

Proposed Public Utility Installation (Submarine Cables and Landing System)  
in “Coastal Protection Area” (“CPA”) zone on Government Land near Rural Building Lots (RBL) 1220 and 1221, Chung Hom Kok, Hong Kong  
Planning Application No. A/H19/86

Responses to Comments

No.	Comment	Response
<b>Submission Planning Statement (Document No. 001)</b>		
1	<b>PLANNING DEPARTMENT</b> <b>Chief Town Planner/Urban Design and Landscape Section</b> <b>Landscape Unit</b> <b>(Contact Person: Mr. NGAI CM, Tel.: 3565 3955)</b> <b>By Email dated 16 September 2024</b>	
	<u><b>Landscape Observations and Comments</b></u>	
	<p>3. Based on the aerial photo of 2023, the Site is located in an area of Coastal Upland and Hillside landscape character and surrounded by existing vegetation and rocky shores. A satellite earth station (HKIS-1) and a teleport substation (GB21 Cable STB CHK Teleport Substation) are located to the further northeast of the Site. Given the nature (i.e. surface mounted cable landing ducts, drawpits, beach manholes and chain link fences on ground surface) and scale of the proposed use, significant impact on the landscape character of surrounding area is not anticipated.</p>	<p>Agreed.</p>
	<p>4. Inconsistent/inaccurate tree numbers (e.g. number of trees within the Site) and tree treatment (e.g. number of trees within the Site to be felled) are observed in the Planning Statement (PS), Annex C -Landscape Impact Assessment (LIA) and Annex E – Tree Survey Report (TSR), which should be clarified and rectified.</p>	<p>Drawings have been updated with regard to T69 and T70 and the relevant parts of the application to provide tree and landscape information for the Application Site only.</p> <p>The relevant parts of the Planning Statement and supporting technical assessments have been revised to indicate that 12 nos. trees identified within the Application Site are proposed to be felled, of which 8 nos. (excluding the 4 nos. <i>Leucaena leucocephala</i>) are proposed to be compensated following a 1:1 ratio based on the number of trees felled given the area available for compensatory planting is constrained.</p>
	<p>5. It is noted that the Project Site boundary is not equivalent to the Application Site boundary, while many tree/landscape information on areas outside the Application Site are provided. Tree/landscape information in the PS, LIA (Annex C) and TSR (Annex E) should be provided for the Application Site only. Excessive and irrelevant information (i.e. tree/landscape information on areas outside the s.16 application site) would not be reviewed by LU.</p>	<p>We note your request to provide tree and landscape information for the Application Site only. The relevant parts of the Planning Statement and supporting technical assessments (LIA and TSR) have been updated accordingly.</p>
	<u><b>Detailed Comments</b></u>	
	<p>PS</p> <p>6. Para. 5.5.4 – According to this paragraph, there are 14 nos. existing trees <u>within</u></p>	<p>As per your request above, the relevant parts of the Planning Statement and</p>

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	<p>and adjacent to the Site. Of which, 1 no. tree is proposed to be retained while 13 no. trees (including 5 nos. <i>Leucaena leucocephala</i>) are proposed to be felled. Information on surveyed existing trees <u>within and outside the s.16 application boundary</u> should be separately indicated, relevant paragraphs/information is advised to be clearly indicated as “for PlanD’s reference only”, and comments from relevant authorities should be sought accordingly.</p>	<p>supporting technical assessments (LIA and TSR) have been updated to provide tree and landscape information within the Application Site only.</p>
	<p>7. Para. 5.5.4 – It is mentioned that 8 nos. trees (excluding 5 nos. <i>Leucaena leucocephala</i>) proposed to be felled are proposed to be <u>compensated at a 1:1 ratio in accordance with relevant Government guidelines</u>. The applicant should also demonstrate that greening opportunities within the site has been maximised as far as practicable. This comment is also applicable to other sections in the LIA (e.g. para. 4.3.9 – 4.3.11) and the TSR (e.g. Sections 6 and 7).</p>	<p>Given the hillside terrain, thin soils and existing vegetation cover, planting opportunities are very limited and therefore compensation planting on a 1:1 by number basis will be the best that can be achieved at this site. This has been clarified in updated parts of the Planning Statement and supporting technical assessments (LIA and TSR). An additional exhibit has been added to the updated TSR to demonstrate the constraints on compensation tree planting.</p> <p>We have also made it clear in these reports that whilst the feasibility of compensatory planting within the Application Site has been thoroughly examined, due to the narrowly drawn Application Site boundary, compensation within the Application Site is not feasible. Therefore, compensatory planting will be carried out in locations as close as practicably possible to the proposed cable landing alignment where appropriate and practical.</p>
	<p>8. Para. 5.5.5 – It is noted that information on existing trees <u>outside the s.16 application boundary</u> and the relevant compensatory tree planting proposals are provided for PlanD’s reference only. Such information is not required for the s.16 application and will not be reviewed by LU. For any existing trees and proposed tree treatments outside the s.16 Application Site, comments from relevant authorities should be sought accordingly.</p>	<p>The relevant parts of the Planning Statement and supporting technical assessments (LIA and TSR) have been updated to provide tree and landscape information for the Application Site only.</p>
	<p>Annex C - LIA</p>	
	<p>9. Fig. 3.1 and Fig. 4.1 – Some existing trees (e.g. T69, T70) outside the application site are incorrectly indicated as existing trees inside the application site. Inconsistencies on these figures as well as inconsistencies (e.g. tree number and proposed tree treatment) with other sections in the PS, LIA and TSR should be revised accordingly. This comment is also applicable to the same drawings in Appendix B of the TSR.</p>	<p>Drawings have been updated with regard to T69 and T70 and the relevant parts of the application to provide tree and landscape information for the Application Site only.</p>
	<p>Annex E – TSR</p>	
	<p>10. Fig. 3.2 – Compensatory planting was proposed in densely vegetated area. Proposed seedlings with planting pits should avoid damaging the existing tree roots and should not be located underneath tree canopies.</p>	<p>Agreed. We have supplemented the relevant parts of the Planning Statement and supporting technical assessments (LIA and TSR) to make this clear.</p>

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	<b><u>Public Comment Received</u></b>	
	<p>Dear CTG Team &amp; Town Planning Board,</p> <p>This is HKBN Group-Network Development. We have reviewed the proposed alignment of CTG landing ducts in Chung Hom Kok. It appears that the proposed route will intersect with our existing infrastructure. To avoid any potential conflicts, we require a minimum clearance of 5 meters from our existing route.</p> <p>Also, we strongly recommend further coordination with us to discuss the details and ensure that all necessary precautions are taken before the commencement of your project.</p>	<p>The proposed cable landing ducts, beach manholes and associated structures within the Application Site will not intersect with HKBN Group-Network Development’s existing infrastructure as they are set back at least 3m away from that infrastructure.</p> <p>Despite the absence of statutory nor industry requirement for any set distance between the construction works for telecommunications facilities and other public utilities, for reference, under the provisions of the Electricity Supply Lines (Protection) Regulation (Cap. 409), where mechanical equipment is used to undertake excavation works near electricity supply lines, a minimum of 3m offset from that supply lines is required to ensure safety and to avoid potential risk.</p> <p>We have been communicating with HKBN Group-Network Development, with a view to reaching reasonable resolution of their comment.</p> <p>Given the &gt;3m set back and because all reasonable precautionary measures will be taken to limit the extent of the proposed works, it is considered that the proposed installation during the construction phase will not affect the use of HKBN’s existing facility.</p>
2	<p><b>PLANNING DEPARTMENT</b>  <b>(Contact Person: Mr. LAW TING HIN, HARVEY, Town Plnr/HK 1, Tel.: 2231 4929)</b>  <b>By Email dated 25 September 2024</b></p>	
	<b><u>Public Comment Received</u></b>	
	<p>Dear TPB Members,</p> <p>Strong Objections, this is on top of a similar project close by. The cumulative effect destroys the natural terrain on the coastline.</p> <p>A/H19/83 Approved 29 Oct 2021  Two Strips of Government Land adjacent to RBL 1158, Chung Hom Kok  Site area: About 292sq.m  Zoning: “Coastal Protection Area”  Applied development: Submarine Cable Landing Ducts and Beach Manholes Only</p>	<p>We would suggest that it is not true that the projects will ‘destroy’ the natural terrain of the coastline. The Landscape Impact Assessment for this project accompanying the Planning Statement has assessed that changes to the ‘Rocky Shore’ Landscape Resource as a whole will not be significant.</p>

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	<p>The loss of trees along the coast is unacceptable. Under the mantra of undesirable species 5 trees within the site and 18 outside will not be compensated. This effectively wipes out 30% of the trees in the area. That this will have a significant visual impact is indisputable. Moreover the new trees will be saplings so the area will effectively be stripped of much of its green coverage.</p>	<p>The proposed routing in this “CPA” is of the shortest viable distance, with due consideration given to minimising impact on trees where practicable.</p> <p>Under the revised Tree Survey Report (Annex E of the Planning Statement) submitted in response to PlanD/UD&amp;L’s comment no.5 in this RtoC, 12 nos. trees identified within the Application Site are proposed to be felled, of which 8 nos. (excluding 4 nos. invasive non-native <i>Leucaena leucocephala</i>) will be compensated. A summary is provided below:</p> <table border="1" data-bbox="1238 469 2085 684"> <thead> <tr> <th></th> <th>Number of Trees within the Application Site (no.)</th> </tr> </thead> <tbody> <tr> <td>Trees Identified</td> <td>12</td> </tr> <tr> <td>Trees to be Felled</td> <td>12</td> </tr> <tr> <td>Trees to be Compensated</td> <td>8 (excluding 4 nos. invasive non-native <i>Leucaena leucocephala</i>)</td> </tr> </tbody> </table> <p>Development Bureau Technical Circular (Works) No. 4/2020 ‘Tree Preservation’ (at Page 20) states that seedling tree planting is more appropriate on slopes than trees of larger sizes. Seedling trees of native species are therefore proposed to be planted as compensation which will offer an enhancement of local biodiversity.</p> <p>With a view to further minimising impact, we have jointly submitted this planning application (as two companies, each developing a cable landing station) in a coordinated manner.</p>		Number of Trees within the Application Site (no.)	Trees Identified	12	Trees to be Felled	12	Trees to be Compensated	8 (excluding 4 nos. invasive non-native <i>Leucaena leucocephala</i> )
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Trees Identified	12									
Trees to be Felled	12									
Trees to be Compensated	8 (excluding 4 nos. invasive non-native <i>Leucaena leucocephala</i> )									
	<p>In addition, the Visual Impact Assessment does not include realistic images of the structures to be introduced onto the beach. Going by the image provided with Application 83 these will be considerably bulky and ugly.</p>	<p>The photomontage image is realistic in that it is produced using industry standard visualisation techniques. For clarification, we have enhanced the resolution of part of the photomontage, which is shown in an inset blow-up on the amended Figure 3.3 of the Visual Impact Assessment (Annex B of the Planning Statement) (p.12 of the submitted Further Information).</p> <p>Furthermore, the colour of our proposed built structures has been carefully selected to blend in seamlessly with the surrounding environment. With the implementation of the proposed visual mitigation measures, no significant visual impacts are anticipated as a result of the proposed installation.</p>								
	<p>It is very disturbing to note the increasing use of ‘undesirable species’ to get around the 1:1 compensation. Regardless of the species, all these trees have foliage and contribute to the green coverage of the area.</p>	<p>Although it may have green foliage, <i>Leucaena</i> is an invasive non-native tree which typically out-competes and suppresses native tree species. The removal of this aggressive competitor to native vegetation species is therefore in itself beneficial for the native plant ecology and biodiversity of the area.</p>								

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	Why is this project not integrated with that of A/H19/83 to reduce impact?	The proposals under this planning application are based on considerations regarding data security and our business decisions.
	In view of the misleading visual impact images, members should request to have access to fotos of the current condition at the 83 site.	The photomontage image is produced using industry standard visualisation techniques.  For clarification, we have enhanced the resolution of part of the photomontage, which is shown in an inset blow-up on the amended Figure 3.3 of the Visual Impact Assessment (Annex B of the Planning Statement) (p.12 of the submitted Further Information).
	Not only are ponds and green belt being wiped out, we now face the incremental degradation of the coast line with ugly facilities like this.	Our proposed works have been planned with the aim of minimising impacts within the “CPA” zone. As highlighted in the Visual Impact Assessment accompanying the Planning Statement, the colour of our proposed built structures has been carefully selected to blend in seamlessly with the surrounding environment. With the implementation of the proposed visual mitigation measures, no significant visual impacts are anticipated as a result of the proposed installation.
3	<b>PLANNING DEPARTMENT (Contact Person: Mr. LAW TING HIN, HARVEY, Town Plnr/HK 1, Tel.: 2231 4929) By Email dated 30 September 2024</b>	
	Please note the comments of DLO on the proposed location of compensatory tree below and duly address the comment in the next further information submission:  According to figure 4.2 of the landscape impact assessment in Annex C of the FI received, it is given to our understanding that the 8 nos. of compensatory trees were proposed to be planted on government land outside the application site boundary. Unless the management and maintenance for the compensatory trees was identified by applicants, it is considered not acceptable from land administrative point of view.	After careful review of the practicability of compensatory tree planting and maintenance, we have relocated the 8 nos. of compensatory trees to an area within Lot RBL No. 1220. This lot has been granted to the Applicant of the subject planning application (i.e., China Telecom Global Limited) and will not require agreement from Government. The relevant parts of the Planning Statement and supporting technical assessments (LIA, VIA and TSR) have been updated accordingly.