



**LCH Planning and Development
Consultants Limited**

**Section 16 Application for Temporary Holiday Camp 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
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Consultants Limited

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Report : Version 1.5



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 (“**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**” or “**the 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 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 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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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 (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**" or "**the 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 which requires planning permission from the Board.



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 is under licence No. 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 1,913 square metres ("sq. m."). The Whole Site covers an area of about 7,949 square metres ("sq. m."). 6,036 sq. m. falls within the "REC" zone with structure, while about 1,913 sq. m.



falls within the “GB” zone is the subject site of this application.

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 Part of the Application Site was previously paved with concrete, and now is reinstated and the operation of the caravan holiday camp that falls entirely in the “GB” zone has been ceased (**Diagram 1**).



Diagram 1 Existing Condition

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

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 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 Taken into account of the Guide to Licence Applications for Guesthouse (Holiday Camp) - Caravan Camp Site under Cap. 349 the Hotel and Guesthouse Accommodation Ordinance, a minimum of 5m wide of unobstructed space shall be provided to any sides of a caravan and its annex. The Applicant also intended to provide a good accommodation design with spacious space between the proposed caravans and the tent/camps/caravans approved under STW No. 1638. As such, 9 caravans (accommodate a maximum of about 27 campers) within the "GB" zone is proposed to ensure compliance of the license requirement of caravan camp site and adoption of good accommodation design to provide spacious atmosphere for the campsite users¹ (**Diagram 2**).

¹ [https://www.hadla.gov.hk/filemanager/en/docs/Guide for Caravan Camp Site Eng.pdf](https://www.hadla.gov.hk/filemanager/en/docs/Guide%20for%20Caravan%20Camp%20Site%20Eng.pdf)



**Illustrative Diagram for the Separation Space
between Caravans and Other Structures/Buildings on a Caravan Camp S**

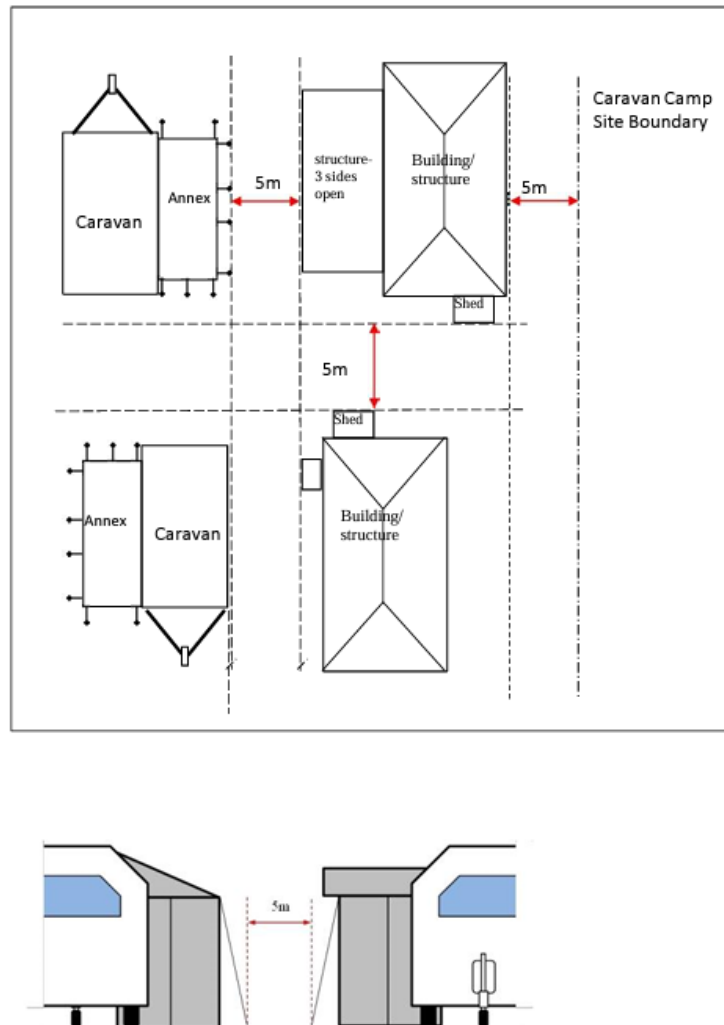


Diagram 2 Extract of the Guide to Licence Applications for Guesthouse (Holiday Camp) – Caravan Camp Site

- 2.5.3 Neither construction of structures nor further land filling and excavation are anticipated. Refers to **Figure 5** for the indicative tent/ camp/ caravan layout plan.
- 2.5.4 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.
- 2.5.5 **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.**
- 2.5.6 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.

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

2.5.8 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 7,949 sq.m.	About 1,913 sq.m. (Form part of the Whole Site area of 7,949 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 of Campers	80 ^	About 27 (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

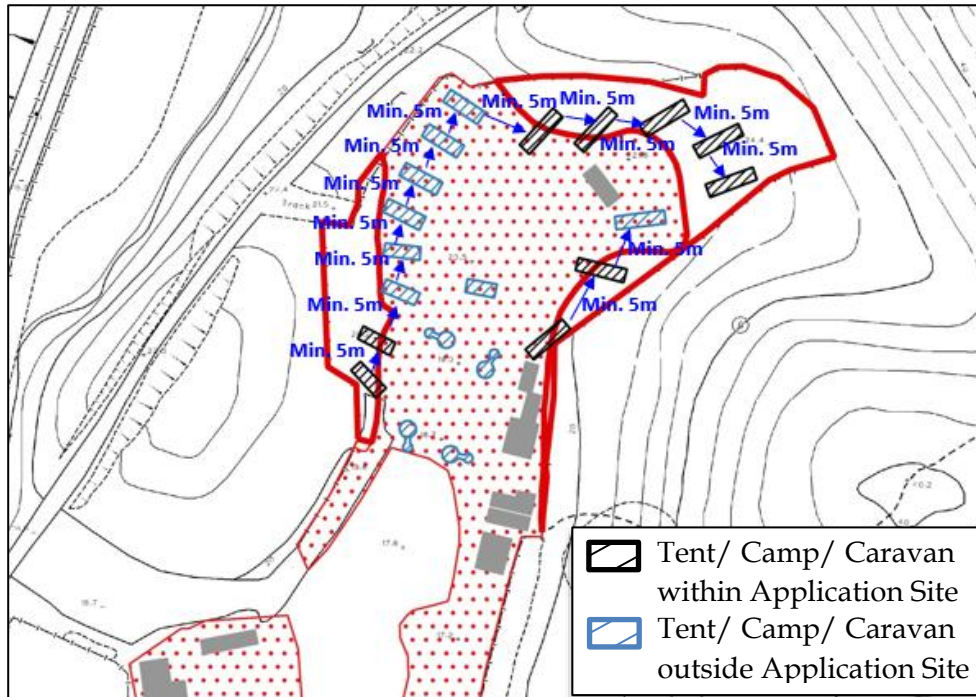


Diagram 3 Location of Tent/ Camp/ Caravan (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

2.6 Existing Transport Services

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

<u>Mode</u>	<u>Route No.</u>	<u>Origin - Destination</u>	<u>Frequency</u>
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 (HYW BCP)	25 - 35 minutes
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 HYW BCP, by going through the subway from the bus stop along Lin Ma Hang



Road.

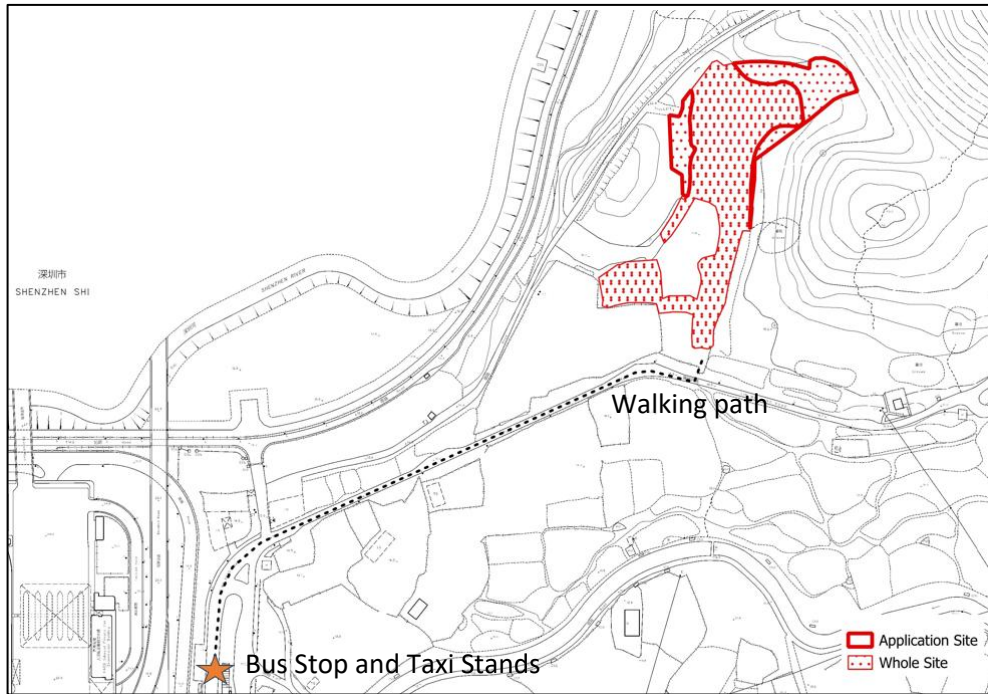


Diagram 4 Walking Path to Public Transport (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)



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 the Notes 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 which may be permitted with or without condition on application to the Town Planning Board.

3.1.5 In view of the Proposed Development, locates immediately adjacent to the existing camping site, is intended for holiday camp use, approval of this application on a temporary basis for a period of 3 years would comply with the planning intention of the “GB” zone for provision of passive recreational outlets.



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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, Planning Application No. 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

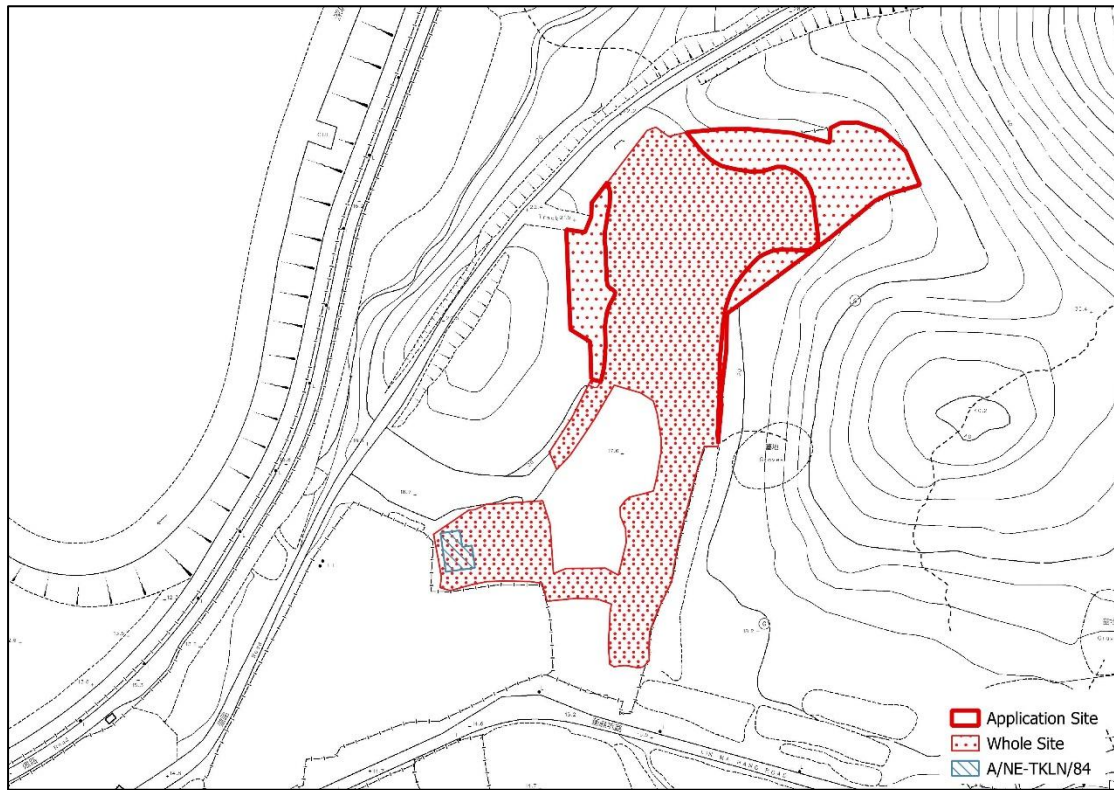


Diagram 5 Approved Application falling within the Whole Site (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

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 HYW BCP, serving mainly the staff and workers of HYW BCP. 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

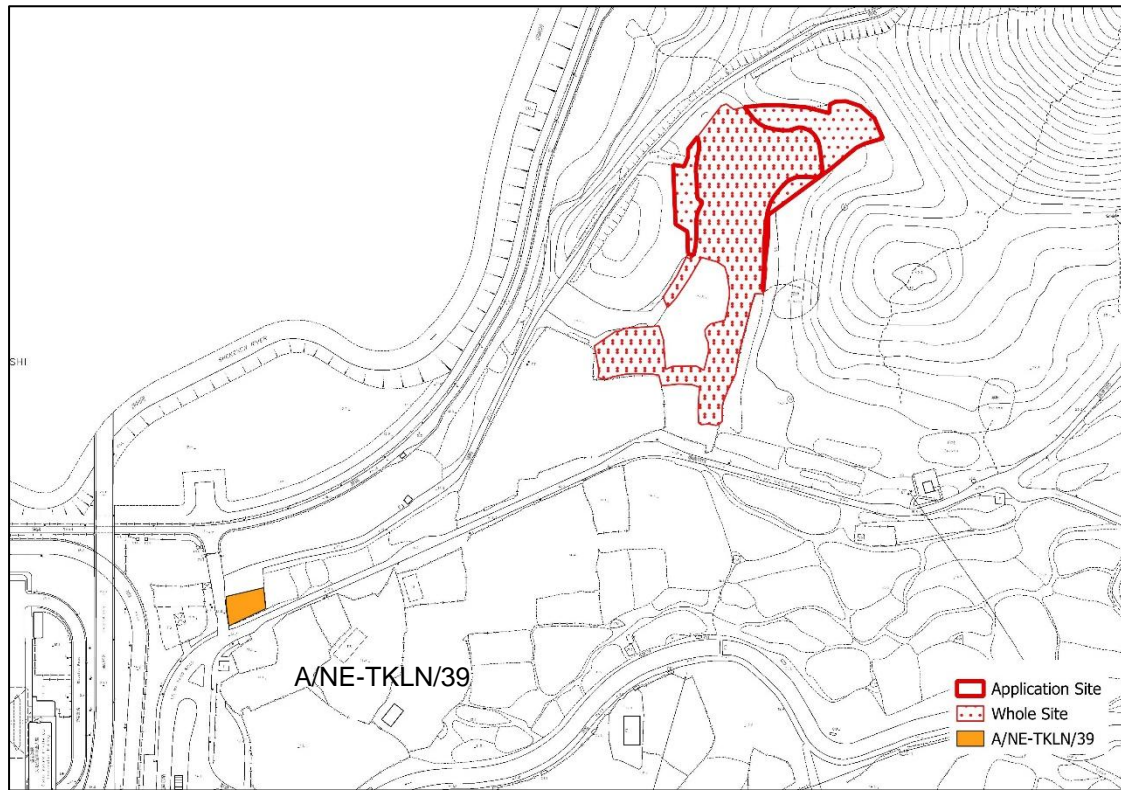


Diagram 6 Approved Applications falling within “REC” and “GB” Zones in the Vicinity (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)

3.3.3 There are also two planning applications for recreational or leisure uses riding on the increased accessibility brought 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

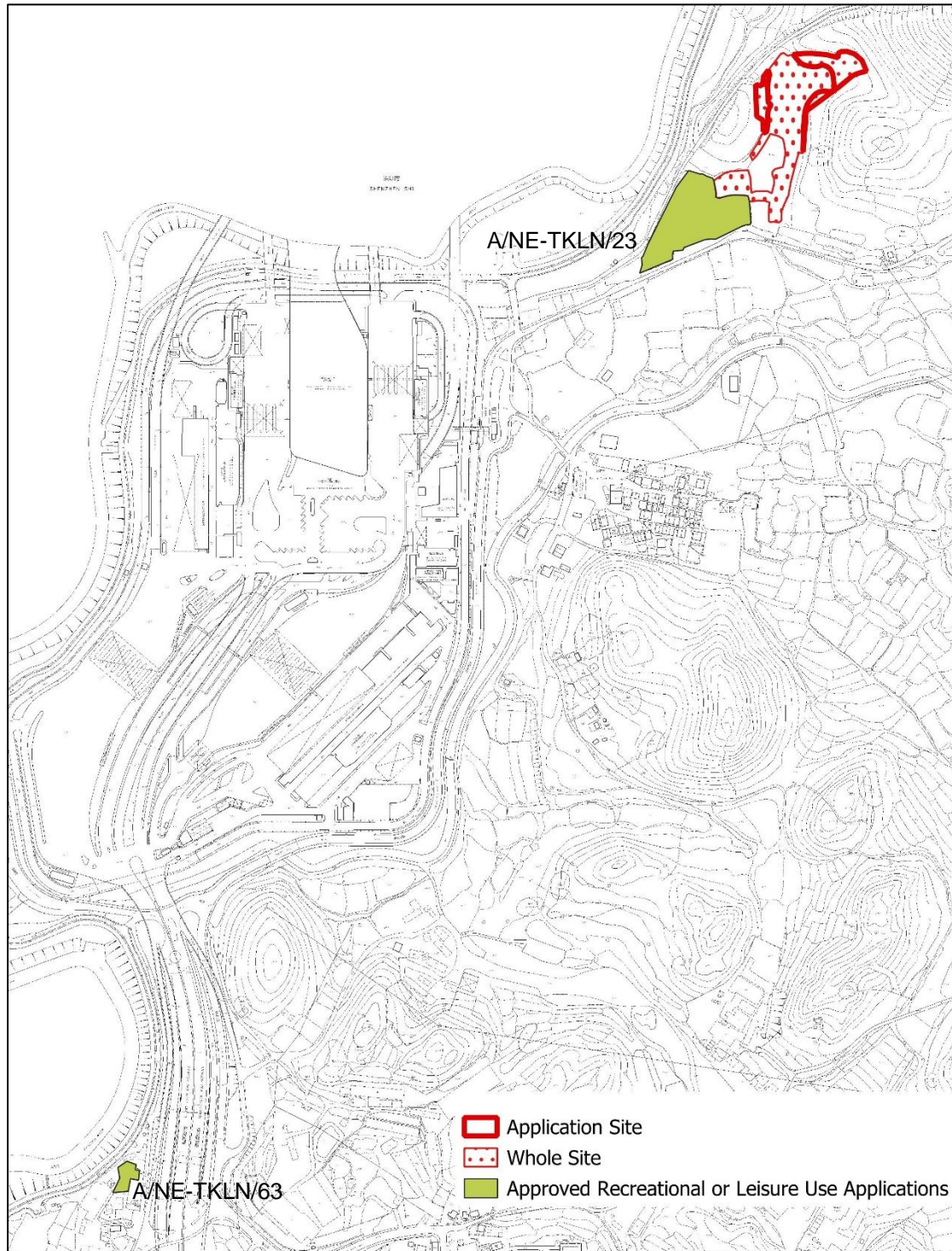


Diagram 7 Approved Recreational or Leisure Use Applications in the vicinity
(Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)



3.3.4 There are other precedent approved planning applications falling within “GB” zone for temporary holiday camp in the vicinity, including Planning Applications No. 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 Planning Applications No. 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 is intended to avoid the use of audio amplification system at the Application Site. 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 HYW BCP, it is expected that the campers would access the Application Site on foot from the HYW BCP, which is readily accessible by public transport. Public transport routes to and from HYW BCP 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 HYW BCP. 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.

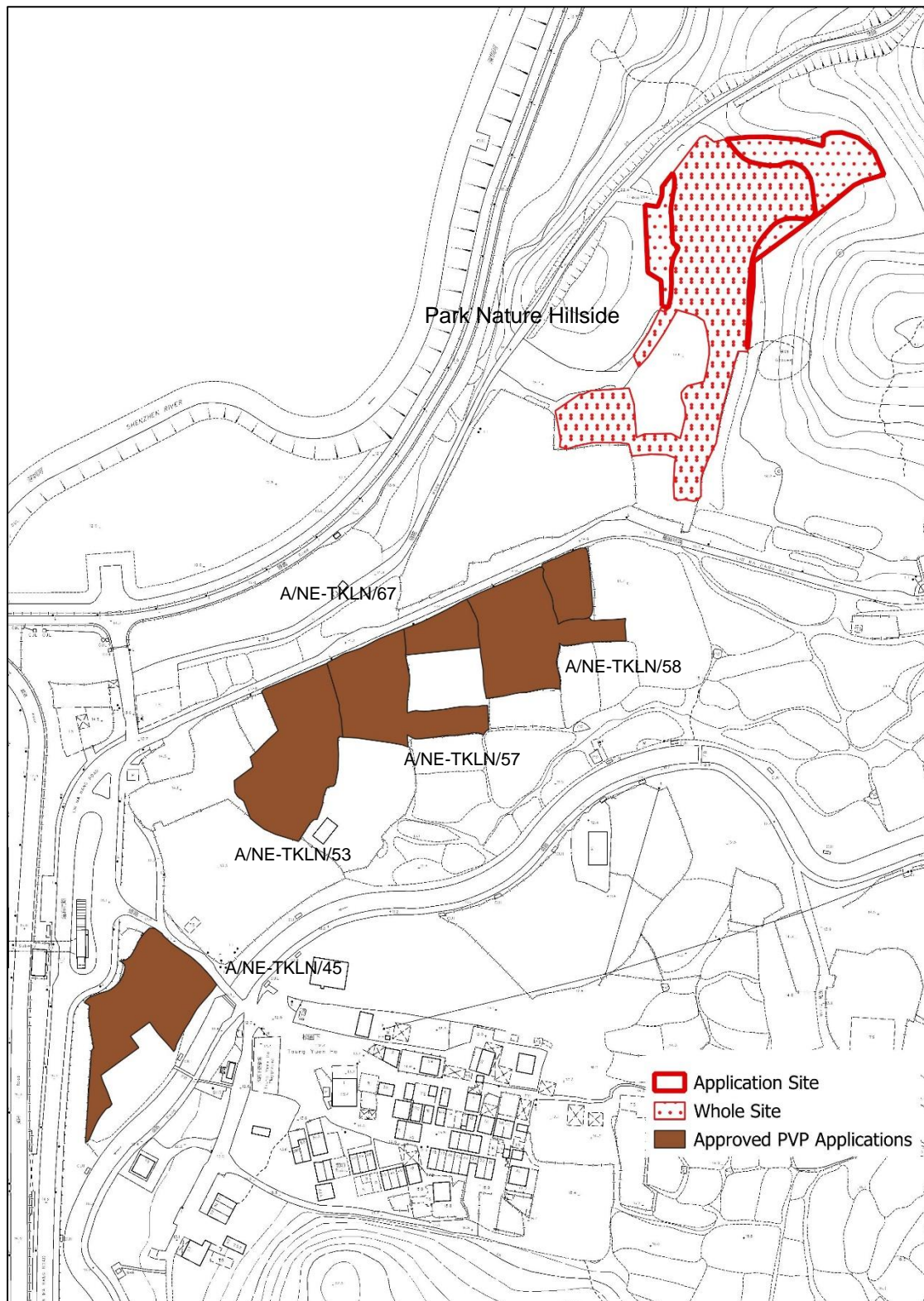


Diagram 8 Approved Public Vehicle Parks in the Vicinity (Source: Town Planning Board & HK GEODATA STORE, HKSAR Government)



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 Landscape Consideration

3.8.1 The Application Site locates adjacent to HYW BCP and Pak Fu Shan was previously a grassland covered by weeds. Since the operation of the Site in 2020, the Applicant has undertaken weed control and regular maintenance of the Site which includes removal of weeds in order to prevent hill fire (**Diagram 8** and **Diagram 9**).



Diagram 9 Site Photo taken in 2020



Diagram 10 Site Photo taken in 2024

3.8.2 Planters are proposed to be placed at the Site to improve the amenity area in the “GB” zone (**Figure 6**). Given that no filling of land and tree removal are involved at the Site and the Site will be continued to be covered by grass with regular maintenance by the Applicant, it is considered there is no loss in the landscape area but enhancement will be brought by the Proposed Development. As such, no adverse landscape impact is anticipated.



3.9 Compliance of Town Planning Board Guidelines for Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance

- 3.9.1 The Proposed Development complies 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) which stipulates the main purpose and planning criteria of “GB” zone.
- 3.9.2 The planning consideration of “GB” zone is to provide additional outlets for passive recreational uses which could be fulfilled by the use of holiday camping site. Not to mention only portion of the Application Site will be used for passive recreational use, which will continue to maintain the “GB” area to define the limits of urban and sub-urban development areas by natural features and to contain urban sprawl.
- 3.9.3 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.
- 3.9.4 No clearance of existing vegetation, tree felling and affect the existing natural landscape will be undertaken. Planters are placed at the Site to improve the amenity are, hence no adverse landscape impact is anticipated.
- 3.9.5 Neither vehicular access roads nor parking provision are involved in the “GB” zone within the Application Site, hence no existing trees or other natural landscape features will be affected by access and parking.
- 3.9.6 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.
- 3.9.7 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.
- 3.9.8 The Proposed Development is not situated on a slope or hillside and does not cause any impact on slope stability.
- 3.9.9 Given that the Proposed Development is in compliance with the TPB-PG No. 10, sympathetic consideration can be given by the Board.



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 Guidelines No. 10

4.3.1 With respect to the OZP, the Application Site is intended to provide a passive recreational outlet. 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 for passive recreational purposes while being compatible with the surrounding environment. The proposal does not involve erection of any permanent structures. Planters will be placed at the Site to improve the amenity area in “GB” zone. 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.

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 HYW BCP. 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 HYW BCP. 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 similar application for temporary recreational and leisure uses, particularly holiday camp use, approved with conditions within the Sha Tin, Tai Po and North District Planning Office boundary. The proposed temporary holiday camp is not inconsistent with the surrounding land uses and the planning assessment concluded that 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.

4.7.2 In additional, there will be landscape proposal to further enhance the landscape value of this area. Improvement in the landscape context should be



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.