

## **Table A**

---

*Responses-to-Comments (“R-to-C”) Table dated 24.11.2023*

**Table A: Responses-to-Comments (24.11.2023)**

Departmental Comments		Applicant’s Responses
<b>A. Environmental Protection Department (received on 6.11.2023)</b>		
<b>A. Sewerage (SIA Report)</b>		
1.	Table 2-1 - Please include the unit flow factor of 1.58 m <sup>3</sup> /d/head adopted for restaurant category in Table 2-1.	Unit flow factor of 1.58 m <sup>3</sup> /d/head has been included in the table.
2.	Table 2-2 - The unit flow factor adopted should be 1580 instead of 1500 L/employee/day for restaurant. Please check.	Unit flow factor of 1580 L/employee/day has been used.
3.	Table 2-2, Appendix 2.1 and 2.2 i. The calculation of contributing population should be calculated as 562 instead of 504 people.	Based on current calculation, the total contributing population of 563 people has been adopted accordingly.
	ii. Appendix 2.1 shows the contributing population value calculated as 504 people (for all of the pipes) while Appendix 2.2 shows the contributing population value calculated as 560 people (from pipe MH236 to P1). Please check.	Contributing population mentioned in Appendices 2.1 and 2.2 have been updated to 563 people for consistency.
4.	Section 2.5.1 - Typo: "It is proposed that the sewage generated from the Proposed Development will be discharges discharged to the....."	Typo has been rectified accordingly.
5.	Figure 2.1 and 2.3 - Figure 2.3 Section B-B shows the internal diameter of the twin sewers between proposed sewer P6 and P7 are 525 mm which is different from 675 mm in Figure 2.1. Please check.	Please be clarified that 675 mm sewer is now proposed. Cross sections in Figures 2.1 to 2.3 have been amended accordingly.
6.	Appendix 2.1 and 2.2 i. Please provide the ADWF of the catchment 1-3 inflow respectively and their corresponding planning applications	The concerned catchment is now changed to two catchments for clarity. Catchment 1 will be the other planned developments in the upstream, while Catchment 2 will be the nearby application no. Y/YL-NSW/7. And the total ADWF of the nearby development (i.e. catchments 1 and 2) is still 15,000 m <sup>3</sup> /d as advised before.

Departmental Comments		Applicant's Responses
	ii. Please check and ensure whether the values of full bore velocity and full bore capacity for both cases were calculated correctly. If they are calculated correctly, from MH235 to P1, P1 to P2 and P2 to P3 - please note some may exceed the maximum velocity of peak flow of 3m/s.	Manholes P1 to P3 have been revised to backdrop manhole so that the maximum velocity is now within 3 m/s.
	iii. Please ensure the calculation is updated in case of any modification	All relevant calculations have been updated.
7.	Appendix 3.1 - Typo: Nam Sang Wai SPS instead of Casam SPS.	The typo in Appendix 3.1 has been rectified. Nam Sang Wai SPS is used instead.
<b>B. Water Quality (EA report)</b>		
1.	Table 5.1 - Please cite WQO in accordance with the Schedule of Cap 358R.	Table 5.1 and S5.2.1 have been amended. WQOs for Deep Bay Buffer WCZ in the Schedule of Cap 358R, is also presented in Appendix 5.1.
2.	S5.3.1 - It should read “S/YL-KTN/9 10”	S/YL-KTN/10 is used in S5.3.1.
3.	S5.4.17 – i. Nam Sang Wai SPS has been mentioned twice, please check. ii. Yuen long Long Sewage Treatment Works (YLSTW).	S.5.4.17 has been amended: i. Duplicated text has been removed. ii. Yuen Long Sewage Treatment Works (YLSTW)
4.	Pages 5-17 & 5-18 are missing.	Only replacement pages were provided in last FI submission. Page no. in Chapter 5 has been rearranged. Full report is now provided for ease of reference.
5.	S5.6.2 – please remove “As discussed earlier,”	“As discussed earlier” has been removed from S.5.6.2 accordingly.
6.	Please submit the full WQIA with highlight the changes in next submission.	Full report of WQIA is now provided for ease of reference. Changes have been highlighted in the report accordingly.
7.	Should there be any discharge of wastewater and/or pond water, proper pretreatment to meet WPCO and TM requirements, the discharge should be sited away from natural water stream.	The discharge after pre-treatment should meet WPCO and TM requirements, and that the discharge should be sited away from natural water stream, have also been added in S5.6.10.

Departmental Comments		Applicant’s Responses
<b>C. Air Quality (EA report)</b>		
1.	Sections 2.4.3 and 2.4.5 - It is noted that San Tin Highway is considered as Expressway based on ATC 2021 instead of TD's view. Please revise the text accordingly.	ATC report has now been referenced in S.2.4.3 and 2.4.5 that San Tin Highway should be an Expressway.
2.	Section 2.4.5 and R-t-C 3(b) - Please note that a district distributor (DD) can be connected to another DD and hence it is unjustified to conclude that Kam Pok Road is a local distributor. As a conservative approach, please use 10m buffer distance for this road or provide the peak traffic flow to justify if it can be considered as LD. Please revise the text accordingly.	The concerned section of Kam Pok Road connects to other roads via Kam Pok Road East, which is a LD road as advised by TD. According to Appendix 3.1 of EA report, the peak hour traffic flow data for Kam Road Road (Road 5B) in adjacent to the Subject Site, is about 240 veh./hr (2-ways). Given such low traffic flow, it is considered the nature of this section of Kam Pok Road should be similar to a LD road type. Text has been added in S2.4.5.
3.	Appendix 2.1 i. Some entries under “10 min SO <sub>2</sub> ” for year 2021 are missing. Please supplement. ii. For SO <sub>2</sub> , RSP and FSP, all the entries in “5-year average” row are incorrect. Please rectify.	Entries in Appendix 2.1 regarding background air quality level, have been checked and amended accordingly.
<b>D. Noise (EA report)</b>		
1.	An approval condition should be imposed to require the submission of a Noise Impact Assessment (NIA) report for the MLP/GBP and provision of noise mitigation measures to achieve full compliance with relevant noise standards to the satisfaction of DEP/TPB.	Noted with thanks.
2.	To facilitate the preparation of the NIA in future, the applicant is required to review the technical feasibility of the 6.9m to 10.1m high noise barrier at the site boundary with the project engineer and properly document the review result in the report. The applicant shall also review if there are at least two to three lorries with cranes at the existing noise sources S10 and S11, as indicated by the green circles as attached in the future NIA. Given that these existing fixed noise sources, S10 and S11, are in close proximity	Noted.

Departmental Comments	Applicant’s Responses
<p>to the proposed development, please include these lorries with cranes in the fixed noise impact assessment.</p>	
<p><b>B. Agriculture, Fisheries and Conservation Department (received on 25.7.2023)</b></p>	
<p>a. However, the extent of pond loss to be caused by the development (5.62 ha including the outside portions of ponds lying on the site boundary) remains to be substantial as compared with the size of the proposed WRA (2.02 ha). The applicant should provide solid evidence to demonstrate that the proposed WRA could adequately compensate for the loss of existing ponds which has a low-to-moderate ecological value. Please see our elaborations below.</p> <p>Firstly, while the suggested enhancement measures adopted from the quoted examples of Lok Ma Chau Spurline and Mai Po Nature Reserve may enhance the ecological value of the proposed WRA, these examples could not prove that the proposed WRA could achieve the target level of enhancement given it is much smaller than the wetland loss. We are not aware of any approved planning applications with similar extent of net loss in pond area.</p>	<p>We genuinely understand the concern on the decrease in pond size. Comparing with existing 4.9ha abandoned fishponds within site, which partially (about 3.4ha) located within WBA, we would like to convert about 2.02 ha abandoned fishponds in total to ecological value-enhanced Wetland Restoration Area (WRA) (Percentage loss approx. 58.76% (2.88 ha)). Nevertheless, with view to compensate maximal wetland restoration area with quality enhancement, and with maximum development potential for optimal land use of application site, we do believe our proposal could allow for optimal balance on development potential of Application Site as well as ecological improvement.</p> <p>With the implementation of the proposed WRA with ecological enhancement, together with active long-term management and monitoring (details refer to WRP), the overall ecological value of the original wetland habitat (i.e. abandoned pond) within the Application Site will be increased from low to medium to medium to high maximally by restoring the degraded abandoned ponds (Table 3.1 of WRP). The integrity and connectivity of wetland habitats in the vicinity will also be enhanced due to the proposed WRA within Application Site.</p> <p>In addition, as the Application Site is partly located at the fringe of the Wetland Buffer Area (WBA) and partly outside the WBA. Thus it is considered that the Site is remotely connected to Deep Bay Area. The creation of the WRA can act as an enhancement to the overall ecological value of the habitats in the proximity, given that the Application Site is already subjected to fragmentation to other wetland habitats that are with higher ecological value and connectivity, such as the channel habitat to the</p>

Departmental Comments	Applicant’s Responses
	<p>west of the Application Site and the active fishpond in the southwest of the Study Area.</p> <p>By reviewing the case of Lok Ma Chau Habitat Creation and Management Plan, the numerical target of <b>twice</b> that of the CAs was deemed feasible to compensate the wetland area loss caused by the Project. The numerical targets are required for bird target species which were impacted by the Project, for which the Lok Ma Chau Ecological Enhancement Area (EEA) zone should supports a density of target species <b>twice</b> that of the Control Areas (CAs) in order to demonstrate that the predicted potential impacts to these species due to the Project have been compensated. Therefore, it is targeting to achieve a <b>two-fold increase</b> in the total abundance of waterbirds of target families/groups of waterbird that were recorded within Application Site (as shown in Table 2.1 of WRP) within the proposed Wetland Restoration Area after the development (details of surveys will be discussed in section 3.5 of WRP), due to the substantial increase in the ecological function to be provided by the proposed WRA.</p>
<p>b. Secondly, according to the proposed construction programme, the construction works of the residential portion will commence before planting of the proposed WRA. It will take another year or two for the reed and other plantings to develop and establish in order to provide a functional WRA. In other words, all the existing ponds within the application site will be lost for a substantial period of time before the proposed WRA could provide favorable habitats for attracting target species and the level of wildlife use be checked.</p>	<p>To address this concern, the planting of the WRA will be advanced, to be conducted in parallel with the re-profiling works (i.e. on wherever portions have been reprofiled and available for planting). The ecological considerations are as follows.</p> <ul style="list-style-type: none"> <li>● Establishment period of WRA could thus commence earlier</li> <li>● The period of temporary loss of wetland habitat is thus minimized to the several months, avoiding the active season of waterbirds (dry season)</li> <li>● The construction period will be also divided into four phases, the first phase is the restoration of wetland, while the second phase involves the construction of buildings in the rearrested part of the WRA</li> <li>● The third phase on building construction at northwestern part with separation from the WRA and the final phase on building construction at rest part of application site. (Section 5.1.2 to 5.1.3 of</li> </ul>

Departmental Comments	Applicant’s Responses																																																																																																																
	<p>WRA refer)</p> <ul style="list-style-type: none"> <li>● Construction works adjacent to the WRA in dry season are avoided, minimizing the potential impacts to the establishment of the WRA</li> <li>● During the final phase of building construction, the reed zone is supposed to be developed. Together with the hoarding erected between the WRA and the residential portion, the reed zone could act as a buffer to screen out the disturbance to the Water Zones within proposed WRA by the construction. Table 15 is revised as follow in the EcoIA report.</li> </ul> <p>9.3.8 <b>Table 15 Timeline of the construction of the WRA</b></p> <table border="1" data-bbox="1234 628 1939 1018"> <thead> <tr> <th>Construction works of the WRA</th> <th>Apr.</th> <th>May</th> <th>Jun.</th> <th>Jul.</th> <th>Aug.</th> <th>Sep.</th> <th>Oct.</th> <th>Nov.</th> <th>Dec.</th> <th>Jan.</th> <th>Feb.</th> <th>Mar.</th> <th>Apr.</th> </tr> </thead> <tbody> <tr> <td>Installation of sheet pipe to separate ponds lying on boundary</td> <td></td> </tr> <tr> <td>Drain down of Ponds</td> <td></td> </tr> <tr> <td>Construction of bunds/walls for ponds lying on boundary</td> <td></td> </tr> <tr> <td>Re-profiling earth works</td> <td></td> </tr> <tr> <td>Re-filling WRA</td> <td></td> </tr> <tr> <td>Planting</td> <td></td> </tr> <tr> <td>Commencement of Establishment</td> <td></td> </tr> </tbody> </table>	Construction works of the WRA	Apr.	May	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	Installation of sheet pipe to separate ponds lying on boundary														Drain down of Ponds														Construction of bunds/walls for ponds lying on boundary														Re-profiling earth works														Re-filling WRA														Planting														Commencement of Establishment													
Construction works of the WRA	Apr.	May	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.																																																																																																				
Installation of sheet pipe to separate ponds lying on boundary																																																																																																																	
Drain down of Ponds																																																																																																																	
Construction of bunds/walls for ponds lying on boundary																																																																																																																	
Re-profiling earth works																																																																																																																	
Re-filling WRA																																																																																																																	
Planting																																																																																																																	
Commencement of Establishment																																																																																																																	
<p>c. Thirdly, according to the RtC, the major mitigation target is the provision of specific habitat conditions. Although there will be fauna monitoring to demonstrate success in reaching the target of the restored wetland, there is no information on what actions could be taken in case the future wildlife use in the proposed WRA is not as high as expected/ required even the habitats are kept at target conditions</p>	<p>To monitor the conditions of habitats in the WRA, vegetation will be checked for survival and health status. Replacement planting will be conducted where necessary. In addition, wildlife usage of the WRA will also be conducted. The presence of the groups of fauna typical to the created habitats are considered as the indicator.</p> <p>The following families/groups of bird/fauna that are generally habituated in wetland habitats and were recorded within the abandoned ponds in Application Site are potential mitigation targets:</p>																																																																																																																

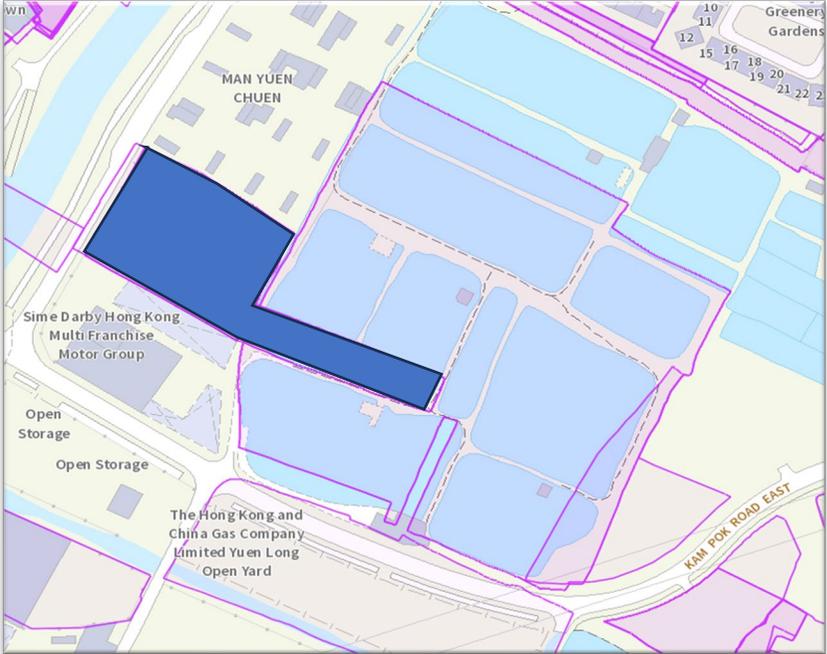
Departmental Comments	Applicant’s Responses
	<ol style="list-style-type: none"> <li>1. Podicipedidae (鵞鵝科)</li> <li>2. Phalacrocoracidae (鸕鷀科)</li> <li>3. Ardeidae (鷺科)</li> <li>4. Anatidae (鴨科)</li> <li>5. Cuculidae (杜鵑科)</li> <li>6. Alcedinidae (翠鳥科)</li> </ol> <p>By making reference to the Lok Ma Chau Habitat and Management Plan, to mitigate the impact of the wetland area loss within Application Site in current case, one of the mitigation targets is to achieve a <b>two-fold</b> increase in the total abundance of waterbirds of target families/groups of waterbird within the proposed Wetland Restoration Area in the same period/season when the pre-construction surveys conducted. This increase will in turn constitute to about <b>two-fold</b> increase in the density of target waterbird families/groups in wetland habitat within the Application Site, Table 2.1, 2.2, 2.3, S.2.3.5 – 2.3.9 and S.7.1.11 of the WRP are revised.</p> <p>In order to maintain the ecological functions of the proposed WRA in the long run, a detailed plan for the management and monitoring of the WRA will be submitted to the authorities during the detailed design stage. An outline of the content of the plan is presented in Table 2.3 of WRP. Action level and contingency action are supplemented in S.7.1.11 and S.7.1.12. Contingency measures such as the removal of exotic species, replenish of the plants, adjustment of water level, and adjustment frequency could be considered in case the target species is not recorded.</p>
<p>d. From fisheries perspective, we note that a Fisheries Impact Assessment (FIA) shall be conducted, and as such, reserve our comments until the formal submission of this chapter. An FIA is considered as an essential element of the EIA process, as highlighted in our previous round of comments to the applicant. Though submission of an FIA offers no</p>	<p>A preliminary FIA report has been conducted and submitted as Further Information to the Town Planning Board on 31.10.2023.</p> <p>Desktop literature review will be conducted. Pond status survey through aerial photos, ground-truth surveys, and Drone will also be conducted, to</p>

Departmental Comments		Applicant’s Responses
	guarantee of eventual support, if no FIA is submitted, we would not be in a position to consider lending support to the current application.	collect the latest baseline information on the ponds within the Application Site. Impact assessment will be conducted in accordance with the development plan.
e.	WRP S.1.1.4 The sentence “ <i>As a substantial amount of the fish ponds in WBA have already been lost over time, the proposed wetland restoration area would result in enhancing the quality of wetland area inside WBA and thus be beneficial for the intention of the WBA</i> ” is misleading as the Application Site is actually existing fish ponds. Please revise.	Noted, the statement is clarified as “ <i>As a substantial amount of the fish ponds within the 500m Study Area that were located within WBA have already been lost over time (used as open storage, car parking and residential purposes), the proposed wetland restoration area would result in enhancing the quality of wetland area inside WBA...</i> ” in S.1.1.4 of the WRP.
f.	S.1.1.5 Please elaborate how the proposed WRA could meet the planning intention of OU(CDWRA) and the requirements under TPB PG-No. 12C.	Noted, the S.1.1.5 is elaborated in terms of the enhanced ecological function.
g.	S.1.2.2 Please elaborate how the proposed WRA could benefit WCA and enhance the quality of the WCA.	Noted, more elaboration about the contribution to the ecological value of WCA are made in the following sections i.e. S.1.2.3 and S.1.2.4.
<b>D. RNTPC Paper No. A/YL-NSW/290A For Consideration by the Rural and New Town Planning Committee on 20.5.2022</b>		
10.1.5. Previous Comments from the Director of Agriculture, Fisheries and Conservation (DAFC)		
a.	The Site is mostly abandoned ponds (4.9ha, 96%) with low to moderate value. About two-thirds of the Site would be developed, leading to a loss of 2.88ha of ponds within the Site, as well as an additional loss of 0.72ha of the outside portions of ponds lying on the site boundary. In other words, the proposed development would result in a significant reduction in wetland area by nearly two-third, from 5.62ha (i.e. 4.9ha of ponds within the Site plus 0.72ha of the outside portions of ponds lying on the site boundary) to 2.02ha (i.e. WRA). To achieve “no-net-loss” in wetland, the proposed WRA of 2.02ha should be able to provide a substantial increase in wetland functions that can compensate for the loss of about 5.62ha of existing ponds.	To achieve “no-net-loss” in wetland, the potential ecological impacts of wetland area loss within the Application Site would be fully compensated by enhancing substantially the ecological functions through a proposed WRA within Site.  With the implementation of the proposed WRA with ecological enhancement, active long-term management and monitoring (details refer to WRP), the overall ecological value of the original wetland habitat (i.e. abandoned pond) within the Application Site will be increased from low to medium to medium to high maximally (Table 3.1 of WRP). The integrity and connectivity of wetland habitats in the vicinity will also be enhanced due to the proposed WRA within Application Site. It is targeting

Departmental Comments	Applicant’s Responses
	to achieve a <b>two-fold increase</b> in the total abundance of waterbirds of target families/groups of waterbird (as shown in Table 2.1 of WRP) within the proposed Wetland Restoration Area (details of surveys will be discussed in section 3.5 of WRP).
b. The applicant proposed to compensate for such wetland loss by enhancing the remaining one-third (2.02 ha) of the abandoned ponds as WRA. However, the applicant is yet to demonstrate that the proposed WRA could fully compensate for such wetland loss due to the following reasons:	
i. firstly, the applicant claimed that though smaller in size, the WRA could provide more areas which are available for usage by ardeids by providing more shallow water areas. However, it should be noted that ecological functions of the affected ponds do not only come from the shallow water area, but also other habitats therein including the deep water area. Around 100 species of fauna including 16 species of bird, dragonfly and mammal of conservation importance were recorded there. These included species that utilise deep water (e.g. great cormorant and little grebe), shallow water (e.g. little egret and great egret) as well as pond bund areas (e.g. collared crow). It is claimed that “It is believed that habitat management can be considered to increase the ecological function of this wetland to over the existing levels”. While habitat management may enhance the ecological value of the wetland habitat, justifications are needed to substantiate this statement given that not only the shallow water area but the whole abandoned ponds can provide ecological functions and that a considerable amount of fauna species of conservation importance could be found. Detailed monitoring programmes, management practices and contingency plans should be provided to monitor the performance of the proposed WRA and recommend actions to take in case of failure in meeting the targets;	<p>The proposed development proposes to create an artificial on-site wetland of 2.02 ha, as a wetland restoration area, with substantial ecological enhancement through creation of variety micro-habitats, such as water zones of different water depths and islands, to attract the wetland-associated fauna in the proximity. With a comprehensive planning, active long-term management and monitoring of the proposed WRA during operational phase, including but not limited to the partial drain down of the WRA, fish stocking within WRA, continuous ecological monitoring, proposed action level and contingency measures. The provision of proposed outline of the wetland Habitat Creation and Management Plan with regard to the proposed WRA will also be submitted at the detailed design stage for AFCD and other relevant government departments’ consideration and approval. By the end, the wetlands and fish pond around the Deep Bay Area would be beneficial greatly by the enhanced ecological functions through the implementation of the proposed WRA.</p> <p>The wetland restoration efforts will focus on enhancing the quality of the habitats within the WRA. This includes restoring and improving vegetation, water quality, and ecological processes. By implementing sustainable management practices and promoting ecological health, the improved habitat quality will attract more migratory birds and contribute to the overall enhancement of the WBA and WCA's ecological value. The</p>

Departmental Comments	Applicant’s Responses
	<p>wetland restoration will create additional ecologically-enhanced wetland habitats within the WRA. By increasing the availability and diversity of habitats, it will provide more resources and shelter for migratory birds and other wildlife. This expansion of suitable habitats within the WRA will directly benefit the WBA by extending its reach and capacity to support a greater number of species.</p> <p>The proposed WRA can also enhance ecological connectivity within the WCA. By establishing a contiguous wetland habitat in the WRA, it will offer a connected landscape ecosystem for migratory birds and other wildlife. This connectivity will contribute greater and wider movement of species, facilitates migration patterns, and supports the overall ecological functioning of the WCA. As the WRA could sustainably provide food supplies, thus safeguarding the waterbird populations from other potential risks and is in line with the TPB PG-No. 12C, and also the planning intention of the OU(CDWRA) zone in terms of wetland ecological function.</p>
<p>ii. secondly, while planting buffer (including reed and trees) of 0.59ha (ranging from 4.0m to 25.0m) will be planted along the edge of wetland, the planting buffer actually forms part of the WRA and the proposed shallow water zone is immediately adjacent to the residential buildings (less than 10m). Noting the layout of the proposed WRA is largely surrounded by residential buildings and any disturbance (e.g. noise, lighting and visual impact) will adversely affect the fauna in particular the waterbirds using the habitat, it is highly doubtful if the habitats including the reed planting, tree group and shallow water created are favourable habitats for the wetland fauna in particular the waterbirds. As such, the ecological value of the WRA will be diminished.</p>	<p>The reed zone serves as a belt surrounding the WRA in the latest version of WRP. This could act as a buffer to screen out disturbances generated by the adjacent residential buildings. By creating a natural barrier, it aims to mitigate potential noise, lighting, and visual impacts on the wetland fauna, particularly the waterbirds.</p> <p>The reed planting and shallow water zones proposed as part of the WRA habitats are indeed favorable habitats for wetland fauna. The shallow water zone will provide feeding opportunities for non-swimming waterbirds such as Cuculidae and Alcedinidae. Additionally, the reedbeds serve as important habitats for various wildlife, including birds. The creation of reedbeds can provide suitable habitats for cryptic species like bitterns, offering them foraging and roosting grounds. The reedbeds will also provide diverse micro-habitats surrounding the water zones, which in turn</p>

Departmental Comments		Applicant’s Responses
		offer increased cover and feeding opportunities for a range of mammals, insects, other invertebrates, amphibians, reptiles, and birds. This includes species such as bitterns, smaller herons, rails, crakes, and dragonflies.
c.	The cluster of abandoned ponds at the Site is isolated from other wetland habitats. As such, the integrity of the cluster itself is important to the around 100 species of fauna including birds, mammals, herpetofauna, butterflies and dragonflies found there. The impact of further fragmenting this cluster of wetlands by the proposed development layout (i.e. with the proposed WRA enclosed by the residential portion) should not be minor.	<p>The present proposed development layout has effectively addressed the potential ecological impacts resulting from the fragmentation of the abandoned ponds cluster near the Application Site. Specifically, the northern section of the WRA is intentionally left open and not enclosed by the residential portion of the development. This strategic decision has been made to enhance ecological connectivity between the WRA and the wetland habitats located to the north of the Application Site.</p> <p>By keeping the northern part of the WRA unenclosed, it will allow for a more seamless and uninterrupted movement of species between the WRA and the adjacent wetland habitats. This higher level of ecological connectivity is crucial for the overall health and functioning of the WRA.</p>
d.	As it is assumed that the portions of the abandoned ponds outside the Site (~0.72ha) will also lose their wetland functions, such loss would be permanent. Due to the permanent nature of the impact and the low to moderate value of these ponds, the impact should not be minor.	<p>Considering the remnant parts of abandoned pond enclosed by the western boundary of the Application Site, the ponds were already subject to fragmentation with very limited fauna species recorded during the survey. Therefore, the potential ecological impacts due to the habitat fragmentation to these remnant parts of abandoned ponds are considered minor. For the abandoned pond to the north of the Application Site, higher level of ecological connectivity is expected after the establishment of the WRA with ecological enhancement. Therefore, the impacts of fragmentation of the abandoned pond to the north of the Site is also considered minor.</p> <p>Optimal efforts to formalize and integrate the fragmented wetlands into the Application Site have been made, with the aim to mitigate the impacts on habitat fragmentation. These efforts include engaging in negotiations with adjoining owners, particularly in relation to a previous planning</p>

Departmental Comments	Applicant’s Responses
	<p>application (i.e. Case no. A/YL-NSW/270 as indicated in the figure below), but unsuccessful.</p> 
<p>e. The applicant is strongly advised to revise the proposed development layout to fully mitigate the potential adverse ecological impacts.</p>	<p>The proposed development layout has been taking into a comprehensive consideration of management and monitoring of the proposed WRA.</p>
<p>f. Major construction works for the residential portion will commence before the WRA is well established. The WRA hoardings will be removed partially after the nearest building units are constructed. As such, there would be disturbance impacts by the residential development on the WRA and thus reducing the wetland function.</p>	<p>Mere elaborated phasing programme has been incorporated in the present proposed scheme:</p> <ul style="list-style-type: none"> <li>● The construction period will be also divided into four phases, the first phase is the restoration of wetland, while the second phase involves the construction of buildings in the rearrested part of the WRA</li> <li>● The third phase on building construction at northwestern part with</li> </ul>

Application No. A/YL-NSW/314 Proposed Residential Development with Wetland Habitat, and associated Filling of Ponds and Excavation of Land in “Other Specified Uses” annotated “Comprehensive Development to include Wetland Restoration Area” Zone, Various Lots in D.D.104, Pok Wai, Yuen Long

Departmental Comments	Applicant’s Responses
	<p>separation from the WRA and the final phase on building construction at rest part of application site. (Section 5.1.2 to 5.1.3 of WRA refer)</p> <ul style="list-style-type: none"> <li>● Construction works adjacent to the WRA in dry season are avoided, minimizing the potential impacts to the establishment of the WRA</li> <li>● During the final phase of building construction, the reed zone is supposed to be developed. Together with the hoarding erected between the WRA and the residential portion, the reed zone could act as a buffer to screen out the disturbance to the Water Zones within proposed WRA by the construction</li> </ul> <p>WRA hoarding could be removed section by section to allow connectivity to the surrounding wetland habitats (e.g. abandoned ponds to the north of the Application Site), after the nearest building units are constructed.</p>