

Table A: Responses-to-Comments (22.2.2024)

Departmental Comments		Applicant’s Responses
A. Drainage Services Department (received on 8.2.2024)		
A. Drainage Impact Assessment (DIA Report)		
1.	Figure 3.1: The proposed discharging pipe sizes are in descending order (i.e. from 1600mm dia. to 1450mm dia.) which is not acceptable. Please review and revise the size accordingly.	The proposed discharging pipe size has been amended. It is now proposed from 1350 mm dia. to 1500 mm dia. accordingly. Please refer to Figure 3.1.
2.	Figure 3.1: Please provide cover levels of terminal manhole S1 and manhole S2 for comment.	Noted and revised accordingly.
3.	Figures: The proposed discharging drains appears in conflict with existing road drains. Please incorporate the existing road drains alignment on drawings for reference. Besides, the size of existing road drains does not tally with our record. The drainage discharging alignment should be assessed to demonstrate it is feasible in this DIA report.	Noted and revised accordingly. Figure 3.2 shows the overall overlaid drawing with existing road drains, while Figures 3.3, 3.4, and 3.5 illustrate details of the proposed drainage system overlaying with existing road drains. The proposed drainage system is considered feasible.
4.	Figure 2.1 and Appendix 2.1: Please advise where is catchment area C8.	Catchment area C8 is now shown in Figure 2.1 and Appendix 2.1.
5.	Appendix 2.4: Please advise the proposed 800mm drain is a pipe or u-channel and how it could intercept surface runoff from adjacent areas if it is a pipe drain.	The 800mm drain is u-channel. Please refer to Appendix 2.4.
6.	Please clearly state the maintenance responsibility of proposed drainage facilities in report text and also provide a drawing to indicate the above.	The maintenance responsibility is stated in sections 2.5, 3.1.2 and illustrated in Figure 3.6.
B. Sewerage Impact Assessment (SIA Report)		
1.	Figure 2.1: The invert levels of MH340 and MH380 do not tally with our record. Please revise.	Noted and revised accordingly.
2.	Figure 2.1: Please provide the proposed cover level of terminal manhole PO.	Noted and revised accordingly.

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3.	Section 2.5.6 and 3.1.2: Please clearly state the maintenance reasonability of the proposed sewers in the report. Also, please provide a drawing indicating the maintenance reasonability for proposed works for vetting.	The maintenance responsibility is stated in Sections 2.5.6, 2.6, and 3.1.3, which is also illustrated in Figure 2.4.
B. Environmental Protection Department (received on 8.2.2024)		
A. Environmental Assessment (EA Report)		
1.	It is noted that noise barriers ranging from 7.5m to 10.1m in height have been proposed on the western site boundary to mitigate the potential traffic noise impacts and fixed noise sources impacts. Please verify and confirm the technical feasibility of the 7.5m to 10.1m noise barrier at the site boundary with the project engineer and spell it out in the main text for proper record.	Proposed 7.5m to 10.1m high noise barriers have been confirmed with Project Engineer to be technically feasible. Sections 3.5.5 and 4.6.1 have been amended accordingly.
2.	Please be reminded that the proponent/consultant shall review if there are at least two to three lorries with cranes at the existing noise sources S10 and S11 in the future NIA assessment. Given that these existing fixed noise sources, S10 and S11, are in close proximity to the proposed development, please include these lorries with cranes in the fixed noise impact assessment.	Please be clarified the current fixed noise impact assessment and plant inventory was based on noise sources identified during site surveys. Relevant noise protective measures such as noise barriers have already been proposed near noise sources S10 and S11. In addition, there are other existing village houses as well as residential buildings at Man Yuen Chuen in close vicinity to the concerned noise sources. Operation of these noise sources will also need to comply with noise criteria at existing sensitive uses. It is also noted from previous EPD’s comment that a future NIA should be required in later stage as a planning condition. In later detailed design stage, the plant inventory together with necessary noise mitigation measures to be proposed based on the development scheme will be further reviewed/ proposed accordingly.
3.	Please clarify and supplement the tentative completion year/population intake year of the proposed development in the report.	Section 3.4.2 has been amended accordingly.

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

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4.	S.4.3.1 - "...There was no night-time operation at the identified fixed noise sources...", relevant records shall be included in the report for future reference.	Relevant records have been added in Appendix 4.1.
5.	Figure 3.5 - Please double check the location and legend of the proposed noise barrier in the drawing.	Legend in Figures 3.5 and 4.6 has been amended accordingly.
6.	From noise perspective, it is noted that the applicant has revised its noise impact assessment as per the amendments made on the MLP. Having reviewed the assessment, please be advised that our previous comment dated 6.11.2023 remains valid as follows –	-
	- 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.
	- 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 to the proposed development, please include these lorries with cranes in the fixed noise impact assessment.	Noted that a future NIA is required as a planning condition.
7.	It is understood that the applicant submitted the captioned FI 7 on 5 Jan 2024, and we have also provided our comments to you on FI 6 ([See attachment "NSW 314 Departmental Comments 20240112.docx"]). Our previous comments provided to you have not been addressed in the current FI. The applicant is asked to review and revise the EA and SIA as per our comments and resubmit to us for our consideration.	The EA and SIA have been revised accordingly.
C. Environmental Protection Department (received on 12.1.2024)		
A. Environmental Assessment (EA Report)		

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1.	S.1.3: The applicant is advised to briefly describe the mitigation measures proposed in each environmental aspect covered under this EA.	Mitigation measures incorporated into the design have been briefly described in Section 1.3.3.
2.	S.1: Under a new section, please include the details, with figures as appropriate, to describe the reasons that the development projects may constitute a Designated Project under the EIAO. Please mention that the applicant would be required to obtain an environmental permit following the statutory EIA process for the construction and operation of the project.	Section 1.3.4 has been amended to describe the reason that the proposed development may constitute a designated project under EIAO and that an environmental permit will be required for both construction and operation of the project.
3.	S5.2.4, S5.2.5, S5.4.4, S5.4.9, S5.5.2, S5.6.8: Please note the ProPECC PN 1/23 and PN 2/23 have superseded the ProPECC PN 5/93 and PN 1/94 respectively. Please update the relevant sections in the report https://www.epd.gov.hk/epd/english/resources_pub/publications/pub_propeccpns.html	Sections 5.2.4, S5.2.5, S5.4.4, S5.4.9, S5.4.19, S5.5.2, S5.5.8, S5.6.8, and S5.6.12 have been amended accordingly.
4.	S5.6.8: With reference to S5.4.17, “The proposed SPS has a design ADWF of about 151 cu. m/day.” Please review.	The proposed capacity of SPS should be about 125m ³ /day. Section 5.4.17 has been amend accordingly.
B. Sewerage Impact Assessment (SIA Report)		
1.	Appendix 2.1 and Appendix 2.2: from our record, manhole segment calculation discrepancies still exist, please check again and ensure whether the values of full bore velocity, full bore capacity thus pipe utilization for both cases were calculated correctly. According to our calculation, the utilization of P10 to P11, P12- P13, P14-E1 would be over 100%. Please check.	Noted. Values of full bore velocity and full bore capacity in the calculation have been reviewed and updated accordingly. Please refer to revised Appendix 2.1 and 2.2. Accordingly, size of proposed sewer between P9 and E1 as shown in revised Figure 2.1, has now been amended to 750mm and 825mm and that the updated utilization rate is below 100%.
D. Agriculture, Fisheries and Conservation Department (received on 5.2.2024)		
1.	<u>Works programme</u> To further minimize the ecological impacts and enhance the function of the WRA, please consider to revise the works programme as follows –	In order to minimize the ecological impacts on the nearby WRA during the construction phase and prioritize the improvement of the WRA, the construction activities for Phase IV, which do not involve noisy construction work for

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	<ul style="list-style-type: none"> - Commence construct of the WRA immediately after dry season and start planting in the early wet season. - Lengthen the establishment period to 1.5 year after the completion of planting works. - Restrict the construction works under Phase IV to wet season only. 	<p>the housing units, have been revised to take place exclusively during the wet season. This adjustment aims to minimize the impact on the environment by aligning construction activities with a period when ecosystems are typically more resilient and when wildlife may be less active or have alternative habitats available. Table 15 is revised.</p>
2.	<p><u>Funding arrangement</u></p> <p>It is noted that detailed information about the funding arrangement is yet to be provided and agreed among relevant parties. As a secure funding is essential to the sustainability of the WRA, the relevant arrangement should be confirmed at an early stage of the project.</p>	<p>A detailed funding arrangement is submitted to ensure sustainable funding for the operation and maintenance of the WRA. The proposed cost for the maintenance and management of the WRA is estimated at \$3M per year, taking into account the specific requirements and needs of the wetland area. This funding is crucial to ensure the successful implementation and operation of the proposed long-term management plan. The cost includes staff, contractor packages, ecological monitoring, and administration expenses. Based on the estimated recurrent costs for the eight habitats in the WRA, the proposed budget of \$3M per annum is also considered sufficient to cover the necessary management and monitoring activities.</p>
A. Ecological Impact Assessment (EcoIA Report)		
1.	<p><u>S.8.2.6</u></p> <p>Please advise whether any measures would be taken to avoid/ minimize the disturbances (e.g. water pollution) to the remaining portion of the ponds lying along the Application Site during the sheeting piling and construction of concrete wall along the application boundary.</p>	<p>Good site practice will be strictly followed during the operation of sheet piling to minimize the potential impacts of disturbance to the surroundings. S.9.3.4 is revised.</p>
	<p>Please revise as “... while the portions outside the Application Sites Site will retain</p>	<p>Noted, the sentence is revised.</p>

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<p>remain unchanged...”.</p>	
<p>2. <u>S.9.3.3</u></p> <p>Please supplement as follows – <i>“There will be two types of hoarding, perimeter hoarding and WRA hoarding. Perimeter hoarding will properly delineate the works site boundary and screen disturbance to the nearby habitats during construction phase. [Please add a sentence about WRA hoarding.] In order to reduce the potential disturbance to wildlife utilizing habitats near the Application Site, the hoardings will be made of opaque, non-reflective materials and painted in colour that will blend in with the environment. The workers will be instructed not to disturb any nearby habitats, and any works beyond the boundary would be strictly prohibited.”</i></p>	<p>Noted, S.9.3.3 is revised. In order to minimize disturbance to the WRA during construction phases I and II of the residential portion that are located further away from the WRA, a protective hoarding will be erected around the WRA, screening the disturbances generated from the construction of the residential portion.</p>
<p>3. <u>S.9.3.7</u></p> <p>Please move the text about WRA into a new section.</p>	<p>Noted, the text about WRA is moved into S.9.3.8.</p>
<p>4. <u>S.9.3.7 (WRA) – S.9.3.13, Table 15</u></p> <p>The construction programme is unclear. Please expand Table 15 to cover the timeline for Phase One (WRA) to Final Phase of the project (to be read together with Figure 5.1 of WRA showing the construction phasing). Please indicate in the table and figure which construction works phase/ items would avoid winter.</p>	<p>Noted, Table 15 is revised. Phase IV construction, that is located adjacent to the WRA is limited in wet season.</p>
<p>5. <u>S.9.3.7 (WRA)</u></p> <p>- It is stated that <i>“The earth works and water filling as well as planting works of reed for the WRA will be conducted during the wet season of the first year of construction programme”</i>. How about the landscape planting near the WRA and the submerged plants? Does the 5th row of Table 15 refers to all types of planting? This comment applies to the same table in WRP.</p>	<p>The planting stated in Table 15 refers to the planting of reed and submerged plants within the WRA. Table 15 is revised.</p>

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6.	<p><u>Table 15, first row</u></p> <p>Please correct the typo “..... sheet pipe piling.....”. This comment applies to the same table in WRP.</p>	Noted, the tables in EcoIA and WRP are revised.
7.	<p><u>S.9.3.10</u></p> <p>Please remove the last sentence “<i>Planting and initial vegetation maintenance will commence in the subsequent wet season</i>”.</p>	Noted, the sentence in S.9.3.10 is removed.
8.	<p><u>S.9.3.12</u></p> <p>- It is stated that the last phase (i.e. for the buildings around the WRA) will commence after the completion of the establishment period. Would the reedbed and the landscape planting adjacent to the WRA be well established enough to act as a buffer to the disturbance of the last construction phase only one year after planting, given that it would be planted in late wet season (i.e. Aug and Sep as shown in Table 15), instead of the optimal planting months in early wet season e.g. April?</p>	The reed and submerged plant are expected to be planted within Aug of 2024 and is allowed for 8-months establishment covering wet and dry season. During this period, actions such as water levels management, soil composition management and replenishment of plants will be involved to ensure the growth and survival when necessary. Together with the WRA hoarding surrounding, the disturbance to the WRA could be minimized to acceptable level. S.9.3.12 is revised accordingly.
9.	<p><u>S.9.3.15 – 9.3.17, Landscape Master Plan</u></p> <p>There will be hoarding and noise barrier around the WRA according to the Landscape Master Plan. Please advise whether the WRA hoarding and the noise barriers will hinder the animal movement between the WRA with the nearby ponds. Will any animal passage or wildlife corridor be set up around the WRA?</p>	The possibility of creating small openings in the reinforced concrete wall, which is situated along the northern boundary of the site, is being considered to facilitate the movement of small animals, including but not limited to the amphibian and reptile species recorded in the ecological survey. The design of the small opening will be further proposed in the later detailed design stage.
10.	<p><u>S.9.6.2</u></p> <p>We are not aware of any EM&A Manual submitted under this planning application. Please revise.</p>	Noted, the EM&A Manual will be submitted in the later stage.

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11.	<p><u>S.9.4</u></p> <p>While the details about the creation and operation of the WRA could be provided in WRP, please beef up in the EcoIA regarding how the wetland loss could be compensated adequately in a quantitative way.</p>	Noted, the content of the WRP is beefed up in S.9.4.5.
B. Wetland Restoration Proposal (WRP Report)		
1.	<p><u>S.1.1.5</u></p> <p>Please elaborate how the WRA could “<i>sustainably provide food supplies, thus safeguarding the waterbird populations from [from?] other potential risks</i>”.</p>	Noted, S.1.1.5 is revised.
2.	<p><u>S.1.2.3, S.1.2.4</u></p> <p>It is stated that “<i>The wetland restoration can enhance ecological connectivity within the WCA</i>” and “<i>the improved habitat quality will attract more migratory birds and contribute to the overall enhancement of the WCA's ecological value</i>”. Please explain how the above could be achieved given that the application site is at least 185m away from the WCA.</p>	Although the application site is located about 185 meters away from the WCA, it is suggested that wetland restoration efforts can still enhance ecological connectivity within the WCA and contribute to its overall ecological value. Wetland restoration involves creating or restoring wetland features such as pond of different water depths and vegetation that can provide suitable habitat for various species. By improving the quality of habitats in the restored wetlands, such as ensuring food availability, nesting sites, and shelter, the area can become more attractive to migratory birds. As a result, more birds may be inclined to use the restored wetlands as a stopover site during migration or as a breeding ground, indirectly benefiting the overall ecological value of the WCA. S.1.2.4. is elaborated.
3.	<p><u>Table 2.1</u></p> <p>- Please advise how these 6 target waterbird families were generated. Were they based on all the bird species recorded within the application site or only the species</p>	The 6 target waterbird families are summarized by the most common and abundant waterbird/bird species recorded within the Application Site and other habitat during the ecological survey period. A table showing the respective

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	of conservation importance? Please provide a table showing the list recorded species under the respective mitigation target. Please asterisk the species of conservation importance.	recorded waterbird species of conservation importance is supplemented as Table 2.2.
	<p>- In addition to the target waterbird families, the abundance of individual avifauna and non-avifauna species of conservation importance should also be recorded during the pre-construction survey and monitored during the construction and operation phases.</p> <p>- As the species recorded during the future pre-construction survey may change, the list of mitigation targets should be updated as per the pre-construction survey. Appropriate adjustments to the habitat design of the WRA may be required accordingly.</p>	Noted, appropriate adjustment will be made when necessary according to the site condition.
4.	<p><u>S.4.2.5</u></p> <p>It seems that there are typos for the depth of the water zones. Please rectify.</p>	Noted, the depth of the deep water zones are revised in S.4.2.5.
5.	<p><u>S.4.4.5</u></p> <p>It is stated that “.....the planting of seedlings should be conducted in early spring (March – April) to avoid frost while not missing the growing season and thus will be conducted in the following spring time”, which does not tally with the table after S.4.4.5, EcoIA S.9.3.7 and EcoIA Table 15. Please clarify.</p>	Noted, the updated schedule is revised as the Table 15 of the EcoIA and the timeline in S.4.4.5 of the WRP.
E. Agriculture, Fisheries and Conservation Department (received on 12.1.2024)		
1.	<p><u>Feasibility of two-fold increase in ecological value</u></p> <p>It is mentioned that other projects or studies with intensive management measures such as pond drain-down and restocking of trash fish have been reviewed and it was targeting to achieve a two-fold increase in the total abundance of waterbirds. Please specify what intensive management measures would be implemented in the proposed WRA, and provide details to demonstrate how these measures could be implemented effectively</p>	<p>In the latest layout plan, the proposed WRA has been further expanded up to 2.47 ha covering over 48.4% of the Application Site.</p> <p>WRA with ecological enhancement and active management including regular fish stocking and large areas of year-round shallow water zone could compensate the loss of the wetland due to the residential portion.</p>

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<p>given that the proposed WRA would be much smaller in size and would consist of one compartment only as compared with the ponds in the examples.</p>	<p>As the existing abandoned fish ponds are relatively deep in nature (i.e. 2m), which are not favored for the non-dabbling waterbirds, the design of the Wetland Restoration Area will provide much larger shallow water areas for the waterbirds to roost and feeding, and also to include areas with different water depths as well as in order to provide more micro-habitable conditions for the waterbirds.</p> <p>The proposed restoration of wetland habitats will create more shallow water areas than the present conditions. Thus, the provision of more shallow water regions could compensate the loss of abandoned fishponds, resulting “no-net-loss in wetland” in terms of enhanced ecological functions and provide more microhabitats that are favorable for waterbirds.</p> <p>To ensure an adequate food source for waterbirds during the dry season, fish stocking will be conducted at least once prior to the onset of the dry season. This proactive measure aims to guarantee that there is a sufficient supply of fish available within the WRA to sustain the waterbird population during this period when natural food sources may be limited. Additionally, monitoring of the fish stocks within the WRA will be carried out throughout the dry season as well as wet season, which helps to assess the availability and abundance of fish, ensuring that the waterbirds have access to a continuous food supply and enabling any necessary interventions or adjustments to be made if needed to support the ecological balance within the WRA. The usefulness of fish stocks for birds is maximized in the way that most fishes</p>

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	<p>are of suitable size to be eaten by the different types of waterbird species.</p>
<p>2. <u>Wetland loss to be covered by the two-fold increase</u></p> <p>Even though a two-fold increase in ecological value could be achieved, given that the size of the proposed WRA (2.02 ha) is smaller than the area of permanent wetland loss to be caused by the proposed development (2.88 ha), the proposed WRA is not adequate in compensating the wetland loss within the Application Site, not to mention the potential permanent loss in wetland function of the remaining portion of ponds lying along the boundary of the Application Site. The applicant is advised to increase the "WRA to development footprint" ratio for adequate wetland compensation.</p>	<p>In the latest layout plan, the proposed WRA has been further expanded up to 2.47 ha covering over 48.4% of the Application Site.</p> <p>More importantly, the entire northern part of the Application Site would be included as part of the WRA, and therefore after the implementation of the present development, the adjacent ponds outside the Application Site would still be adjacent to wetland (i.e. the WRA).</p> <p>As stipulated in S.8.2.6 of the EcoIA, for each of the ponds lying on the Application Site boundary, they will be divided by sheet piling along the site boundary, and then only the portion of ponds within the Application Site will be drained for construction, while the portions outside the Application Sites will retain unchanged. A series of vertical concrete walls (of smaller width than the existing earth pond bunds in the ponds of Pok Wai) will be built immediately behind the sheet piling within the Application Site. So that, the temporary loss of the portions of the abandoned ponds outside the Application Site (~0.72 ha) is not anticipated.</p> <p>Furthermore, WRA with ecological enhancement and active management including regular fish stocking and large areas of year-round shallow water zone could compensate the loss of the wetland due to the residential portion.</p> <p>Experience from LMC Spur Line wetland and the Management Agreement in Northwest fishponds by</p>

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		HKBWS well demonstrated that significant increase of wetland function for waterbirds (i.e. two-fold increase in LMC Spur Line project and up to 6 times increase in HKBWS MA project) is practically feasible. Particularly in the HKBWS MA project where the ponds joining the project are mostly traditional fishponds and some of them have the sizes similar with or smaller than the proposed WRA.
3.	<p><u>Action level and contingency measures</u></p> <p>Examples of action level and contingency measures from other projects have been quoted. Please beef up the WRA as appropriate for our further comments.</p>	Action levels (covering target species and habitat conditions such as vegetation conditions, water quality, water depth, stocked fish, etc) and corresponding contingency measures have been provided in Table 7.1 of the revised WRP.
4.	<p><u>Works programme</u></p> <p>For clarity, please expand Table 15 to cover the timeline for Phase One (WRA) to Final Phase of the project (to be read together with the figure showing the construction phasing). Please indicate in the table and figure which construction works phase/ items would avoid winter.</p>	<p>Table 15 of the revised EcoIA and the timeline under section 4.4 of WRP have been expanded to cover the timeline of the full construction programme of the present project (from Phase I to Phase IV). Figure 6 of the revised EcoIA has illustrated the locations of each phase.</p> <p>Piling works for piled foundations are the major noise sources in many construction projects. In the present Project, however, given the low-rise nature of the residential buildings, pile foundation are not required and thus has been completely avoided. Sheet piling for temporary dividing the adjacent ponds during construction would be installed by non-percussive method. Therefore, the majority of noise impact due to construction has been avoided in the present project.</p>