

Annex C

Methodology Paper and
AFCD's comments on the Methodology Paper

Section 16 Planning Application
Proposed Filling of Ponds for Permitted Innovation and Technology Hub
(including Permitted Cargo Handling and Forwarding Facilities, Creative
Industries, Eating Place, Flat (Staff Quarters only), Industrial Use, Information
Technology and Telecommunications Industries, Office, Public Utility Installation,
Research, Design and Development Centre, Shop and Services, Warehouse
(excluding Dangerous Goods Godown)) at Lot 764 RP (Part) in D.D. 99, San Tin,
Yuen Long, N.T.

Ecological Survey Methodology Paper

Ecosystems Limited

October 2025

1. PROJECT BACKGROUND

- 1.1. The 2013 Policy Address first stated the need to take forward further development of the New Territories North (NTN) with a view to developing a modern new town there, and the Government commissioned the Preliminary Feasibility Study on Developing NTN and an area in San Tin / Lok Ma Chau (STLMC) was identified as having potential for further development. In 2021, the Policy Address proposed to expand STLMC Development into San Tin Technopole together with the Hong Kong-Shenzhen Innovation and Technology Park (HSITP). An Investigation Study including the statutory Environmental Impact Assessment (EIA) was carried out and approved in 2024 (AEIAR-261/2024).
- 1.2. The Application Site, about 16.3ha, is located at Lot 764 RP (Part) in D.D. 99, San Tin, Yuen Long, N.T, which is within the Project Location of the approved EIA (**Figure 1**). The proposed Project is a comprehensive Innovation and Technology Hub development involving filling of ponds, the potential ecological impacts have been assessed with mitigation measures provided.
- 1.3. The Application Site falls within Wetland Conservation Area (WCA) and an area zoned as "Other Specified Uses" annotated "Innovation and Technology" ("OU(I&T)") on the Approved San Tin Technopole Outline Zoning Plan (OZP) No. S/STT/2 gazetted on 20.9.2024. Although the uses of the proposed development is under Column 1 of the planning intention (uses always permitted), the Application Site previously fell within the "Other Specified Uses" annotated "Comprehensive Development and Wetland Enhancement Area", any filling of ponds requires planning permission from the Town Planning Board.
- 1.4. In accordance with the TPB PG-No. 12C, ecological field investigation covering a period of not less than 12 months should be included, no matter a 12-month ecological survey was conducted for the approved EIA.
- 1.5. The purpose of this paper is to propose the survey methodology, and with the information of the approved EIA, for ecological impact assessment (EcoIA) to fulfill the requirements of the OZP.

2. ASSESSMENT AREA AND KEY ECOLOGICAL ISSUES

- 2.1. The proposed assessment area for the purpose of the terrestrial and aquatic ecological impact assessment shall include areas within 500m from the Application Site (**Figure 1**). Ecological field surveys shall be conducted over a 12-month period covering both wet and dry seasons.

2.2. Recognized sites of conservation importance and key ecological resources within the proposed 500m Assessment Area included but not limited to the following:

- Wildlife groups/habitats of conservation interest
- Conservation Areas (“CA”s)
- Deep Bay Wetland outside Ramsar Site Priority Site for Enhanced Conservation (“Priority Site”)
- Inner Deep Bay and Shenzhen River Catchment Important Bird Area (“IBA”)
- Mai Po Inner Deep Bay Ramsar Site (“Ramsar Site”)
- Wetland Conservation Area (“WCA”)
- Wetland Buffer Area (“WBA”)

3. LEGISLATION AND STANDARDS

3.1. Ordinances and regulations that are relevant to this study include the following:

- Forests and Countryside Ordinance (Cap. 96) and its subsidiary legislation, the Forestry Regulations (Cap. 96A);
- Wild Animals Protection Ordinance (Cap. 170);
- Environmental Impact Assessment Ordinance (Cap. 499) and the associated Technical Memoranda (TM-EIAO); and
- The Protection of Endangered Species of Animals and Plants Ordinance (Cap. 586) and its subsidiary legislation.

3.2. This study will also make reference to the following guidelines and standards:

- Hong Kong Planning Standards and Guidelines (HKPSG) Chapter 10, "Conservation";
- Town Planning Board Planning Guideline No. 12C – Application for Developments Within Deep Bay Area;
- PELB Technical Circular 1/97 Works Branch Technical Circular 4/97 "Guidelines for Implementing the Policy on Off-site Ecological Mitigation Measures";
- EIAO Guidance Note No. 6/2010 - Some Observations on Ecological Assessment from the Environmental Impact Assessment Ordinance Perspective;
- EIAO Guidance Note No. 7/2023 – Ecological Baseline Survey for Ecological Assessment; and
- EIAO Guidance Note No. 10/2023 – Methodologies for Terrestrial and Freshwater Ecological Baseline Surveys.

4. RESULTS OF PRELIMINARY REVIEWED LITERATURE

4.1. The preliminary findings of literature review focused on key ecological issues are presented below to identify data gap to justify survey methodology. A thorough review of existing information including approved EIA and planning application will be included in the full EcolA report. The identified recognized sites of conservation importance and key ecological resources within the proposed 500m assessment area are indicated in **Figure 2**. Details are discussed in the following.

4.2. The Agriculture, Fisheries and Conservation Department (AFCD) has identified SPS WCP as the first park under its Strategic Feasibility Study on Wetland Conservation Parks System. This proposed 338 ha park will enhance Northern Metropolis ecological quality and biodiversity while offering public eco-education, recreation, and modernized aquaculture facilities. The park fulfills two primary objectives: first, enhancing ecological value, biodiversity,

and connectivity in Deep Bay through proactive conservation; second, compensating for San Tin Technopole development impacts through active management of 288 ha of wetlands and modernized aquaculture on 40 ha of fishponds, achieving no-net loss in ecological function, and about 10 ha reserved for other supporting facilities.

- 4.3. Mai Po Inner Deep Bay and Deep Bay Wetland outside Ramsar Site Priority Sites for Enhanced Conservation - The Hong Kong SAR Government's New Nature Conservation Policy (NNCP) selected 12 priority sites for enhanced conservation, including the Ramsar Site and Deep Bay wetland outside it, which are relevant to this submission. The NNCP introduced two schemes to protect ecologically important sites, especially privately owned ones: the Nature Conservation Management Agreement (MA) Scheme and the Public-Private Partnership (PPP) Scheme. The PPP Scheme allows limited development on less ecologically sensitive parts of a site (Developable Portion) provided that a conservation and management plan (CMP) is provided for the more sensitive part (Conservation Portion).
- 4.4. Mai Po Village site of Special Scientific Interest (SSSI) – An Area of the fund shui woodland is zoned as “SSSI” under the Approved Mai Po and Fairview Park Outline Zoning Plan (OZP) No. S/YL-MP/8. This “SSSI” zone was designated with a general presumption against development, and to conserve the undisturbed woodland that support the community of nesting and breeding ardeids at Mai Po Village Egretary. However, the egretery has moved partially outside the SSSI boundary. The SSSI is now located adjacent to the northern part of the original SSSI site. The egretery is located at least 300m outside of the Assessment Area.
- 4.5. The Wetland Conservation Area (WCA) was designated by Town Planning Board (TPB) to conserve the ecological value of the fishponds in the Deep Bay wetland ecosystem (TPB Guideline No. 12C). The WCA comprises existing active and abandoned fishponds within the Deep Bay wetland system continuous with the Mai Po Inner Deep Bay Ramsar Site, while the aim is to conserve the ecological value and functions of the fishponds as an integral part of the system. Except for permitted essential conservation or infrastructural works, no development involving pond-filling or other works detrimental to the ecological function of the wetland are allowed within the WCA. All essential works conducted within the WCA should comply with the “No- Net- Loss in Wetland” principle. The proposed Application Site is location within the WCA.
- 4.6. The Wetland Buffer Area (WBA) is approximately 500m in width and lies along the landward boundary of the WCA. The intention of the WBA is to protect the ecological integrity of wetland habitats within the WCA (TPB Guideline No. 12C). Development within the WBA causing negative impacts on the ecological value of the WCA should be avoided unless appropriate mitigation measures are implemented. However, residential or recreational developments may be approved with appropriate conditions where undesirable open storage area is removed and wetlands are restored. Such development should satisfy the “No-Net- Loss in Wetland” principle. Only a small portion of Assessment Area are outside the WBA in this Project.
- 4.7. Important Bird Area namely Inner Deep Bay and Shenzhen River catchment area. The Inner Deep Bay and Shenzhen River catchment, recognized as an Important Bird Area (IBA) by BirdLife International in 2004, is an estuarine region with diverse habitats, including freshwater wetlands, marine-coastal areas (intertidal mudflats and mangroves), and man-made habitats like fishponds, tidal shrimp ponds (gei wai), and oyster farms. Freshwater wetlands are located at Mai Po and Long Valley, a floodplain south of the Shenzhen River, now managed as Long Valley Nature Park by the AFCD. Mudflats line the Shenzhen River from Mai Po/Tsim Bei Tsui in Hong Kong to Fu Tian in Shenzhen, bordered by coastal mangroves. The inland area

includes farmland, fishponds, and shrimp ponds, surrounded by residential and industrial zones. The IBA is located within the proposed Application Site and Assessment Area.

- 4.8. Egretries – According to Anon (2022), Mai Po Lung Egrettry is the third largest colony in Hong Kong. The Mai Po Lung Egrettry is located within the assessment area, to the south of the Application Site. Little Egret (*Egretta garzetta*) and Chinese Pond Heron (*Ardeola bacchus*) were recorded utilising tree species *Ficus benjamina*, *Ficus microcarpa*, *Ficus virens*, *Litchi chinensis* and *Melaleuca leucadendra* as nesting substrates. Another egrettry (Mai Po Village Egrettry) is located outside the 500m Assessment Area.
- 4.9. San Tin Open Storage Area Day Roost - A small roosting colony of Black-crowned Night Herons was documented at San Tin Open Storage Area, where the birds primarily occupied Elephant's Ear trees (*Macaranga tanarius* var. *tomentosa*) positioned along pond embankments. The roosting site was situated within an environment characterized by busy open storage areas with considerable traffic and human activity. According to AEIAR-261/2024 - San Tin / Lok Ma Chau Development Node, the colony showed varying numbers over time, peaking at 20 birds in December 2021 and subsequently dropping to nine individuals by April 2022, and no records since May 2022.
- 4.10. San Tin Open Storage Area Night Roost - AEIAR-261/2024 reports that a night roost near San Tin Open Storage area was first identified within the EIA Assessment Area. Absent from prior studies, the roost consisted of a single, moderately sized India-rubber Tree (*Ficus elastica*) on a pond bund. Ardeids including Little Egret, Chinese Pond Heron, and Great Egret were present in low abundance (peak 53 individuals). Great Cormorants were not recorded.
- 4.11. San Tin Night Roost - A night roost in the San Tin area was identified within the Assessment Area during the kick-off survey of this Project. This roost was not reported in previous studies. It comprises a patch of *Sonneratia caseolaris* situated in a modified watercourse. Little Egret and Chinese Pond Heron were recorded at this night roost during the kick-off survey. The roost is located approximately 260 m northwest of the Application Site.
- 4.12. Lok Ma Chau Meander and San Tin Eastern Main Drainage Channel (STEMDC) - This meander was originally part of the natural Shenzhen River before channelization were carried out, subsequently restored as mitigation for fishpond habitat lost during river training activities. It now constitutes one of Hong Kong's largest remaining semi-natural riverine systems. The LMC Meander serves multiple ecological functions, providing foraging habitat and movement corridors for Eurasian Otter (*Lutra lutra*), roosting sites for waterbirds and various ardeids, and functioning as an aerial corridor facilitating avifauna movement between adjacent wetland habitats (CEDD & PlanD, 2013). A portion of the LMC Meander falls within the Project area boundaries.
- 4.13. Mitigation Wetlands – Three mitigation wetland were proposed under various designated projects within the Assessment Area, including the STEMDC and San Tin Constructed Wetland. The STEMDC construction under the "Main Drainage Channels and Poldered Village Protection Schemes for San Tin, NWNT" resulted in fishpond and wetland habitat loss. Approximately 16 ha of compensatory habitats were created, including the STEMDC wetland (small ponds and shallow marshes) east of STEMDC within the Project area (TDD, 1999). Additional mitigation included tidal channels, grasscrete lining, embankment planting, and water level/vegetation management at STWMDC and a flood storage pond near San Tin Tsuen Road. Drainage works near Tsing Lung Tsuen before 2000 resulted in fishpond loss during flood protection infrastructure construction. Compensatory measures created an artificial

wetland west of San Tin Tsuen Road, featuring planted wetland vegetation and shrub species, both of mitigation wetland within the Project area.

5. METHODOLOGY OF ECOLOGICAL SURVEY

- 5.1. Ecological field surveys will be carried out to verify ecological profile established from literature review, update baseline information, and fill identified information gaps to facilitate the establishment of complete ecological characters of the assessment area and to facilitate the ecological assessment.
- 5.2. Ecological field surveys are proposed to be carried out with a duration of 12 months covering both wet and dry seasons. Investigations should be carried out to verify the information collected and to fill in the information gaps as identified in literature review. The ecological survey programme covers terrestrial and aquatic habitats. A twelve-month ecological survey (conducting from September 2025 to August 2026) covering wet and dry seasons is proposed (see Section 6 for proposed survey programme).
- 5.3. The methodology of the ecological surveys will make reference to the relevant Guidance Notes (GN 7/2023 and GN 10/2023). Sampling locations for terrestrial and aquatic fauna are shown in **Figure 3**.

Ecological Survey Items

- 5.4. **Vegetation and habitat survey:** Vegetation surveys will be conducted by direct observation to record the diversity and dominance of plant species present in different habitat types. The locations of any plant species of conservation importance will be recorded. Identification of flora species and status in Hong Kong will be made with reference to Xing et al. (2000), Hu et al. (2003), Lai et al. (2008), Hong Kong Herbarium (2012), and Hong Kong Herbarium and South China Botanical Gardens (2007; 2008; 2009; 2011).
- 5.5. Terrestrial and aquatic habitats within the assessment area will be identified, sized and mapped. Ecological characteristics of each habitat type, including size, vegetation type, and species present, dominant species found, species diversity and abundance, community structure, ecological value and inter-dependence of the habitats and species, and presence of any features of ecological importance will be defined and characterized. Representative photographs of the habitat types and/or any important ecological features identified will be taken. A habitat map of suitable scale showing types and locations of terrestrial and aquatic habitats within the assessment area will be prepared from digital aerial photographs. The habitat map will then be checked during ground truthing. For areas that are inaccessible, aerial drones shall be used to capture photographs and videos to survey ecological features and verify habitats.
- 5.6. **Mammals survey:** The surveys shall focus on areas that may be utilized by terrestrial mammals. Field signs including droppings, footprints, diggings or burrows left by larger mammals shall be searched for. Mammal identification shall be made from the field signs encountered. Any mammals directly observed shall be recorded. Camera traps will be deployed in the Camera Trap Locations mentioned in **Figure 5.1**, the locations will serve as general guides and may be adjusted for appropriate angle of view depending on the latest site conditions and accessibility. Bat surveys shall be undertaken by surveyor(s) equipped with ultrasonic bat detector(s) along the terrestrial transects and at potential roosting, commuting,

foraging and drinking sites. Bat species will be identified through the detection of echolocation calls and direct observation. The acoustic information recorded will be analyzed using specialized software. Nomenclature of mammal follows Shek (2006).

- 5.7. **Birds survey:** The presence and abundance of avifauna species in various habitats shall be recorded. Avifauna shall be surveyed quantitatively using the transect count method along the walk-transects during early morning, day, dusk and night times. The location of any avifauna species of conservation importance encountered shall be recorded, along with notable behaviours (e.g. breeding behaviour such as nesting and the presence of recently fledged juveniles, roosting, and feeding activities and behaviors). Ornithological nomenclature follows Carey et al. (2001), Viney et al. (2005) and the most recently updated list from the Hong Kong Bird Watching Society.
- 5.8. **Egret survey:** The existing information on the Mai Po Lung and Mai Po Village egrets is considered comprehensive and sufficient to support a robust impact assessment. Therefore, field surveys will be conducted twice within peak breeding season to verify the status of the egrets.
- 5.9. **Day roost and night roost survey:** The existing information on the San Tin Open Storage Day Roost and Night Roost is considered comprehensive and sufficient to support a robust impact assessment. Field survey will be conducted on two occasions solely to verify the status of these roosts.
- 5.10. **Winter flight path survey:** Winter flight path surveys for the waterbirds will be conducted at the proposed vantage points and will commence in both early morning and dusk. The survey time will be approximately 0.5 hours before sunrise, lasting for at least 2 hours for early morning; or 1 hour before sunset, lasting for at least 2 hours for dusk as far as possible. The exact times of sunrise and sunset on the survey date will be referenced from the Hong Kong Observatory. The vantage points will serve as general guides and may be adjusted for appropriate angle of view depending on the latest site conditions and accessibility, based on the judgment exercised during the survey. The flight paths of waterbirds will be tracked using high-powered binoculars to determine their general direction of flights whenever possible. If the ardeids fly out of sight before landing, the location where they disappear will be recorded.
- 5.11. **Herpetofauna (reptiles and amphibians) survey:** Within the assessment area, herpetofauna will be surveyed qualitatively along survey transects, with potential microhabitats (e.g., leaf litter, underneath rotten logs) searched and all reptiles and amphibians sighted recorded. Amphibian surveys will be conducted whenever possible on evenings following or during periods of rainfall, focusing on areas suitable for amphibians (e.g., forests, shrublands, grasslands, streams, catchwaters, fishponds, and marshes, if any), with records of calling amphibians forming the bulk of the data collected, supplemented, when possible, by visual observations of eggs, tadpoles, frogs, and toads. During reptile surveys, careful searches of appropriate microhabitats and refugia (e.g., stones, pond bunds, crevices, leaf litter/debris, rotten logs) will be undertaken, with all reptiles observed identified, and observations of exposed, basking, or foraging reptiles also recorded. The nomenclature of amphibians and reptiles will follow Chan et al. (2005) and Chan et al. (2006), respectively.
- 5.12. **Butterflies and odonates survey:** Butterflies and odonates (dragonflies and damselflies) within the assessment area will be surveyed along survey transects, with attention given to their potential habitats. The relative abundance of butterflies, dragonflies, and damselflies will

be recorded, along with any larvae and pupae encountered. The nomenclature of butterflies will follow Lo & Hui (2010), and that of odonates will follow Tam *et al.* (2011) and Reels (2019).

5.13. **Fireflies survey:** Firefly surveys will be carried out along the transects at day, dusk and night. During the surveys, fireflies observed, including larvae and adults, will be identified to the species level where possible. The locations of firefly species of conservation importance or any notable behaviors (e.g., breeding) will be recorded. The nomenclature and conservation status of fireflies (such as those endemic to Hong Kong) will follow Yiu (2023).

5.14. **Freshwater Community survey:** Daytime and surveys nighttime freshwater fish, and daytime freshwater invertebrate survey will be carried out during the wet season. Aquatic fauna, including freshwater macro-invertebrates (e.g. freshwater crabs, shrimps, freshwater molluscs and aquatic insect larvae) and fishes, within the assessment area will be studied by direct observation and active searching. The tentative aquatic sampling locations are shown in **Figure 5.1**. All freshwater fauna found will be identified to the lowest practicable taxonomic level and their abundance will be recorded. The nomenclature for fish and invertebrates will follows that available from the Hong Kong Biodiversity Information Hub and Dudgeon (1999) respectively.

6. SURVEY PROGRAMME

6.1. The proposed ecological survey programme is shown as follows (E: Early morning; D: Daytime U: Dusk; N: Night-time).

No. of Month	1	2	3	4	5	6	7	8	9	10	11	12
Month	Sep 2025	Oct 2025	Nov 2025	Dec 2025	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	Jul 2025	Aug 2026
Season	Wet		Dry					Wet				
Vegetation and habitat		D			D			D			D	
Mammals	D, U, N											
Birds	E, D, N	D, U, N										
Winter Flight Path		D, U	E, D	D, U	E, D	D, U	E, D					
Reptiles		D, N						D, N		D, N		D, N
Amphibians		N						N		N		N
Butterflies		D	D					D		D		D
Odonates		D						D		D		D
Fireflies		D, U, N	D, U, N	D, U, N				D, U, N	D, U, N	D, U, N		
Freshwater fish and invertebrates		D, N						D, N		D, N		

7. REFERENCE

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END

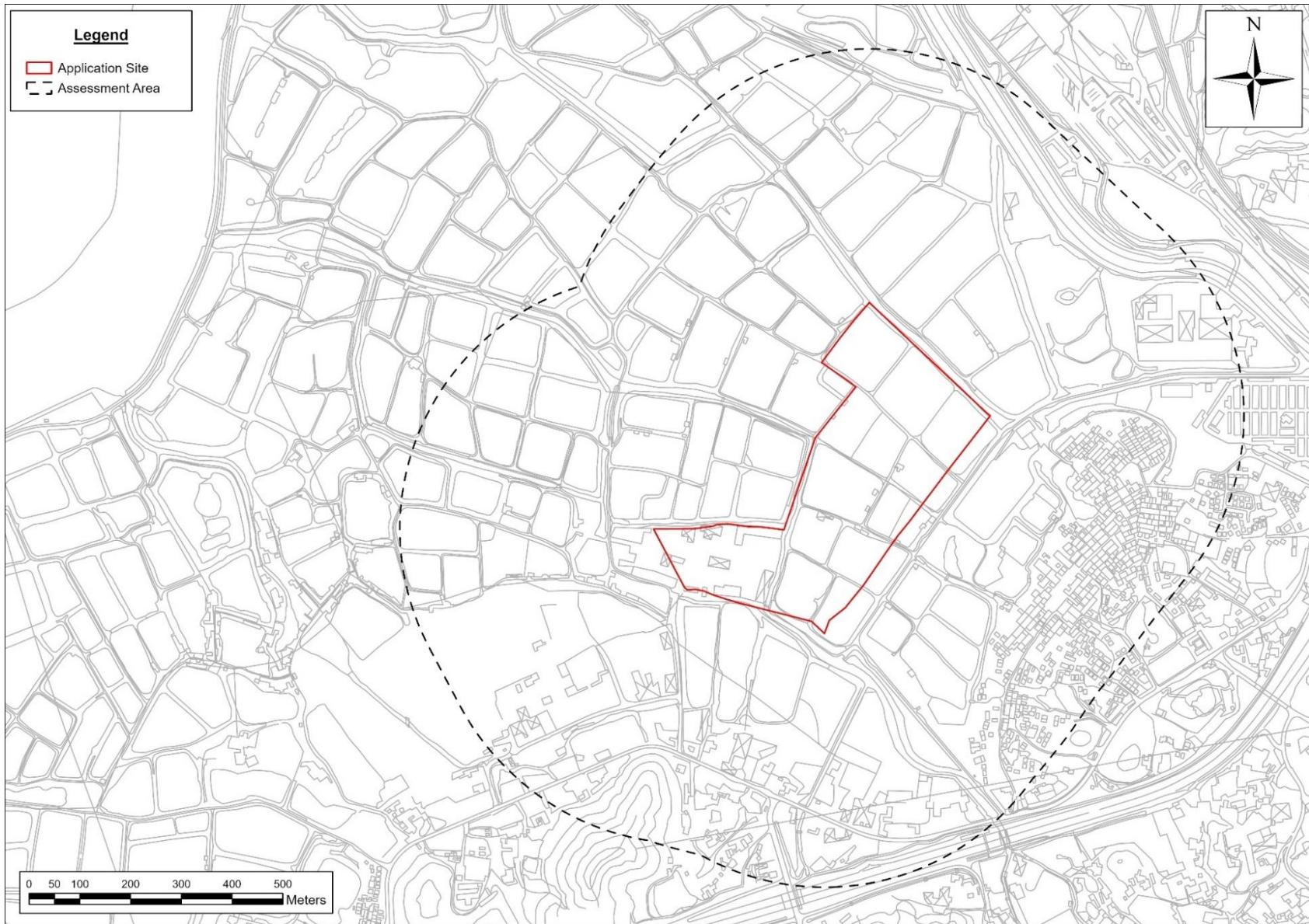


Figure 1 Application Site and 500m Assessment Area

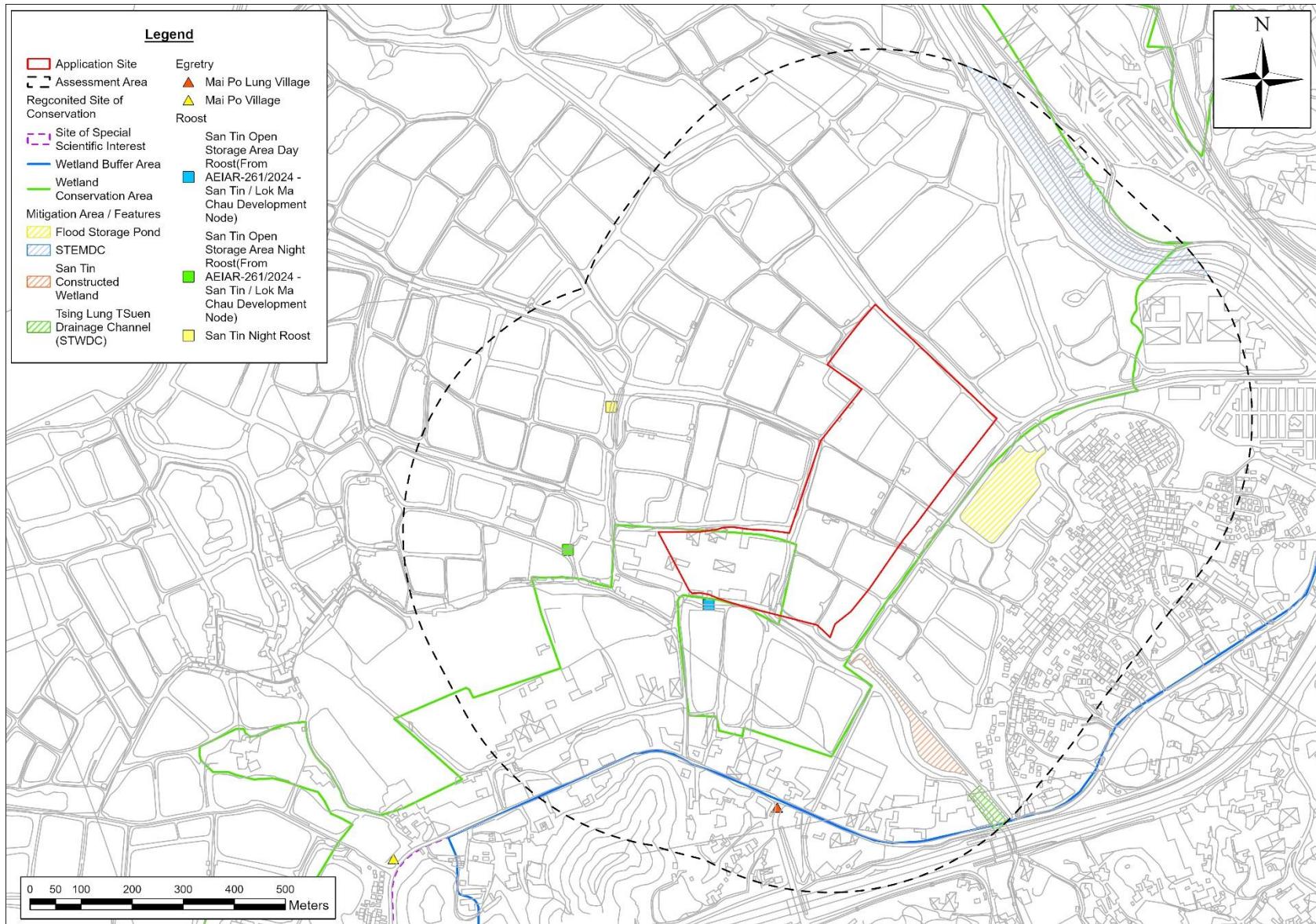


Figure 2 Indicative Location of the Identified Recognized Sites of Conservation Importance and Key Ecological Resources within the 500m Assessment Area

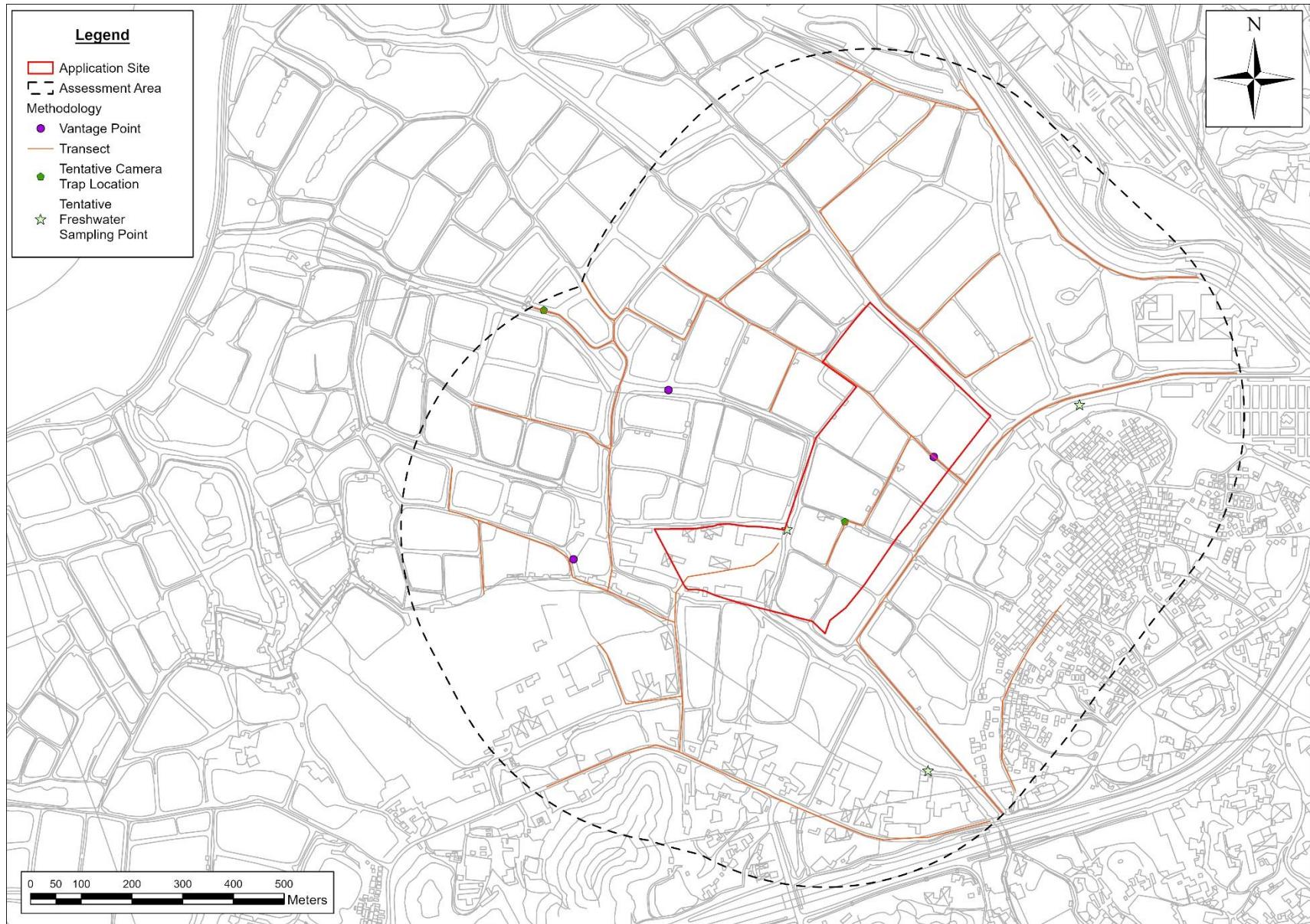


Figure 3 Proposed Transects and Sampling Points for Ecological Surveys

Planning Application No. A/STT/26
Comments from AFCD (Received on 12.12.2025)

S.5.6, S.5.14

Figure 5.1 is missing.

S.5.7

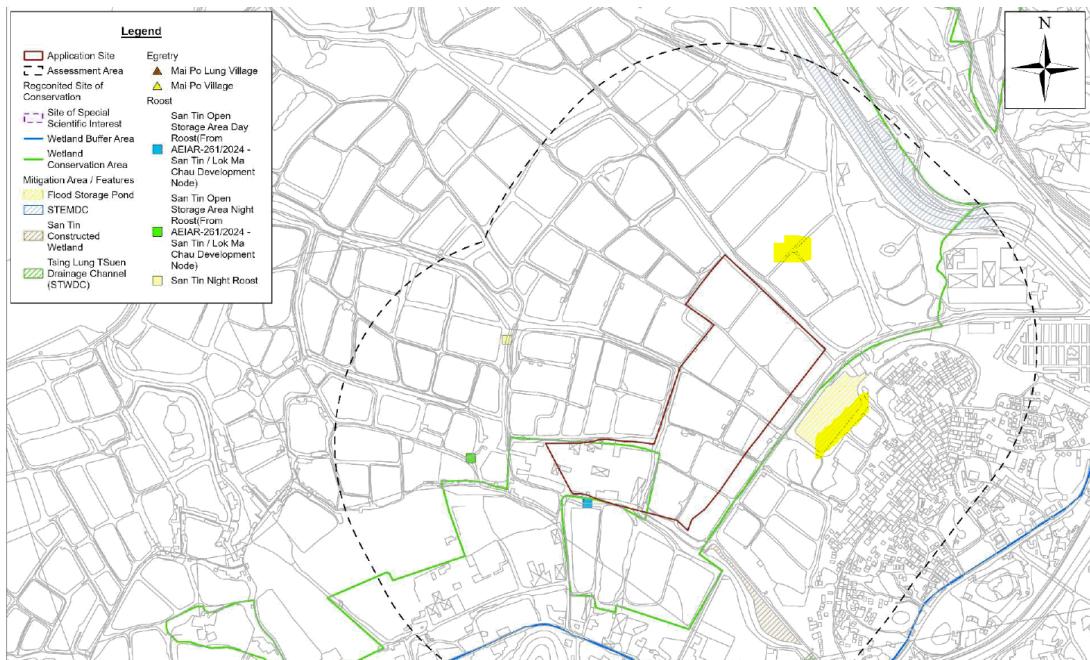
- Birds seen or heard should both be recorded in the survey.

S.5.8

- The egretry should be conducted monthly during the breeding season (Mar to Aug) to record the species, abundance of breeding ardeids, egretry boundary, substrate, flight height and flight line of the egretry. The flightline survey should be conducted at suitable vantage points and start approximately half an hour before sunrise and last for at least two hours.

S.5.9

- The surveys should also cover (1) the night roost to the northeast of the project site discovered as a part of the pre construction surveys of ST technopole, and (2) a day roost of Black-crowned Night Herons to the east of the project site.
- The survey should cover the entire 12 month period, and record species, abundance, substrate, location, extent and flight line and flight height of existing and potential night and day roosts of ardeids. The flightline survey should be conducted at suitable vantage points and commence approximately one hour before sunset and continue until nightfall (i.e. approximately 30 minutes after sunset).



S.5.10

- The survey time during sunrise period, rather than sunset period. Please remove this information "or 1 hour before sunset, lasting for at least 2 hours for dusk as far as possible"
- The survey should also record flight height.

S.6.1

The table should also include the roost and egretry survey.

S.2.2, S.4.3 & Figure 2

The STEMDC and San Tin Mitigation Wetlands located within the 500m assessment area are missing from the list of key ecological resources while the Mai Po Inner Deep Bay Ramsar Site which locates outside the 500m assessment area is included. Please review and update the subject submission.

S.4.13

Please specify the distances in between the project area and each of the mitigation wetlands, and whether records of species of conservation importance were noted in "the preliminary reviewed literature".

Figure 3

Please consider adding a transect/sampling points in STEMDC Mitigation Wetland.

From the perspective of the Sham Po Shue Wetland Conservation Park (SPS WCP):

Section 2.2

Please include the proposed Sam Po Shue Wetland Conservation Park as one of the recognized sites of conservation importance and key ecological resources within the proposed 500m Assessment Area.

Section 4.2

Please revise the Section to read: "~~The Agriculture, Fisheries and Conservation Department (AFCD) has identified SPS WCP as is the first park to be established under its Strategic Feasibility Study on the~~ Wetland Conservation Parks System proposed under the Northern Metropolis Development Strategy. This proposed 338 ha park will serve multiple functions: 1) enhance the ecological quality and biodiversity of the Northern Metropolis; ~~ecological quality and biodiversity while offering public eco-education, recreation, and modernized aquaculture facilities~~ 2) compensate for ecological and fisheries impacts arising from development of San Tin Technopole, to achieve no-net-loss in ecological function; 3) provide quality outdoor eco-education and recreation facilities for public enjoyment; and 4) introduce ecologically friendly and modernized aquaculture in the park. The park ~~fulfills two primary objectives: first, enhancing ecological value, biodiversity, and connectivity in Deep Bay through proactive conservation; second, compensating for San Tin Technopole development impacts through active management of 288 ha of wetlands and modernized aquaculture on 40 ha of fishponds, achieving no net loss in ecological function~~ will include 253 ha ecologically enhanced fishponds, 35 ha enhanced freshwater wetland habitat, 40 ha fisheries enhancement area, and about 10 ha reserved for eco-education, recreation and other supporting facilities."

Section 7

Please add the following reference under Section 7: "AFCD. (2024). Strategic Feasibility Study on the Development of Wetland Conservation Parks System under the Northern Metropolis Development Strategy. Study Report. October 2024. Available at

https://www.afcd.gov.hk/english/conservation/con_wet/wcps_system/wcps_system.html. (Accessed in November 2025)."

Figure 2

The SPS WCP is missing from this Figure, please supplement accordingly.