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Date : 30th October, 2026
Our Ref. : ADCL/PLG-10325/L005

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

By Email

Dear Sir/Madam,

Re: Section 16 Planning Application for Proposed House (Site Formation Works) at Government Land near Cheung Chau Inland Lot (CCIL) 4 RP, Fa Peng, Cheung Chau
(Planning Application No. A/I-CC/34)

We refer to our submission and the comments received from the relevant departments regarding the subject application. We would like to provide a *Response to Comment Table and Revised Landscape Assessment to* facilitate consideration by the relevant departments and the Town Planning Board.

Thank you for your kind attention and should you have any queries, please do not hesitate to contact the undersigned at [redacted].

Yours faithfully,
For and on behalf of
Aikon Development Consultancy Limited

Isa YUEN

Address 地址：
香港德輔道中 267-275 號龍記大廈 17 樓 1702 室
Unit 1702, 17/F, Loon Kee Building,
Nos. 267-275 Des Voeux Road Central, Hong Kong

Department	Date	Comments	Responses to Departmental Comments
Lands Department	25.9.2026	- The application site ("the Site") is on unleased and unallocated Government land adjacent to Cheung Chau Inland Lot No. 4 RP ("the Lot"). - Any excavation works or site formation works to facilitate the implementation of development or redevelopment on the Lot should be confined within the Lot. - Unless there are exceptional geotechnical reasons support by the relevant government offices, any application for cutting into Government land adjoining a private lot, whether permanently or temporarily, in connection with a development or redevelopment of the Lot, would not be considered by their office. Should there be any excavation works or site formation works proposed on the Government land outside the Lot boundary, the applicant should apply to this office for permission/ land document to cut into Government land. Such application will be considered by the Government in its capacity as a landlord and there is no guarantee that it will be approved. The application, if approved, will be subject to such terms and conditions including the payment of premium/fees as considered appropriate by LandsD.	Noted. Only temporary works will be carried out within the application site to facilitate the proposed house redevelopment. Such temporary works involve excavation works of less than 2.5 m for a period of not more than 12 months within the subject site, followed by reinstatement upon completion. The applicant has exhaustively explored alternative engineering schemes confined strictly within the lot boundary. However, Due to the isolated knoll location in Cheung Chau with no vehicular road access, alternative method confined strictly to the lot, such as steel sheet piling are unfeasible and present unacceptable safety risks across three main areas: <u>On-Site Occupational Safety</u> The installation of steel sheet piles necessitates heavy specialized machinery (such as crawler cranes and vibro-hammers) to generate sufficient driving force. Operating such methods in an **extremely constrained space would require massive amounts of manual labor and equipment, introducing severe operational difficulties**. Deploying heavy, high-tonnage machinery within an extremely **confined, sloped site severely increases the risk of equipment instability, tipping, and structural failure**. Furthermore, the restricted footprint forces site operatives to work in dangerous proximity to active machinery, drastically

Department	Date	Comments	Responses to Departmental Comments
			heightening the **risk of severe industrial injuries**. <u>Public & Pedestrian Safety</u> **Transporting heavy steel sections, piling rigs, and equipment via manual carts or village vehicles** over an extended period along narrow, shared village footpaths create safety concerns, trip risks, and physical obstruction for local pedestrians and residents, their emergency access. <u>Structural & Geotechnical Risks</u> The alternative steel sheet piling scheme would involve a **significantly longer construction window**. Prolonged manual haulage and concentrated dynamic/static loads along non-vehicular, unrated village footpaths and uneven knoll terrain risk damaging public footpath infrastructure and destabilizing adjacent ground conditions. Furthermore, in economic terms, the unique island geography and remote terrain of Cheung Chau already impose exceptionally high construction and logistical costs. **Requiring specialized, micro-piling machinery to be dismantled, shipped by ferry, manually carted across footpaths, and reassembled on-site would result in prohibitive, disproportionate financial costs** that render a small-scale single-house redevelopment economically unviable, which most development in Cheung Chau avoid by adopting manual construction methods and practical localized approaches. According to cost estimates, the construction of temporary sheet pile wall could dramatically increase cost of site formation works

Department	Date	Comments	Responses to Departmental Comments
			by tens of millions of dollars. This renders the site formation works disproportionately expensive relative to the construction of the 6 NTEHs themselves, making the scheme economically unviable and unreasonable. In view of the above, such alternative scheme are grossly disproportionate in terms of cost, human input, operational risks, and environmental disruption, rendering the proposed temporary open-cut and backfilling scheme the only practical, safe, and viable option. Considering the **excessive nature** of alternative schemes alongside the **temporary and reversible nature of the open-cut method**, the applicant respectfully seeks favourable consideration by the Lands Department. Upon approval of the planning application, the applicant will apply to the Lands Department for permission for temporary excavation work over Government Land and will submit the prescribed site formation and building plans to the Buildings Department for approval prior to the commencement of works. Rigorous site safety control, geotechnical monitoring, and reinstatement will be strictly guaranteed throughout and upon completion of the temporary works. The application site is currently unmanaged and vulnerable to degradation during severe weather events, such as typhoons. By allowing the occupation of Government Land, the applicant will properly manage and maintain the subject Government land at their own expense, including the implementing appropriate tree planting to commensurate with the proposed house development

Department	Date	Comments	Responses to Departmental Comments
			and ensuring the surrounding area remains well-maintained.
Civil Engineering and Development Department	25.9.2026	- Based on the circulation memo and supplementary statement, only temporary works will be carried out within the subject site to facilitate the proposed house redevelopment. Such temporary works involve excavation works of less than 2.5 m for a period of not more than 12 months within the subject site, followed by reinstatement upon completion. - Based on the referred S.12A planning application (no. Y/I-CC/7) mentioned in Section 2.6 of the supplementary statement, the Applicant would submit the prescribed plans for site formation works of the proposed house redevelopment to the Buildings Department (BD) for approval in a standard manner prior to commencement of the works. It is also stated in Section 2.8 of the supplementary statement that the General Building Plans will be submitted to the BD for approval. It is expected that the proposed temporary works at the subject site will also be considered in the same prescribed plans by the Applicant and geotechnical assessment will then be carried out by the appointed AP/RSE/RGE upon submission to the BD. - The applicant has included in the supplementary statement their justifications for the proposed temporary open-cut scheme. However, the information provided by the applicant does not constitute "exceptional	The applicant acknowledges GEO's observation that alternative schemes contained entirely within the lot boundary could theoretically be conceptualized. However, the applicant submits that such alternatives are grossly disproportionate in terms of

Department	Date	Comments	Responses to Departmental Comments
		geotechnical reasons" to support the proposed scheme as the only viable option. From the geotechnical perspective, the justification cannot rule out the feasibility of alternative schemes.	cost, human input, and environmental disruption, making the proposed temporary open-cut and backfilling scheme the only practical and viable option. Due to the isolated knoll location in Cheung Chau with no vehicular road access, alternative method confined strictly to the lot, such as steel sheet piling are unfeasible and present unacceptable safety risks across three main areas: <u>On-Site Occupational Safety</u> The installation of steel sheet piles necessitates heavy specialized machinery (such as crawler cranes and vibro-hammers) to generate sufficient driving force. Operating such methods in an **extremely constrained space would require massive amounts of manual labor and equipment, introducing severe operational difficulties**. Deploying heavy, high-tonnage machinery within an extremely confined, sloped site severely increases the risk of equipment instability, tipping, and structural failure. Furthermore, the restricted footprint forces site operatives to work in dangerous proximity to active machinery, drastically heightening the risk of severe industrial injuries. <u>Public & Pedestrian Safety</u> **Transporting heavy steel sections, piling rigs, and equipment via manual carts or village vehicles** over an extended period along narrow, shared village footpaths create acute safety hazards, trip/impact risks, and physical obstruction for local pedestrians, residents, and emergency response access.

Department	Date	Comments	Responses to Departmental Comments
			Structural & Geotechnical Risks The alternative steel sheet piling scheme would involve a significantly longer construction window. Prolonged manual haulage and concentrated dynamic/static loads along non-vehicular, unrated village footpaths and uneven knoll terrain risk damaging public footpath infrastructure and destabilizing adjacent ground conditions. Furthermore, in economic terms, the unique island geography and remote terrain of Cheung Chau already impose exceptionally high construction and logistical costs. Requiring specialized, micro-piling machinery to be dismantled, shipped by ferry, manually carted across footpaths, and reassembled on-site would result in prohibitive, disproportionate financial costs that render a small-scale single-house redevelopment economically unviable, which most development in Cheung chau avoid by adopting manual construction methods and practical localized approaches. Conversely, the proposed temporary open-cut and backfilling method significantly compresses the construction schedule into a streamlined 12-month window, utilizing a small island-compatible excavator to minimize vibration, protect the natural landscape, and reduce overall environmental impact to the absolute minimum. In light of these excessive costs, unnecessary human and logistical burdens, and unacceptable impacts on the surrounding environment, alternative schemes are economically and

Department	Date	Comments	Responses to Departmental Comments
			practically unfeasible. The proposed temporary open-cut approach remains the only sensible, safe, and balanced engineering solution, subject to rigorous control and full reinstatement.

Department	Date	Comments	Responses to Departmental Comments
UD&L Section, Planning Department	26.10.2026	(a) For T189 and T194, the crown spreads shown in the tree photos appear to be much narrower than the dimensions as stated in the Tree Assessment Schedule (Table 1).	Please note that the crown spreads for T189 and T194 recorded in Table 1 represent the extent of the canopy as verified on-site. The crown spreads shown in the photographic records might appear narrower due to perspective angles and surrounding vegetation partially blocking the full view.
		(b) They have reservation on the application (site formation works for the proposed house) from landscape planning perspective.	Noted.
		(c) "GB" is considered as distinctive landscape character. Adverse impact on distinctive landscape character is anticipated. According to the Landscape Assessment submitted in the FI, 13 existing trees of common species of poor to fair conditions within the Site will be felled, while 13 new ornamental trees are proposed to be planted within the Site. However, noting that existing trees of native species will be felled, the proposed exotic ornamental trees cannot compensate for the loss of native trees.	Please refer to the revised landscape assessment. To compensate the loss of the 13 existing trees, 24 standard trees (native species) (*Ficus macrocarpa* and *Celtis sinensis*) with average DBH approx. 75 mm are proposed to be planted. These compensatory trees will be planted within the application site boundary. With a high quantity compensation ratio (approx. 1:1.85), it is considered that the proposed tree planting will enhance the overall landscape amenity and blend in well with the surrounding green belt environment. No significant adverse landscape impact is anticipated with the implementation of the proposed mitigation measures.
		(d) In view of the above, significant adverse landscape impact arising from the proposed use is anticipated.	Ditto.

Department	Date	Comments	Responses to Departmental Comments
Lands Department	26.10.2026	(e) As far as the trees on Government Land are concerned, the owner of the Lot shall through his Registered Landscape Architect prepare and submit the tree preservation and removal proposal to LandsD for approval. Such proposal will be considered by the Government in its capacity as a landlord and there is no guarantee that it will be approved. The proposal, if approved, will be subject to such terms and conditions as considered appropriate by the Government, and shall not in any way prejudice or affect any rights of the Government under lease or otherwise including the right to reject any applications, which may be submitted by the owner of the Lot for cutting into Government Land adjoining the Lot. (f) Their previous comments provided in our email dated 25.9.2026 are still valid.	Noted. The applicant is prepared to submit the tree preservation and removal proposal to LandsD for approval. Noted.

Landscape Assessment

Tree Survey and Proposed Mitigation Measures

Background

This Landscape Assessment, including a tree survey and proposed mitigation measures, has been prepared in support of a planning application for proposed house (site formation works) at Government Land near Cheung Chau Inland Lot No. 4 RP. The proposed works are associated with temporary excavation works for the permitted house redevelopment, covering an area of approximately 240m², extending about 3m from the Lot Boundary, with a maximum excavation depth not exceeding 2.5m.

To facilitate the permitted residential development at Cheung Chau Inland Lot No. 4 RP, which is zoned “R(C)9” on the OZP, retaining walls are proposed within the Lot boundary. While the permanent retaining walls are designed strictly within the boundary of the Lot, temporary occupation of the adjacent Government Land zoned "GB" on the OZP (i.e. the application site) is technically unavoidable during the construction phase. This temporary encroachment is required solely to accommodate safe engineering operations, including open-cut excavation, backfilling and slope stabilization. Upon completion of the retaining walls, excavated soil mass will be backfilled, and no permanent structures will remain within the “GB” zone or the associated Government Land.

The proposed works has adopted a pragmatic approach to minimise the disturbance to existing vegetation by optimizing the works footprint. Potential landscape impacts during the construction and operation of the proposed development have been assessed through a tree survey, with appropriate compensatory planting and mitigation measures proposed accordingly.

Tree survey

Existing Trees

A total of 13 nos. of tree were identified within the application site. No Old and Valuable Trees or mature tree was found on the site (i.e. trees with individual trunk(s) over 750mm diameter at breast height) were recorded. As excavation works are required across the application site, all 13 trees, including some undesirable trees, are anticipated to be inevitably affected. These trees are generally in fair to poor conditions. Details of the tree survey are presented in **Table 1** and **Appendix 1**.

Table 1. Tree Assessment Schedule for Trees Within Application Site Boundary

Tree	Name		Size			Form	Amenity Value	Proposed Treatment	Justification For Felling
No.	Botanical Name	Chinese Name	DBH (mm)	Height (m)	Spread (m)	(Good/Fair/ Poor)	(High/Med/Low)	(Retain/Fell/Transplant)	
T30	*Acacia confusa*	台灣相思	300	10	10	Fair	Low	Fell	1,3
T63	*Celtis sinensis*	朴樹	170	10	8	Fair	Low	Fell	1,3
T65	*Celtis sinensis*	朴樹	160	10	7	Poor	Low	Fell	1,2,3
T67	*Sterculia lanceolata*	假蘋婆	130	5	2	Poor	Low	Fell	1,2,3
T181	*Acacia confusa*	台灣相思	110	6	5	Fair	Low	Fell	1,3
T184	*Schefflera heptaphylla*	鵝掌柴	210	8	6	Fair	Low	Fell	1,3
T186	*Celtis sinensis*	朴樹	240	7	5	Poor	Low	Fell	1,2,3
T187	*Schefflera heptaphylla*	鵝掌柴	130	7	5	Poor	Low	Fell	1,2,3
T189	*Acacia confusa*	台灣相思	210	9	7	Poor	Low	Fell	1,2,3
T193	*Macaranga tanarius*	血桐	150	9	6	Poor	Low	Fell	1,2,3
T194	*Litsea glutinosa*	潺槁樹	100	7	5	Poor	Low	Fell	1,2,3
T203	*Schefflera heptaphylla*	鵝掌柴	180	8	6	Fair	Low	Fell	1,3
T205	*Bridelia tomentosa*	土蜜樹	100	4	2	Poor	Low	Fell	1,2,3

Justification for Tree Felling

1. Trees are in conflict with the proposed development
2. Tree with poor health and/ or form for transplantation
3. Lack of access for transplantation machinery and vehicle

Compensatory Planting

While transplanting should be considered as far as possible, most of the affected trees are in fair to poor condition, making their post-transplant survival rate low and transplanting technically infeasible. Therefore, tree felling is proposed with compensatory planting.

Table 2. Summary of Treatment of Existing Trees

Total Nos. of Trees within the Application Site	13
Total Nos. of Trees to be felled	13
Aggregate Loss of DBH	2.19m
Nos. of Compensatory Trees	13

Planting Proposals

To compensate the loss of the **13** existing trees, **24** standard trees (native species) with average DBH approx. 75 mm are proposed to be planted. These compensatory trees will be planted within the application site boundary (**Figure 1** refers). The proposed planting species list is shown as follows.

Table 3. Proposed Compensatory Trees

Chinese Name	Botanic Name	Height x Spread x DBH (mm)	Spacing (mm)	Nos.
Standard Trees (Native species)				
細葉榕	*Ficus microcarpa*	2750x1500x75	4000	14
朴樹	*Celtis sinensis*	2750x1500x75	4000	10
Total				**24**

Upon the above, the compensation ratio in terms of quantity and quality is shown as follows:

Table 4. Compensation Ratio

Quantity of loss of trees:	13 nos.
Aggregate Loss of DBH:	2.19 m
Quantity of compensatory trees:	24 nos.
Quantity compensation ratio:	About 1:1.85
DBH compensation:	About 1.8m
DBH compensation ratio	About 1:0.82

Proposed Mitigation Measures

The following landscape treatments and mitigation measures will be enforced to minimize environmental and visual impacts during construction and operational phases:

Good Site Practices

During construction phase, the applicant would ensure all works areas, plant, machinery, storage areas and temporary structures shall be confined within designated area and arranged in an orderly manner. Temporary facilities will adopt subdued, non-reflective colors to minimize visual intrusion. Good site housekeeping practices will be strictly enforced, including the regular removal of construction waste, proper covering of stockpiles, and avoidance of any unnecessary disturbance to surrounding vegetation beyond the works footprint.

Compensatory Planting

Upon completion of the site formation and retaining wall construction works, the excavated soil will be backfilled. Compensatory tree planting will be carried out using appropriate species as proposed. An Establishment Period will be provided to ensure proper plant establishment, during which any failed plantings will be replaced.

Conclusion

Considering the proposed works are temporary in nature and that no permanent structures will remain on the application site upon completion, no significant change to the surrounding landscape character is anticipated. With the implementation of the proposed compensatory planting and site mitigation measures, the overall landscape impact arising from the proposed works is considered negligible.

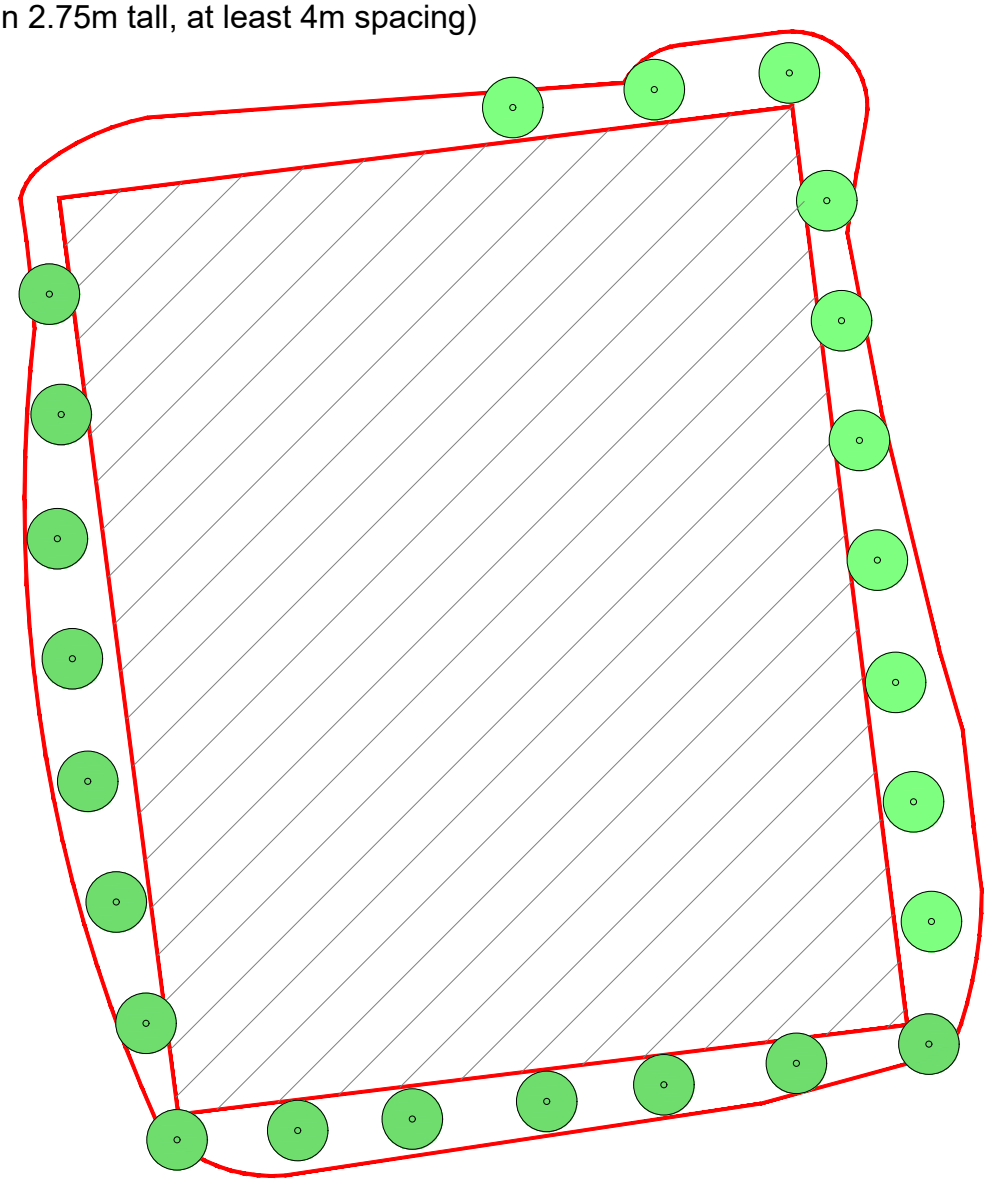
LEGEND

APPLICATION SITE BOUNDARY

LOT BOUNDARY (CCIL 4RP)

PROPOSED TREES
Ficus microcarpa (Total: 14 nos.)
(Min 2.75m tall, at least 4m spacing)

Celtis sinensis (Total: 10 nos.)
(Min 2.75m tall, at least 4m spacing)

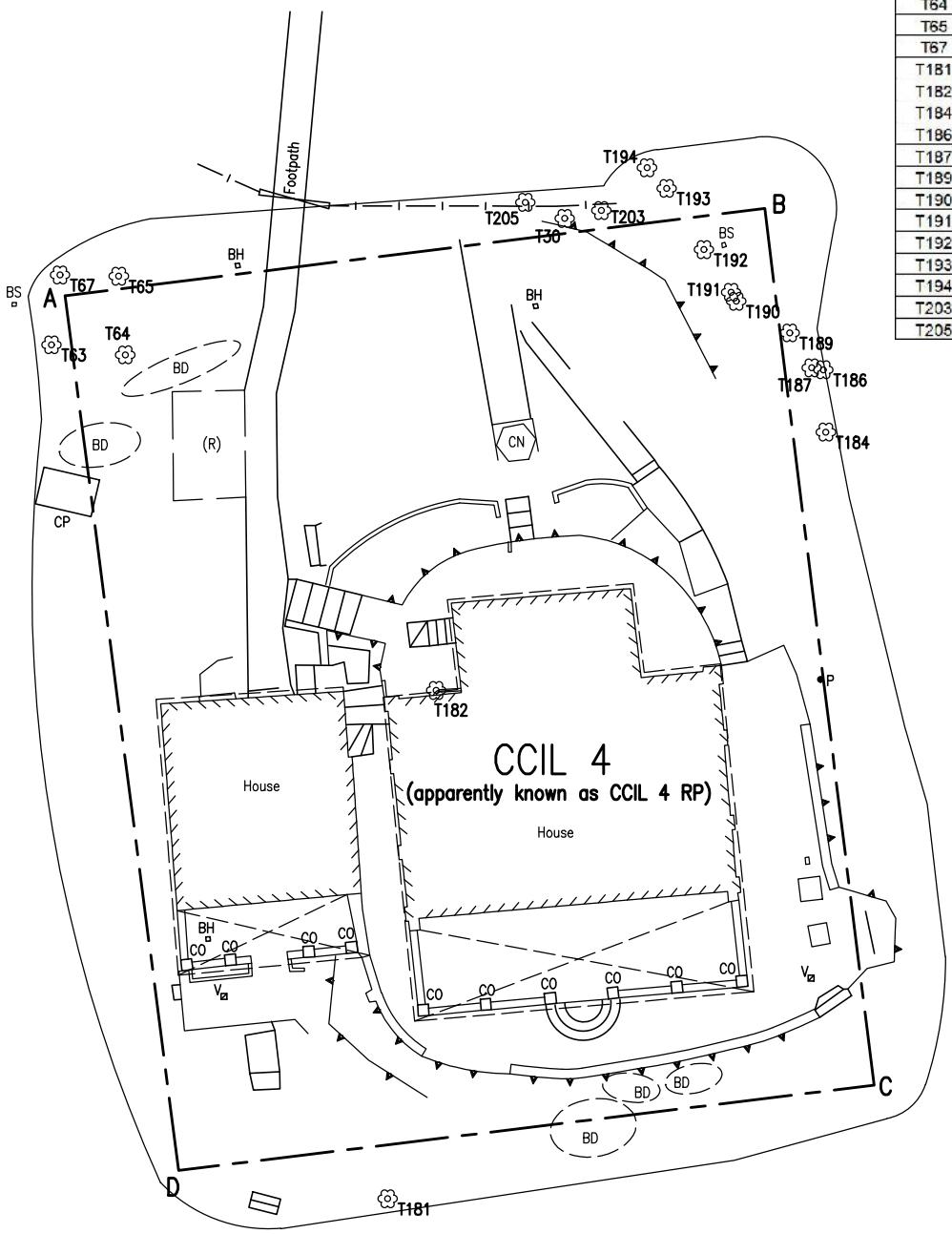


CONCEPTUAL LANDSCAPE PLAN

FIGURE 1

PLAN OF CHEUNG CHAU INLAND LOT No. 4
TREE LOCATION

Tree No.	Diameter (m)	Height (m)	Spread (m)
T30	0.30	10	10
T63	0.17	10	8
T64	0.12	8	5
T65	0.16	10	7
T67	0.13	5	2
T181	0.11	6	5
T182	0.45	6	7
T184	0.21	8	6
T186	0.24	7	5
T187	0.13	7	5
T189	0.21	9	7
T190	0.17	7	5
T191	0.15	7	7
T192	0.12	6	6
T193	0.15	9	6
T194	0.10	7	5
T203	0.18	8	6
T205	0.10	4	2





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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T30









PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T63









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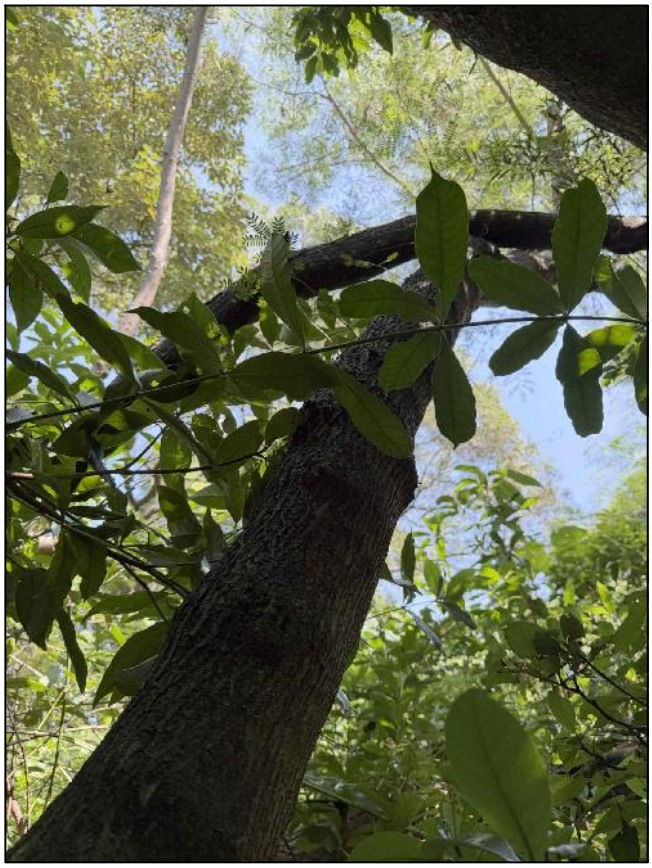
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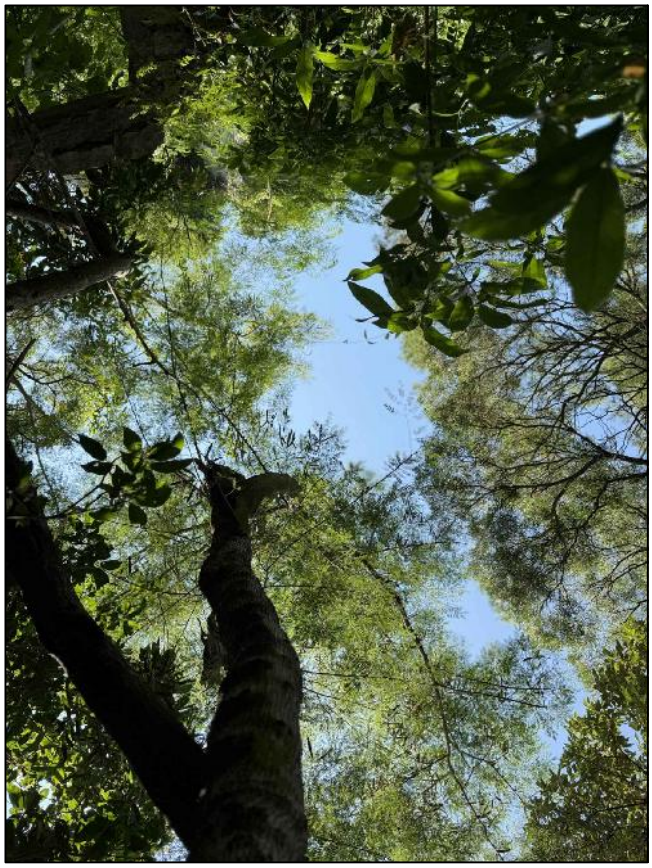
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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T65









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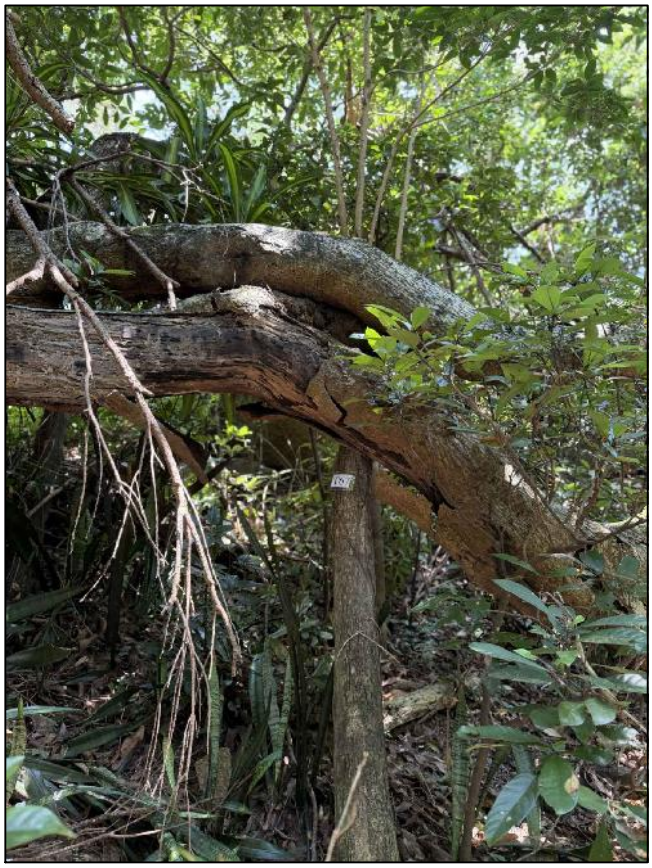
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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T67









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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T181









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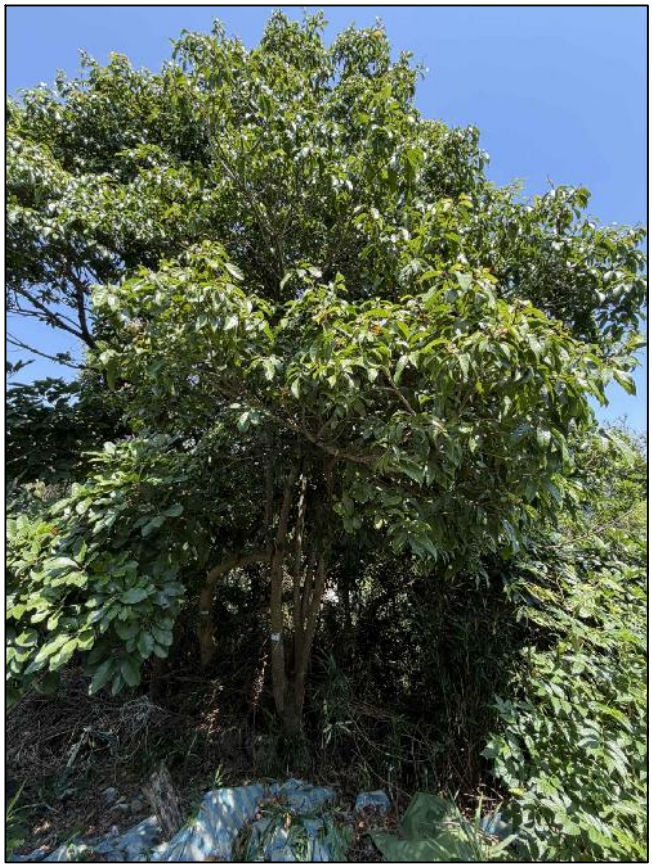
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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T184









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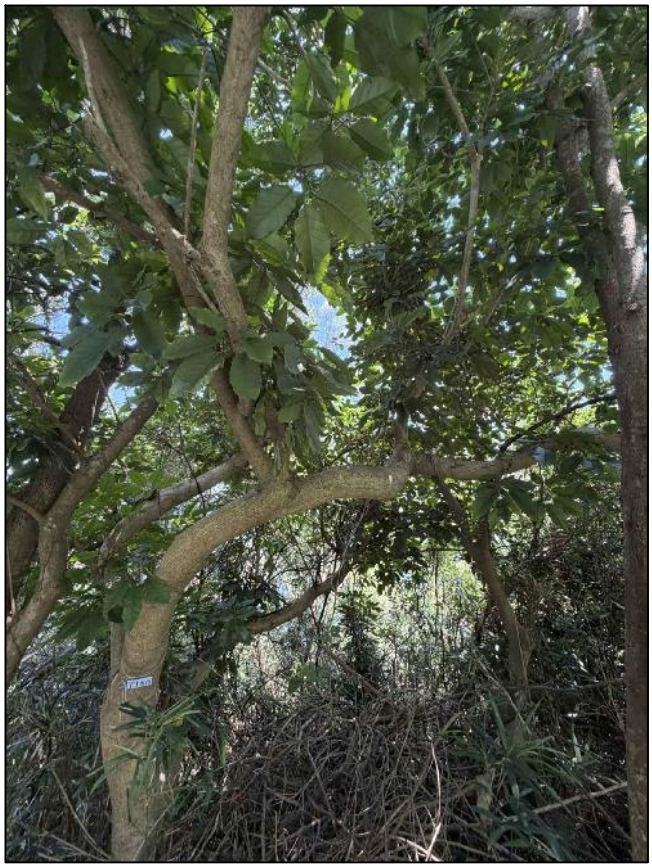
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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T186









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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T187









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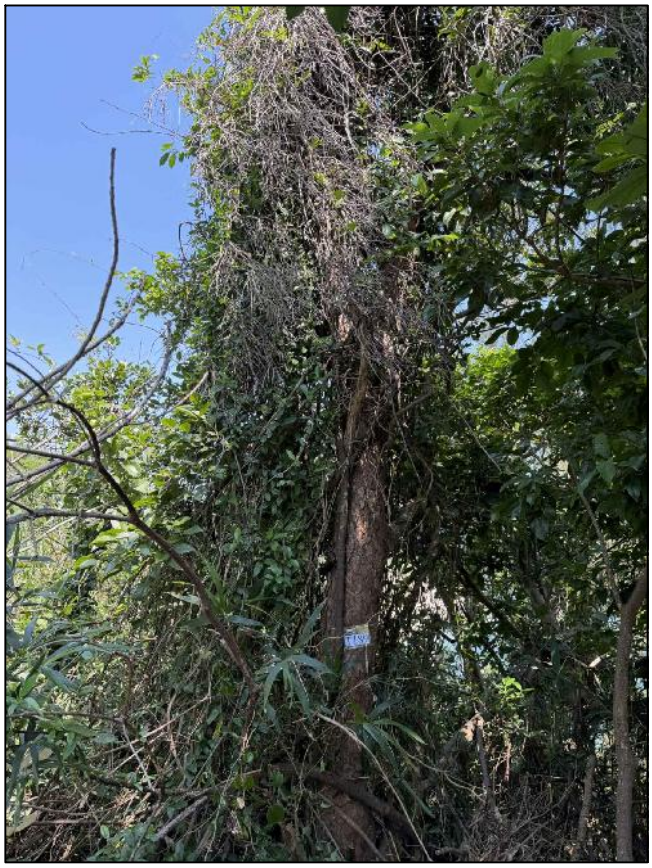
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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T189









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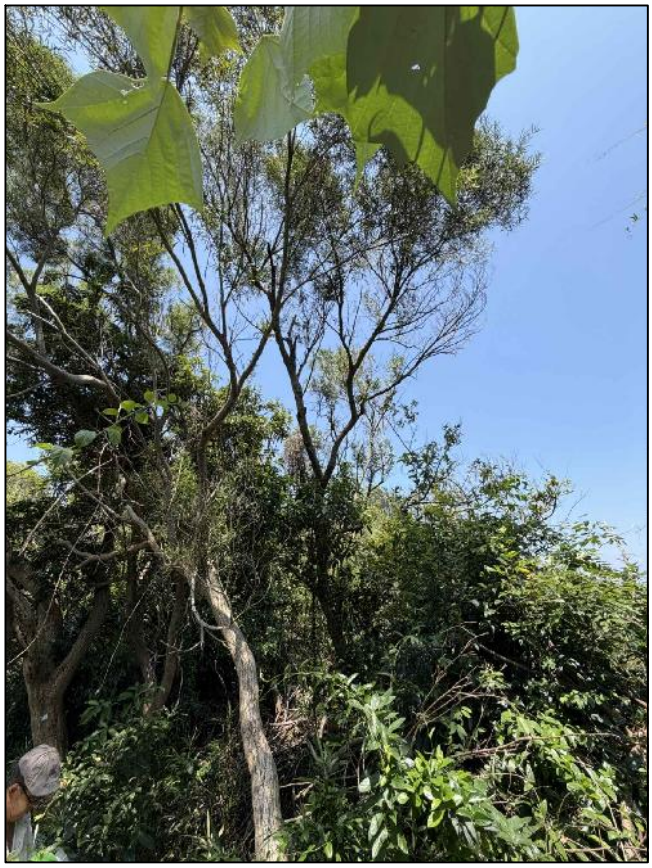
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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T193









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JOB No. : TCHK5457

DATE : 18 September 2026

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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T194









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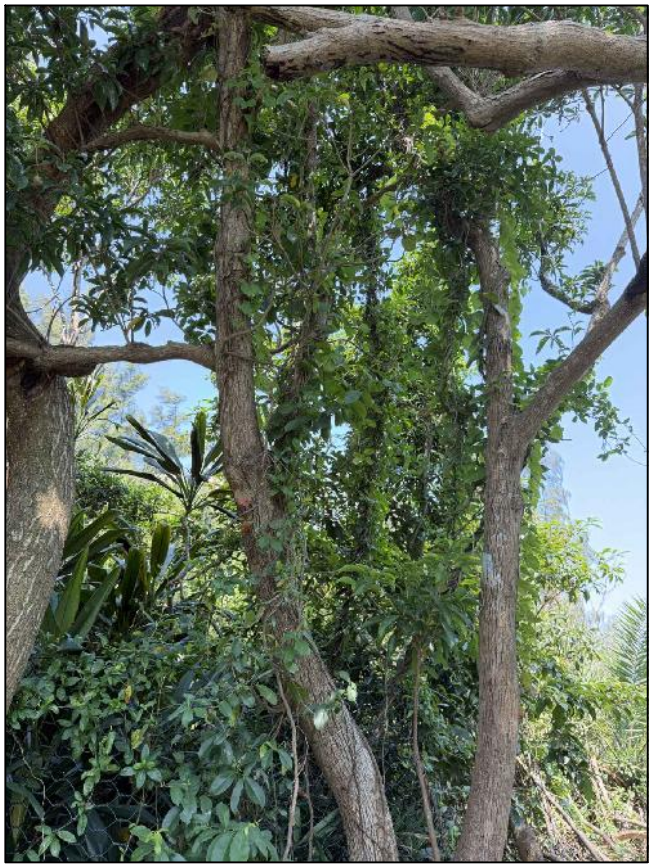
DATE : 18 September 2026

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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T203









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TED CHAN & ASSOCIATES LIMITED
Authorized Land Surveyors

JOB No. : TCHK5457

DATE : 18 September 2026

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PHOTO RECORD OF CHEUNG CHAU INLAND LOT No. 4
TREE No. T205









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TED CHAN & ASSOCIATES LIMITED
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JOB No. : TCHK5457

DATE : 18 September 2026

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