

02 September 2021
Chairman and Members
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245;
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**Proposed Temporary Place of Recreation, Sports or Culture and Tent Camping Ground with Ancillary Storage for a Period of 3 Years
(Application No.A/SK-PL/2)**

Dear Chairman and Members,

Designing Hong Kong Limited **objects** the captioned for the following reasons:

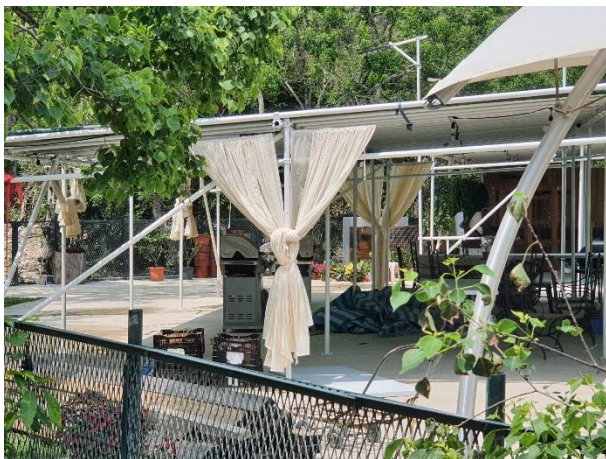
- The proposed area is zoned as "**Agriculture (AGR)**". The planning intention of this zone is primarily for retaining and safeguarding good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes.
- From the Google Earth's aerial image, artificial lawn, stage, activity tents were already set up at the proposed site back in February 2021.



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- From our site visit in April, the proposed site has already been set up as the current proposal, including hand washing basins, barbeque stoves, camp fire setups, storage facilities and tree plantation, **without any planning application and approval.**



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- It is noted that an **enforcement notice** (Case No. E/SK-PL/0007) has been issued for use of toilets, changing rooms and bathing facilities and storage use on 04 January 2021. The approval of the application will further legitimize unauthorized use of land set an undesirable precedent to regularize unlawful activities through a planning application.
- There are also lots of advertisements, photographs and videos on the internet and social media promoting the recreational development in Pak Lap. It is believed that these activities have been operating in Pak Lap for years, without any planning approval.
- The Town Planning Board made a clear statement¹ back in 2011 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 <https://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>

- In the 1244th Town Planning Board Meetings on 23 April 2021², a Board Member opined that *“the Government should step up planning enforcement and **send out a clear message to deter ‘destroy first, build later’ activities.** Allowing more intensive levels of development after extensive devastation of an area was **fundamentally wrong.**”*
- We concern the Town Planning Board may be rewarding a **“Destroy First, Development Later” practice** and **unauthorized development** here through the approval of the captioned application. The Board should reject the application to send out a clear message to stop all these illegal activities.
- Moreover, the applicant fails to provide sufficient data on waste management for the application. As a popular hiking and camping spot in Hong Kong, tons of waste and rubbish has been generated during the weekend and it is common to see the rubbish is laying on the ground as it has exceeded the capacity of the waste collection bin at the entrance of the village.
- It is believed that more waste will be generated after the approval of the application and it is doubtful whether there is enough capacity to accommodate the extra waste from the development. Currently, the workers have to carry the waste all the way uphill to the nearest Sai Kung Man Yee Road. More waste would mean more burden for the workers on their duties.
- Besides, the applicant fails to show in the sewerage impact assessment that the proposed development would not bring any adverse environmental impact to the surrounding areas. As the applicant claims *“portable toilet will be deployed as necessary for activity participants and campers.”*, there is no further explanation on how the sewage would be treated.
- It is expected there is a tank to store the sewage temporary before a sanitation company arrives with a truck to empty the tank. However, there is an operation difficulty that the large truck is unable to access the site as there is no vehicular road in Pak Lap. The applicant fails to illustrate how the sewage would be treated and removed from the site and we worry **the environment would be polluted and damaged due to improper sewerage treatment and management.**
- In the same meeting in April, the Board decided to rezone the proposed site from “Village House Development (V)” to “AGR”. The Board believes *“it was necessary to **provide a buffer to protect the stream on the FR Site as it discharged into Pak Lap Wan** which had very good water quality and the high ecological value of the surrounding Country Park.”* And therefore, approved the amendment for the rezoning.
- The existing planning application will bring active human activities near the river. We worry these such intensive human activities would bring adverse impacts to the environment and the stream. As there is insufficient evidence that the applicant can ensure the sewerage and waste can be managed properly, **we worry the approval of this application would be a threat to the environment and stream in Pak Lap.**

² https://www.info.gov.hk/tpb/en/meetings/TPB/Minutes/m1244tpb_e.pdf

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- Pak Lap is a Country Park Enclave (CPE) and is surrounded by the Sai Kung East Country Park. All development within the CPE would unavoidably affect the adjacent Country Park. **The proposed application will bring environmental and ecological disturbance to Pak Lap and the Country Park.** All the development within the CPE should be considered the possible damages to the vulnerable asset in the city.
- The approval of the application would set an undesirable precedent for other applications within the CPE and "Agriculture (AGR)" zone, and lead to a general degradation of the natural environment and value of the Country Park in Hong Kong.

Here we submit our concerns for your consideration.

Yours,
Designing Hong Kong Limited