on behalf of
LCH Planning & Development Consultants Limited


Junior Ho *RPS RPP*
Director

Encl.
c.c. the Applicant





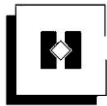
2.5.4 **The relevant campsite scheme was submitted to various Government Departments for approval of Short Term Waiver No. 1638 in 2022. The Application Site has been designated for camping ground use already.**

2.5.5 The Application Site serves only the campers. While a small proportion of users are non-campers who can only have access to the temporary eating place in the Whole Site. The temporary eating place has been granted planning permission under A/NE-TKLN/84 in 2024. The staff of the camping site will provide first screening on the non-campers. The non-campers are only allowed to visit the temporary eating place but not allowed to enter the camping site without permission.

2.5.6 Taking into consideration that no additional building or structure will be erected on the Application Site in the Proposed Development, it satisfies the special conditions of the Short Term Waiver. No modification of the existing Short Term Waiver is expected.

2.5.7 Below the development parameters for easy reference:

Development Parameters	Whole Site	Application Site (included inside the Whole Site)
Lot No.	Lot Nos. 20 RP, 21, 22, 23, 24, 25, 28, 31, 33, and 37 in Demarcation District No. 80	Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part) in Demarcation District No. 80
Zone	"GB" (about 24% in Whole Site area) "REC" (about 76% in Whole Site area)	"GB"
Site Area	About 7,956 sq.m.	About 1,920 sq.m. (Form part of the Whole Site area of 7,956 sq.m.)
Total Number of Building/ Structure	11	No #
Maximum Height	Not exceeding 6m or 2 storeys ^ for structures, tents/camps/ caravans	Not exceeding 3.5m or 2 storeys for tents / camps / caravans
Total Built Over Area	Not exceeding 830.5 sq.m. of built over area ^	N/A *
Covered Area of Tent / Camp / Caravan	Not more than 661.5 sq.m.	About 283.5 sq.m.
Total Plot Ratio	Not exceeding 0.2	N/A *
Total No. of Camps/ Tents/ Caravans	21 nos.	9 nos. partially on "GB" zone (Form part of total 21 nos.)
Maximum Number of Campers	80 ^	About 27 (Form part of the total 80 campers)



Development Parameters	Whole Site	Application Site (included inside the Whole Site)
Parking Provision	2 private car parking spaces for staff only; 1 light bus pick-up/ drop-off space for visitor (upon reservation only) ^	Nil, all provided inside the Whole Site already

* Camps/ Tents/ Caravans are not countable for gross floor area

Camps/ Tents/ Caravans are not considered as building nor structure nor support for any building or structure

^ As approved when the STW No. 1638 was granted

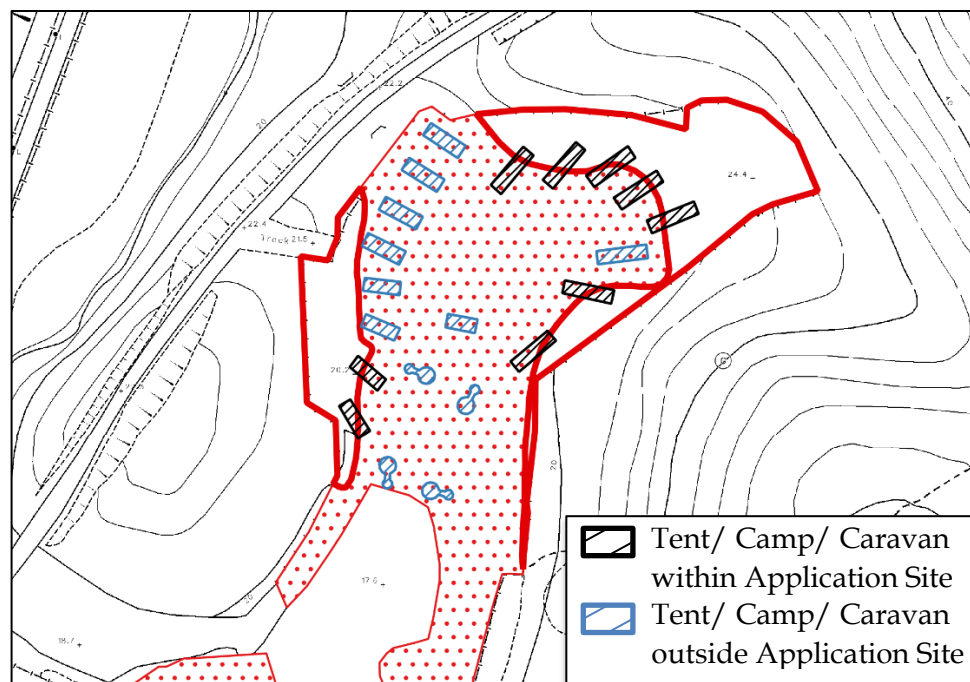


Diagram 1 Location of Tent/ Camp/ Caravan (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

2.6 Existing Transport Services

2.6.1 Existing public transport services to the vicinity are shown below:

Mode	Route No.	Origin - Destination	Frequency
Scheduled Green Minibus	59K	Sheung Shui Station Public Minibus Terminus - Chuk Yuen	35 - 45 minutes
	59S	Sheung Shui Station Public Minibus Terminus -Heung Yuen Wai Boundary Control Point (HYWBCP)	25 - 35 minutes
Franchised	B7	Fanling Station - Heung	10 - 20 minutes



Bus		Yuen Wai Port	
	B8	Tai Wai Station – Heung Yuen Wai Port	30 minutes
	B9	Tuen Mun Station – Heung Yuen Wai Port	60 minutes
	79K	Sheung Shui – Ta Kwu Ling (Tsung Yuen Ha)	15-35 minutes

- 2.6.2 It only takes about 5 minutes to walk from the Application site to the HYWBCP, by going through the subway from the bus stop along Lin Ma Hang Road.

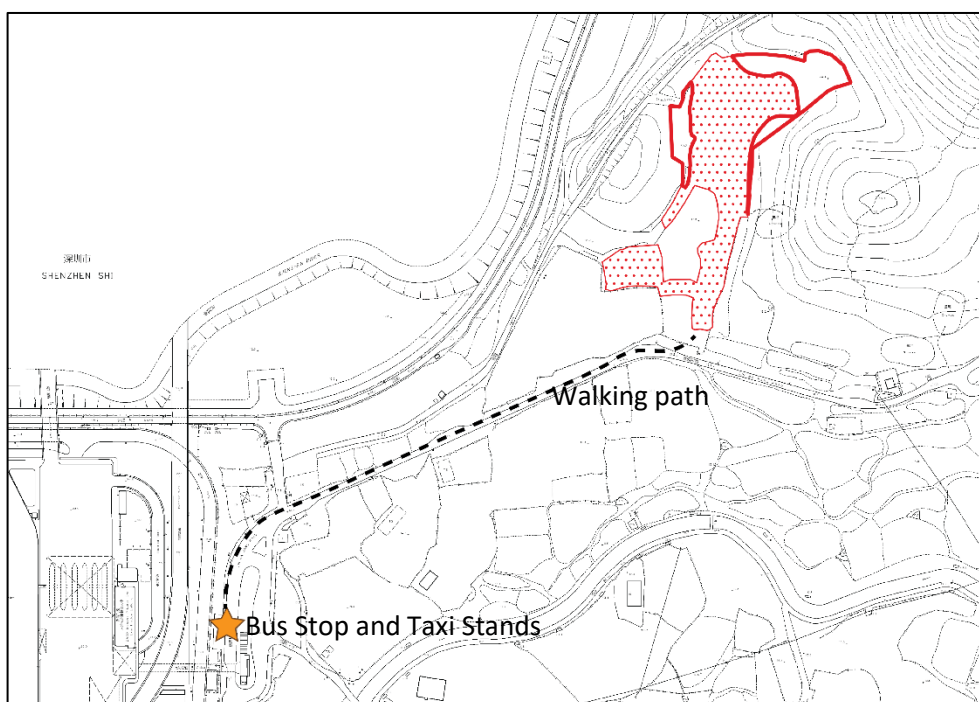


Diagram 2 Walking Path to Pubic Transport (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)



3 PLANNING ASSESSMENT

The following planning assessment covers the Whole Site to demonstrate the planning and technical compatibility of the Holiday Camp in the majority of the “REC” zone and a minority of the “GB” zone.

3.1 Statutory Planning Context

- 3.1.1 The Application Site falls within an area designated as “Green Belt” (“GB”) zone on the Approved Ta Kwu Ling North Outline Zoning Plan No. S/NE-TKLN/2 (**Figure 4**) (also known as the “OZP”), while the remaining area of the Whole Site falls within an area designated as “Recreational” (“REC”).
- 3.1.2 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”*.
- 3.1.3 The planning intention of the “REC” zone is *“primarily for low-density recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism”*, while that 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”*.
- 3.1.4 **According to Notes of “REC” zone of OZP, ‘Holiday Camp’ is a Column 1 use under “REC” zone which is always permitted by the Board and thus no additional planning approval is to be sought under this Application.** Meanwhile, ‘Holiday Camp’ is a Column 2 use under “GB” zone. According to the Notes of the OZP, temporary use not exceeding a period of three years within “GB” zone requires planning permission from the Town Planning Board notwithstanding that the use is not provided for in terms of the Plan.
- 3.1.5 Approval of this application on a temporary basis for a period of 3 years would follow the long-term planning intention of the “GB” zone, indeed, would support the provision of passive recreational outlets, which is the existing camping site. Recreational facilitates on the “REC” zone is an as-of-right usage. No planning permission is required.



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S/NE-TKLN/2	
GREEN BELT	
Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Agricultural Use Barbecue Spot Government Use (Police Reporting Centre only) Nature Reserve Nature Trail On-Farm Domestic Structure Picnic Area Public Convenience Tent Camping Ground Wild Animals Protection Area	Animal Boarding Establishment Broadcasting, Television and/or Film Studio Burial Ground Columbarium (within a Religious Institution or extension of existing Columbarium only) Crematorium (within a Religious Institution or extension of existing Crematorium only) Field Study/Education/Visitor Centre Firing Range Flat Golf Course Government Refuse Collection Point Government Use (not elsewhere specified) Helicopter Landing Pad Holiday Camp House (other than rebuilding of New Territories Exempted House or replacement of existing domestic building by New Territories Exempted House permitted under the covering Notes) Petrol Filling Station Place of Recreation, Sports or Culture Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (excluding container vehicle) Radar, Telecommunications Electronic Microwave Repeater, Television and/or Radio Transmitter Installation Religious Institution Residential Institution Rural Committee/Village Office School Service Reservoir Social Welfare Facility Utility Installation for Private Project Zoo
(Please see next page)	

(Source: Town Planning Board, HKSAR Government)



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S/NE-TKLN/2

GREEN BELT (cont'd)

Planning Intention

The planning intention of this 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.

Remarks

Any diversion of streams, filling of land/pond or excavation of land, including that to effect a change of use to any of those specified in Columns 1 and 2 above or the uses or developments always permitted under the covering Notes (except public works co-ordinated or implemented by Government, and maintenance, repair or rebuilding works), shall not be undertaken or continued on or after the date of the first publication in the Gazette of the notice of the draft development permission area plan without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance.

(Source: Town Planning Board, HKSAR Government)



<u>S/NE-TKLN/2</u>	
<u>RECREATION</u>	
Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Agricultural Use	Animal Boarding Establishment
Barbecue Spot	Broadcasting, Television and/or Film Studio
Field Study/Education/Visitor Centre	Eating Place
Government Use (Police Reporting Centre only)	Flat
Holiday Camp	Golf Course
On-Farm Domestic Structure	Government Refuse Collection Point
Picnic Area	Government Use (not elsewhere specified)
Place of Recreation, Sports or Culture	Helicopter Landing Pad
Public Convenience	Hotel
Rural Committee/Village Office	House (other than rebuilding of New Territories Exempted House or replacement of existing domestic building by New Territories Exempted House permitted under the covering Notes)
Tent Camping Ground	Place of Entertainment
	Private Club
	Public Utility Installation
	Public Vehicle Park (excluding container vehicle)
	Religious Institution
	Residential Institution
	Shop and Services
	Theme Park
	Utility Installation for Private Project
	Zoo

(Source: Town Planning Board, HKSAR Government)

3.2 Approved Application

3.2.1 There is an approved application within the Whole Site, A/NE-TKLN/84, which was approved by the Town Planning Board on 5 July 2024.

Application No.	A/NE-TKLN/84
Decision Date	05/07/2024
Applied Use	Proposed Temporary Eating Place for a Period of 3 Years
Site Area	93 sq. m.
Maximum Building Height	3.5 m
Decision	Approved with condition(s) on a temporary basis

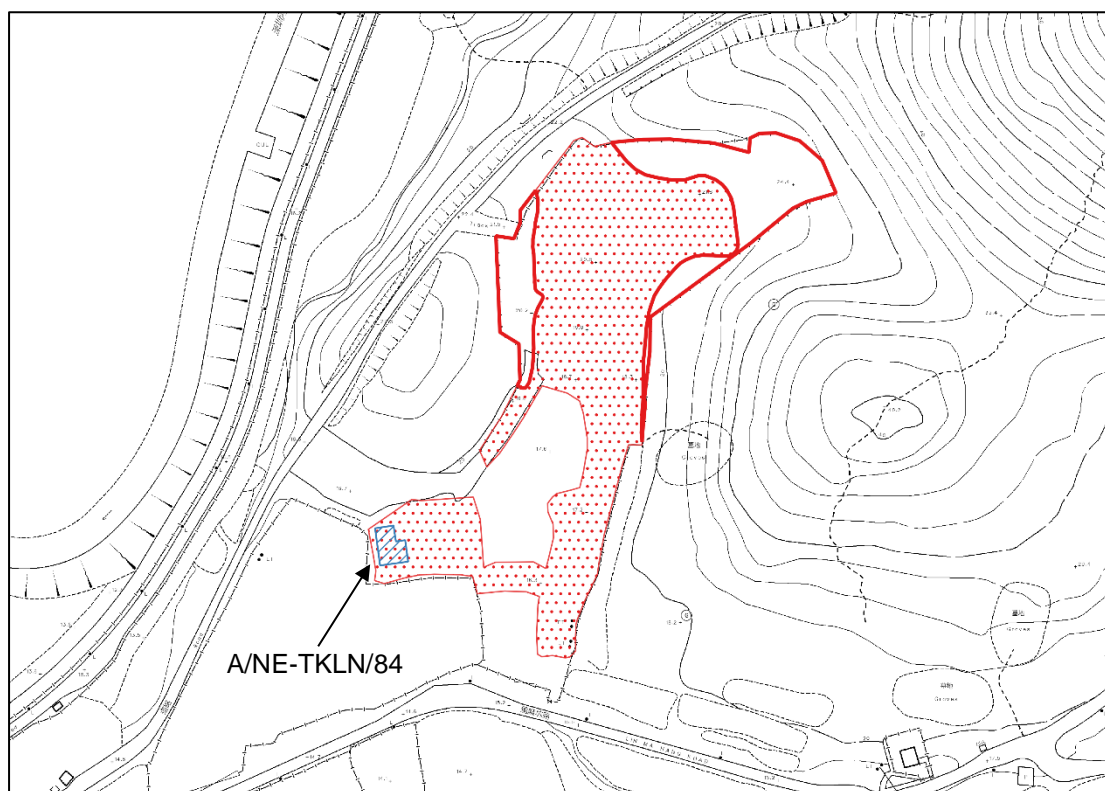


Diagram 3 Approved Application falling within the Whole Site (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

3.3 Similar Approved Applications

- 3.3.1 There is one application for temporary eating place in the vicinity of the Application Site which falls within “REC” and “GB” zones approved by the Town Planning Board in 2021, which is Application No. A/NE-TKLN/39.
- 3.3.2 Application No. A/NE-TKLN/39 is situated on Lin Ma Hang Road at the east of HYWBCP, serving mainly the staff and workers of HYWBCP. The details of the application are summarized as follows:

Application No.	A/NE-TKLN/39
Decision Date	28/05/2021
Applied Use	Proposed Temporary Retail Shop, Canteen and Ancillary Office for a Period of 3 Years
Site Area	270.5 sq. m.
Maximum Building Height	3.5 m
Decision	Approved with condition(s) on a temporary basis

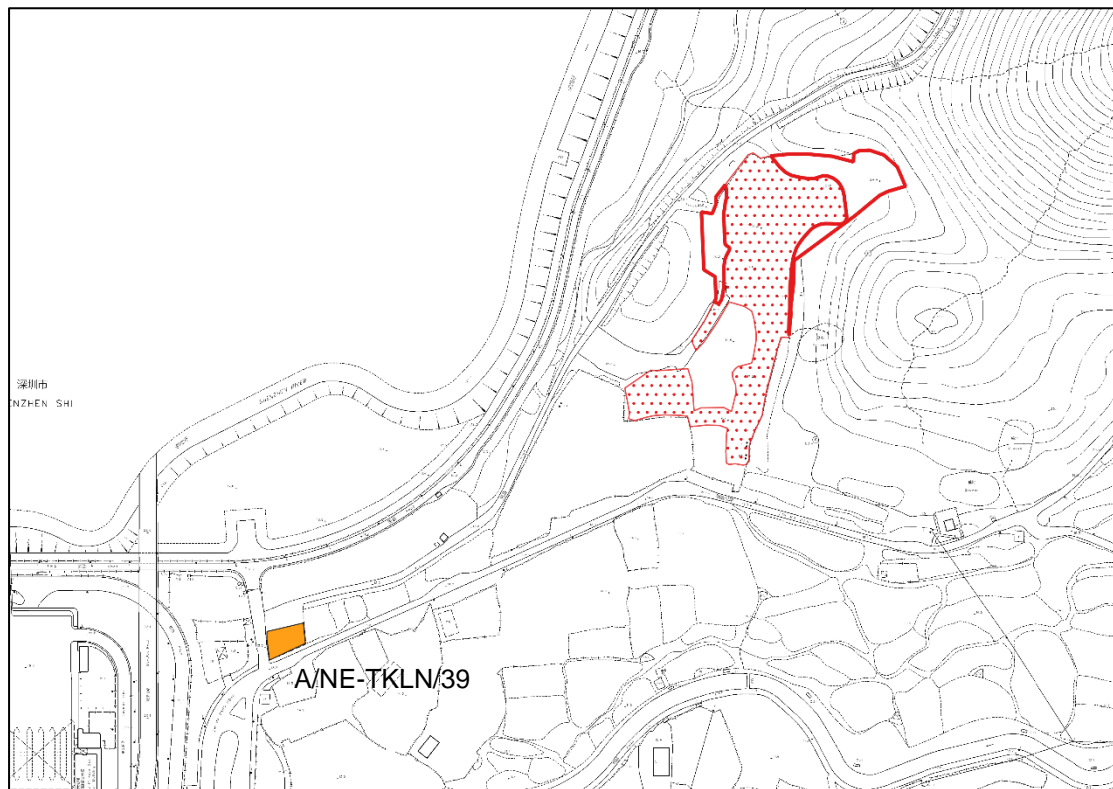
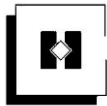


Diagram 4 Approved Applications falling within “REC” and “GB” Zones in the Vicinity (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

3.3.3 There are also two planning applications for recreational or leisure uses riding on the increased accessibility brought about by the HYW BCP within the Approved Ta Kwu Ling North OZP, as approved by the Board in recent years, namely A/NE-TKLN/23 and A/NE-TKLN/63. Refer to Diagram 2 for their locations. The details of the applications are summarized as follows:

Application No.	A/NE-TKLN/23	A/NE-TKLN/63
Decision Date	05/02/2021	01/03/2024
Applied Use	Proposed Temporary Place of Recreation, Sports or Culture (Parent-Child Play Area), Eating Place, Shop and Services for a Period of 5 Years	Proposed Temporary Private Club for a Period of 5 Years
Site Area	5,147 sq. m.	451.5 sq. m.
Maximum Building Height	6.25 m	5.2 m
Decision	Approved with condition(s) on a temporary basis	Approved with condition(s) on a temporary basis

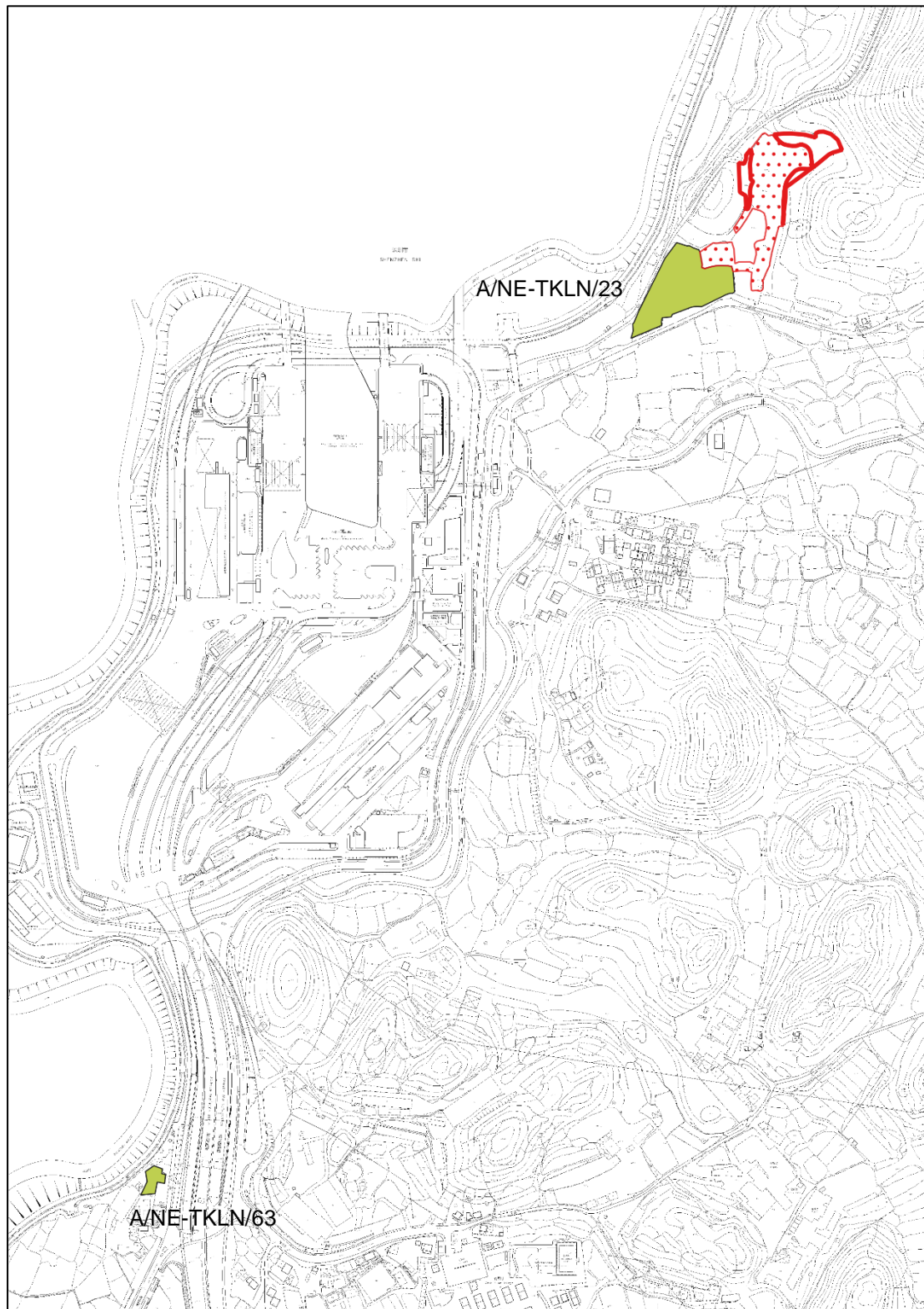


Diagram 5 Approved Recreational or Leisure Use Applications in the vicinity
(Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)



3.3.4 There are other precedent approved planning applications falling within “GB” zone for temporary holiday camp in the vicinity, including A/NE-TKL/726, A/NE-LCW/8, and A/TP/684. The details of the applications are summarized as follows:

Application No.	A/NE-TKL/726	A/NE-LCW/8	A/TP/684
Decision Date	22/12/2023	11/09/2023	11/08/2023
Applied Use	Proposed Temporary Place of Recreation, Sports or Culture (Hobby Farm) and Holiday Camp (Private Tent Camping Ground) for a Period of 3 Years	Proposed Temporary Holiday Camp with Ancillary Facilities for a Period of 3 Years and Associated Excavation of Land	Proposed Field Study/Education/Visitor Centre with Ancillary Holiday Camp
Site Area	451.5 sq. m.	4,750 sq. m.	9,054 sq. m.
Maximum Building Height	5.2 m	3.8 m	6.65 m
Decision	Approved with condition(s) on a temporary basis	Approved with condition(s) on a temporary basis	Approved with condition(s)

3.3.5 Besides, there are precedent approved planning applications falling within “AGR” zone for temporary recreational and leisure uses specifically including caravan holiday camp in recent years, namely A/NE-MUP/183 and A/NE-TK/752. The details of the applications are summarized as follows:

Application No.	A/NE-MUP/183	A/NE-TK/752
Decision Date	10/11/2023	28/10/2022
Applied Use	Proposed Temporary Place of Recreation, Sports or Culture (Hobby Farm) and Holiday Camp (Caravan) with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	Proposed Temporary Barbecue Site and Caravan Holiday Camp with Ancillary Facilities for a Period of 3 Years and Filling of Land
Site Area	6,453 sq. m.	2,841 sq. m.
Maximum Building Height	4 m	5 m
Decision	Approved with condition(s) on a temporary basis	Approved with condition(s) on a temporary basis

3.4 Environmental Consideration

3.4.1 The Applicant will follow the relevant mitigation measures and requirements in the latest “Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites” to minimize any potential environmental impact. No adverse environmental impact is anticipated.



3.4.2 The Applicant will try to avoid to use audio amplification system for the Proposed Development. In case there is no alternative means, it is proposed that the audio amplification system is only available for use during day time, i.e., 9a.m. to 7p.m. in limited extent and on occasional periods only. When the audio amplification system is applied, there will be some noise mitigation measures adopted, including:

- to orientate stage to point away from the nearby noise sensitive receivers;
- to use a cluster of small power loudspeakers instead of a few large power loudspeakers;
- to use directional loudspeakers and orientate them to point towards the audience and away from the nearby noise sensitive receivers; and etc.

3.4.3 Besides, there will be a manned complaint hotline directly connect to the campsite operation team so that action can be taken to reduce the noise in response to complaints raised.

3.4.4 The Applicant will follow the Noise Control Ordinance and adopt relevant noise control guidelines available from the Environment Protection Department including the Noise Control Guidelines for Music, Singing and Instrument Performing Activities and etc.

3.5 Visual Compatibility

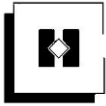
3.5.1 The Application Site is situated in area of rural village landscape character which are surrounded by temporary structures and car parks. The approved maximum height of existing structures under the Short Term Waiver is capped at 6 m, while the concerned caravans have a maximum height of 3.5 m which is totally compatible with the surrounding use and will not disturb the prevailing rural village landscape character, being compliant with the conditions of the concerned Short Term Waiver. No tree felling is anticipated.

3.5.2 Having said that, the height of the concerned caravans is lower than the approved height of 6m under the concerned Short Term Waiver.

3.6 Drainage Consideration

3.6.1 Upon the grant of Short Term Waiver, a drainage proposal was submitted to the Drainage Services Department, and was approved already. Resultant drainage works has been conducted in regards to the approved drainage proposal.

3.6.2 There is no substantial change in the campsite development proposal submitted for the approval of Short Term Waiver as compared to the Proposed Development, there should be no drainage impact from this planning application upon the implementation of the approved drainage proposal.



3.7 Traffic Consideration

3.7.1 To minimise carbon footprint, campers are encouraged to take public transport to arrive at the campsite. As it only takes about 5 minutes to walk from the Application Site to the HYWBCP, it is expected that the campers would access the Application Site on foot from the HYWBCP, which is readily accessible by public transport. Public transport routes to and from HYWBCP is expected to be increased in the future, which shall increase the accessibility of the Application Site. Light bus is also available for use by the campers upon reservation.

3.7.2 As mentioned in the previous section, non-campers only constitute the minority of users of the Whole Site. For the cross-boundary travellers transiting with their vehicles, they would park their vehicles in the surrounding public vehicle parks which provide at least 190 car parking spaces, or else in the carpark of the HYWBCP. The planning applications of the public vehicle parks in the vicinity approved by Town Planning Board in the past years are summarized as follows:

Application No.	Approval Date	Total No. of Vehicles Parking Spaces Provided
A/NE-TKLN/45	29/07/2022	42
A/NE-TKLN/53	23/06/2023	69
A/NE-TKLN/57	22/09/2023	24
A/NE-TKLN/58	22/09/2023	26
A/NE-TKLN/67	27/10/2023	18
A/NE-TKLN/70	27/10/2023	11

3.7.3 **The traffic trips of the cross-boundary travellers have already been reflected in the approved planning applications for public vehicle parks. It is anticipated that no traffic trips for cross-boundary travellers would be generated nor attracted due to the Proposed Development.**

3.7.4 As the Proposed Development aims to mainly serve the campers, their traffic trips have been considered and reflected during the grant of the concerned Short Term Waiver. As the current accommodation capacity of the campsite is fully compliant with the submitted proposal of the Short Term Waiver, it is anticipated that the approval of the Proposed Development will not generate any additional impacts on traffic conditions.

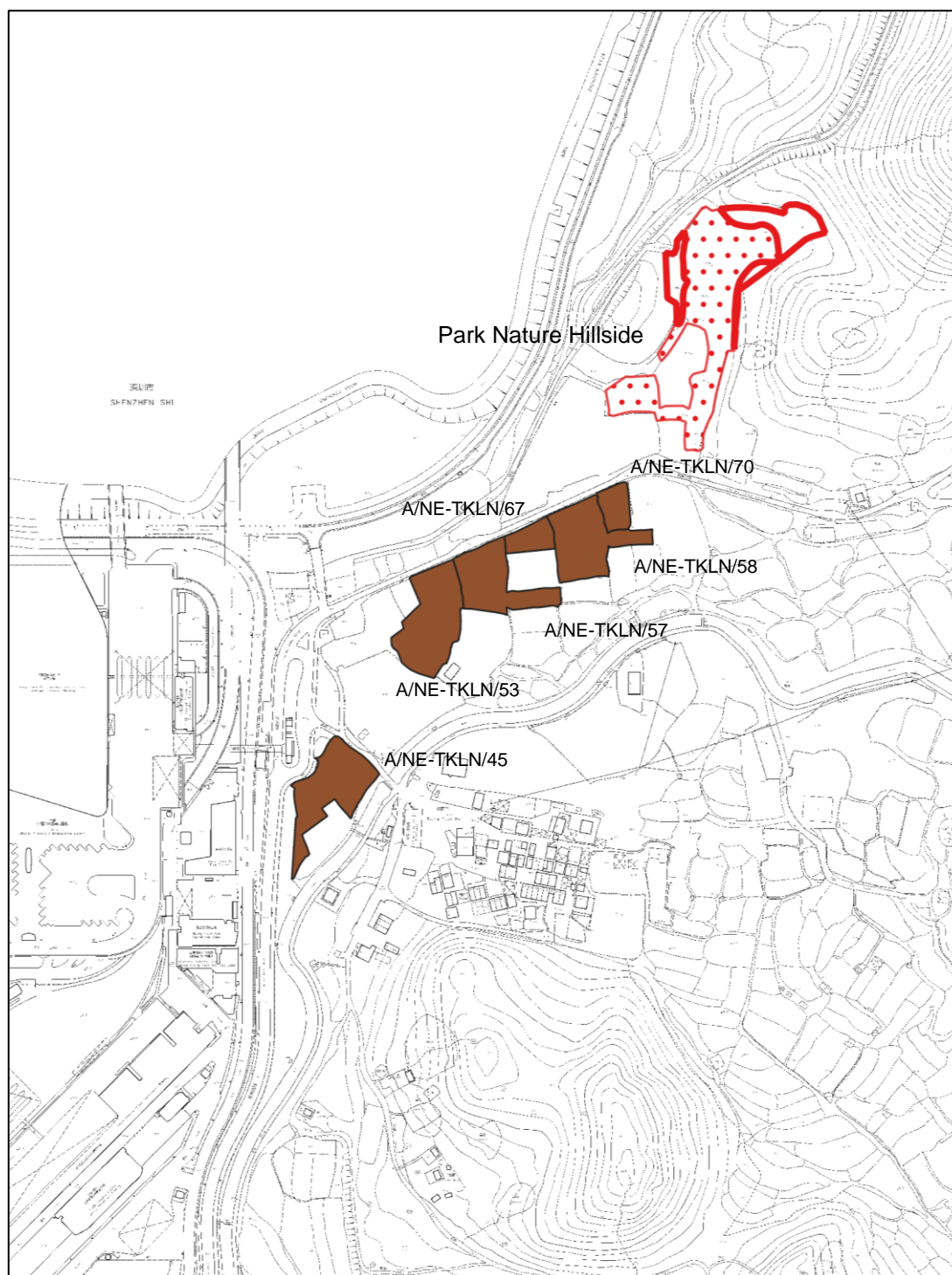
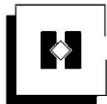


Diagram 6 Approved Public Vehicle Parks in the Vicinity (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

3.7.5 There is no additional loading/ unloading bay to serve the Proposed Development. The Proposed Development will utilize the existing loading/ unloading bay as provided under the camping site only.



3.8 Compliance of TPB-PG No. 10

- 3.8.1 The Town Planning Board Planning Guideline for '*Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance*' stipulates that one of the main purposes of "GB" zones is "to provide additional outlets for passive recreational uses", which could be fulfilled by the use as a holiday camping site. Given that the Proposed Development is compatible with the character of surrounding areas, it should be given sympathetic consideration by the Board. The main relevant planning criteria in TPB-PG No. 10 are considered below.
- 3.8.2 The Proposed Development is of small scale and low intensity, as no building structures are erected and the caravans are only of a maximum 3.5m tall. Thus, it shall not cause any adverse impacts to the character of the existing surrounding areas.
- 3.8.3 As suggested by its small scale and low development intensity, the Proposed Development also does not involve any extensive clearance of existing vegetation, any tree felling, or affect the existing natural landscape, and thus shall not cause any adverse visual impacts on the surrounding environment.
- 3.8.4 Neither vehicular access roads nor parking provision are involved in the "GB" zone within the Application Site. None of the existing trees or other natural landscape features shall be affected by access and parking.
- 3.8.5 The existing campsite is compliant with the development control imposed by the Short Term Waiver. The accommodation capacity of the campsite is controlled and compliant with submitted proposal of the Short Term Waiver. Therefore it is not anticipated that the Proposed Development will overstrain the capacity of the existing infrastructure such as sewerage, roads and water supply or cause any adverse drainage impacts and flooding.
- 3.8.6 The Application Site is neither susceptible to adverse environmental effects from nearby pollution sources, nor being a source of pollution itself, as the Applicant will follow the relevant mitigation measures and requirements in the latest "*Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites*" to minimize any potential environmental impact.
- 3.8.7 The Proposed Development is not situated on a slope or hillside and does not cause any impact on slope stability.



4 PLANNING MERITS & JUSTIFICATIONS

4.1 Promoting “Tourism is Everywhere in Hong Kong” and Developing Tourism Projects with Local Characteristics

4.1.1 The promotion of local tourism is well in line with Government policy, and the camp site provides an innovative opportunity to explore rural Hong Kong and enrich the thematic contents of local tourism. Considering the recent upward trend of public members camping locally in Hong Kong as a mode of local tourism, there is a potential demand for private campsites apart from government designated camping grounds.

4.1.2 The proposed slight extension of the camping ground is to create a more spacious atmosphere of the existing campsite, which echoes with the Government’s direction of “Tourism is Everywhere in Hong Kong”. The approval of this application would extend the diversity of Hong Kong’s tourism, being a flagship tourism project in the Boundary Control Point.

4.2 Align with Long-term Planning Intention

4.2.1 According to the explanatory statement of the OZP, one of its planning intentions is to promote recreation and tourism. The Ta Kwu Ling North area provides a wide array of unique and attractive tourism opportunities with a good potential for eco-tourism. Provision of tourism and recreation-related developments such as overnight accommodation facilities would thus be required to realise the tourism potential of the area.

4.2.2 The operation of the camping ground is totally in line with the planning intention of “Recreation” zone, and no planning permission is required. The Application Site only occupies about 24% of the Whole Site for Holiday Camp. The proposed slight extension from the “REC” zone to a small portion of adjoining “GB” zone is still considered as in line with the planning intention.

4.3 Comply with Town Planning Board Planning Guidelines No. 10

4.3.1 Approval of the application on a temporary basis for a period of 3 years would not jeopardize the long-term planning intention of the “GB” zone. With respect to the OZP, one of the uses of the Application Site is to provide passive recreational outlets. The use as a temporary holiday camp fully complies with TPB PG-No. 10, as the temporary set up is small in scale and the intensity and uses can optimise land resources solely for passive recreational purposes while being compatible with the surrounding environment. The proposal does not involve erection of any permanent structures.

4.4 Echo with Northern Metropolis Action Agenda 2023

4.4.1 The Proposed Development shall strengthen the eco-tourism opportunities as promoted in the Northern Metropolis Action Agenda. Besides, catering the needs of the cross-boundary travellers also support the boundary economy.



The Boundary Commerce and Industry Zone, in which HYW falls into, is positioned to be an area with rich local cultural resources and economic vigour. This is echoed by the objectives of the camping site, which is to raise awareness of visitors towards local cultural heritage by means of an emerging mode of local tourism.

- 4.4.2 Currently there is no particular supporting facilities in the vicinity of the HYWBCP. With the previously approved application of establishing a temporary eating place open for non-campers, the camping site can support the development of the Boundary Commerce and Industry Zone as detailed in the Northern Metropolis Action Agenda 2023. Thus, this application demonstrates significant planning merit.

4.5 Existing Operator as Pioneer in the Local Tourism Industry for Caravan Camp

- 4.5.1 This campsite shall serve as a good example in the management of a passive recreational outlet. The Applicant is a professional campsite management team operating 'Park Nature Hillside' in HYW and 'Park Nature' in Yuen Long. According to a report by the Consumer Council published on 17 June 2024, both campsites are among the few studied sites providing "glamping" services which explicitly declared purchase of third-party liability insurance. 'Park Nature' in Yuen Long is also one of the few successful precedents having obtained a Guesthouse (Holiday Camp) Licence under the Hotel and Guesthouse Accommodation Ordinance (HAGAO).

4.6 Supported by Previous Planning Approvals of Similar Applications

- 4.6.1 Planning context has substantially changed upon the full commission of HYWBCP. Although there were no similar applications of temporary recreational and leisure use within the same "GB" zone as the Application Site, the Committee generally approved with conditions applications for temporary recreational and leisure uses in the Ta Kwu Ling North area during the recent years. Besides, there is support of previous project approvals for temporary recreational and leisure uses, particularly holiday camp use, under similar circumstances within the Shatin, Taipo and North District Planning Office boundaries. The proposed temporary holiday camp is not inconsistent with the surrounding land uses and it is unlikely to generate adverse impacts to the surrounding area.

4.7 Compatible with the Surrounding Development with No Adverse Visual and Landscape Impact

- 4.7.1 The temporary holiday camp within the Whole Site, without the introduction of additional structures, is visually compatible with the surrounding environment. No tree felling is anticipated. There is no change to the rural village landscape character as well. Therefore, no adverse visual and landscape impact is anticipated.



4.8 No Adverse Traffic Impact

- 4.8.1 The temporary holiday camp within the Whole Site will not incur adverse traffic impact. No traffic trip is expected to be generated from the cross-boundary travellers as they will park their vehicles in the surrounding public vehicle parks. The campers' traffic generation have been addressed upon the approval of the Short Term Waiver already. The existing loading and unloading bay and parking facilities of the camping site will be utilized by the Proposed Development as well. Therefore, it is expected that there will not be significant negative impacts regarding the traffic network of the area concerned.

4.9 No Adverse Environmental Impact

- 4.9.1 The latest "*Code of Practice on Handling Environmental Aspects of Open Storage and Temporary Uses*" issued by Environmental Protection Department will also be followed. Therefore, there will not be adverse environment impacts including noise and air quality.

4.10 No Adverse Drainage Impact

- 4.10.1 The approved drainage proposal of the camping site under the Short Term Waiver is under implementation. With no material change in the development context, no adverse drainage impact is anticipated.



LCH Planning and Development
Consultants Limited

Our Ref.: PD2402001/04
Your Ref.: TPB/A/NE-TKLN/91

27 November 2024

By Email

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

Dear Sir/Madam,

APPLICATION NO. A/NE-TKLN/91 FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

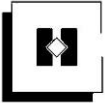
We refer to departmental comments received regarding the captioned application.

Attached our responses to departmental comments for consideration of the Town Planning Board (**Annex 1**). Please find our clarifications on the development parameters and operation mode of the captioned application.

- 1) Although the subject site is currently occupied by caravans, the applicant would like to apply for tent/camp/caravans use to allow flexibility for meeting the changing customer needs.
- 2) Reservation is required for camping at the Site.
- 3) The maximum height of structure will be not be exceeding 3.5m or 1 storey. Updated Planning Statement is attached in **Annex 2**.
- 4) The covered area refers to the area covered by the 9 caravans.
- 5) Please kindly note that area under the caravan is not paved and will remain as the existing condition (**Annex 3**).

Since this Further Information only involve responses to comments without changing the scheme, according to TPB PG-No. 32B this Further Information should be exempted from publication and recounting requirements. Should you require further information or have any query, please feel free to contact the undersigned or Larissa Wong [REDACTED].

[REDACTED]



Yours faithfully,
For and on behalf of
LCH Planning & Development Consultants Limited

Junior Ho *RPS RPP*
Director

Encl.

Annex 1 - Response to Comments table

Annex 2 - Updated Planning Statement and Replacement Pages of Application Form

Annex 3 - Site Photo

c.c. the Applicant



Section 16 Planning Application No. A/NE-TKLN/91

Annex 1 - Response to Departmental Comments Table

No.	Comments Received	Our Responses
A. Comments from Transport Department (Contact Person: Mr. TAM Kam Fai, Tel: 2399 2405)		
1.	Given that the acute demand of cross-boundary car parking space at the nearby car parking facilities especially during the weekend, it is expected that the parking need derived from the proposed development should be self-contained; and	Comments noted. Please kindly note that the number of campers and parking provision are remained the same as the approved STW No. 1638 in which the transport arrangement was accepted by Lands Department and Transport Department (para. 2.5.7 of the Planning Statement Report refers). Hence, no additional parking space will be provided to serve the campers.
2.	The applicant shall illustrate on a layout plan, and justify the adequacy of the parking spaces and loading/unloading spaces so provided by relating to the number of vehicles visiting the subject site.	
B. Comments from Sha Tin, Tai Po and North District Planning Office of Planning Department (Contact Person: Mr. WU Wai Pui, Timothy, Tel: 2158 6031)		
1.	It is observed that parts of the application site has been paved. Please clarify if your application involves application for filling of land.	Comment noted. In view of the Application Site involves steep slope on the western boundary (i.e. Lot 25), minor portion of the Site (about 33 sq.m; about 0.01% of the Site) has been filled with concrete for safety purpose. Please find the updated planning statement, including the revised layout plan and land filling plan, and replacement pages of the application form in Annex 2 .
2.	It is also observed that position of caravans at the site does not match with your submitted layout. Please clarify.	Comment noted. Revised layout plan and relevant part of the planning statement is updated (Annexes 2).
C. Comments from Environmental Protection Department		
1.	There is no indication on how the sewage is treated and disposed of. Please clarify.	The applicant will follow the Professional Persons Environmental Consultative Committee Practice Notes (ProPECCPNs), i.e. the use of septic tank for sewage treatment at the Site. Licensed collectors will be employed by the Applicant to collect and dispose of sewage regularly to ensure no overflowing of sewage at the Application Site.

Section 16 Application for Temporary Holiday Camp and Associated Filling of Land at Demarcation District No. 80 Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part) for a Period of 3 Years

Planning Statement Report

Prepared by
Planning Consultant : LCH Planning & Development
Consultants Limited

November 2024
Report : Version 1.4



Executive Summary

(in case of discrepancy between English and Chinese versions, English version shall prevail)

This Application is submitted to the Town Planning Board ("**the Board**") under Section 16 of the Town Planning Ordinance ("**the Ordinance**") for a proposed temporary Holiday Camp for a period of 3 years and associated filling of land ("**the Proposed Development**") at Demarcation District No. 80 Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part) ("**the Application Site**").

The Application Site falls within an area of "Green Belt" ("**GB**") zone on the Approved Ta Kwu Ling North Outline Zoning Plan No. S/NE-TKLN/2 ("**the OZP**"). Upon approval of the Proposed Development, the Application Site will be used as a temporary holiday camp. No structures will be constructed and no further filling of land or excavation works will be carried out under the Proposed Development.

The Application is critical to support the continued operation of the approved camping site. It is totally in line with the Government's direction of "**Tourism is Everywhere in Hong Kong**". It also echoes Northern Metropolis Action Agenda to support eco-tourism opportunities and the boundary economy of the Heung Yuen Wai Boundary Control Point. The Proposed Development is compliant with the "Town Planning Board Guidelines for Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance" (TPB-PG-No. 10) and supports the long-term planning intention of "GB". Similar applications in the "GB" zone have also been considered and approved. There will be no adverse traffic, visual, landscape, drainage and environmental impacts.

In view of the above justifications, we would sincerely seek the favourable consideration of the Board to approve this Application.



內容摘要

(如內文與其英文版本有差異，則以英文版本為準)

本規劃申請根據《城市規劃條例》第 16 條，就丈量約份第 80 約地段第 37 號的部分地段 (下稱「**申請地點**」) 的用地，向城市規劃委員會 (下稱「**城規會**」) 申請作擬議臨時度假營，為期 3 年 (下稱「**擬議發展**」)。

申請地點現時於《打鼓嶺北分區計劃大綱圖編號 S/NE-TKLN/2》(下稱「**大綱圖**」) 劃作「綠化地帶」。申請獲准後，擬議發展包括將申請地點作為臨時度假營及填土用途。擬議發展中不會建造任何構築物，亦不會牽涉進一步填土和挖掘工程。

申請對於支持已經批准及營運中的營地可否持續營運至關重要。**申請有助推動政府有關於「無處不旅遊」的策略**。申請亦響應北部都會區行動綱領 2023，支持生態旅遊以及香園圍邊境管制站附近的邊境經濟發展。擬議發展符合「城市規劃委員會規劃指引－擬在綠化地帶進行發展而按照城市規劃條例第 16 條提出的規劃申請」（規劃指引編號 10）的要求，並支持打鼓嶺北「綠化地帶」的長遠規劃意向。而且於「綠化地帶」亦已有不少相關申請曾被批准。擬議發展亦不會對交通、視覺、景觀、排水和環境造成不利影響。

鑒於以上提出的依據，我們真誠地尋求城規會批准該申請。

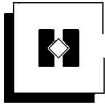


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Figure 4	Extract of Outline Zoning Plan
Figure 5	Indicative Tent/ Camp/ Caravan Layout Plan
Figure 6	Land Filling Plan

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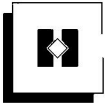
Diagram 1	Location of Tent/ Camp/ Caravan
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1 INTRODUCTION

1.1 The Application

- 1.1.1 We are commissioned by the Applicant to prepare and submit on its behalf this planning application for a proposed temporary ‘Holiday Camp’ for a period of 3 years and associated filling of land (hereinafter referred to as the “**Proposed Development**”) at Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part) in Demarcation District No. 80 (hereinafter referred to as the “**Application Site**”) to the Town Planning Board (“**the Board**”) under Section 16 of the Town Planning Ordinance (“**the Ordinance**”).
- 1.1.2 The Application Site falls within an area designated as “Green Belt” (“**GB**”) zone on the Approved Ta Kwu Ling North Outline Zoning Plan No. S/NE-TKLN/2 (“**the OZP**”) (**Figure 4**). According to the Notes of the OZP for “GB” zone, ‘Holiday Camp’, meaning any place where huts, cabins, shelters such as tents and caravans, or other structures are put up as short-term accommodation for leisure for people on outings or on vacation, is a Column 2 use that may be permitted by the Board.
- 1.1.3 According to the Notes of the OZP, temporary use or development of any land or building not exceeding a period of three years requires permission from the Town Planning Board. Notwithstanding that the use or development is not provided for in terms of the Plan, the Town Planning Board may grant permission, with or without conditions, for a maximum period of three years, or refuse to grant permission.



2 THE APPLICATION SITE AND DEVELOPMENT PROPOSAL

2.1 Park Nature Hillside

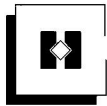
- 2.1.1 The Application Site and its surrounding area are part of a camping site known as 'Park Nature Hillside', which is operated by the Applicant. It is a stylish camping site that provides eco-tourism opportunities in the boundary area. The entire camp has a total of 21 tents/ camps/ caravans available for booking, accommodating about 80 campers.
- 2.1.2 The Application Site and its surrounding area are currently designated as a holiday camp, with a total of 9 tents/ camps/ caravans partly falling within the Application Site that accommodates about 27 campers. The remaining parts of the Site are grassed as a landscaped area.
- 2.1.3 The Applicant is a professional campsite management team operating 'Park Nature Hillside' in HYW and 'Park Nature' in Yuen Long. According to a report by the Consumer Council published on 17 June 2024, both campsites are among the few studied sites providing "glamping" services which explicitly declared purchase of third-party liability insurance. 'Park Nature' in Yuen Long is also one of the few successful precedents having obtained a Guesthouse (Holiday Camp) Licence under the Hotel and Guesthouse Accommodation Ordinance (HAGAO). 'Park Nature' Guesthouse licence No is H/6678.
- 2.1.4 The Applicant intended to utilize the Application Site as a holiday camping site, and hence, submit this Application. The Application Site has submitted an application for Guesthouse Licence to the Home and Affairs Department, pending for approval.

2.2 Land Status

- 2.2.1 The Application Site falls within the boundaries of Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part) in Demarcation District No. 80 ("**the Lots**") (**Figure 3**).
- 2.2.2 The whole 'Park Nature Hillside' campsite, together with the Application and the remaining area, falls within boundaries of Lot Nos. 20 RP, 21, 22, 23, 24, 25, 28, 31, 33, and 37 in Demarcation District No. 80 ("**the Whole Site**")
- 2.2.3 The Whole Site is also subject to a Short Term Waiver No. 1638 which covers the Lot Nos. 20 RP, 21, 22, 23, 24, 25, 28, 31, 33, and 37 in Demarcation District No. 80 for the purpose of Holiday Camp with associated facilities. According to the Short Term Waiver, the concerned Lots are allowed to erect the building(s) and structure(s).

2.3 Current Condition of the Application Site

- 2.3.1 The Application Site covers an area of about 1,920 square metres ("sq. m."). The Whole Site covers an area of about 7,956 square metres ("sq. m."). 6,036 sq. m. falls within the "REC" zone while about 1,920 sq. m. falls within the



“GB” zone. Therefore, the portion of the Application Site subject to planning approval covers an area of about 1,920 sq. m. There are existing structures erected on the Site that falls within the “REC” zone.

2.3.2 The Whole Site is attached to two local access roads on its west and northwest which eventually connects to Lin Ma Hang Road. The Site is situated at the north of Lin Ma Hang Road and southwest of Pak Fu Shan. Besides, it is located at the northeast of Heung Yuen Wai Boundary Control Point.

2.3.3 **Figure 1** illustrates the location of the Application Site and its immediate vicinity, with **Figure 2** illustrates the site plan.

2.3.4 In view of the Application Site involves steep slope on the western boundary (i.e. Lot 25), minor portion of the Site (about 33 sq.m; about 0.01% of the Site) has been filled with concrete for safety purpose. No further land filling or excavation of land is proposed in this application. Details of the associated land filling is at **Figure 6**.

2.4 Surrounding Context

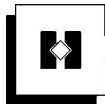
2.4.1 Ta Kwu Ling is a sub-urban area located northern area in the New Territories which is comprised of multiple villages. The predominant land uses are vehicle parking, storage, temporary and domestic structures, as well as vacant land. Ta Kwu Ling forms one of three new development areas currently being planned for North District, in parallel with Fanling North and Kwu Tung North. Ta Kwu Ling North is positioned to the north of Tsung Yuen Ha Chuen. The area is accessible via Lin Ma Hang Road in Ta Kwu Ling North, which is the major road in Ta Kwu Ling North. The major transportation mode is by bus or minibus, connecting Ta Kwu Ling North to several MTR stations and public minibus terminal.

2.4.2 The Application Site is located at the northern edge of Ta Kwu Ling, with village houses, temporary structures and car parks surrounding the site. Tsung Yuen Ha is situated between the middle and eastern section of Ling Ma Hang Road. Going south along the Lin Ma Hang is Chuk Yuen, and further east is Ha Heung Yuen.

2.5 The Proposal

2.5.1 **The Application Site with the adjoining area is proposed to serve as a holiday camp with caravans. Upon actual implementation of the holiday camp, there are feedbacks from the potential campers to enlarge the camping ground area in order to create a spacious atmosphere. The operator thus considers to utilize the remaining private land and slightly extend the holiday camp operation area.**

2.5.2 The 9 caravans falling within the “GB” zone, which is the Application Site, are proposed to be maintained and will serve only the campers, accommodating a maximum of about 27 campers. Neither construction of structures nor further land filling and excavation are anticipated. Refer to **Figure 5** for the indicative tent/ camp/ caravan layout plan.



- 2.5.3 The Application Site will be managed and operated by the same operator of “Park Nature Hillside”. It is intended to operate 24 hours daily, from Monday to Sunday including public holidays.
- 2.5.4 **The relevant campsite scheme was submitted to various Government Departments for approval of Short Term Waiver No. 1638 in 2022. The Application Site has been designated for camping ground use already.**
- 2.5.5 The Application Site serves only the campers. While a small proportion of users are non-campers who can only have access to the temporary eating place in the Whole Site. The temporary eating place has been granted planning permission under A/NE-TKLN/84 in 2024. The staff of the camping site will provide first screening on the non-campers. The non-campers are only allowed to visit the temporary eating place but not allowed to enter the camping site without permission.
- 2.5.6 Taking into consideration that no additional building or structure will be erected on the Application Site in the Proposed Development, it satisfies the special conditions of the Short Term Waiver. No modification of the existing Short Term Waiver is expected.
- 2.5.7 Below the development parameters for easy reference:

Development Parameters	Whole Site	Application Site (included inside the Whole Site)
Lot No.	Lot Nos. 20 RP, 21, 22, 23, 24, 25, 28, 31, 33, and 37 in Demarcation District No. 80	Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part) in Demarcation District No. 80
Zone	“GB” (about 24% in Whole Site area) “REC” (about 76% in Whole Site area)	“GB”
Site Area	About 7,956 sq.m.	About 1,920 sq.m. (Form part of the Whole Site area of 7,956 sq.m.)
Total Number of Building/ Structure	11	No #
Maximum Height	Not exceeding 6m or 2 storeys ^ for structures, tents/camps/ caravans	Not exceeding 3.5m or 1 storey for tents / camps / caravans
Total Built Over Area	Not exceeding 830.5 sq.m. of built over area ^	N/A *
Covered Area of Tent / Camp / Caravan	Not more than 661.5 sq.m.	Not more than 283.5 sq.m.
Total Plot Ratio	Not exceeding 0.2	N/A *
Total No. of Camps/ Tents/ Caravans	21 nos.	9 nos. partially on “GB” zone (Form part of total 21 nos.)
Maximum Number	80 ^	About 27



Development Parameters	Whole Site	Application Site (included inside the Whole Site)
of Campers		(Form part of the total 80 campers)
Parking Provision	2 private car parking spaces for staff only; 1 light bus pick-up/drop-off space for visitor (upon reservation only) ^	Nil, all provided inside the Whole Site already

* Camps/ Tents/ Caravans are not countable for gross floor area

Camps/ Tents/ Caravans are not considered as building nor structure nor support for any building or structure

^ As approved when the STW No. 1638 was granted

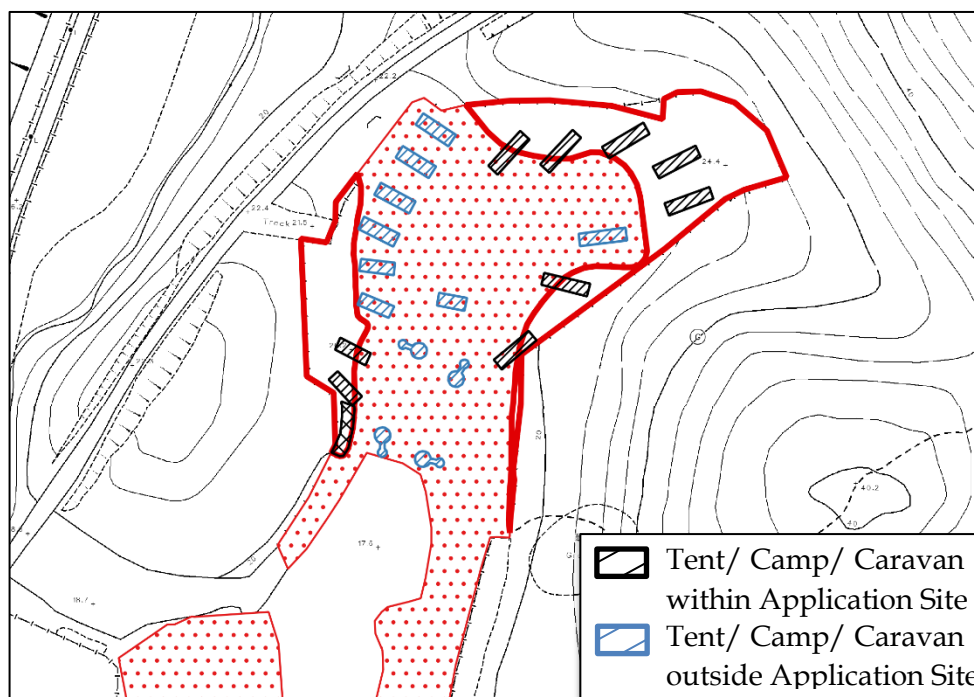
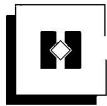


Diagram 1 Location of Tent/ Camp/ Caravan (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

2.6 Existing Transport Services

2.6.1 Existing public transport services to the vicinity are shown below:

Mode	Route No.	Origin - Destination	Frequency
Scheduled Green Minibus	59K	Sheung Shui Station Public Minibus Terminus - Chuk Yuen	35 - 45 minutes
	59S	Sheung Shui Station Public	25 - 35 minutes



		Minibus Terminus -Heung Yuen Wai Boundary Control Point (HYWBCP)	
Franchised Bus	B7	Fanling Station - Heung Yuen Wai Port	10 - 20 minutes
	B8	Tai Wai Station - Heung Yuen Wai Port	30 minutes
	B9	Tuen Mun Station - Heung Yuen Wai Port	60 minutes
	79K	Sheung Shui - Ta Kwu Ling (Tsung Yuen Ha)	15-35 minutes

- 2.6.2 It only takes about 5 minutes to walk from the Application site to the HYWBCP, by going through the subway from the bus stop along Lin Ma Hang Road.

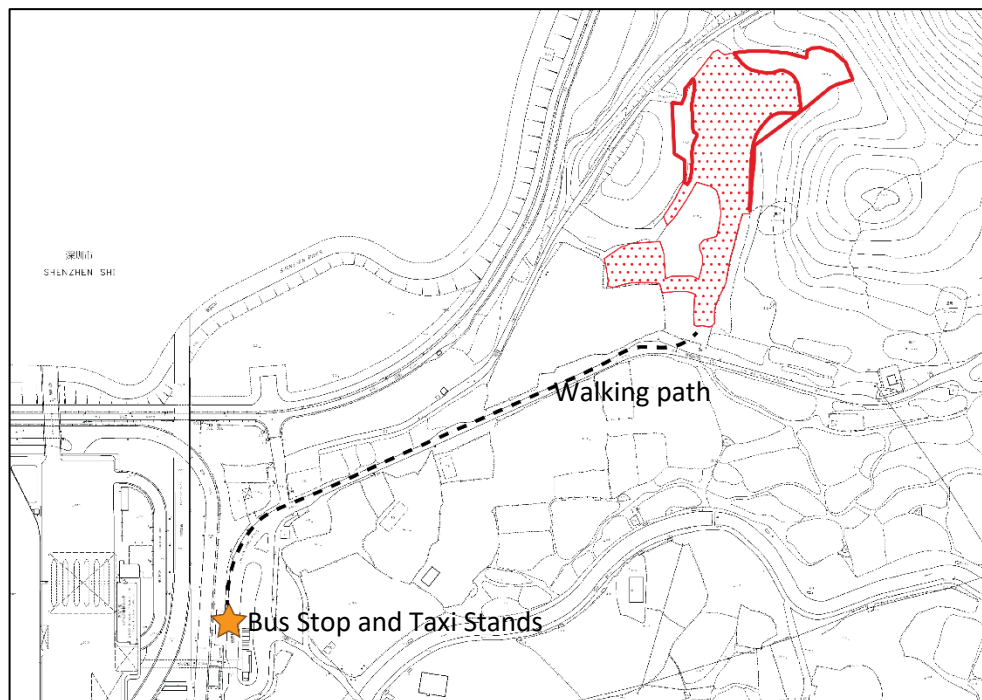
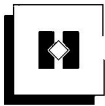


Diagram 2 Walking Path to Public Transport (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)



3 PLANNING ASSESSMENT

The following planning assessment covers the Whole Site to demonstrate the planning and technical compatibility of the Holiday Camp in the majority of the “REC” zone and a minority of the “GB” zone.

3.1 Statutory Planning Context

- 3.1.1 The Application Site falls within an area designated as “Green Belt” (“GB”) zone on the Approved Ta Kwu Ling North Outline Zoning Plan No. S/NE-TKLN/2 (**Figure 4**) (also known as the “OZP”), while the remaining area of the Whole Site falls within an area designated as “Recreational” (“REC”).
- 3.1.2 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”*.
- 3.1.3 The planning intention of the “REC” zone is *“primarily for low-density recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism”*, while that 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”*.
- 3.1.4 **According to Notes of “REC” zone of OZP, ‘Holiday Camp’ is a Column 1 use under “REC” zone which is always permitted by the Board and thus no additional planning approval is to be sought under this Application.** Meanwhile, ‘Holiday Camp’ is a Column 2 use under “GB” zone. According to the Notes of the OZP, temporary use not exceeding a period of three years within “GB” zone requires planning permission from the Town Planning Board notwithstanding that the use is not provided for in terms of the Plan.
- 3.1.5 Approval of this application on a temporary basis for a period of 3 years would follow the long-term planning intention of the “GB” zone, indeed, would support the provision of passive recreational outlets, which is the existing camping site. Recreational facilitates on the “REC” zone is an as-of-right usage. No planning permission is required.



- 8 -	
<u>S/NE-TKLN/2</u>	
<u>GREEN BELT</u>	
Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Agricultural Use Barbecue Spot Government Use (Police Reporting Centre only) Nature Reserve Nature Trail On-Farm Domestic Structure Picnic Area Public Convenience Tent Camping Ground Wild Animals Protection Area	Animal Boarding Establishment Broadcasting, Television and/or Film Studio Burial Ground Columbarium (within a Religious Institution or extension of existing Columbarium only) Crematorium (within a Religious Institution or extension of existing Crematorium only) Field Study/Education/Visitor Centre Firing Range Flat Golf Course Government Refuse Collection Point Government Use (not elsewhere specified) Helicopter Landing Pad Holiday Camp House (other than rebuilding of New Territories Exempted House or replacement of existing domestic building by New Territories Exempted House permitted under the covering Notes) Petrol Filling Station Place of Recreation, Sports or Culture Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (excluding container vehicle) Radar, Telecommunications Electronic Microwave Repeater, Television and/or Radio Transmitter Installation Religious Institution Residential Institution Rural Committee/Village Office School Service Reservoir Social Welfare Facility Utility Installation for Private Project Zoo
(Please see next page)	

(Source: Town Planning Board, HKSAR Government)



- 9 -

S/NE-TKLN/2

GREEN BELT (cont'd)

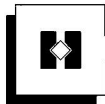
Planning Intention

The planning intention of this 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.

Remarks

Any diversion of streams, filling of land/pond or excavation of land, including that to effect a change of use to any of those specified in Columns 1 and 2 above or the uses or developments always permitted under the covering Notes (except public works co-ordinated or implemented by Government, and maintenance, repair or rebuilding works), shall not be undertaken or continued on or after the date of the first publication in the Gazette of the notice of the draft development permission area plan without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance.

(Source: Town Planning Board, HKSAR Government)



<u>S/NE-TKLN/2</u>	
<u>RECREATION</u>	
Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Agricultural Use Barbecue Spot Field Study/Education/Visitor Centre Government Use (Police Reporting Centre only) Holiday Camp On-Farm Domestic Structure Picnic Area Place of Recreation, Sports or Culture Public Convenience Rural Committee/Village Office Tent Camping Ground	Animal Boarding Establishment Broadcasting, Television and/or Film Studio Eating Place Flat Golf Course Government Refuse Collection Point Government Use (not elsewhere specified) Helicopter Landing Pad Hotel House (other than rebuilding of New Territories Exempted House or replacement of existing domestic building by New Territories Exempted House permitted under the covering Notes) Place of Entertainment Private Club Public Utility Installation Public Vehicle Park (excluding container vehicle) Religious Institution Residential Institution Shop and Services Theme Park Utility Installation for Private Project Zoo

(Source: Town Planning Board, HKSAR Government)

3.2 Approved Application

3.2.1 There is an approved application within the Whole Site, A/NE-TKLN/84, which was approved by the Town Planning Board on 5 July 2024.

Application No.	A/NE-TKLN/84
Decision Date	05/07/2024
Applied Use	Proposed Temporary Eating Place for a Period of 3 Years
Site Area	93 sq. m.
Maximum Building Height	3.5 m
Decision	Approved with condition(s) on a temporary basis

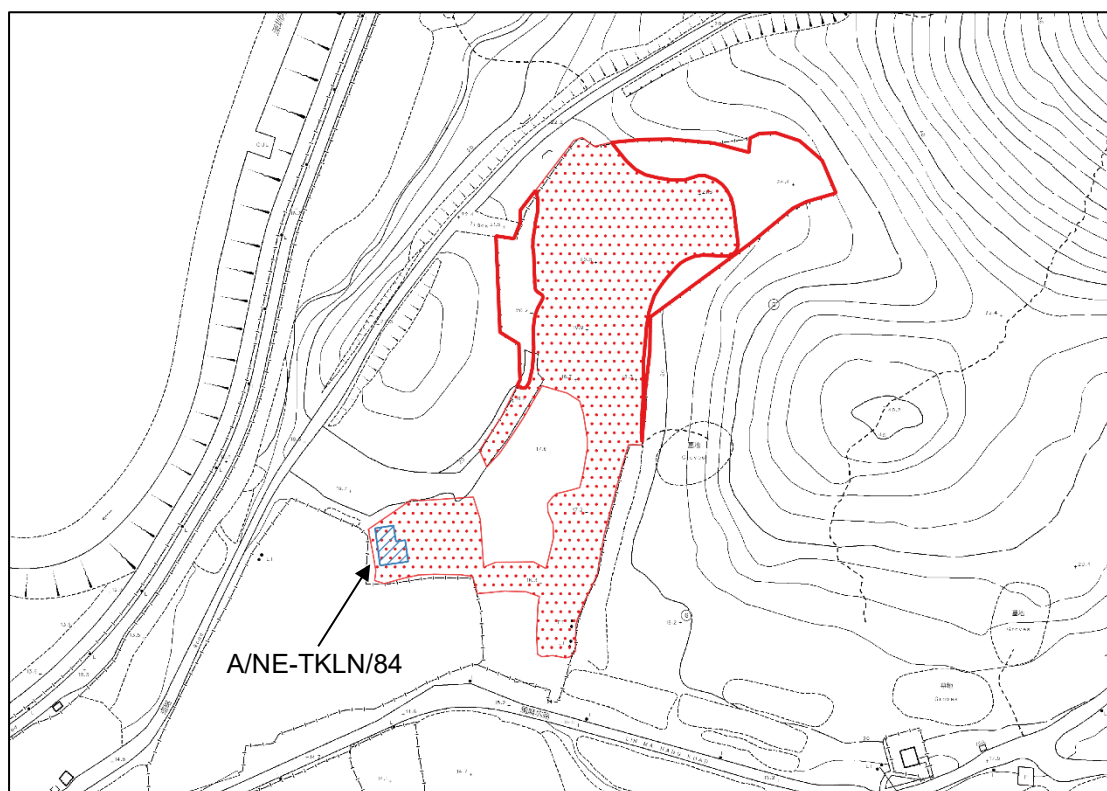
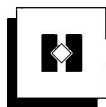


Diagram 3 Approved Application falling within the Whole Site (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

3.3 Similar Approved Applications

- 3.3.1 There is one application for temporary eating place in the vicinity of the Application Site which falls within “REC” and “GB” zones approved by the Town Planning Board in 2021, which is Application No. A/NE-TKLN/39.
- 3.3.2 Application No. A/NE-TKLN/39 is situated on Lin Ma Hang Road at the east of HYWBCP, serving mainly the staff and workers of HYWBCP. The details of the application are summarized as follows:

Application No.	A/NE-TKLN/39
Decision Date	28/05/2021
Applied Use	Proposed Temporary Retail Shop, Canteen and Ancillary Office for a Period of 3 Years
Site Area	270.5 sq. m.
Maximum Building Height	3.5 m
Decision	Approved with condition(s) on a temporary basis

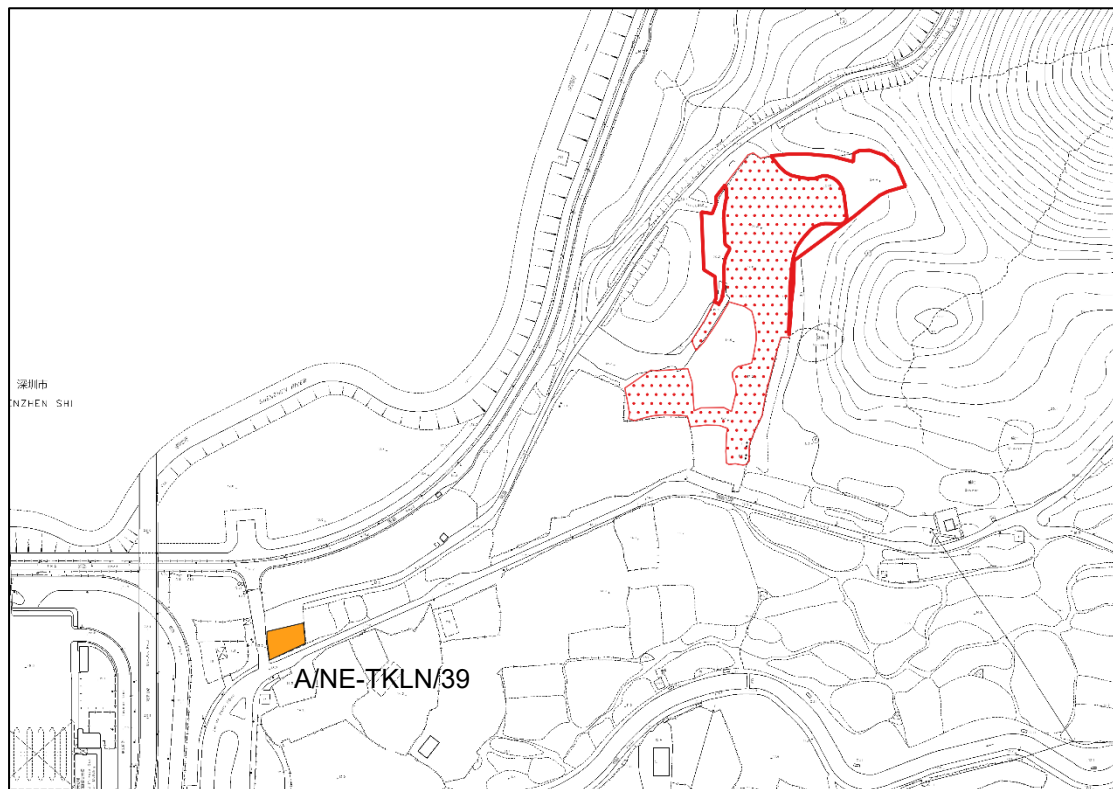
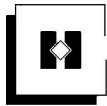


Diagram 4 Approved Applications falling within “REC” and “GB” Zones in the Vicinity (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

3.3.3 There are also two planning applications for recreational or leisure uses riding on the increased accessibility brought about by the HYW BCP within the Approved Ta Kwu Ling North OZP, as approved by the Board in recent years, namely A/NE-TKLN/23 and A/NE-TKLN/63. Refer to Diagram 2 for their locations. The details of the applications are summarized as follows:

Application No.	A/NE-TKLN/23	A/NE-TKLN/63
Decision Date	05/02/2021	01/03/2024
Applied Use	Proposed Temporary Place of Recreation, Sports or Culture (Parent-Child Play Area), Eating Place, Shop and Services for a Period of 5 Years	Proposed Temporary Private Club for a Period of 5 Years
Site Area	5,147 sq. m.	451.5 sq. m.
Maximum Building Height	6.25 m	5.2 m
Decision	Approved with condition(s) on a temporary basis	Approved with condition(s) on a temporary basis

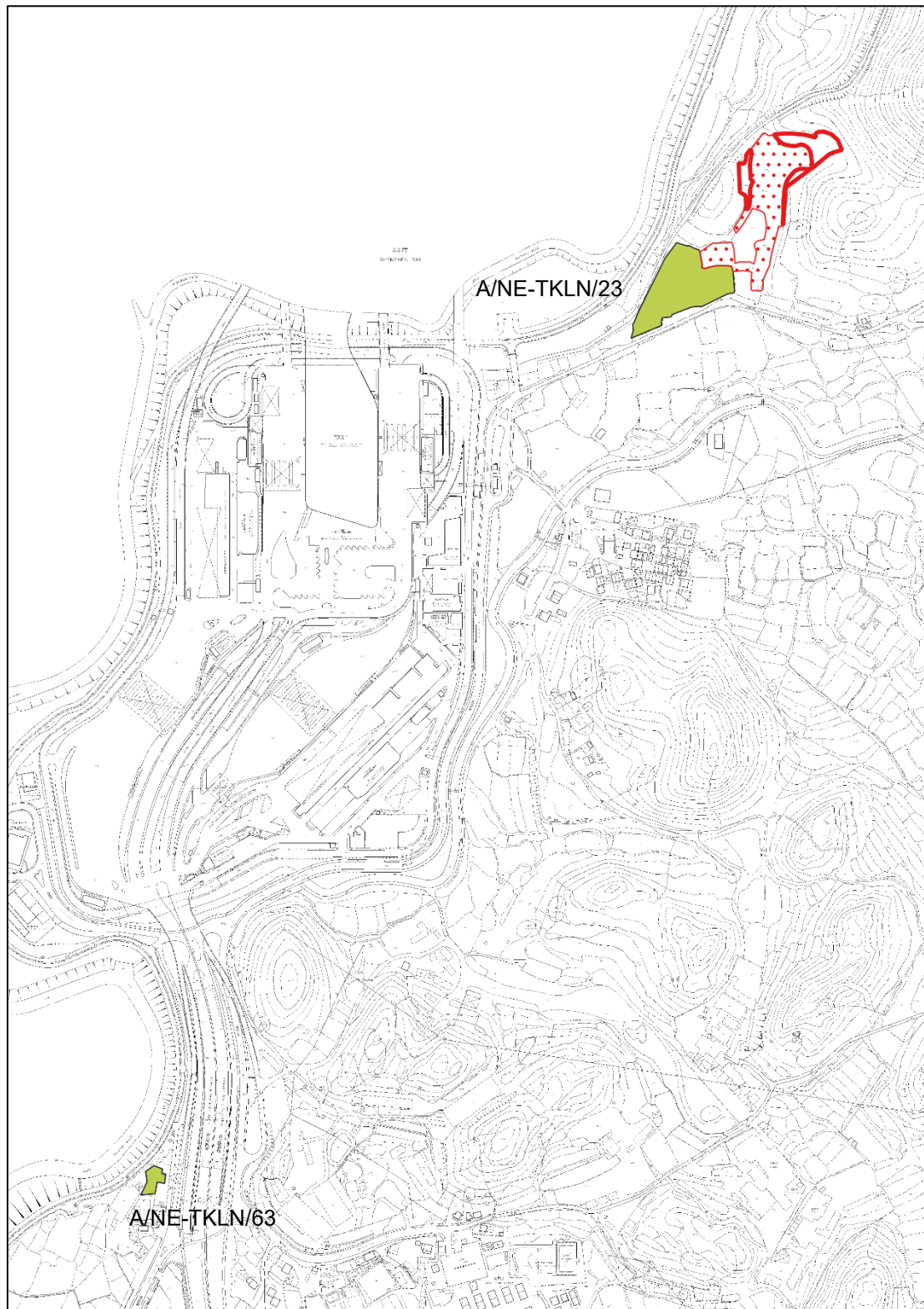
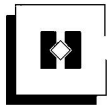
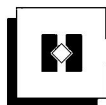


Diagram 5 Approved Recreational or Leisure Use Applications in the vicinity
(Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)



3.3.4 There are other precedent approved planning applications falling within “GB” zone for temporary holiday camp in the vicinity, including A/NE-TKL/726, A/NE-LCW/8, and A/TP/684. The details of the applications are summarized as follows:

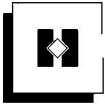
Application No.	A/NE-TKL/726	A/NE-LCW/8	A/TP/684
Decision Date	22/12/2023	11/09/2023	11/08/2023
Applied Use	Proposed Temporary Place of Recreation, Sports or Culture (Hobby Farm) and Holiday Camp (Private Tent Camping Ground) for a Period of 3 Years	Proposed Temporary Holiday Camp with Ancillary Facilities for a Period of 3 Years and Associated Excavation of Land	Proposed Field Study/Education/Visitor Centre with Ancillary Holiday Camp
Site Area	451.5 sq. m.	4,750 sq. m.	9,054 sq. m.
Maximum Building Height	5.2 m	3.8 m	6.65 m
Decision	Approved with condition(s) on a temporary basis	Approved with condition(s) on a temporary basis	Approved with condition(s)

3.3.5 Besides, there are precedent approved planning applications falling within “AGR” zone for temporary recreational and leisure uses specifically including caravan holiday camp in recent years, namely A/NE-MUP/183 and A/NE-TK/752. The details of the applications are summarized as follows:

Application No.	A/NE-MUP/183	A/NE-TK/752
Decision Date	10/11/2023	28/10/2022
Applied Use	Proposed Temporary Place of Recreation, Sports or Culture (Hobby Farm) and Holiday Camp (Caravan) with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	Proposed Temporary Barbecue Site and Caravan Holiday Camp with Ancillary Facilities for a Period of 3 Years and Filling of Land
Site Area	6,453 sq. m.	2,841 sq. m.
Maximum Building Height	4 m	5 m
Decision	Approved with condition(s) on a temporary basis	Approved with condition(s) on a temporary basis

3.4 Environmental Consideration

3.4.1 The Applicant will follow the relevant mitigation measures and requirements in the latest “Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites” to minimize any potential environmental impact. No adverse environmental impact is anticipated.



3.4.2 The Applicant will try to avoid to use audio amplification system for the Proposed Development. In case there is no alternative means, it is proposed that the audio amplification system is only available for use during day time, i.e., 9a.m. to 7p.m. in limited extent and on occasional periods only. When the audio amplification system is applied, there will be some noise mitigation measures adopted, including:

- to orientate stage to point away from the nearby noise sensitive receivers;
- to use a cluster of small power loudspeakers instead of a few large power loudspeakers;
- to use directional loudspeakers and orientate them to point towards the audience and away from the nearby noise sensitive receivers; and etc.

3.4.3 Besides, there will be a manned complaint hotline directly connect to the campsite operation team so that action can be taken to reduce the noise in response to complaints raised.

3.4.4 The Applicant will follow the Noise Control Ordinance and adopt relevant noise control guidelines available from the Environment Protection Department including the Noise Control Guidelines for Music, Singing and Instrument Performing Activities and etc.

3.5 Visual Compatibility

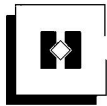
3.5.1 The Application Site is situated in area of rural village landscape character which are surrounded by temporary structures and car parks. The approved maximum height of existing structures under the Short Term Waiver is capped at 6 m, while the concerned caravans have a maximum height of 3.5 m which is totally compatible with the surrounding use and will not disturb the prevailing rural village landscape character, being compliant with the conditions of the concerned Short Term Waiver. No tree felling is anticipated.

3.5.2 Having said that, the height of the concerned caravans is lower than the approved height of 6m under the concerned Short Term Waiver.

3.6 Drainage Consideration

3.6.1 Upon the grant of Short Term Waiver, a drainage proposal was submitted to the Drainage Services Department, and was approved already. Resultant drainage works has been conducted in regards to the approved drainage proposal.

3.6.2 There is no substantial change in the campsite development proposal submitted for the approval of Short Term Waiver as compared to the Proposed Development, there should be no drainage impact from this planning application upon the implementation of the approved drainage proposal.



3.7 Traffic Consideration

3.7.1 To minimise carbon footprint, campers are encouraged to take public transport to arrive at the campsite. As it only takes about 5 minutes to walk from the Application Site to the HYWBCP, it is expected that the campers would access the Application Site on foot from the HYWBCP, which is readily accessible by public transport. Public transport routes to and from HYWBCP is expected to be increased in the future, which shall increase the accessibility of the Application Site. Light bus is also available for use by the campers upon reservation.

3.7.2 As mentioned in the previous section, non-campers only constitute the minority of users of the Whole Site. For the cross-boundary travellers transiting with their vehicles, they would park their vehicles in the surrounding public vehicle parks which provide at least 190 car parking spaces, or else in the carpark of the HYWBCP. The planning applications of the public vehicle parks in the vicinity approved by Town Planning Board in the past years are summarized as follows:

Application No.	Approval Date	Total No. of Vehicles Parking Spaces Provided
A/NE-TKLN/45	29/07/2022	42
A/NE-TKLN/53	23/06/2023	69
A/NE-TKLN/57	22/09/2023	24
A/NE-TKLN/58	22/09/2023	26
A/NE-TKLN/67	27/10/2023	18
A/NE-TKLN/70	27/10/2023	11

3.7.3 **The traffic trips of the cross-boundary travellers have already been reflected in the approved planning applications for public vehicle parks. It is anticipated that no traffic trips for cross-boundary travellers would be generated nor attracted due to the Proposed Development.**

3.7.4 As the Proposed Development aims to mainly serve the campers, their traffic trips have been considered and reflected during the grant of the concerned Short Term Waiver. As the current accommodation capacity of the campsite is fully compliant with the submitted proposal of the Short Term Waiver, it is anticipated that the approval of the Proposed Development will not generate any additional impacts on traffic conditions.

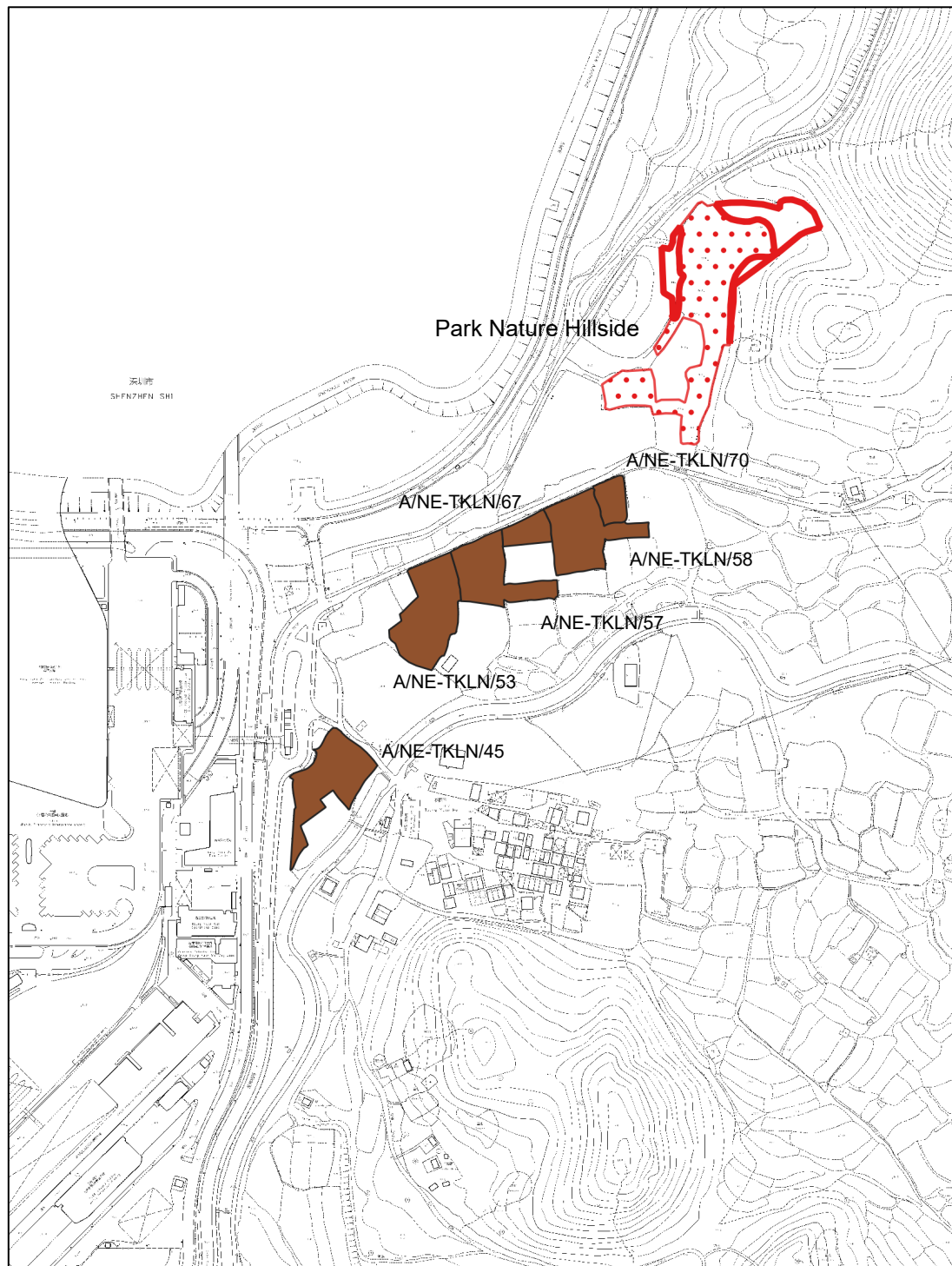
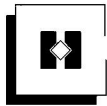
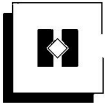


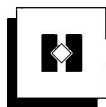
Diagram 6 Approved Public Vehicle Parks in the Vicinity (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

3.7.5 There is no additional loading/ unloading bay to serve the Proposed Development. The Proposed Development will utilize the existing loading/ unloading bay as provided under the camping site only.



3.8 Compliance of TPB-PG No. 10

- 3.8.1 The Town Planning Board Planning Guideline for '*Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance*' stipulates that one of the main purposes of "GB" zones is "to provide additional outlets for passive recreational uses", which could be fulfilled by the use as a holiday camping site. Given that the Proposed Development is compatible with the character of surrounding areas, it should be given sympathetic consideration by the Board. The main relevant planning criteria in TPB-PG No. 10 are considered below.
- 3.8.2 The Proposed Development is of small scale and low intensity, as no building structures are erected and the caravans are only of a maximum 3.5m tall. Thus, it shall not cause any adverse impacts to the character of the existing surrounding areas.
- 3.8.3 As suggested by its small scale and low development intensity, the Proposed Development also does not involve any extensive clearance of existing vegetation, any tree felling, or affect the existing natural landscape, and thus shall not cause any adverse visual impacts on the surrounding environment.
- 3.8.4 Neither vehicular access roads nor parking provision are involved in the "GB" zone within the Application Site. None of the existing trees or other natural landscape features shall be affected by access and parking.
- 3.8.5 The existing campsite is compliant with the development control imposed by the Short Term Waiver. The accommodation capacity of the campsite is controlled and compliant with submitted proposal of the Short Term Waiver. Therefore it is not anticipated that the Proposed Development will overstrain the capacity of the existing infrastructure such as sewerage, roads and water supply or cause any adverse drainage impacts and flooding.
- 3.8.6 The Application Site is neither susceptible to adverse environmental effects from nearby pollution sources, nor being a source of pollution itself, as the Applicant will follow the relevant mitigation measures and requirements in the latest "*Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites*" to minimize any potential environmental impact.
- 3.8.7 The Proposed Development is not situated on a slope or hillside and does not cause any impact on slope stability.



4 PLANNING MERITS & JUSTIFICATIONS

4.1 Promoting “Tourism is Everywhere in Hong Kong” and Developing Tourism Projects with Local Characteristics

4.1.1 The promotion of local tourism is well in line with Government policy, and the camp site provides an innovative opportunity to explore rural Hong Kong and enrich the thematic contents of local tourism. Considering the recent upward trend of public members camping locally in Hong Kong as a mode of local tourism, there is a potential demand for private campsites apart from government designated camping grounds.

4.1.2 The proposed slight extension of the camping ground is to create a more spacious atmosphere of the existing campsite, which echoes with the Government’s direction of “Tourism is Everywhere in Hong Kong”. The approval of this application would extend the diversity of Hong Kong’s tourism, being a flagship tourism project in the Boundary Control Point.

4.2 Align with Long-term Planning Intention

4.2.1 According to the explanatory statement of the OZP, one of its planning intentions is to promote recreation and tourism. The Ta Kwu Ling North area provides a wide array of unique and attractive tourism opportunities with a good potential for eco-tourism. Provision of tourism and recreation-related developments such as overnight accommodation facilities would thus be required to realise the tourism potential of the area.

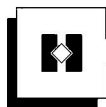
4.2.2 The operation of the camping ground is totally in line with the planning intention of “Recreation” zone, and no planning permission is required. The Application Site only occupies about 24% of the Whole Site for Holiday Camp. The proposed slight extension from the “REC” zone to a small portion of adjoining “GB” zone is still considered as in line with the planning intention.

4.3 Comply with Town Planning Board Planning Guidelines No. 10

4.3.1 Approval of the application on a temporary basis for a period of 3 years would not jeopardize the long-term planning intention of the “GB” zone. With respect to the OZP, one of the uses of the Application Site is to provide passive recreational outlets. The use as a temporary holiday camp fully complies with TPB PG-No. 10, as the temporary set up is small in scale and the intensity and uses can optimise land resources solely for passive recreational purposes while being compatible with the surrounding environment. The proposal does not involve erection of any permanent structures.

4.4 Echo with Northern Metropolis Action Agenda 2023

4.4.1 The Proposed Development shall strengthen the eco-tourism opportunities as promoted in the Northern Metropolis Action Agenda. Besides, catering the needs of the cross-boundary travellers also support the boundary economy.



The Boundary Commerce and Industry Zone, in which HYW falls into, is positioned to be an area with rich local cultural resources and economic vigour. This is echoed by the objectives of the camping site, which is to raise awareness of visitors towards local cultural heritage by means of an emerging mode of local tourism.

- 4.4.2 Currently there is no particular supporting facilities in the vicinity of the HYWBCP. With the previously approved application of establishing a temporary eating place open for non-campers, the camping site can support the development of the Boundary Commerce and Industry Zone as detailed in the Northern Metropolis Action Agenda 2023. Thus, this application demonstrates significant planning merit.

4.5 Existing Operator as Pioneer in the Local Tourism Industry for Caravan Camp

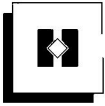
- 4.5.1 This campsite shall serve as a good example in the management of a passive recreational outlet. The Applicant is a professional campsite management team operating 'Park Nature Hillside' in HYW and 'Park Nature' in Yuen Long. According to a report by the Consumer Council published on 17 June 2024, both campsites are among the few studied sites providing "glamping" services which explicitly declared purchase of third-party liability insurance. 'Park Nature' in Yuen Long is also one of the few successful precedents having obtained a Guesthouse (Holiday Camp) Licence under the Hotel and Guesthouse Accommodation Ordinance (HAGAO).

4.6 Supported by Previous Planning Approvals of Similar Applications

- 4.6.1 Planning context has substantially changed upon the full commission of HYWBCP. Although there were no similar applications of temporary recreational and leisure use within the same "GB" zone as the Application Site, the Committee generally approved with conditions applications for temporary recreational and leisure uses in the Ta Kwu Ling North area during the recent years. Besides, there is support of previous project approvals for temporary recreational and leisure uses, particularly holiday camp use, under similar circumstances within the Shatin, Taipo and North District Planning Office boundaries. The proposed temporary holiday camp is not inconsistent with the surrounding land uses and it is unlikely to generate adverse impacts to the surrounding area.

4.7 Compatible with the Surrounding Development with No Adverse Visual and Landscape Impact

- 4.7.1 The temporary holiday camp within the Whole Site, without the introduction of additional structures, is visually compatible with the surrounding environment. No tree felling is anticipated. There is no change to the rural village landscape character as well. Therefore, no adverse visual and landscape impact is anticipated.



4.8 No Adverse Traffic Impact

- 4.8.1 The temporary holiday camp within the Whole Site will not incur adverse traffic impact. No traffic trip is expected to be generated from the cross-boundary travellers as they will park their vehicles in the surrounding public vehicle parks. The campers' traffic generation have been addressed upon the approval of the Short Term Waiver already. The existing loading and unloading bay and parking facilities of the camping site will be utilized by the Proposed Development as well. Therefore, it is expected that there will not be significant negative impacts regarding the traffic network of the area concerned.

4.9 No Adverse Environmental Impact

- 4.9.1 The latest "*Code of Practice on Handling Environmental Aspects of Open Storage and Temporary Uses*" issued by Environmental Protection Department will also be followed. Therefore, there will not be adverse environment impacts including noise and air quality.

4.10 No Adverse Drainage Impact

- 4.10.1 The approved drainage proposal of the camping site under the Short Term Waiver is under implementation. With no material change in the development context, no adverse drainage impact is anticipated.

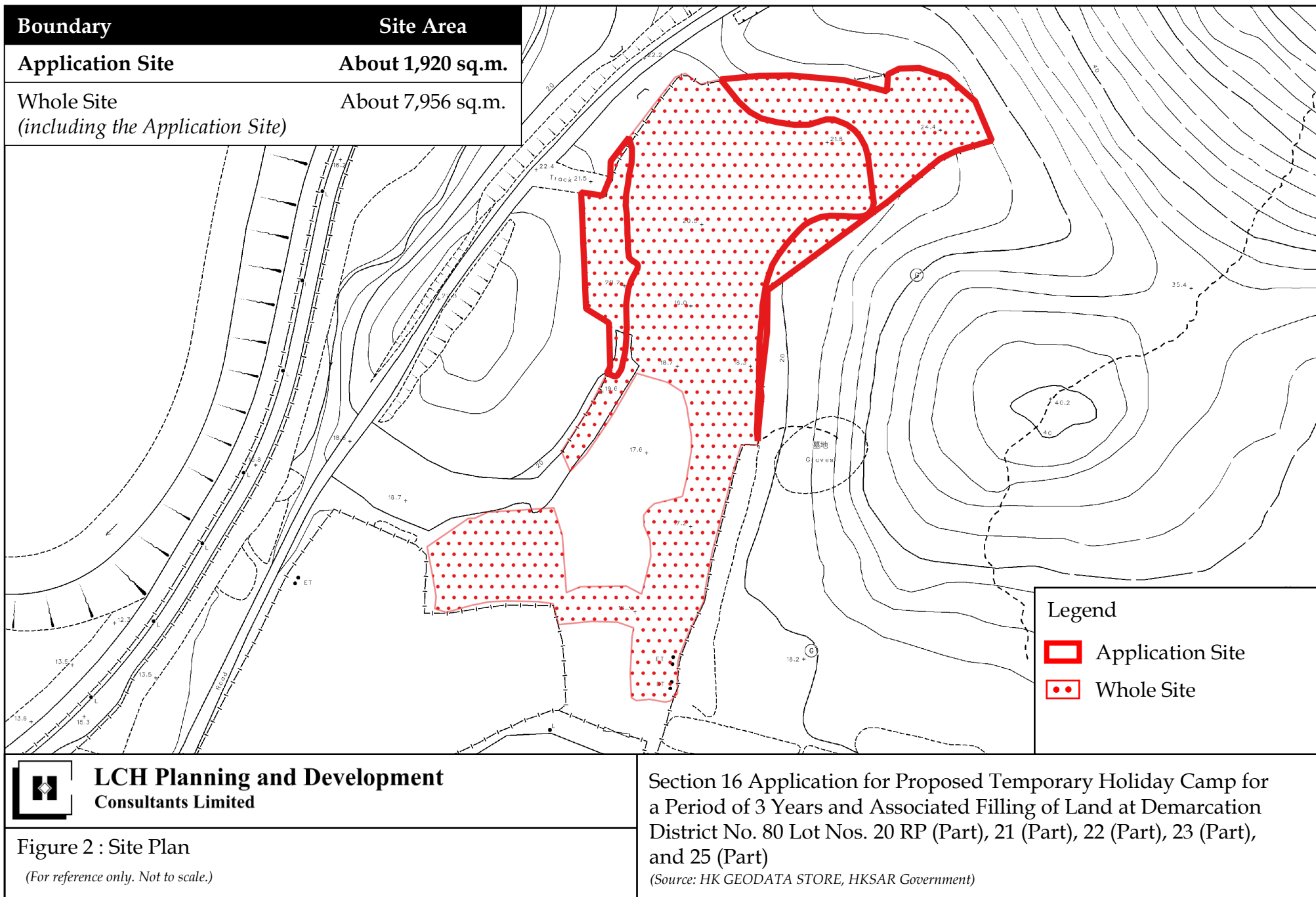
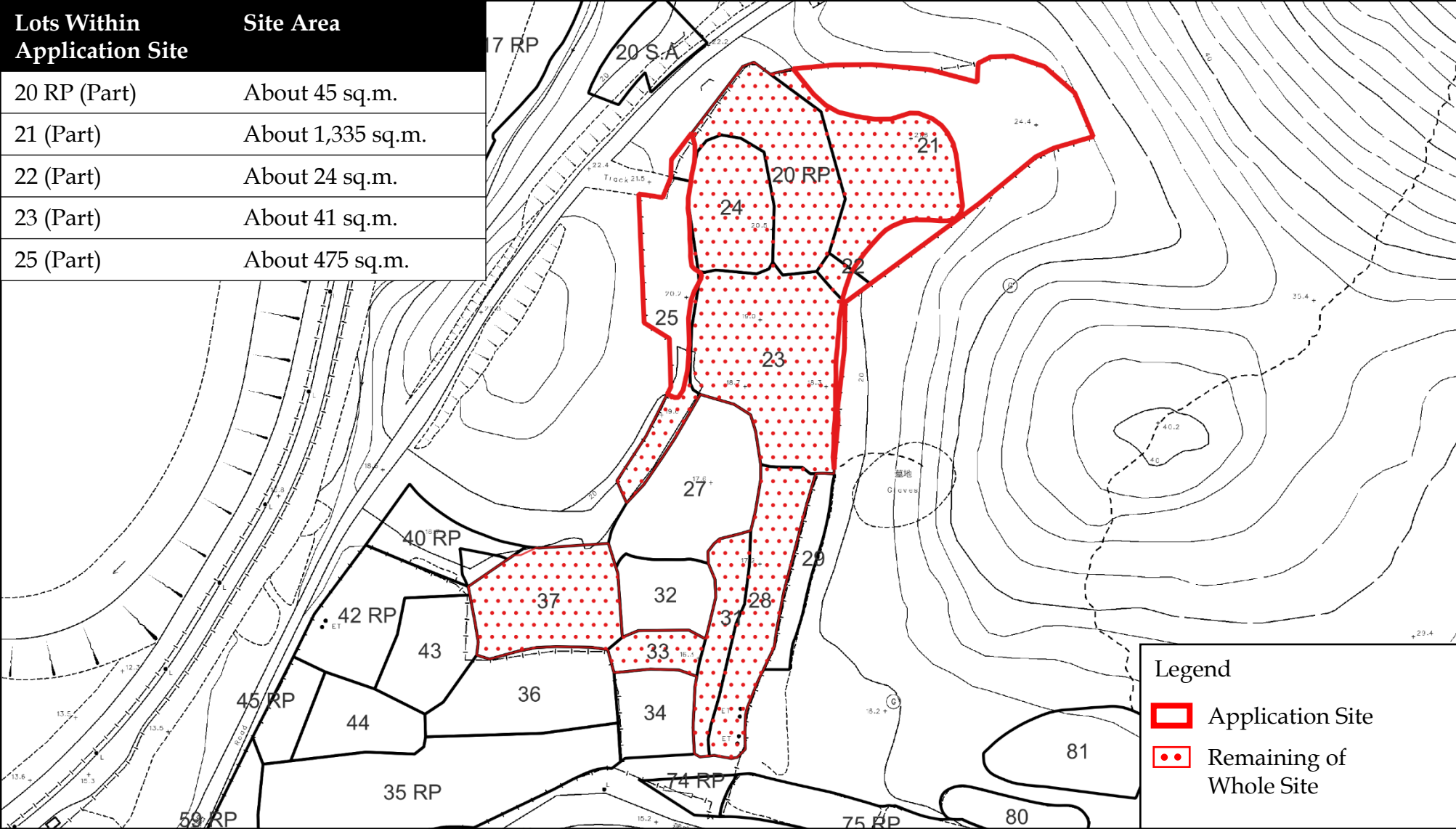


Figure 2 : Site Plan

(For reference only. Not to scale.)



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Figure 3 : Land Status

(For reference only. Not to scale.)

Section 16 Application for Proposed Temporary Holiday Camp for a Period of 3 Years and Associated Filling of Land at Demarcation District No. 80 Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part)

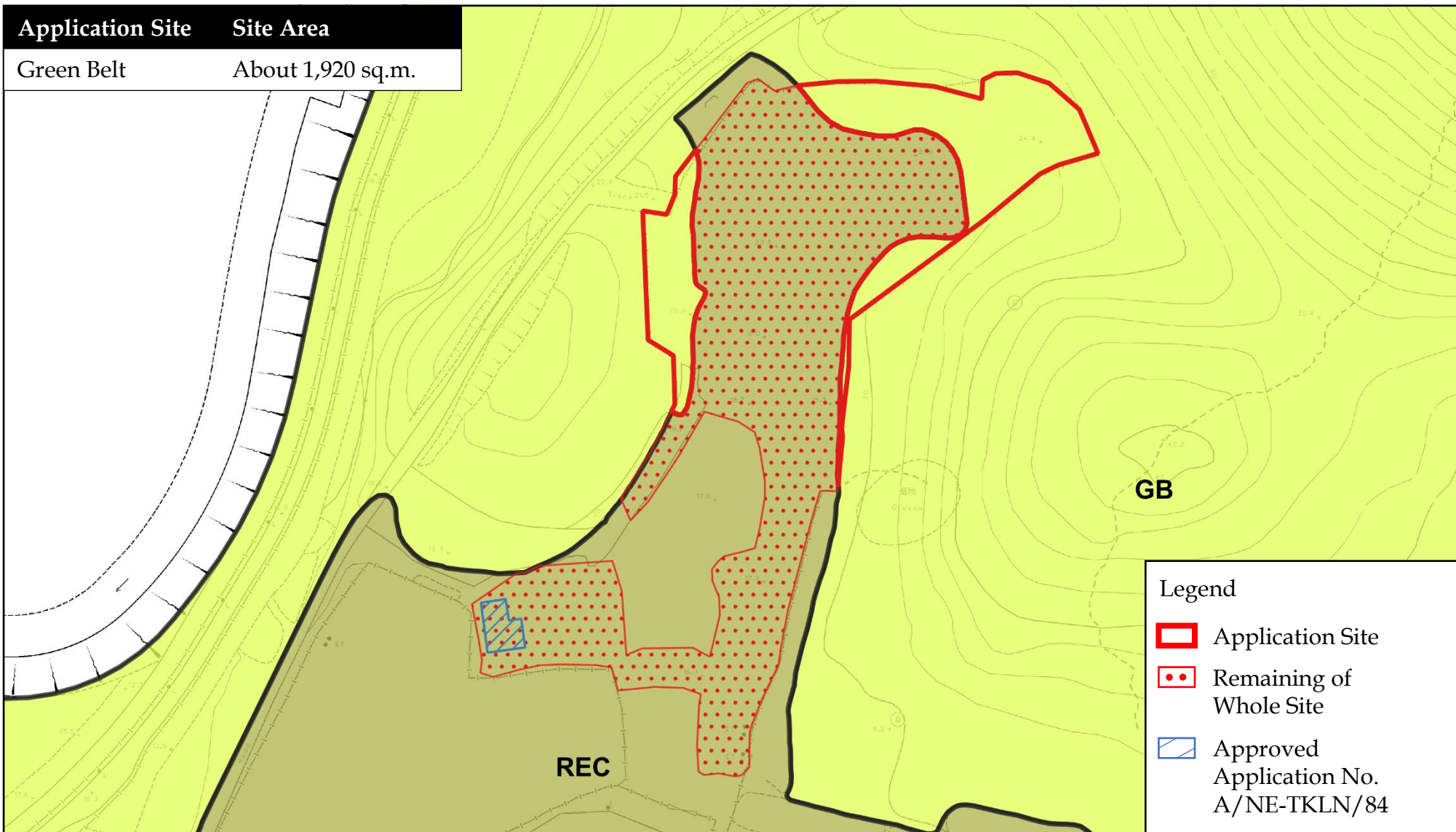
(Source: HK GEODATA STORE, HKSAR Government)

Application Site




Site Area

Green Belt

About 1,920 sq.m.



Legend

-  Application Site
-  Remaining of Whole Site
-  Approved Application No. A/NE-TKLN/84



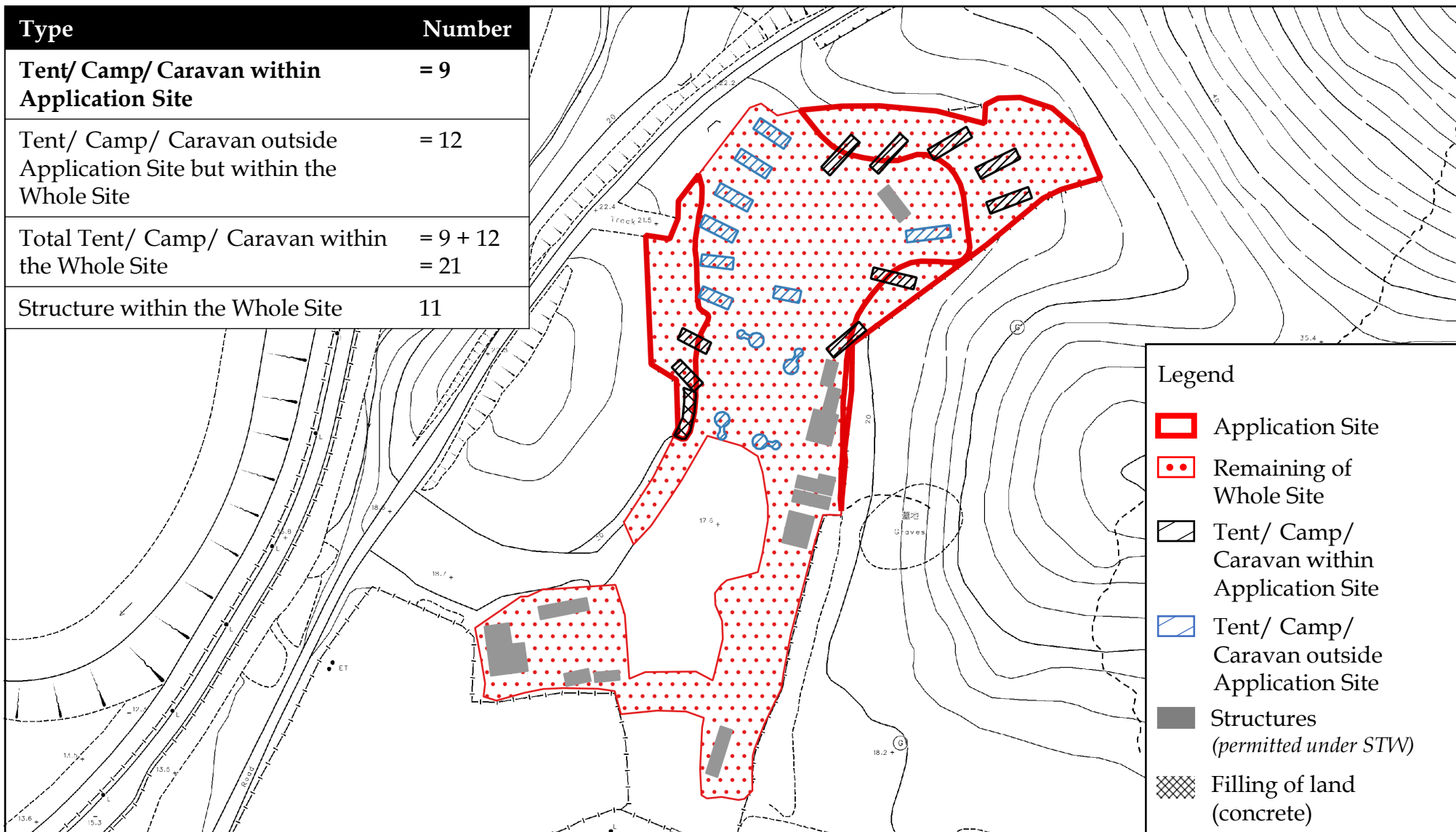
**LCH Planning and Development
Consultants Limited**

Figure 4 : Extract of OZP

(For reference only. Not to scale.)

Section 16 Application for Proposed Temporary Holiday Camp for a Period of 3 Years and Associated Filling of Land at Demarcation District No. 80 Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part)

(Source: HK GEODATA STORE & Town Planning Board, HKSAR Government)



**LCH Planning and Development
Consultants Limited**

Figure 5 : Indicative Tent/ Camp/ Caravan Layout Plan

(For reference only. Not to scale.)

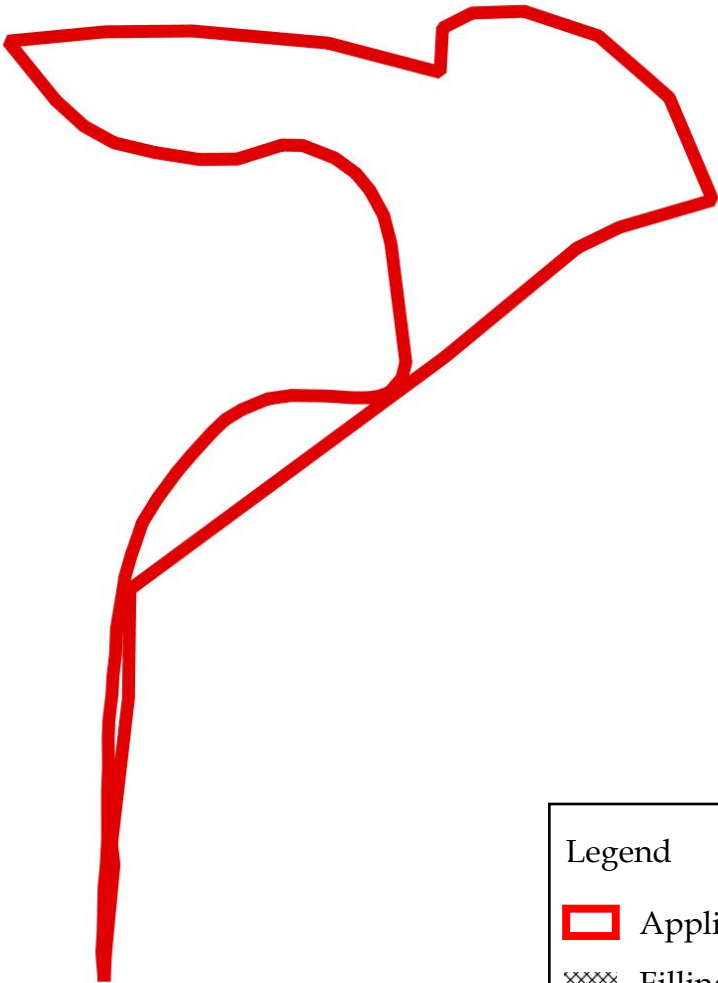
Section 16 Application for Proposed Temporary Holiday Camp for a Period of 3 Years and Associated Filling of Land at Demarcation District No. 80 Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part)

(Source: HK GEODATA STORE & Town Planning Board, HKSAR Government)



Application Site Area: about 1,920 sq.m.
Site Levels before Filling of Land: about +19.4mPD

Filling of Land
0.2m thick of concrete layer
About 33 sq.m. in area

Current Site Levels: about +19.6mPD



Legend

-  Application Site
-  Filling of land (concrete)

6. Type(s) of Application 申請類別	
(A) Temporary Use/Development of Land and/or Building Not Exceeding 3 Years in Rural Areas or Regulated Areas 位於鄉郊地區或受規管地區土地上及/或建築物內進行為期不超過三年的臨時用途/發展 (For Renewal of Permission for Temporary Use or Development in Rural Areas or Regulated Areas, please proceed to Part (B)) (如屬位於鄉郊地區或受規管地區臨時用途/發展的規劃許可續期，請填寫(B)部分)	
(a) Proposed use(s)/development 擬議用途/發展	Temporary Holiday Camp for a period of 3 years and Associated Filling of Land (Please illustrate the details of the proposal on a layout plan) (請用平面圖說明擬議詳情)
(b) Effective period of permission applied for 申請的許可有效期	<input checked="" type="checkbox"/> year(s) 年 3 <input type="checkbox"/> month(s) 個月
(c) Development Schedule 發展細節表	
Proposed uncovered land area 擬議露天土地面積	1,920sq.m <input checked="" type="checkbox"/> About 約
Proposed covered land area 擬議有上蓋土地面積sq.m <input type="checkbox"/> About 約
Proposed number of buildings/structures 擬議建築物／構築物數目
Proposed domestic floor area 擬議住用樓面面積sq.m <input type="checkbox"/> About 約
Proposed non-domestic floor area 擬議非住用樓面面積sq.m <input type="checkbox"/> About 約
Proposed gross floor area 擬議總樓面面積sq.m <input type="checkbox"/> About 約
Proposed height and use(s) of different floors of buildings/structures (if applicable) 建築物/構築物的擬議高度及不同樓層的擬議用途 (如適用) (Please use separate sheets if the space below is insufficient) (如以下空間不足，請另頁說明) Refer to Planning Statement Report	
Proposed number of car parking spaces by types 不同種類停車位的擬議數目 Private Car Parking Spaces 私家車車位 Refer to Planning Statement Report Motorcycle Parking Spaces 電單車車位 Light Goods Vehicle Parking Spaces 輕型貨車泊車位 Medium Goods Vehicle Parking Spaces 中型貨車泊車位 Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 Others (Please Specify) 其他 (請列明)	
Proposed number of loading/unloading spaces 上落客貨車位的擬議數目 Taxi Spaces 的士車位 Refer to Planning Statement Report Coach Spaces 旅遊巴車位 Light Goods Vehicle Spaces 輕型貨車車位 Medium Goods Vehicle Spaces 中型貨車車位 Heavy Goods Vehicle Spaces 重型貨車車位 Others (Please Specify) 其他 (請列明)	

Proposed operating hours 擬議營運時間 24 Hours, including weekdays, weekends and holiday			
(d) Any vehicular access to the site/subject building? 是否有車路通往地盤／有關建築物？	Yes 是	<input checked="" type="checkbox"/> There is an existing access. (please indicate the street name, where appropriate) 有一條現有車路。(請註明車路名稱(如適用)) <u>Lin Ma Hang Road</u>	
	No 否	<input type="checkbox"/> There is a proposed access. (please illustrate on plan and specify the width) 有一條擬議車路。(請在圖則顯示，並註明車路的闊度) <input type="checkbox"/>	
(e) Impacts of Development Proposal 擬議發展計劃的影響 (If necessary, please use separate sheets to indicate the proposed measures to minimise possible adverse impacts or give justifications/reasons for not providing such measures. 如需要的話，請另頁註明可盡量減少可能出現不良影響的措施，否則請提供理據/理由。)			
(i) Does the development proposal involve alteration of existing building? 擬議發展計劃是否包括現有建築物的改動？	Yes 是	<input type="checkbox"/> Please provide details 請提供詳情 	
	No 否	<input checked="" type="checkbox"/>	
(ii) Does the development proposal involve the operation on the right? 擬議發展是否涉及右列的工程？	Yes 是	<input checked="" type="checkbox"/> (Please indicate on site plan the boundary of concerned land/pond(s), and particulars of stream diversion, the extent of filling of land/pond(s) and/or excavation of land) (請用地盤平面圖顯示有關土地／池塘界線，以及河道改道、填塘、填土及／或挖土的細節及／或範圍) <input type="checkbox"/> Diversion of stream 河道改道 <input type="checkbox"/> Filling of pond 填塘 Area of filling 填塘面積 sq.m 平方米 <input type="checkbox"/> About 約 Depth of filling 填塘深度 m 米 <input type="checkbox"/> About 約 <input checked="" type="checkbox"/> Filling of land 填土 Area of filling 填土面積 33 sq.m 平方米 <input checked="" type="checkbox"/> About 約 Depth of filling 填土厚度 0.2 m 米 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Excavation of land 挖土 Area of excavation 挖土面積 sq.m 平方米 <input type="checkbox"/> About 約 Depth of excavation 挖土深度 m 米 <input type="checkbox"/> About 約	
	No 否	<input type="checkbox"/>	
(iii) Would the development proposal cause any adverse impacts? 擬議發展計劃會否造成不良影響？	On environment 對環境	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	On traffic 對交通	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	On water supply 對供水	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	On drainage 對排水	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	On slopes 對斜坡	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	Affected by slopes 受斜坡影響	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	Landscape Impact 構成景觀影響	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	Tree Felling 砍伐樹木	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	Visual Impact 構成視覺影響	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>
	Others (Please Specify) 其他 (請列明)	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>

Gist of Application 申請摘要 (Please provide details in both English and Chinese <u>as far as possible</u> . This part will be circulated to relevant consultees, uploaded to the Town Planning Board's Website for browsing and free downloading by the public and available at the Planning Enquiry Counters of the Planning Department for general information.) (請盡量以英文及中文填寫。此部分將會發送予相關諮詢人士、上載至城市規劃委員會網頁供公眾免費瀏覽及下載及於規劃署規劃資料查詢處供一般參閱。)	
Application No. 申請編號	(For Official Use Only) (請勿填寫此欄)
Location/address 位置／地址	Demarcation District No. 80 Lot Nos. 20RP (Part), 21 (Part), 22 (Part), 23 (Part) and 25 (Part) 丈量約份第80約地段第20號餘段(部分), 21號(部分), 22號(部分), 23號(部分) 及25號(部分)
Site area 地盤面積	<div style="display: flex; justify-content: space-between;"> 1,920 sq. m 平方米 <input checked="" type="checkbox"/> About 約 </div> <div style="display: flex; justify-content: space-between;"> (includes Government land of 包括政府土地 sq. m 平方米 <input type="checkbox"/> About 約) </div>
Plan 圖則	Approved Ta Kwu Ling North Outline Zoning Plan No. S/NE-TKLN/2 打鼓嶺北分區計劃大綱圖編號S/NE-TKLN/2
Zoning 地帶	Green Belt 綠化
Type of Application 申請類別	<input checked="" type="checkbox"/> Temporary Use/Development in Rural Areas or Regulated Areas for a Period of 位於鄉郊地區或受規管地區的臨時用途/發展為期 <div style="display: flex; justify-content: space-around;"> <input checked="" type="checkbox"/> Year(s) 年 <u>3</u> <input type="checkbox"/> Month(s) 月 _____ </div> <input type="checkbox"/> Renewal of Planning Approval for Temporary Use/Development in Rural Areas or Regulated Areas for a Period of 位於鄉郊地區或受規管地區臨時用途/發展的規劃許可續期為期 <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Year(s) 年 _____ <input type="checkbox"/> Month(s) 月 _____ </div>
Applied use/ development 申請用途/發展	Temporary Holiday Camp for a Period of 3 Years and Associated Filling of Land 臨時露營車度假營，為期3年及填土





LCH Planning and Development
Consultants Limited

Our Ref.: PD2402001/04
Your Ref.: TPB/A/NE-TKLN/91

29 November 2024

By Email

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

Dear Sir/Madam,

APPLICATION NO. A/NE-TKLN/91 FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

We refer to departmental comments received regarding the captioned application.

Attached our responses to departmental and public comments and revised layout plan for consideration of the Town Planning Board (**Annex 1**). Please find our clarification on the operation mode of the captioned application below.

- 1) As the proposed development is intended to serve as the extension of an existing holiday camp (STW No. 1638), the existing ingress/egress in the southern part of Lots 28 and 31 will continue to serve the users of the proposed development.

Since this Further Information only involve responses to comments without changing the scheme, according to TPB PG-No. 32B this Further Information should be exempted from publication and recounting requirements. Should you require further information or have any query, please feel free to contact the undersigned or Larissa Wong at [REDACTED].

Yours faithfully,
For and on behalf of
LCH Planning & Development Consultants Limited

Junior Ho *R.P.S R.P.P.*
Director

Encl.
Annex 1 – Response to Comments table and Revised layout plan
c.c. the Applicant

[REDACTED]



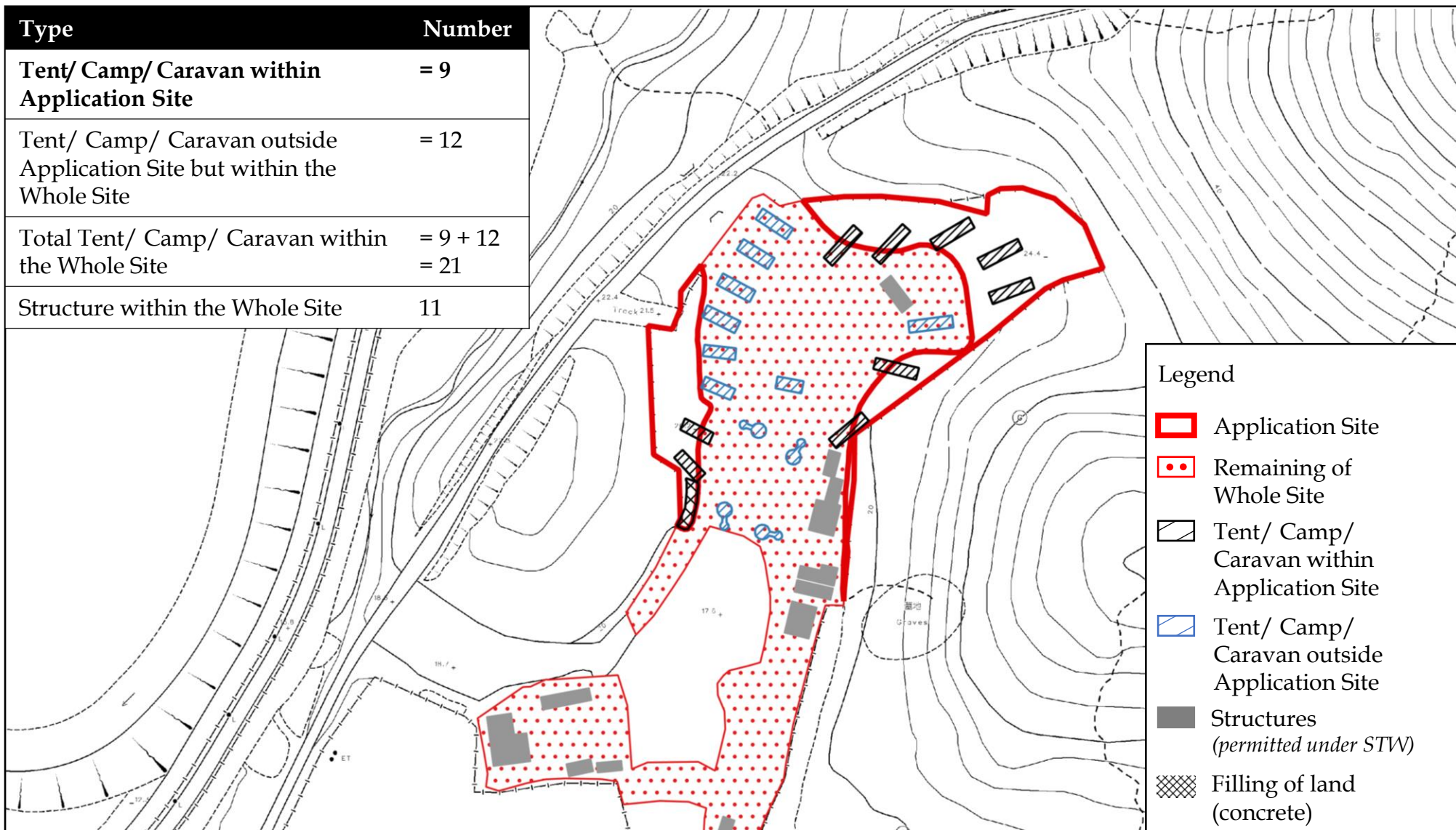
Section 16 Planning Application No. A/NE-TKLN/91

Annex 1 - Response to Departmental Comments Table

No.	Comments Received	Our Responses
<i>A. Comments from Office of the Licensing Authority</i>		
1.	According to the Hotel and Guesthouse Accommodation Ordinance (Cap.349) (“HAGAO”), “hotel” and “guesthouse” means any premises whose occupier, proprietor or tenant holds out that, to the extent of his available accommodation, he will provide sleeping accommodation at a fee for any person presenting himself at the premises, unless all accommodation in the premises is provided for a period of 28 consecutive days or more for each letting which is exempted under the Hotel and Guesthouse Accommodation (Exclusion) Order (Cap. 349C);	Well noted with thanks.
2.	If the mode of operation falls within the definition of “hotel” or “guesthouse” under the HAGAO, a licence under HAGAO must be obtained before operation;	Well noted with thanks.
3.	For any structure which constitutes as “building works” or “building” under the Buildings Ordinance to be included into the licence, the applicant should submit a copy of either an occupation permit issued by the Building Authority or a Certificate of Compliance issued by the Lands Department when making an application under the HAGAO; and	Well noted with thanks.
4.	According to the records of Office of the Licensing Authority (OLA), this office received an application for holiday camp licence – Caravan Camp site under HAGAO at Lot 20RP, 23, 24, 25 28 in DD. 80, Ta Kwu Ling, New Territories. The application only includes 4 nos. of caravans as indicated at the proposed plan. The application is still in progress and not yet satisfied by the Licensing Authority. Should the applicant intends to operate more tents/camps/caravans under HAGAO, revised proposal/new application should be submitted to OLA for approval.	Well noted with thanks. revised proposal/new application should be submitted to OLA for tents/camps/caravans under Hotel and Guesthouse Accommodation Ordinance.
<i>B. Comments Received during the 3-week Public Consultation Period</i>		
1.	Concern on tree felling at the Application Site.	Please kindly note that no tree felling is proposed in the Application Site.



No.	Comments Received	Our Responses
2.	Concern on adverse sewage impact.	The applicant will follow the Professional Persons Environmental Consultative Committee Practice Notes (ProPECCPNs), i.e. the use of septic tank for sewage treatment in the campsite and any other relevant measures. Licensed collectors will be employed by the Applicant to collect and dispose of sewage regularly to ensure no overflowing of sewage at the Application Site.



**LCH Planning and Development
Consultants Limited**

Figure 5 : Indicative Tent/ Camp/ Caravan Layout Plan

(For reference only. Not to scale.)

Section 16 Application for Proposed Temporary Holiday Camp for a Period of 3 Years and Associated Filling of Land at Demarcation District No. 80 Lot Nos. 20 RP (Part), 21 (Part), 22 (Part), 23 (Part), and 25 (Part)

(Source: HK GEODATA STORE & Town Planning Board, HKSAR Government)

**Relevant Extracts of Town Planning Board Guidelines on
Application for Development within Green Belt Zone
(TPB PG-No. 10)**

1. In assessing applications for development within “Green Belt” (“GB”) zone, the relevant planning criteria are summarised as follows:
 - (a) there is a general presumption against development (other than redevelopment) in a “GB” zone;
 - (b) an application for new development in a “GB” zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The scale and intensity of the proposed development including the plot ratio, site coverage and building height should be compatible with the character of surrounding areas;
 - (c) passive recreational uses which are compatible with the character of surrounding areas may be given sympathetic consideration;
 - (d) the design and layout of any proposed development should be compatible with the surrounding area. The development should not involve extensive clearance of existing natural vegetation, affect the existing natural landscape, or cause any adverse visual impact on the surrounding environment;
 - (e) the vehicular access road and parking provision proposed should be appropriate to the scale of the development and comply with relevant standards. Access and parking should not adversely affect existing trees or other natural landscape features. Tree preservation and landscaping proposals should be provided;
 - (f) the proposed development should not overstrain the capacity of existing and planned infrastructure such as sewerage, roads and water supply. It should not adversely affect drainage or aggravate flooding in the area;
 - (g) the proposed development must comply with the development controls and restrictions of areas designated as water gathering grounds;
 - (h) the proposed development should not overstrain the overall provision of government/institution/community facilities in the general area; and
 - (i) the proposed development should not be susceptible to adverse environmental effects from pollution sources nearby such as traffic noise, unless adequate mitigating measures are provided, and it should not itself be the source of pollution.

Government Departments' General Comments

1. Land Administration

Comments of the District Lands Officer/North, Lands Department (DLO/N, LandsD):

- no objection to the application;
- the application site (the Site) comprises Old Schedule Agricultural Lot held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government;
- the application lots together with Lot Nos. 24, 28, 31, 33 and 37 all in D.D. 80 are covered by the Short Term Waiver (STW) No. 1638 for the purpose of holiday camp with associated facilities. The Site falls within the area where no building/structure is allowed under the STW. Besides, a non-exclusive right-of-way is granted under the STW;
- as it is understood that the holiday camping venue under this planning application is visited by the community (including families, students, elderly etc.), the applicant may have to address the structural safety aspect of the structures erected; and
- if the planning application is approved, the lot owner(s) shall apply to her office for modification of the STW conditions where appropriate having regard to the nature of the concerned tent/camp/caravan. The application for modification if required will be considered by LandsD in its capacity as a landlord and there is no guarantee that it will be approved. The modification, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of back-dated waiver fee from the first date of when the unauthorised structures were erected as well as administrative fee as considered appropriate by LandsD. Besides, given the applied use is temporary in nature, only erection of temporary structure(s) will be considered.

2. Traffic

Comments of the Chief Highway Engineer/New Territories East, Highways Department (CHE/NTE, HyD):

- no comment on the application from the highways maintenance point of view.

3. Drainage

Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD):

- no objection to the application from the public drainage viewpoint;
- as drainage facilities for the Site has been constructed in accordance with a previously accepted drainage proposal, which was submitted under a STW on Lot nos. 20 RP, 21, 22, 23, 24, 25, 28, 31, 33 and 37 in D.D. 80, submission of a drainage proposal is not required for this application;
- should the application be approved, a condition should be included to request the applicant to submit condition records of the implemented drainage facilities to ensure that there will be no adverse drainage impact on the adjacent area;

- the applicant should properly maintain the implemented drainage works whether within or outside the Site at his own expense at all times during the planning approval period and rectified if they are found inadequate/ineffective during operation;
- the Site is in an area where public sewerage connection is not available.

4. Fire Safety

Comments of the Director of Fire Services (D of FS):

- no objection in principle to the proposal subject to fire service installations and water supplies for firefighting being provided to his satisfaction.

5. Nature Conservation

Comments of the Director of Agriculture, Fisheries and Conservation (DAFC):

- the Site is vacant and he has no strong view on the application from the nature conservation perspective.

6. Building Matters

Comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD):

- based on the information provided, there are nine existing caravans and no proposed building structure on the Site. He has no comment under the Buildings Ordinance on the application.

7. Environment

Comments of the Director of Environmental Protection (DEP):

- no adverse comment on the application from the environmental planning perspective; and
- no environmental complaint against the Site has been received over the past three years.

8. Licensing

Comments of the Chief Officer (Licensing Authority), Office of the Licensing Authority, Home Affairs Department (CO (OLA), HAD):

- according to the Hotel and Guesthouse Accommodation Ordinance (Cap. 349) (“HAGAO”), “hotel” and “guesthouse” means any premises whose occupiers, proprietor or tenant holds out that, to the extent of his available accommodation, he will provide sleeping accommodation at a fee for any person presenting himself at the premises, unless all accommodation in the premises is provided for a period of 28 consecutive days or more for each letting which is exempted under the Hotel and Guesthouse Accommodation (Exclusion) Order (Cap. 349C);

- if the mode of operation falls within the definition of “hotel” or “guesthouse” under the HAGAO, a licence under HAGAO must be obtained before operation;
- for any structure which constitutes as “building works” or “building” under the Buildings Ordinance to be included into the licence, the applicant should submit a copy of either an occupation permit issued by the Building Authority or a Certificate of Compliance issued by the Lands Department when making an application under the HAGAO; and
- according to the records of OLA, his office received an application for holiday camp licence – Caravan Camp site under HAGAO at Lots 20RP, 23, 24, 25 and 28 in D.D. 80, Ta Kwu Ling, New Territories. The proposed licencing area of the application only covers part of the Site. The application is still in progress and not yet satisfied by the Licensing Authority. Should the applicant intends to operate more tents/camps/caravans under HAGAO, revised proposal/new application should be submitted to OLA for approval.

9. Other Departments

The following government departments have no objection to/no comments on the application:

- (a) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD);
- (b) Head of the Geotechnical Engineering Office, Civil Engineering and Development Department (H(GEO), CEDD);
- (c) Project Manager (North), CEDD (PM(N), CEDD);
- (d) District Officer (North), Home Affairs Department (DO(N), HAD);
- (e) Commissioner for Transport (C for T); and
- (f) Commissioner of Police (C of P).

Recommended Advisory Clauses

- (a) to note the comments of the District Lands Officer/North, Lands Department (DLO/N, LandsD) that:
 - (i) the application site (the Site) comprises Old Schedule Agricultural Lots held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government; and
 - (ii) the application lots together with Lot Nos. 24, 28, 31, 33 and 37 all in D.D. 80 are covered by the Short Term Waiver (STW) No. 1638 for the purpose of holiday camp with associated facilities. The Site falls within the area where no building/structure is allowed under the STW. Besides, a non-exclusive right-of-way is granted under the STW;
 - (iii) the holiday camping venue under this planning application is visited by the community (including families, students, elderly etc.), the applicant may have to address the structural safety aspect of the structures erected; and
 - (iv) the lot owner(s) shall apply to her office for modification of the STW conditions where appropriate having regard to the nature of the concerned tent/camp/caravan. The application for modification if required will be considered by LandsD in its capacity as a landlord and there is no guarantee that it will be approved. The modification, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of back-dated waiver fee from the first date of when the unauthorised structures were erected as well as administrative fee as considered appropriate by LandsD. Besides, given the applied use is temporary in nature, only erection of temporary structure(s) will be considered;
- (b) to note the comments of the Chief Highway Engineer/New Territories East, Highways Department (CHE/NTE, HyD) that:
 - (i) the proposed access arrangement of the Site should be commented and approved by the Transport Department;
 - (ii) adequate drainage measures shall be provided to prevent surface water running from the Site to the nearby public road and drains; and
 - (iii) the access road connecting to the Site with the nearby public road is not and will not be maintained by his office. His office should not be responsible for maintaining any access connecting to the Site;
- (c) to note the comments of the Chief Town Planner/Urban Design & Landscape, Planning Department (CTP/UD&L, PlanD) that approval of the application does not imply approval of tree works, such as pruning, transplanting and felling. The applicant is reminded to seek approval for any proposed tree works from relevant authority prior to commencement of the works;
- (d) to note the comments of Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD) that:
 - (i) the applicant should properly maintain the implemented drainage works whether within or outside the Site at his own expense at all times during the planning approval period and rectified if they are found inadequate/ineffective during operation; and

- (ii) the Site is in an area where public sewerage connection is not available. The Environmental Protection Department should be consulted regarding the sewage impact assessment and sewage treatment/disposal facilities for the applied use;
- (e) to note the comments of the Director of Fire Services (D of FS) that:
 - (i) in consideration of the design/nature of the proposal, fire service installations (FSIs) are anticipated to be required. The applicant is advised to submit relevant layout plans incorporated with the proposed FSIs to his department for approval. In addition, the applicant should also be advised on the following point:
 - the layout plans should be drawn to scale and depicted with dimensions and nature of occupancy;
 - the location of where the proposed FSI to be installed should be clearly marked on the layout plans; and
 - (ii) if any proposed structures are required to comply with the Buildings Ordinance (BO) (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans or referral from the relevant licensing authority;
- (f) to note the comments of the Director of Agriculture, Fisheries and Conservation (DAFC) that the applicant is reminded to adopt good site practice in order to avoid adverse impact on the natural environment nearby;
- (g) to note the comments of the Chief Officer (Licensing Authority), Office of the Licensing Authority, Home Affairs Department (CO (OLA), HAD) that according to the records of the OLA, his office received an application for holiday camp licence – Caravan Camp site under HAGAO at Lots 20RP, 23, 24, 25 and 28 in D.D. 80, Ta Kwu Ling, New Territories. The proposed licencing area of the application only covers part of the Site. The application is still in progress and not yet satisfied by the Licensing Authority. Should the applicant intends to operate more caravans/tents/camps under the Hotel and Guesthouse Accommodation Ordinance, revised proposal/new application should be submitted to OLA for approval;
- (h) to note the comments of the Director of Environmental Protection (DEP) that the applicant is reminded to follow the requirements of EPD's Practice Note for Professional Person (ProPECC) PN 1/23 "Drainage Plans subject to Comment by the Environmental Protection Department" to properly handle the sewage produced from the holiday camp and to implement the noise mitigation measures as proposed by the applicant to avoid causing nuisance to nearby surroundings;
- (i) to note the comments of Project Manager (North), Civil Engineering and Development Department (PM(N), CEDD) that the applied use is located within the proposed New Territories North (NTN) New Town under the Planning and Engineering (P&E) Study for NTN New Town and Man Kam To. The P&E Study already commenced on 29.10.2021. While the implementation programme of NTN New Town is being formulated under the P&E Study, the site formation works will likely commence soon after the completion of detailed design in next stage. Subject to the land use planning in the P&E Study, the applied use, if approved, may need to be vacated for the site formation works; and
- (j) to note the comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD) that:
 - (i) the Site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulations (B(P)R) respectively;

- (ii) the Site does not abut on a specified street of not less than 4.5 m wide and its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at building plan submission stage;
- (iii) if existing structures (not being a New Territories Exempted House) are erected on leased land without the approval of the Building Authority (BA), they are unauthorised building works (UBW) under the BO and should not be designated for any applied use under this application;
- (iv) before any new building works (including containers/open sheds as temporary buildings, demolition and land filling, etc.) are to be carried out on the Site, prior approval and consent of the BA should be obtained, otherwise they are UBW under the BO. An authorised Person should be appointed as the co-ordinator for the proposed building works in accordance with the BO;
- (v) for UBW erected on leased land, enforcement action may be taken by the BD to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the Site under the BO;
- (vi) if the applied use under application is subject to issue of a license, the applicant should be reminded that any existing structures on the Site intended to be used for such purposes are required to comply with the building safety and other relevant requirements as may be imposed by the licensing authority;
- (vii) any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings are subject to the control of Part VII of the B(P)R;
- (viii) in general, there is no requirement under the BO in respect of provision of car parking spaces for a proposed development. However, the applicant's attention is drawn to the provision of accessible car parking spaces designated for the use of persons with a disability as per the requirements under regulation 72 of the B(P)R and Division 3 of Design Manual: Barrier Free Access 2008;
- (ix) the applicant's attention is drawn to the provision under Regulations 40 and 41 of the Building (Standards of Sanitary Fitments, Plumbing, Drainage Works and Latrines) Regulation in respect of disposal of foul water and surface water respectively; and
- (x) detailed checking under the BO will be carried out at building plan submission stage.

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

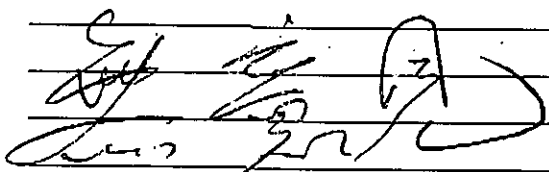
By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/NE-TKLN/91

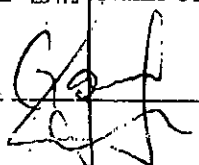
意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)



「提意見人」姓名/名稱 Name of person/company making this comment 侯志強

簽署 Signature



日期 Date

2024.10.28

From:
Sent: 2024-11-14 星期四 03:39:00
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: A/NE-TKLN/91 DD 80 Lin Ma Hang Road Nature Park Hillside
Tent City

A/NE-TKLN/91 Nature Park Hillside

Lots 20 RP (Part), 21 (Part), 22 (Part), 23 (Part) and 25 (Part) in D.D. 80, Lin Ma Hang Road, Ta Kwu Ling North

Site area: About 1,920sq.m

Zoning: "Green Belt"

Applied use: 9 Tent/Caravan site Holiday Camp / ?? Vehicle Parking

Dear TPB Members,

Strong Objections. Holiday Camp? This is a brownfield site, all vegetation has been stripped. 'Nature Park' name is a bad joke.

The Whole Site covers an area of about 7,956 square metres ("sq. m."). 6,036sq. m. falls within the "REC" zone while about 1,920 sq. m. falls within the 'Green Belt'.

No mention of how many trees have been felled on the entire site.

The ultimate aim is clearly to extend the brownfield operations on the other side of Lin Ma Hang Road once yet another fake Holiday Camp is approved. This is underlined by the recent statement of a holiday camp operator seeking a change in use

https://www.tpb.gov.hk/en/plan_application/A_YL-KTN_1055/Planning_Statement_1.pdf

1.3 Furthermore, the Site formerly served as an ancillary eating place for an existing holiday camping site, offering catering services to visitors. However, **the camping site had to cease operations as the operator deemed it financially infeasible to sustain due to the decline in local camping industry.**

The transformation of Lin Ma Hang Road into a vast brownfield despite the OZP restrictions is deplorable.

The application should be rejected and the operator ordered to reinstate the site to 'GB'.

Mary Mulvihill

From:
Sent: 2024-11-15 星期五 08:00:00
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: Comments on the Section 16 Application No. A/NE-TKLN/91
Attachment: TPB20241115(TKLN91).pdf

Dear Sir/Madam,

Please refer to the attachment for the captioned.

Yours faithfully,
Ng Hei Man (Mr.)
Campaign Manager
The Conservancy Association

T:

D:

F:

Registered Name 註冊名稱 : The Conservancy Association 長春社
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

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The Conservancy Association

15th November 2024

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

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Comments on the Section 16 Application No. A/NE-TKLN/91

The Conservancy Association (CA) OBJECTS to the captioned application.

1. Adverse environmental impacts

We worry that there would be several potential adverse environmental impacts caused by the application:

- No plans on land recovery: Various structures/uses, such as caravan would be temporarily proposed in the application site. However, no details are available to illustrate how the land would be recovered after the proposed temporary use.
- Sewage impacts: According to the application, we cannot see any details sewerage management, such as design; collection, treatment and disposal of sewage, and so on. We worry that if the above issues cannot be properly addressed, it may lead to serious environmental and hygiene problems within the application site and its surrounding area.
- Tree felling: Even though the application claims that no tree felling is anticipated, the aerial photo in OZP portal reveals that few trees can be spotted within the application site (Figure 1). Clarification is needed to evaluate whether any tree would be felled.



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- Other sources of environmental impacts not clearly addressed: There are no site management and operational plans to describe issues such as number of expected visitors/users, crowd control, waste management, and so on. All these would help identify source of environmental impacts and then suggest measures to minimize or mitigate potential environmental disturbance, but we cannot see the project proponent has attempted to address this.

2. Undesirable precedent of “destroy first, build later”

The application site has been subject to land formation and vegetation clearance since December 2019. Some caravans are placing at this site in 2024 (Figure 2-5). It is suspected that this is a case of “destroy first, build later”.

Planning Department and members of Town Planning Board (TPB) should alert that TPB has announced approaches to deter “destroy first, build later” activities in 2011. It stated that *“the Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned”*¹. Therefore, this application should not be given any sympathetic consideration, or it will set an undesirable precedent for similar cases in future.

Yours faithfully,

The Conservancy Association

¹ TPB Press Release. Available at:
<http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>

Figure 1 The aerial photo in OZP portal reveals that few trees (circled in blue) can be spotted the application site (marked in red)



Figure 2-5 The application site (marked in red) has been subject to land formation and vegetation clearance since December 2019. Some caravans are placing at this application site in 2024.

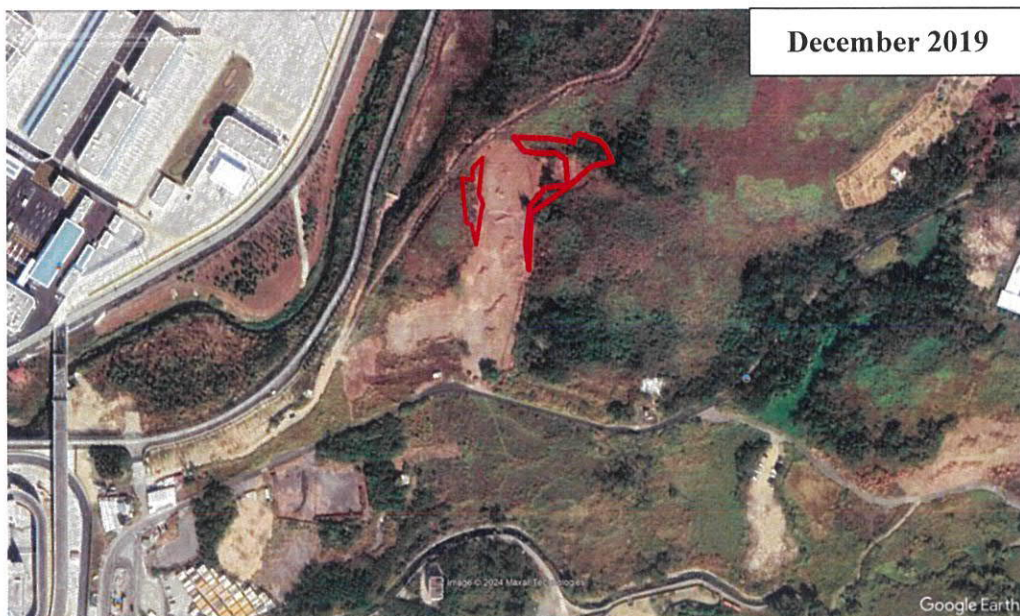




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From:
Sent: 2024-11-15 星期五 23:40:13
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: KFBG's comments on three planning applications
Attachment: 241115 s16 KTN 1060.pdf; 241115 s16 SK 395.pdf; 241115 s16 TKLN 91.pdf

Dear Sir/ Madam,

Attached please see our comments regarding three applications. There are three pdf files attached to this email. If you cannot see/ download/ open these files, please notify us through email.

Please do not disclose our email address.

Thank You and Best Regards,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

Email Disclaimer:

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The Secretary,
Town Planning Board,
15/F, North Point Government Offices,
333, Java Road, North Point,
Hong Kong.
(Email: tpbpd@pland.gov.hk)

15th November, 2024.

By email only

Dear Sir/ Madam,

Temporary Holiday Camp for a Period of 3 Years
(A/NE-TKLN/91)

1. We refer to the captioned.
2. We urge the Board to look at a photo below extracted from the Town Planning Board Statutory Planning Portal 3 which shows the site (bounded by the red line).



3. We urge the Board to investigate with relevant authorities as to what is going on within the site now and whether there are any ongoing enforcement case/ unauthorised uses/ activities appearing at the site; if yes, to consider whether it is appropriate to approve this application.
4. We would like the Town Planning Board to seriously consider whether the planning application regime should be an 'apply first, develop later (after planning permission granted)' mechanism.
5. We would also like to remind the current Town Planning Board that a spokesman for the Board has said, *'The Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned.'* This is documented in a government press release entitled *'Town Planning Board adopts approaches to deter "destroy first, build later" activities'*¹.
6. We urge the current Board to understand (and can also appropriately implement) the stance as claimed by the aforementioned spokesman.
7. Overall, we urge the Board to reject this application as the proposed use is not in line with the planning intention of the GB zone.
8. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

¹ <https://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>