

Section 12A Rezoning Application No. Y/YL-MP/9

To Amend the Notes of the “Comprehensive Development to include Wetland Restoration Area” Zone for a Proposed Comprehensive Development at Wo Shang Wai, Yuen Long, Lots 77 and 50 S.A in DD101

2nd (Formal) Further Information Submission Response to Departmental Comments

18 September 2025

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Addendums

Addendum 1: Comparison table of current proposal with the application No. A/YL-MP/394

Addendum 2: Summary of Planning and Design Merits, and Ecological Merits

Addendum 3: (Revised) Ecological Impact Assessment

Addendum 4: (Revised) Master Layout Plan

Addendum 5: (Revised) Landscape Function Analysis Plan

Addendum 6: (Revised) Landscape Master Plan (including Tree Preservation Proposal)

Addendum 7: (Revised) Visual Impact Assessment

Addendum 8: (Revised) Planning Statement
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Response to Dept Comments of District Planning Officer, PlanD (received 9.9.2025) CURRENT

Comments from the District Planning Officer/Fanling, Sheung Shui and Yuen Long East, Planning Department (PlanD) (received 5.9.2025) (Contact person: Mr. Karen Chan, Tel.: 3168 4041)	Response(s):
<p><u>General</u></p> <p>1. Please provide a comparison between the current proposal with the application No. A/YL-MP/394 under processing.</p>	<p>Please refer to Addendum 1 for the comparison table.</p>
<p>2. Noting from the draft Ecological Impact Assessment (EcoIA) that one building block (i.e. C2-1) has been reduced from 10-storeys to 8-storeys, please update all related architectural drawings, including sections, master plans, as well as the relevant drawings across all technical assessments.</p>	<p>Noted. All related architectural drawings have been updated.</p>
<p>3. Noting from the Traffic Impact Assessment (TIA) that the number of flats and population have been updated, please update all relevant technical assessments where appropriate.</p>	<p>Noted. All relevant technical assessments have been updated.</p>
<p>4. Please prepare a drawing showing all design merits, planning gain as well as additional ecological measures to mitigate any visual, ecological, air ventilation impacts. Reference can be made to Drawing No. Z-11 of Y/YL-MP/10.</p>	<p>Please refer to Addendum 2 for a summary drawing of the planning and design merits.</p>
<p>5. Please provide an estimation of the area required for excavation and filling of land.</p>	<p>The estimation of the area required for excavation and filling of land will be provided at the s16 planning application stage.</p>
<p>6. The approved EcoIA has included measures to avoid night-time lighting and glare to the surrounding areas. Noting that the proposed development is located at the immediate adjoining of the wetland restoration area and the future Sam Po Shue Wetland Conservation Park, please elaborate more on these measures, or advise if</p>	<p>The mitigation measures recommended in the EcoIA (Addendum 3) are very clear, with more detail than the approved EIA report of STT. Inputs in previous RtC to AFCD comments should have addressed this comment.</p> <p>Such impact is assessed and evaluated as insignificant. Measures could be further reviewed during detail design including features e.g. streetlight, façade, safety requirements etc.</p>

<p>Comments from the District Planning Officer/Fanling, Sheung Shui and Yuen Long East, Planning Department (PlanD) (received 5.9.2025) (Contact person: Mr. Karen Chan, Tel.: 3168 4041)</p>	<p>Response(s):</p>
<p>there are additional measures to alleviate such impact.</p>	
<p>7. Please clarify how glare and noise impacts from swimming pools could be mitigated, e.g. in terms of operation hours, cautious design.</p>	<p>The swimming pools will have insignificant disturbance impacts, as the inherent location and design of the pools would mitigate the disturbance impact. The pools will be located at ground floor, surrounded by the proposed residential buildings, and entirely screened off by the perimeter wall and buffer planting. In addition, the pools will generally be closed in the winter season.</p> <p>Operational hours and design considerations – https://www.fehd.gov.hk/english/forms/pdf/Requirement_for_Swimming_Pool_Licence(revised).pdf</p> <p>Noise Impact: Under normal circumstances, swimming pool facilities are not expected to generate significant noise impacts during the operational phase. As such, they are typically not considered a source of concern in the noise impact assessment.</p>
<p>8. While it is understood that this is a rezoning application, as the provision of Residential Care Home for the Elderly (RCHE) may be regarded as a planning merits, please justify and supplement some information on the future implementation arrangement of the RCHE.</p>	<p>The RCHE would cater to the future demand for such community facilities in the district. The RCHE is also grouped in the Phase 1 construction program, so it is intended to be implemented and made available for operation at the earliest stages of the development.</p> <p>The initial intention is for Applicant to construct and operate the RCHE; however, this would be further explored and considered at the s16 planning application or detailed design stage.</p>
<p>Planning Statement</p> <p>9. Please review if tables 2 and 3 and figures 4 and 5 regarding the approved and on-going applications in the surrounding areas need to be updated</p>	<p>The Tables and Figures has been updated. (Addendum 8)</p>
<p>10. Para. 7.1.1 – please update with the latest GFA, flat number, flat size and design population.</p>	<p>Noted, and para. 7.1.1 updated with latest parameters. (Addendum 8)</p>

Comments from the District Planning Officer/Fanling, Sheung Shui and Yuen Long East, Planning Department (PlanD) (received 5.9.2025) (Contact person: Mr. Karen Chan, Tel.: 3168 4041)	Response(s):
<p>11. Table 4</p> <p>(a) Please explain why the domestic GFA has been slightly increased.</p>	<p>In response to AFCD's comment to minimize the construction impact of Tower C2-1, the no. storeys have been reduced from 10- to 8-storeys. As such the domestic GFA of the reduced storeys has been reshuffled to other house developments in the site, while keeping the overall plot ratio the same. The slight increase in domestic GFA is due to the process of maximizing the internal floor space and dimensions of the houses, which has resulted in internal floor space that can accommodate a little bit more domestic GFA than was in the tower.</p>
<p>(b) Please clarify if the bicycle parking space should be 204 as shown on the revised draft TIA dated 14.8.2025.</p>	<p>To address TD comments, the total no. bicycle parking spaces has been updated to comply with the recently updated standard.</p>
<p>(c) Please clarify if all car parking spaces are for private cars. If affirmative, please indicate clearly in the table.</p>	<p>All car parking spaces are for residential (private cars). Table has been updated.</p>
<p>(d) Please clarify if basement parking will include all parking provisions (i.e. residential, visitors, accessible parking space, motorcycle, loading/unloading bays and bicycle) as mentioned.</p>	<p>The basement car park will include all parking provisions.</p>
<p>12. Para 8.5.3 –</p> <p>(a) these extra ecological merits (except for the buffer planting) are not found in EcoIA and Landscape Master Plan (LMP). Please clarify. If these are related to the landscape treatments, they should be shown on LMP.</p>	<p>Noted. The ecological merits are included in the EcoIA, section 9, Addendum 3.</p>
<p>(b) The wildlife viewing point on the roof-top of the residential blocks are not shown on LMP. Please also clarify if this means the roof-top will be opened to the residents.</p>	<p>Please refer to Addendum 2 for the locations of wildlife viewing points. They will be open to residents and their guests only, through a management visitor registration system.</p>
<p>(c) Please clarify if the wildlife viewing points, recreational walk/nature trail might result in human disturbance to the wildlife.</p>	<p>The wildlife viewing points, recreational walk/ nature trail are located within the Residential Portion of the Application Site. They will not result in human disturbance to the wildlife.</p>
<p>(d) Noting the intention for increasing public awareness and education, please</p>	<p>The wildlife viewing points will be opened to residents and their guests only, through management visitor</p>

Comments from the District Planning Officer/Fanling, Sheung Shui and Yuen Long East, Planning Department (PlanD) (received 5.9.2025) (Contact person: Mr. Karen Chan, Tel.: 3168 4041)	Response(s):
explain if the wildlife viewing points, landscape gardens and ponds with recreational walk/nature trail will be opened to the public or just residents in the developments.	registration system. The landscape gardens and ponds with recreational walk/nature trail will be opened to residents and their guests.
13. Para. 8.6.1 – - Please indicate clearly what improvements works will be carried out by the applicant. Please also indicate clearly that according to the sensitive tests, in case of programme mismatch, which road and junction improvements works will be carried out by the applicant.	<p>Please note that the widening works of existing bus stops (Maple Garden Bus Stop – Yuen Long Bound and Palm Springs Bus Stop – Sheung Shui Bound) would be carried out by the applicant, subject to the review of future public transport demand.</p> <p>In case of programme mismatch, the following junction improvement works would be carried out by the applicant:</p> <p>Castle Peak Road – San Tin / Shek Wu Wai Road (if programme of San Tin Technopole project is not in place);</p> <p>Fairview Park Interchange (if programme of Proposed Public Housing Developments at Sha Po and Application Y/YL-MP/10 are not in place)</p>
14. Please supplement how the flood risk associated with storm surges and extreme weather has been taken into consideration in the proposed development.	In compliance with the Stormwater Drainage Manual, tide levels and rainfall with a 200-year return period, taking climate change into account, were adopted in the Drainage Impact Assessment. The assessment concludes that the completion of the proposed development will not aggravate the drainage conditions or result in flooding around the Application Site.
Plans and Drawings	
15. Please add plan number for all drawings for easy reference.	Noted. Annotation label has been added to the MLP drawings. (Addendum 4)
16. The descriptions under the plan titles, i.e. “November 2019 submission” is misleading. Please revise.	Noted, and revised. (Addendum 4)
17. Basement floor layout – please review if the area for the temporary on-site sewage treatment plant would be	Noted, and updated with TSTP facilities in basement level. (Addendum 4)

Comments from the District Planning Officer/Fanling, Sheung Shui and Yuen Long East, Planning Department (PlanD) (received 5.9.2025) (Contact person: Mr. Karen Chan, Tel.: 3168 4041)	Response(s):
unexcavated area, as the section plan for the STP shows that there are underground facilities.	
18. Section 1 could not fully show the Wetland Restoration Area (WRA) as indicated on the keyplan. Also, the buffer planting close to the WRA are missing. It is suggested to indicate the 7.5m-wide buffer planting and the solid wall as suggested in the EcolA. Please review.	Noted, and Section updated. (Addendum 4)
19. In view of the change in the number of parking spaces, please review the plan showing the basement parking spaces.	The basement plan has reflected the change in number of parking spaces. The Revised MLP can be found in Addendum 4 .
20. Phasing Plan – the annotations of “B” seems not in a proper position. Please review.	Noted, and revised. (Addendum 4)
21. Section B - Please indicate the approximate height (in mPD) of the existing houses at palm springs.	Noted, and revised. (Addendum 4)
- Please clarify the reason why “Approx. +5.0” is shown.	Noted, and revised. (Addendum 4)
- The annotation for D2-6 seems not in a proper position. Please review.	Noted, and revised. (Addendum 4)
22. There are two “site boundary” annotations shown in all section plans. Please differentiate clearly site boundary of WRA and the residential portion, and application site boundary.	Noted, and revised. (Addendum 4)
23. Please consider adding the height of the fences shown on the drawings.	Noted, and revised. (Addendum 4)
Landscape Function Analysis Plan 24. Please update the drawing with the latest location of the RCHE.	Please find the updated Landscape Function Analysis Plan in Addendum 5 .

Comments from the District Planning Officer/Fanling, Sheung Shui and Yuen Long East, Planning Department (PlanD) (received 5.9.2025) (Contact person: Mr. Karen Chan, Tel.: 3168 4041)	Response(s):
25. According to RtC item (d) in FI-1, the private open space of 9,998m ² is included as part of the 21,203m ² (i.e. communal open space). However, the demarcation of the private open space in LMP shows that part of it is occupied by water body/pool and communal landscape on the Landscape Function Analysis Plan. Please clarify.	The minimum required open space of 1,817m ² , including the water body/pool as part of its open space function, is included in the communal open space totaling 21,203m ² .
Landscape Master Plan 26. Please update the LMP according to the latest Master Layout Plan (MLP). The latest location of the RCHE has not yet been reflected.	Please find the Revised LMP in (Addendum 6) .
27. The site formation levels and building height levels shown on the plans on the LMP seems not tally with the MLP. Please review.	The Revised LMP has been updated to tally with MLP. (Addendum 6)
28. Please clarify the location of the 2m solid wall as one of the ecological mitigation measures.	Please refer to the Section D in MLP Addendum 4 , which indicate the location of the 2m solid wall at the Residential Portion/ WRA boundary. The 2m solid wall is an ecological mitigation measure to screen off any potential disturbance impact from residential portion to WRA, at the operation phase.
Water Supply Impact Assessment 29. Please review if the surrounding planned developments have been taken into consideration.	Please find the updated report that has taken surrounding planned developments into consideration. (Addendum 10)
WSIA 30. Para. 1.2.1 – please clarify how the 48,716m ² of open greenery area is derived from.	The figure of open greenery is based on 30% minimum site coverage, as required in PNAP-152. It does not include water features, and is a conservative approach.
Environment Assessment	

Comments from the District Planning Officer/Fanling, Sheung Shui and Yuen Long East, Planning Department (PlanD) (received 5.9.2025) (Contact person: Mr. Karen Chan, Tel.: 3168 4041)	Response(s):
31. Please be reminded to update the latest development parameters in the report, including but not limited to pages 1, 10 (parking space number) and 20 (table 2.8, the no. of storeys for Tower C2-1).	Note, Page 1, 10 (parking space number) have been updated with the latest development parameters. The no. of storeys for Tower C2-1 is 8, thus the number will remain unchanged in Table 2.8.
32. Figures 0.1 to 3.3 - Please update the plans with the latest MLP.	Noted, Figures 0.1-3.3 have been updated with the latest MLP.
TIA (draft FI dated 15.8.2025) 33. You are advised to attach the justifications provided for the person per flat ratio (via email dated 27.8.2025) to your R-to-C to TD's comments.	Noted and included in RtC to TD's comments.
EcoIA 34. The EcoIA indicated that the construction works of 3-storey houses abutting WRA will be commenced first. However, the phasing plan could not reflect such. Please clarify the phasing arrangement for the proposed 6 phases.	For rezoning application purposes, the current phasing plan is a preliminary proposal of the phasing arrangement, and its refinement is subject to detailed design stage. Nonetheless, to allow flexibility to commence the construction of the houses abutting WRA at an earlier stage of construction, the phasing plan can be modified at detailed design stage, to include delineation of sub-zones within each of the phases to commence portions on a need and priority basis. For example, Phase 1 can be delineated into sub-zones of Phase 1A (encompassing the houses abutting WRA to be constructed first) and Phase 1B (encompassing the medium-rise buildings and clubhouse could be constructed later).
Sewerage Impact Assessment Please review if a better drawing could be shown for Appendix B.	In response to the comment from EPD dated 2025.06.09, Appendix B has been removed. (Addendum 12)
SIA	

Comments from the District Planning Officer/Fanling, Sheung Shui and Yuen Long East, Planning Department (PlanD) (received 5.9.2025) (Contact person: Mr. Karen Chan, Tel.: 3168 4041)	Response(s):
35. Please clarify if the internal sewage pumping station currently shown at a roundabout in Figures 2 and 4, will be built underground. If affirmative, it is noted that the section plans and drawings have not reflected such.	The internal sewage pumping station will be an underground facility, and the label “underground” has been added to the legend in Figures 2 and 4. (Addendum 12)
36. Please review if the E&M facility block (reserved only for temporary sewage treatment plant (TSTP) under option 1) is required to be shown on Figures 2 and 4.	Noted and removed. (Addendum 12)
37. Noting that the TSTP is not required for option 2, please clarify if there is any plan for the use of this land if a TSTP is not required. Also, please clarify its long-term use after decommissioning of the TSTP.	If a TSTP is not required, the land is intended for landscape amenity or bicycle parking facilities, to provide convenience and facilities for the enjoyment of residents and visitors. It is intended for long-term use as green space.
Air Ventilation Assessment (AVA) 38. The plans are not updated with the latest MLP. Please ensure all plans and drawings should be updated with the latest MLP.	Noted and updated plans are in the (Revised) AVA. (Addendum 9)
39. Please review if the drawing on good design feature of proposed scheme could be presented in a better way.	Illustration of the good design features in the proposed scheme are revised for better presentation. (Addendum 9)
40. It seems that the distance of building separations shown on the drawing on good design feature of proposed scheme does not tally with Figure 3.1 of VIA on the proposed urban design consideration. For example, the BS2 on VIA is marked “approx. 11m” but the building separation on AVA is shown as “at least 15m-wide” Please clarify.	The distance of the building separations is updated to tally with Figure 3.1 of the VIA. (Addendum 9)

Response to Dept Comments of Urban Design and Landscape (received 17.5.2025)

Comments from the Chief Town Planner/Urban Design and Landscape, PlanD (received 17.5.2025) (Contact Person: Ms Nicole LEE; Tel: 3565 3945 (Urban Design Unit)/ Mr Samuel HUI; Tel: 3565 3957 (Landscape Unit))	Response(s):
<p>Re: VIA (Attachment 3) and Visual comparison of proposed scheme and approved scheme (Attachment 5)</p> <p>i. Visual corridors (Figure 3.1) – as raised in our previous comment, some of the proposed visual corridors overlap with the building blocks under the indicative scheme and may not form continuous visual corridors.</p>	<p>Noted, the drawings and text have been revised to reflect this concern with mention of the blockage at the ground level and up to +21.1 mPD where proposed low-rise houses are located within the Visual Corridors and Building Separations. It should also be noted VC2 and BS2 extend above the height of the low-rise houses at the northern edge of the Proposed Scheme, an area which is partially occupied by existing and proposed tree planting within the landscape buffer and fish pond bunds when viewed from the photomontage vantage points. As such these visual corridors and building separations continues above a level of +21 mPD.</p>
<p>ii. Building separation (Figure 3.1) – as raised in our previous comment, some of the proposed building separation overlap with the building blocks under indicative scheme. The consultant may wish to indicate the width of building separation between relevant building blocks instead of continuous strip striking through the application site.</p>	<p>Noted the location and extent of the Visual Corridors and Building Separations have been reviewed to avoid overlap with the adjacent buildings.</p>
<p>iii. As raised in our previous comment, the applicant is reminded to prepare the VIA in accordance to TPB PG No. 41. For effect on public viewers, the effects of the visual changes can be graded qualitatively in terms of magnitude as substantial, moderate, slight or negligible in accordance to TPB PG No. 41.</p>	<p>Noted the assessment of the impact on public viewers have been reviewed in accordance with TPB PG No. 41.</p>

iv.	<p>The 'Proposed Scheme' is compared against 'Existing Situation' under attachment 3 while compared against 'OZP Compliant Scheme' under attachment 5. According to TPB PG No. 41, the VIA should take into account existing and planned development context; and consist photomontages showing the existing views and future views to the proposed development in relation to other existing and known planned developments. The applicant may wish to adopt 'OZP compliant scheme' as baseline for evaluation of visual impact.</p>	<p>Noted the emphasis of the assessment contained within the main VIA text has been revisited to make the approved S16 (OZP Compliant) Scheme, the baseline for comparison with the Proposed Scheme.</p> <p>This approach is consistent with some of the other assessments in the planning application and has been verbally agreed with Planning Department.</p>
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Response to Dept Comments of Urban Design and Landscape (received 19.06.2025)

Further comments received from UD&L (VIA) on 19.06.2025 in response to our (informal) Draft FI-3 made on 13.06.2025 through PlanD:	Responses:
I refer to your draft submission of VIA and RtoC dated 13.6.2025. UD&L's comments are appended below for your information and/or necessary action, please.	Noted.
<p>Our observations/comments from urban design and visual perspectives are as follows.</p> <p>i. Sections 7 and 8 – current draft FI submission has presented two sets of results, i.e., approved application No. A/YL-MP/344 and proposed scheme. Since OZP compliant scheme (i.e. the approved application No. A/YL-MP/344) is adopted as baseline scheme, the appraisal of visual changes should compare the proposed scheme against the baseline scheme.</p>	<p>The relevant sections updated in the VIA. (Addendum 7)</p> <p>Noted the text and table have been rewritten to make a comparison with the baseline Approved Section 16 (OZP Compliant) Scheme and the Proposed Scheme. As such there is now only one set of impacts relating to the Proposed Scheme.</p>
<p>ii. Visual corridors (para. 6.2 and figure 3.1) – as raised in our previous comment, some of the proposed visual corridors overlap with the building blocks under the indicative scheme and may not form continuous visual corridors. Under the current draft FI submission, the long strip of VC2 mostly overlapping with the proposed houses within the application site as well as the</p>	<p>The relevant sections updated in the VIA. (Addendum 7)</p> <p>Noted the diagram now refers to a third category "Gaps between buildings (above a elevation of +21 mPD)" which accounts for the low-rise houses at the edge of the Application Site. The other categories Visual Corridors and Building Separations remain.</p>

houses in the Royal Palm. The function and effectiveness of VC2 as visual corridor is in doubt.	
iii. Building separation (para. 6.2 and figure 3.1) – as raised in our previous comment, some of the proposed building separation overlap with the building blocks under the indicative scheme. Under the current FI submission, the long strip of BS2 claimed with width of approximate 14m. However, it is overlapping with the proposed houses within the application. The presentation of the building separation is misleading and inaccurate.	<p>The relevant sections updated in the VIA. (Addendum 7)</p> <p>Please refer to the response to item ii above.</p>
iv. The existing condition of the selected VPs should be provided for reference.	<p>The relevant sections updated in the VIA. (Addendum 7)</p> <p>Noted as discussed, the photomontages now show the existing situation on a separate page as agreed.</p>
v. Para. 2.4 – according to the RNTPC paper for application No. A/YL-MP/344, the residential development comprises 789 houses instead of units.	<p>The relevant sections updated in the VIA.</p> <p>Noted the terminology has been changed accordingly.</p>

Response to Dept Comments of Urban Design and Landscape (received 11.07.2025) CURRENT

Further comments received from UD&L (VIA) email on 11.07.2025 in response to our (informal) Draft FI-3 made on 27.06.2025 through PlanD:	Responses:
<p>Please note the following input and comments on the enquiry from the consultant and the 3rd Draft FI with a revised VIA:-</p> <p>Input on the enquiry dated 27.6.2025 from the consultant relating to visual corridor and building separation</p> <p>a)</p> <p>According to Urban Design Guidelines in Chapter 11 of Hong Kong Planning Standards and Guidelines, view corridors allow views to distant object such as landmarks, ridgelines, water body, countryside, other natural features, etc. Instead of defining visual corridor according to its dimension, it is more important to focus on the visual connection of the visual corridor to surrounding visual resources. To facilitate wind</p>	<p>Noted.</p>

penetration, building separation of not less than 15m in width is generally considered as an effective measure. Naming of the design measures, as well as function and effectiveness of design measures, should be justified by the project proponent	
Comments on the revised VIA b) We have no further comment on the revised VIA.	Noted. The revised VIA is in Addendum 7 .
c) The consultant is reminded to suitably update the planning statement to reflect the revised VIA.	Noted. The updates to the planning statement, including VIA aspects are provided in Addendum 8 .

Response to Dept Comments of AFCD (received 24.3.2025) [responded w Draft FI 2.5.2025]

Comments from the Director of Agricultural, Fisheries and Conservation (received 24.3.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Response(s): <u>Circulated to AFCD in our (informal) FI made on 2.5.2025</u>
<p>General comments</p> <p>The design and operation of the WRA aim to mitigate the ecological impacts by the original development scheme. The proposed increase in no. of storeys will potentially bring additional disturbance impacts to the WCA during the construction phase and operation phase. There is currently not sufficient information to demonstrate that the WRA could mitigate the additional impacts from the revised development scheme. The applicant should quantify such potential additional impacts, elaborate clearly how the existing WRA and other measures proposed in original EcolA could mitigate the additional impacts, and list out clearly any additional measures required under the new scheme.</p>	<p>The EcolA have been revised accordingly.</p> <p>Information has been supplemented according to the corresponding specific comments.</p> <p>As stated in the approved EIA, “The restored wetland will: <ul style="list-style-type: none"> · compensate for the loss of habitat as a result of proposed development; · provide flood protection to the surrounding developed area; · provide life support by increasing habitat heterogeneity and thus increasing the biodiversity of the area; · provide ecological linkages between the site and the CA; set a buffer between the residential development (set-back) and the existing fishponds area to the north of the Project Area; and · increase the biodiversity of the site and encourage various forms of wildlife.” </p> <p>In the approved OZP no. S/YL-MP/8, the zoning of this Project Site is intended to provide incentive for the restoration of</p>

Comments from the Director of Agricultural, Fisheries and Conservation (received 24.3.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Response(s): <u>Circulated to AFCD in our (informal) FI made on 2.5.2025</u>
	<p>degraded wetlands adjoining existing fishponds through comprehensive residential and/or recreational development to include wetland restoration area. It is also intended to phase out existing sporadic open storage and port back-up uses on degraded wetlands.</p> <p>The implemented WRA is not only mitigation measure for the development but also has eradicated the open storage uses and restored 4.7ha wetland habitats ecologically linked to the WCA. The implemented WRA will act as a buffer between the existing wetland areas and the residential part of the project area until construction is completed.</p>
<p>Specific comments</p> <p><i>Planning Statement</i></p> <ul style="list-style-type: none"> • Figure 8 - The phasing plan seems incorrect (e.g. high-rise buildings up to 22 storeys). Please correct for our further comment. - Please review whether alternative phasing such as completing the low-rise portion adjacent to the WRA in each of the phases first would further minimize the construction impacts. • Please provide a summary table comparing development parameters of the new scheme with the original schemes (e.g. A/YL-MP/344, A/YL-MP/229) 	<p>Please find the Phasing Plan (Revised) with correct information.</p> <p>As mentioned in the approved EIA report, during the construction of the residential areas, the WRA will act as buffer area to the wetland conservation area to the north of the Project Area to minimise disturbance impacts from the ongoing construction work. The prioritisation of construction phasing of the low-rise portion to the south of WRA will be considered as far as practical during the detailed design phase, to further minimize the disturbance impacts to the ecological sensitive habitat during construction.</p> <p>Noted. Please refer to the comparison table of the current rezoning scheme and the most recently approved original scheme (Application No. A/YL-MP/344).</p>

Comments from the Director of Agricultural, Fisheries and Conservation (received 24.3.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Response(s): <u>Circulated to AFCD in our (informal) FI made on 2.5.2025</u>
<p>EcolA</p> <ul style="list-style-type: none"> Section 1.2 <p>Key amendments also include increased estimated population. Please add.</p>	<p>Noted and section 1.2 have been revised. Please find the updated EcolA</p>
<ul style="list-style-type: none"> Section 3.2.1 <p>The numbers of storeys (12- and 18- storeys) are incorrect.</p>	<p>Noted and section 3.2.1 have been revised. Please find the updated EcolA.</p>
<ul style="list-style-type: none"> Section 3.2.2 <p>Please revise as –</p> <p>“Wetlands mainly the fishponds continuous and adjoining to the Deep Bay Area are designated under TPB PG-No.12C, as the Wetland Conservation Area (WCA) with the planning intention of protecting the integrity of the Deep Bay wetland ecosystem. Any development within the WCA should comply with the principle of “No-Net-Loss in Wetland”. <u>New development within the WCA would not be allowed unless it is required to support the conservation of the ecological value of the area or the development is an essential infrastructural project with overriding public interest. Any such development should be supported by an ecological impact assessment to demonstrate that the development would not result in a net loss in wetland function and negative disturbance impact.</u> The Application Site abuts the WCA”.</p>	<p>Noted and section 3.2.2 have been revised. Please find the updated EcolA.</p>
<ul style="list-style-type: none"> Section 3.2.3 <p>Please revise as -</p> <p>“The Wetland Buffer Area (WBA) is also designated under TPB PG-No. 12C to include a buffer of about 500m on the landward side of the WCA. Developments within the WBA are required to demonstrate that ecological impacts on the WCA will be minimized and any negative ecological impacts will be fully mitigated through positive measures. “No-net-loss in wetland” principle also applies to WBA. Residential developments which seek to replace existing open storage areas and/or include pond restoration projects should normally be given sympathetic consideration by the Board may be</p>	<p>Noted and section 3.2.3 have been revised. Please find the updated EcolA.</p>

<p>Comments from the Director of Agricultural, Fisheries and Conservation (received 24.3.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)</p>	<p>Response(s): <u>Circulated to AFCD in our (informal) FI made on 2.5.2025</u></p>
<p>given sympathetic consideration by the Board subject to satisfactory ecological and other impact assessments. The Application Site lies within the WBA”.</p>	
<ul style="list-style-type: none"> Figure 1 The boundaries of WCA and WBA are problematic. Please check. 	<p>Figure 1 has been updated.</p>
<ul style="list-style-type: none"> Table 1 The total number of species recorded for bird (49 no.) does not match with the text (54 no.). 	<p>Noted and Table 1 have been revised.</p>
<ul style="list-style-type: none"> Table 2 <ul style="list-style-type: none"> The title does not match with the content of the table. Mammal data were provided but the concerned EM&A did not include mammal monitoring. Please clarify. 	<ul style="list-style-type: none"> Noted and Table 2 have been revised. Although mammal monitoring is not required in the EM&A Manual, mammal monitoring has been conducted concurrently with other faunal surveys and data has been summarized in the monthly EM&A reports.
<ul style="list-style-type: none"> Section 4.2 <ul style="list-style-type: none"> It is claimed that ecological gain has been induced within the project are by comparing the number of species recorded in Tables 3 and 4 with Table 1. However, it appears that the set of numbers are not comparable given that the survey areas are different among the three tables. Please quantify the “ecological gain” induced by the WRA and review whether it could offset the potential additional impacts. 	<ul style="list-style-type: none"> Only Table 1 and Table 4 are relevant when considering the ecological gain under the Application Site. Table 1 summarized the number of species recorded within the entire Application Site, prior to the implementation of WRA; while Table 4 summarized the number of species recorded within the implemented WRA in the recent 12-months EM&A reports. Within the implemented WRA, the number of species and the number of species of conservation importance have been increased in all six fauna groups, except mammals; however, mammals recorded in the approved EIA included trapping records of Brown Rat and House Mouse which are human commensal species. The increase in number of species of conservation importance utilising the implemented WRA, is therefore considered as ecological gain. As mentioned above, the increase in number of species of conservation

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	<p>importance utilising the implemented WRA, is therefore considered as ecological gain. However, it's not the ecological gain itself offset the potential impacts. The approved EIA stated the implemented WRA will become the buffer between disturbance-sensitive waterbirds and construction works of the residential part.</p>
<ul style="list-style-type: none"> Table 5 <p>According to the EIAO-TM, herpetofauna survey and butterfly survey should also cover March, and firefly survey should also cover December.</p>	<ul style="list-style-type: none"> 12-month ecological surveys have been conducted from April 2024 to March 2025, according to the EIAO-TM. The survey programme and findings have been updated.
<ul style="list-style-type: none"> Section 5 According to EIAO-TM, bird survey should be conducted at dusk and night in additional to early morning, bat survey should be conducted at dusk, odonate and butterfly survey at day and night, aquatic fish survey at day and night. A 12-month ecological survey is normally required given that the site falls within WBA abutting WCA. 	<ul style="list-style-type: none"> Surveys have been conducted. Data have been included in the revised report. 12-month ecological surveys have been conducted from April 2024 to March 2025.
<ul style="list-style-type: none"> Section 6.2 As the survey transects did not cover the WRA, please specify that the survey findings do not cover WRA. The percentage for defining major or minor flightlines is different for wet seasons and dry season. Please review. 	<ul style="list-style-type: none"> Figure 2 has been updated to show the transect covering WRA explicitly. Noted and Section 6.2 has been revised. The percentage should be 15% as in previous approved submissions.
<ul style="list-style-type: none"> Section 6.2 Dry Season Flightline Survey, last para. <p>Please supplement that Flightline no. 2 is across the application site.</p>	<p>Noted and Section 6.2 has been revised.</p>
<ul style="list-style-type: none"> Table 9 <p>The WRA is being managed for nature conservation purpose. But its ecological value is just moderate which is lower than that of the fishponds that might not be using for nature conservation purpose in the assessment area. Please review.</p>	<p>Noted and Table 9 has been revised.</p>

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<ul style="list-style-type: none"> • Section 8.3, 8.6 of EcolA; Section 8.5.3 (e) of the Planning Statement - Several setbacks are mentioned though the submission. Please specify the number of storeys and height (mPD) for the “taller buildings” and “lower buildings”, and provide a figure to illustrate the 50m/ 100m/ 120m/ 150m setbacks. - Making reference to the approved EIA Report of San Tin/ Lok Ma Chau Development Node, the reduced density zone and exclusion zone of higher buildings (35mPD) are 400m and 200m respectively during the construction phase. Please compare the proposed setbacks under the current application with the above disturbance zones and review whether the setback distance is sufficient to minimize the disturbance impacts caused by the proposed taller buildings. 	<ul style="list-style-type: none"> - Please find replacement page for p. 28, Section 8.5.3 (e) of the Planning Statement. - Making reference to the approved EIA Report of San Tin/Lok Ma Chau Development Node, ≤35mPD has been considered as low-rise buildings. High-rise buildings under this Application only refer to the 10-storeys, which have been located further away from the WCA. The MLP has already illustrated the distance between these blocks and the WCA. <p>Within the exclusion zones (EZ) and reduced density zones (RDZ) of the species under consideration lies an area of fishponds that have been exposed to anthropogenic disturbances for decades, including fishpond operation and adjacent village development. There will be no direct impact from this Project to those fishponds to the north of the Project Site; hence, it is anticipated wildlife utilisation will remain in place where wetland habitats are available; waterbirds have been recorded in these ponds close to the villages. In addition, there is anticipated enhancement in habitat quality after the implementation of SPS WCP.</p> <p>Considering the current Application alone, there will be increase in disturbance during construction of high-rise buildings (only those 10-storeys in this Application). One of the additional measures, the 10-storeys have been located further away from the WRA, as well as the WCA (also the proposed SPS WCP); also, those at the eastern portion of Project Site have been considered at less ecologically sensitive area (i.e.</p>

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	<p>farthest away from Deep Bay) and located at least 50m away from the fishponds.</p> <p>Disturbance sensitive bird species of conservation importance recorded during 12-month surveys, have been summarized based on the disturbance distance estimate methodology originally generated to assess construction phase disturbance impacts of the Lok Ma Chau Spur Line.</p> <p>Within the RDZ, 50% of the disturbance sensitive bird are predicted to be excluded. From the 12-month surveys, total of 27 bird species of conservation importance have been recorded; approximately 40 bird individuals were recorded per survey while 21 out of 27 species have been recorded less than 1 bird per survey. The five most abundant species recorded within the RDZ are Tufted Duck (mean number to be excluded= 17.58; number of surveys recorded= 3), Little Grebe (3.54; 11), Great Cormorant (7.83; 5), Chinese Pond Heron (2.25; 11) and Little Egret (2.92; 11).</p> <p>Within the EZ, where all relevant species are excluded, total of 16 bird species of conservation importance have been recorded; less than 20 bird individuals were recorded per survey while 10 out of 16 species have been recorded less than 1 bird per survey. The five most abundant species recorded within the EZ are Tufted Duck (6.00; 2), Little Grebe (2.67; 8), Chinese Pond Heron (2.00; 8), Little Egret (1.58; 8) and Pied Kingfisher (1.17; 6).</p> <p>When comparing the predicted number of individuals displaced for these species with the mean number per month in Deep Bay reported by HKBWS (Winter Count in Oct 2022-Mar 2023), in which 2037 Tufted Duck, 420 Little Grebe, 6269</p>

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	<p>Great Cormorant, 414 Chinese Pond Heron, 1039 Little Egret and 25 Pied Kingfisher were recorded, the disturbance impacts to these species of conservation importance from this Project are anticipated to be minimal.</p> <p>Therefore, additional mitigation measures are not required. The approved mitigation measures during construction phase and operation phase are considered sufficient to minimize the disturbance impacts. Hence, no change is proposed to the design or operation of the WRA.</p> <ul style="list-style-type: none"> - The reduced density zone and exclusion zone are illustrated in Figure 6a and 6b. The existing disturbance is also illustrated in Figure 6c.
<ul style="list-style-type: none"> • Section 8.3 - It seems that the original total number of residential units abutting the WRA (i.e. 13) is incorrect. Please check. - “Greater setback of these residential units from the WRA” is mentioned. Please provide a figure to illustrate the increase in setback distance as compared with the original scheme. 	<ul style="list-style-type: none"> - Noted and Section 8.3 has been revised for clarification. The latest approved amendment(A/YL-MP/344) has already increase the total number of residential units abutting the WRA from 13 (as approved in A/YL-MP/229) to 37. In the current Application, the number of residential units abutting the WRA remain unchanged as 37. - Section 8.3 has been revised for clarification. The additional measure is the increase in width of green barrier, i.e. 5m buffer planting within the residential portion.
<ul style="list-style-type: none"> • Section 8.4 <p>The sentence “Since no changes are proposed to the WRA, no additional disturbance impact is anticipated to the fauna species of conservation importance in the WCA” may be inappropriate. Even though there are no proposed changes to the WRA, additional disturbance may be resulted from increase in population and higher building height of the adjoining residential development. Please revise.</p>	<ul style="list-style-type: none"> - Noted and Section 8.4 has been revised to include the clarification as stated in the aforementioned responses to the comment regarding the exclusion zone and reduced density zone.

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<ul style="list-style-type: none"> Table 8 <p>There are two Table 8. Please update the table number.</p>	<p>Table number have been updated.</p>
<ul style="list-style-type: none"> Section 8 Please evaluate the impacts by making reference to Annex 8 of EIAO-TM. Please list out clearly the potential additional impacts, the relevant measures proposed in the original EcolA, and the additional measures proposed under the current application. 	<ul style="list-style-type: none"> Noted and Section 8 has been revised. The relevant measures proposed in the original EcolA has been listed out. The additional measures proposed has been stated explicitly.
<ul style="list-style-type: none"> Section 9 <p>The proposed amendments do not relate to the layout only but also the building height and number of units. Please revise the section to tally with the current application.</p>	<p>Noted and Section 9 has been revised.</p>
<ul style="list-style-type: none"> Figures Please provide a figure showing the location of species of conservation importance within the assessment area on a habitat map. Please provide two figures (one for dry season one for wet season) overlaying the flightlines and building layout. 	<ul style="list-style-type: none"> Figure 3b has been prepared to show the location of species of conservation importance. Latest MLP has been overlaid to Figure 4 and Figure 5.
<p><u>Comments from wetland management perspective</u></p> <ul style="list-style-type: none"> Appendix 3 & Appendix 8 <p>As shown in the architectural drawings (Appendix 3, Page 3, Cross Section B) and our on-site observation, the ground level of the development portion is much higher than its adjacent Wetland Restoration Area (WRA). The applicant shall be reminded to take into account the gradient differences when designing and evaluating the effectiveness of the "buffer planting" which is said to be provided to provide screening effect and to mitigate disturbance impacts to the WRA.</p> <p>While it is stated in S.8.3 of the EcolA (Appendix 8) that "the buffer planting between the residential portion and the WRA, will be increased</p>	<ul style="list-style-type: none"> The existing ground level has already been considered. The parameters are presented in mPD. The whip buffer planting within WRA (refer to Wetland Restoration and Creation Scheme as approved by AFCD) will remain unchanged and according to the EP, the associated planting of tall trees and shrubs shall be completed before occupation of residential units of the Project. In the current Application, the buffer planting of 5m width along the interface within the residential portion has been

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<p>from width of 2.5m to 5m.", the "whip buffer planting within WRA" as shown in Appendix 3 remains as 2.5m. Pls check and rectify.</p>	<p>proposed as additional mitigation measure, to further minimize the disturbance impacts during construction phase and operation phase of residential development.</p>
<ul style="list-style-type: none"> • Section 8.7 of the EcoIA (Appendix 8): - Based on the latest design, the WRA would be totally encircled by existing drainage channel, private ponds and existing/planned residential development. The applicant should confirm if maintenance access connected to the WRA would be provided under the project to maintain accessibility of WRA for future site management. In particular, there is currently a lack of proper access to allow fish stocking and transportation of maintenance and monitoring equipment to the WRA. - Please clarify if additional measures (e.g. installation and maintenance of dog-proof fence) shall be adopted to "secured to prevent unauthorised human access and exclude dogs from the WRA". 	<ul style="list-style-type: none"> - An existing access track of 3.5m(W) has been provided for WRA maintenance under current site condition. The existing access track will be remained for future site management/maintenance. No WRA maintenance access passing through the residential development shall be provided. - This comment is management issue related to management plan and EM&A of the implemented WRA. The WRA has already been fenced off from the fishponds to the north, preventing unauthorised human access and feral dogs. Unauthorised human access will be avoided from residential part.
<ul style="list-style-type: none"> • Appendix 5 - DIA, Figures 3 & 6 <p>Our previous comments d.d. 5 Sep 2024 on Appendix 5 (re-appended below) remain pertinent:</p> <p>The "existing drainage" and the "proposed drainage" as shown in the figures are incorrect or misleading. In particular, we have no record of any "existing open channel" (in light blue in Figure 3)", "drainage system" (in grey in Figure 6), or flow path directing surface run-off from the development portion of the site to the "mitigation wetland". The application is strongly advised to revisit the accuracy of the information provided in the DIA and to avoid proposing any drainage system connected to or within the "mitigation wetland".</p> <p>Any surface runoff/flow from the development portion of the site should be collected and</p>	<p>After site visit on 27th March, existing open channel" (in light blue in Figure 3) and "drainage system" (in grey in Figure 6) has been removed in Figures 3 and 6. The current drainage path and proposed drainage system has been updated in Figure 3 and 6.</p> <p>No surface runoff/flow from the development portion of the site will be collected and diverted into the "mitigation wetland" to avoid pollution.</p>

<p>Comments from the Director of Agricultural, Fisheries and Conservation (received 24.3.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)</p>	<p>Response(s): <u>Circulated to AFCD in our (informal) FI made on 2.5.2025</u></p>
<p>diverted outside and away from the "mitigation wetland" to avoid pollution.</p>	
<p><u>Comments from Wetland Conservation Park's perspective</u></p> <p><i>Planning Statement</i></p> <ul style="list-style-type: none"> Section 2.3.1(c): Please revise the item to read: "The proposed Sam Po Shue Wetland Conservation Park (SPS WCP) to the north of the Site." 	<p>Noted. Please find the replacement page 3.</p>
<ul style="list-style-type: none"> Section 2.4.3: Please revise the Section to read: "To the north of the Application Site is the "Sham Po Shue Wetland Conservation Park" ("WCP") proposed SPS WCP, made up of mainly large areas of continuous fishponds and vegetation wetlands." 	<p>Noted. Please find the replacement page 5.</p>
<ul style="list-style-type: none"> Section 6.3.1: Please revise the Section to read: "...San Tin Technopole is right adjacent to the Wetland Conservation Park ("SPS WCP")..." 	<p>Noted. Please find the replacement page 15.</p>
<ul style="list-style-type: none"> Section 8.5: Please update this Section to summarise the potential ecological impacts of the proposed development to the SPS WCP. 	<p>Noted. Please find the replacement page 15.</p>
<ul style="list-style-type: none"> Section 8.5.3(e): Please clarify if the land use zoning of nearest fishponds from the project site should be "OU(WCP)", instead of CA. 	<p>Noted, the land use zoning of nearest fishponds from the project site should be "OU(WCP)". Please find the replacement page 28.</p>
<p><i>Appendix 4: Environmental Assessment</i></p> <ul style="list-style-type: none"> Background Please revise the first paragraph to read: "...to rezone the Application Site on the draft approved Mai Po and Fairview Park Outline Zoning Plan ("OZP") No. S/YL-MP/78..." 	<p>Revised accordingly.</p>
<p><i>Appendix 8: Ecological Impact Assessment</i></p> <ul style="list-style-type: none"> Section 3.2: 	

Comments from the Director of Agricultural, Fisheries and Conservation (received 24.3.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Response(s): <u>Circulated to AFCD in our (informal) FI made on 2.5.2025</u>
<p>Please include the SPS WCP as one of the “Recognised Sites of Conservation Importance”. Please create a new Section 3.2.6 that reads: “SPS WCP is located north of the Application Site and falls within the 500m AA. SPS WCP is the first Park to be developed under the WCPs System proposed under the Northern Metropolis Development Strategy. The Park shall be approximately 338 ha, covering fishponds and wetlands in the Lok Ma Chau, SPS and Mai Po areas. The SPS WCP shall serve multiple functions: 1) Enhance the ecological quality and biodiversity of the Northern Metropolis; 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 will be developed in phases, with development of Phase 1 of the park to commence in 2026/27 the earliest for completion in 2031. The development of the entire Park is scheduled for completion by 2039 to align with the estimated time for full operation of San Tin Technopole.”</p> <p>Please also be reminded to update Figure 1 accordingly.</p>	<ul style="list-style-type: none"> - Noted and Section 3.2 has been revised to include the SPS WCP as one of the “Recognised Sites of Conservation Importance”. - Figure 1 has been updated.
<ul style="list-style-type: none"> • Section 8: Please include the assessment of the potential ecological impacts of the proposed development to the SPS WCP, as well as proposed mitigation measure(s), as appropriate. <p>We defer to CEDD and/or other Department(s) to comment on the interface issue between the SPS WCP and the proposed development from technical perspectives.</p>	<p>Noted and Section 8 has been revised to state explicitly mitigation measures for the SPS WCP.</p> <p>Potential impacts to the proposed SPS WCP have already been addressed in the approved EIA and previous applications, as these are the existing wetland habitats to the north of the Project Site, also known as the WCA (recognized sites of conservation importance) from the beginning of the assessment.</p>

Response to Dept Comments of AFCD (received 22.5.2025) [responded w Draft FI 23.6.2025]

Further Comments (received 22.5.2025) from AFCD (Contact person: Dr Azaria Wong; Tel: 2150 6932)	Response(s): circulated (Informal) Draft FI Submission (23.6.2025) to AFCD
Specific comments: Please number every paragraph to facilitate our vetting.	Numbering has been added to the report.
Section 1.1.1 - The survey period stated here (i.e. Apr 2024 – Jan 2025) does not tally with Section 5.	Section 1.1.4 has been revised. The survey period is April 2024 – March 2025.
Section 1.2 - It is stated that “Proposed changes in layout of the internal road, landscaping and number of houses (not abutting the WRA) are not anticipated to have any impact on the WRA and the wetlands in the Wetland Conservation Area (WCA)”. Please elaborate the justifications. - For the sake of clarity, please add a paragraph at the end of the section listing out all the other proposed amendments.	Section 1.2 has been revised for clarification.
Section 3.2.3 - Please check whether “WRA” should read “WBA” in the sentence “No-net-loss in wetland” principle also applies to WRA”.	Section 3.2.3 has been revised.
Table 4.1 - Please supplement the survey period and specify whether the “Project Area” included WRA.	Added the survey period in the title and add the note for Table 4.1. The Project Area in the approved EIA included the WRA.
Section 4.2 - For clarity, please revise as “Assessment Area (excluding WRA the Application Site)” as both WRA and the proposed development site are excluded.	Section 4.2.2 has been revised.
- As mentioned in the RtC, only Table 1 and Table 4 are relevant when considering the species abundance within the Application Site. Please advise the purpose of Table 3 and revise the relevant text accordingly to avoid confusion.	Table 3 is summary of EM&A monitoring data within the Study Area, i.e. the fishpond areas to the north of the Application Site, for comparison with data within the WRA which is managed for wildlife. Section 4.2.2 has been revised.
- Please revise “Compared to Table 1, all fauna group have been recorded increase in total number of species and species of conservation importance, utilizing the WRA.” as there is decrease in total number of mammal species.	Section 4.2.2 has been revised. The number of mammal species recorded within the WRA is lower than that in EIA Study; however, it is not necessarily a decrease in utilisation. Small mammal trapping conducted in EIA Study is not required for the EM&A monitoring. Those four small mammal species

Further Comments (received 22.5.2025) from AFCD (Contact person: Dr Azaria Wong; Tel: 2150 6932)	Response(s): circulated (Informal) Draft FI Submission (23.6.2025) to AFCD
	recorded by trapping in EIA Study, is less detectable with only transect survey due to the low occurrence.
- Please include the EM&A data of the target species of WRA.	EM&A data of target species of WRA has been included in Section 4.2.
<p>Section 5</p> <p>- It seems that some of the survey methodology deviated from the requirements under EIAO-TM.</p>	<p>Section 5 has been revised for clarification. Survey methodologies followed the requirements under EIAO-TM.</p> <p>As required in EIAO-TM Annex 16 Section 5.1.1, <i>“The main objective of the baseline study of an ecological assessment is to provide adequate and accurate ecological baseline information of the proposed development and its vicinity”</i>.</p> <p>In Section 5.1.5, <i>“Optimal time of the year, minimum survey frequency and optimal time of the day for conducting the ecological baseline surveys shall be determined according to Appendix B, unless otherwise agreed by the Director”</i>.</p> <p>In EIAO GN 7/2023 Underlying Principles Section 2.2, <i>“Unlike academic research, the ecological baseline survey aims at collecting ecological data through sampling with reasonable efforts. The actual sampling effort would generally depend on the physical size of the site, diversity of the habitats, flora and fauna, seasonal variation of the target taxa groups under study and availability of existing ecological baseline information. The project proponent, in consultation with environmental consultants where applicable, should determine the appropriate amount of sampling efforts in each case based on their professional judgement and actual site situations, such that the data obtained are representative to address both spatial and temporal variations”</i>.</p> <p>In EIAO-TM Annex 16 Appendix B and EIAO GN 10/2023, “Dusk” is recommended as optimal survey time of day for bats, birds and fireflies. The dusk period shortly after sunset have been included in the night-time surveys. The corresponding survey methodologies have been revised for clarity.</p>

Further Comments (received 22.5.2025) from AFCD (Contact person: Dr Azaria Wong; Tel: 2150 6932)	Response(s): circulated (Informal) Draft FI Submission (23.6.2025) to AFCD
- Habitat and flora: The survey month and frequency do not tally with Table 5.	Section 5 has been revised.
- Bird: It is stated that “Any species found during the night-time surveys for other fauna have been recorded.” Please review whether such night survey meets the requirements of EIAO-TM and EIAO Guidance Notes. Please also note that survey at dusk is also required by EIAO-TM.	In EIAO-TM Annex 16 Appendix B and EIAO GN 10/2023, “Dusk” is recommended as optimal survey time of day for bats, birds and fireflies. The dusk period shortly after sunset have been included in the night-time surveys. The corresponding survey methodologies have been revised for clarity.
- Wet and Dry Seasons Flightline Surveys: One vantage point was missing in Figures 4-5. Also, the survey month for dry season flightline survey does not tally with Table 5. Table 5 states that flightline surveys were conducted for 12 consecutive months (Apr - Mar), but the paragraphs about wet and dry season flightline did not cover the months of February and March.	
- Mammals: Bat survey at dusk is required by EIAO-TM.	In EIAO-TM Annex 16 Appendix B and EIAO GN 10/2023, “Dusk” is recommended as optimal survey time of day for bats, birds and fireflies. The dusk period shortly after sunset have been included in the night-time surveys. The corresponding survey methodologies have been revised for clarity.
- Herpetofauna: The survey month does not tally with Table 5.	Section 5.1.10 has been revised.
- Aquatic fauna: The survey frequency and survey month deviated from the EIAO-TM. Besides, it is stated that “Any nocturnal species found during night-time surveys for other fauna were recorded.” Please review whether such night survey meets the requirements of EIAO-TM and EIAO Guidance Notes.	<p>Ecological survey programme and section 5.1.12 have been revised for clarity.</p> <p>As required in EIAO-TM Annex 16 Section 5.1.1, “<i>The main objective of the baseline study of an ecological assessment is to provide adequate and accurate ecological baseline information of the proposed development and its vicinity</i>”.</p> <p>Aquatic fauna potentially affected by the proposed amendment is anticipated to be limited to the temporary drainage channel within the development site, while the drainage system of the WRA will remain independent from that of the residential component.</p> <p>In addition, with reference to the literature review, for fish and aquatic invertebrate, no species of conservation importance was recorded within the</p>

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	Application Site. The survey frequency is considered adequate to confirm the absence of species of conservation importance, thus no adverse impact.
- Fireflies: both dusk survey and night survey are required by EIAO-TM.	The dusk period shortly after sunset have been included in the night-time surveys. The corresponding survey methodologies have been revised for clarity.
Section 6.1, 7.1 - Development site is not considered as a type of habitat. Please revise.	Section 6.1, Section 7.1 and Figure 3a have been revised to re-categorize the existing habitat within the development portion of the Application Site.
Section 6 - Please provide tables listing out the species of conservation importance recorded during the surveys and relevant information (e.g. recorded within the WRA, development site or assessment area outside the application site; conservation status etc.) in the main text. Please also attach appendices of tables listing out all the species recorded during the surveys and relevant information.	Table summarised species of conservation importance recorded have been included in Section 6. Appendix A summarized the 12-month EM&A findings and Appendix B summarized the species recorded during 12-month ecological surveys.
- Please provide a habitat map showing the records of species of conservation importance.	<p>Figure 3b is supplemented to include the records of species of conservation importance.</p> <p>Given the vagile nature of avifauna, it is not a standard practice to map this group on figures. This faunal group is highly mobile, thus providing indicative locations on the figure would be misleading. Furthermore, it would be impractical to map every single individual recorded, particularly for birds seen in flight. Species recorded in the habitats within Application Site/Assessment Area are presented in Appendix B of the EcolA.</p> <p>Bat species was also recorded foraging in flight, hence both Japanese Pipistrelle and Short-nosed Fruit Bat were not mapped.</p>
Section 6.2 Flightline data - There are discrepancies regarding the number of major flightlines and minor flightlines described in the text, tables and figures. Please double check.	Section 6.2 has been revised.
- For Figure 4, please confirm whether Flightline 7 started/ ended at Pond 51 without crossing the Application Site.	Please note that these flightlines are presenting the indicative direction of disturbance-sensitive waterbird individuals flying across the Assessment Area. Unlike flightline survey for egret/ardeid roost, there is no starting/ending point at specific Pond.

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	<p>Bird individuals recorded using Flightline 7, were flying between the fishponds to the north of the Application Site and further north towards San Tin fishpond areas.</p> <p>It is confirmed this route was not crossing the Application Site.</p>
<p>- For Figure 5, please confirm whether Flightline 7 started/ ended at Pond 51 without crossing the Application Site.</p>	<p>Please note that these flightlines are presenting the indicative direction of disturbance-sensitive waterbird individuals flying across the Assessment Area. Unlike flightline survey for egret/ardeid roost, there is no starting/ending point at specific Pond.</p> <p>Bird individuals recorded using Flightline 7, were flying between the fishponds to the north of the Application Site and further north towards San Tin fishpond areas.</p> <p>It is confirmed this route was not crossing the Application Site.</p>
<p>Section 6, odonates and butterflies</p> <p>- Please supplement whether species of conservation importance have been recorded.</p>	<p>Section 6.2 has been revised.</p>
<p>Section 8</p> <p>- In addition to indirect impact to WRA, there are other potential additional impacts, e.g. indirect impact to WCA. For clarity, please (1) first identify all the potential additional impacts due to the proposed amendments, (2) evaluate the significance of those additional impacts in the absence of additional measures with reference to Annex 8 of EIAO-TM, (3) then recommend additional mitigation measures where necessary and (4) finally assess the residual impacts after mitigation. Please revise the entire section accordingly.</p>	<p>Section 8 have been revised accordingly.</p> <p>Due to the increase in building height, potential additional impacts have been identified as follows:</p> <ul style="list-style-type: none"> - Indirect impact to the WRA - Indirect Impact to Fauna Species of Conservation Importance - Impact to Bird Flightlines - Impact of Bird Collision - Indirect Impact to the WCA and proposed SPS WCP <p>The potential additional indirect impact to the WRA, fauna species of conservation importance, the WCA (the proposed SPS WCP), are disturbances from light, noise, human activities.</p> <p>In absence of mitigation measures, the potential light impact has been evaluated as insignificant as there is no light-sensitive receiver within the WRA and fishponds to the north abutting the Application Site, i.e. significant population of fireflies and ardeid night roosts. The existing fishponds have been lit up with streetlights, operation lightings and surrounding residential areas. To avoid and/or minimize the impact from the Application Site, the approved EIA report has already included following mitigation measures:</p>

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	<ul style="list-style-type: none"> - Limiting the amount of lighting in the construction site - Situating away from the WCA fishponds <p>In absence of mitigation measures, the potential noise impact has been evaluated with reference to San Tin Technopole approved EIA report, based on predicted maximum Exclusion Zone (EZ) and Zone of Reduced Density (RDZ) for the disturbance-sensitive species. These have been illustrated in Figure 6a, 6b and 6c. Species potentially impacted under EZ and RDZ has been evaluated as minimal, as the number of individuals recorded was low to very low when compared to mean population in entire Deep Bay. To avoid and/or minimize the impact from the Application Site, the approved EIA report has already included following mitigation measures:</p> <ul style="list-style-type: none"> - 3m site hoarding between the WRA and the construction works - the WRA will act as buffer between the WCA, and the construction works of residential portion - Good site practice within the construction site - Selection of quiet equipment - Prevention of feral dogs. <p>Additional mitigation measures proposed under current application are summarized as follows:</p> <ul style="list-style-type: none"> - Lighting unit including the building/streetscape should be directional and minimize unnecessary light spill by hooding or lower intensity, subject to detail design. - Avoid use of the percussive piling. - Scheduling the foundation works for the nearest building (C2-1) from the WCA, between mid-March to mid-November only, to avoid the period when the number of disturbance-sensitive species is the greatest. - Increase in width of buffer planting between the residential portion and the wetland areas, from 5m to 7.5m. - To further minimize the potential disturbance impact from operation of 10-storey buildings, the MLP has been revised to reduce one of the 10-storey at the eastern portion, such that the nearest 10-storey building will be located at least 80m away from the WCA (Figure 7).

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	The 6-/8-/10-storey buildings have been considered carefully to minimize the potential impact, by setback of at least 50m away from the WRA and the WCA (Figure 7). The 3-storey houses abutting the WRA and the WCA will be completed first. These will become physical barriers between the wetland and the remaining construction works.
Table 24 - Please move this table after the assessment of residual impacts.	The summary table has been moved accordingly.
- Please add a column on additional impacts to the left of the column on additional measures, and a column of residual impacts at the right. Please also revise the table title and the concerned description paragraph accordingly.	The summary table and description paragraph have been revised accordingly.
- Tam Kon Chau Egrettry which has been abandoned since 2008. Please revise the table to reflect the above.	Revised accordingly.
Section 8.3 - 1st para.: Light is another potential indirect impact to the WRA. Please beef up.	There is no light-sensitive receiver in the WRA and fishponds to the north, e.g. significant population of fireflies and ardeid night roosts. Section 8.4 has been supplemented accordingly.
- 2nd para.: the sentence “The buffer planting has been postponed due to the need to retain the existing site boundary and noise barrier, and it will be completed prior to the operational phase of the Project (refer to EP-311/2008/C). No additional mitigation measure was required for postponing the buffer planting.” is confusing. It seems that such arrangement has already been stated under the EP and is not a new change under the current application. Please revise to reflect the above.	Section 8.4 has been revised accordingly.
- 3rd para.: The meaning of this paragraph is not clear. Is it about the residential units abutting the WRA? Does the “greater setback” refer to the increase in buffer planting from 2.5m to 5m? Please specify that the residential units abutting the WRA would increase from 2-storeys to 3-storeys and state the increase in house units due to such change. It is stated that “All measures to	For clarity, “setback” has been removed. The proposed increase in width of buffer planting along the interface of WRA and the residential portion. Mitigation measures in the approved EIA report have been listed out.

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screen the WRA from the residential proportion of the project included in the approved EIA are retained.” Please list out those measures.	
- 4th para.: It is stated that “The proposed high-rise buildings (i.e. 10-storeys) have been considered carefully the alignment and orientation. More than 50m setback from the nearest WCA at the eastern part of Application Site is proposed while including the WRA and Palm Springs, there are more than 100m setback between the high-rise buildings and the WCA to the north and to the west.” Please provide a figure to illustrate the aforesaid setbacks with clear labels. The figure mentioned in the RtC does not provide the requested information clearly. Please move this para. to Section 8.7 as it is related to the impact to WCA rather than impact on WRA.	Added Figure 7 showing the nearest 6-/8-/10-storeys from the WCA. The paragraph has been moved accordingly.
- Please evaluate the indirect impact by the 6-/8-/10-storeys buildings on WRA. Please specify the distance between the 6-/8-/10-storeys buildings and the WRA and provide a figure to illustrate these distances with clear labels.	Added Figure 7 showing the nearest 6-/8-/10-storeys from the WCA. Further clarification for evaluation of the WRA buffering function has been supplemented.
- Please provide evidence to demonstrate that the increase in buffer planting by 2.5m only could screen out the additional disturbances (e.g. light, noise human distance) due to the increase in building height and population in the residential portion.	<p>Figure 7 and architectural cross-section drawings showing the 6-/8-/10-storeys building, have been carefully oriented with setback from the WRA and WCA. The increase in 2.5m buffer planting is additional mitigation measures.</p> <p>The potential additional disturbance due to the increase in building height is evaluated with reference to STT in Section 8.5.</p> <p>It is not anticipated increase in population will result in additional disturbance as the human activity will be limited within the residential portion.</p>
- Please explain clearly regarding the potentially increased disturbances (light, human activities, noise etc.) to WRA due to construction activities of higher buildings in the residential portion.	The WRA was designed to provide a buffer between disturbance to WCA and construction works in the residential portion. To further minimise the potential disturbance to the WRA, a 3m site hoarding will be maintained between the WRA and the construction works, noise impacts will be minimised through good site practice within the construction site and the selection of quiet equipment, minimisation of night-

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	<p>time lighting and location of this away from the wetlands and prevention of dogs from accessing the construction site will also be implemented.</p> <p>To minimise the potential disturbance to the WCA during the construction phase, the construction programme for foundation activities involving bore piling for Tower C2-1, located within the WCA buffer zone, will be scheduled between mid-March to mid-November only. All construction work will be screened from adjacent fishponds by 2.4m visual barriers, designed with a colour tone that matches the environment prior to the construction to minimise the potential disturbance to waterbirds. Noise impacts will be minimised through good site practice and selection of quiet equipment, such as avoiding the use of percussive piling. Night-time light disturbance will be minimised by no night work within the WCA buffer zone, limiting the amount of lighting in construction site, preventing lighting pointing directly toward the WCA and positioned the lighting as far from the WCA as possible.</p>
<p>Section 8.4, 3rd para.</p> <p>- It is stated that “the eastern portion of Project Site have been considered at less ecologically sensitive area (i.e. farthest away from Deep Bay)”. However, it seems that the southern portion of the Application Site is even farther away from Deep Bay. Please explain the ecological merit of the stepped design from 3-storey houses abutting the WRA, 8 to 10-storeys (+35mPD to +42mPD) in the middle and 6-storeys buildings (+28mPD) along the southern boundary, as compared to a stepped design from 3-storey houses abutting the WRA, 6 to 8-storeys in the middle and 10-storeys buildings along the southern boundary.</p>	<p>The eastern portion itself is located farthest away from the Deep Bay and directly adjacent to existing developed areas, making it a less ecologically sensitive area. The potentially impacted area has been assessed, and the impact severity is evaluated in Section 8.5.</p> <p>In addition, ecological merit is not the only criterion when considering the alignment and orientation of the stepped design.</p> <p>From the standpoint of better urban design, the stepped building height would form a variation of building height to create visual interest, rather than a monotonous building form with bands of similar building heights. From the standpoint of land use compatibility, the lower building height of 6-storeys along the southern boundary is to minimize the visual impact, and to establish a reasonably compatible building form, scale and height to the surrounding existing low-rise houses, with trees and landscaping.</p>
<p>Section 8.4, para. 5-6</p> <p>- The data do not tally with Appendix B. Please double check.</p>	<p>Checked with the Appendix (updated as Appendix C). The data is correct.</p>

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<p>Section 8.4, para. 7</p> <p>- The estimated number of birds to be potentially displaced for Pied Kingfisher represented about 6% of the mean number per month in Deep Bay, and those for Tufted Duck, Little Grebe and Chinese Pond Heron were over 1%. It is not convincing to say that the disturbance impacts to these species of conservation importance from this Project are anticipated to be minimal. Please review.</p>	<p>Simple percentage comparison is not appropriate for evaluation, when considering the difference in population/occurrence/habitat preference of these species. Also, the predicted maximum distance of Exclusion/Reduced Density for each of these species are different, as presented in Appendix C, while Figure 6a and 6b are illustration of the highest maximum distance only.</p> <p>The two fishponds fall within predicted Exclusion Zone (EZ) are inactive. Disturbance-sensitive waterbirds foraging in the adjacent fishponds may temporarily visit these inactive ponds due to flushing from elsewhere.</p> <p>Tufted Duck generally occurs in large flocks but was only recorded on two survey within the predicted Exclusion Zone.</p> <p>Further elaboration and clarification have been included in Section 8.5.</p>
<p>Section 8.4</p> <p>- Please explain clearly the potentially increased disturbances (light, human activities, noise etc.) due to increased population and building height of the residential portion during the operation phase.</p>	<p>Section 8.5 have been supplemented accordingly.</p>
<p>Table 25</p> <p>- It is not clear what is the target of the impact ("developed area" ?) being evaluated.</p>	<p>The table has been revised. The table is evaluation of potential impact to fauna species of conservation importance.</p>
<p>Section 8.5</p> <p>- Please clarify that the current information refers to dry season flightlines, and supplement with information for wet season flightlines.</p>	<p>Section 8.6 have been revised and supplemented accordingly.</p>
<p>- The flightline data do not tally Section 6.2.</p>	<p>Both Section 6.2 and Section 8.6 have been revised.</p>
<p>- 2nd para.: It seems that the assessment is based on a low-rise development proposal, which is not the case under application.</p>	<p>Section 8.6 have been revised and supplemented accordingly.</p>
<p>- Although there seemed to be only one flightline over the Application Site during both wet season and dry season, this flightline accounted for 10.09%/8.19% of the total flightlines recorded during the wet/dry season. This flightline passed</p>	<p>Please note that these flightlines are presenting the indicative direction of disturbance-sensitive waterbird individuals flying across the Assessment Area. Percentages presented in the table are comparison</p>

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<p>through the middle of the Application Site where the 10-storeys buildings are located. 94%/77% of the birds flew below 40m during the wet/dry season and will be impacted by the 10-storeys buildings. Please review the impact significance on bird flightlines, and review whether the building layout could modify to further minimize the impact.</p>	<p>between flightlines recorded from the two vantage points within the Assessment Area.</p> <p>The potential impact severity should be evaluated based on the mean number of birds per survey hour, which is also presented in the summary tables. In addition, both in wet season and dry season, the flightline across the Application Site has been evaluated as minor flightline with low utilisation.</p> <p>Comparing to the mean population (hundreds or thousands) of each species recorded in entire Deep Bay, mean number of 0.07-2.21 bird individuals of ardeids were recorded flying across the Application Site; mean number of 3.71-8.83 Great Cormorants were recorded flying across the Application, while the survey finding also showed their preference on flying across fishponds/other wetlands than flying across the Application Site. Therefore, the impact to flightline is not anticipated to be significant.</p> <p>During the surveys, relative height above ground (this was measured relative to a 10m tall noise barrier on site, with height recorded in 10m increments such that 1x = 10m, 2x = 20m etc.) were recorded. The 10-storey buildings (42mPD) are approximately 35m height above ground. The percentage in the comment is not reflecting the number of birds utilising the flightline. Approximately 7-10 bird individuals per survey hour were recorded flying at height of 40m or below in the flightlines surveys, which were conducted during the peak activity of the day, i.e. early morning including the dawn. During</p> <p>Further clarifications have been supplemented in the evaluation.</p>
<p>Section 8.6</p> <p>- Please specify what do the 150m distance (from where?) and the wetland habitat (WRA?) refer to.</p>	<p>Section 8.7 has been revised.</p>
<p>Section 8.7</p> <p>- 1st para.: Please specify the distance between the 6-/8-/10-storeys buildings and the WCA and provide a figure to illustrate these distances with clear labels. Then, please assess with supporting evidence whether the WRA could still provide adequate buffering function under the revised development scheme.</p>	<p>Added Figure 7 showing the nearest 6-/8-/10-storeys from the WCA. Further clarification for evaluation of the WRA buffering function has been supplemented.</p>

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<p>- The shortest distance between the 10-storeys building is only about 50m away from the fishpond of moderate to high ecological value within WCA. Please review whether the building layout could be modified to further minimize the disturbance impact on WCA by the 10-storeys buildings.</p>	<p>With regards to the concern in this comment, the MLP has been reviewed and revised, to further minimize the disturbance impact.</p> <p>The nearest 10-storeys building at the eastern portion has been lowered to 8-storey building.</p> <p>As shown in Figure 7 (attached), the nearest 10-storey will be approximately 80m away from the WCA, which is more than double of the distance between nearest wetland and the high-rise zone in STT.</p> <p>As shown in Figure 6c, the maximum predicted disturbance zones from 10-storey buildings without mitigation measures, none of the fishponds within the WCA will fall within the exclusion zone. While in Figure 6b, the maximum predicted disturbance zones including the low-rise buildings without mitigation measures, will be effectively minimized by the mitigation measures as in approved EIA report and the additional mitigation measures proposed in the current application, including but not limited to increase in width of buffer planting, use of quiet equipment, etc.</p>
<p>- 2nd para.: Please provide more details about the measure of avoiding night-time lighting and glare in the approved EcoIA. Does it refer to the construction or operation of the residential portion?</p>	<p>Section 8.8 have been revised.</p> <p>The mitigation measures for light impact in approved EcoIA refers to the construction phase.</p> <p>The mitigation measures for both construction and operation phase of the residential portion have been listed out.</p>
<p>Section 9</p> <p>- It is stated that “The setback of 3-storey detached house adjacent to the implemented WRA, remains unchanged.” This contradicts with Section 8.3.</p>	<p>Section 9, conclusion has been revised accordingly.</p>
<p>- Please update Section 9 after updating other sections.</p>	<p>Section 9, conclusion has been revised accordingly.</p>
<p>Comments from the management perspective of WRA:</p> <p>RtC, Sections 8.1-8.4, 8.7 & 9 of the revised EcoIA (Attachment 9) & Appendix 3 of the last submission:</p>	
<p>- According to Figure 6, the Wetland Restoration Area (WRA) is fully located in the Exclusion Zone during both the</p>	<p>As shown in Figure 6a, during construction of residential portion, the WRA is fully located within the predicted maximum Exclusion Zone. This is one of the</p>

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<p>construction and operational phases. Please revisit the indirect impacts on the WRA and hence the effectiveness of the WRA serving as an ecological mitigation wetland under the subject project.</p>	<p>mitigation measures in the approved EIA report, the WRA will act as buffer between the construction site and the WCA. Potential additional impact to the two inactive ponds adjoining the eastern portion, has been evaluated.</p> <p>Figure 6b has been checked and revised. The WRA is not fully located in the predicted maximum Exclusion Zone.</p> <p>Figure 6c has been added to illustrate the predicted maximum Exclusion Zone from the 10-storeys buildings, which have been located away from the WCA as far as possible, to minimize the disturbance impact.</p>
<p>- The assessment on the potential direct and indirect ecological impacts on the mitigation wetland / WRA is missing from Table 24. Please supplement.</p>	<p>The assessment on the potential direct and indirect ecological impacts on the has been added to the summary table.</p>
<p>- Please specify in relevant sections the change of ground level and the resulting building height of the proposed residential development portion (against the ground level of the WRA portion) as compared with the approved EIA / S16 schemes, and whether such changes would results in indirect impacts on the WRA that requires mitigation.</p>	<p>Parameter used is "mPD". There is no change in ground level of residential portion. It is the same, +6.8mPD, with reference to approved S16 scheme, A/YL-MP/344. Hence, no additional impact on the WRA is anticipated.</p>
<p>- It is stated in S.8.4 that "a 3m site hoarding will be placed between the WRA and the construction works for residential area so that a visual barrier is maintained between the construction work and the wetland habitats". Please clarify if such hoarding would be built and maintained in the development portion during both the construction and operational phases, and review its effectiveness in screening the visual and ecological indirect impacts on the WRA taking into account the elevation differences between the WRA and the residential development. This also applies to the proposed provision of buffer planting in between the WRA and the buildings.</p>	<p>Parameter used is "mPD". There is no change in ground level of residential portion. It is the same, +6.8mPD, with reference to approved S16 scheme, A/YL-MP/344. Hence, no additional impact on the WRA is anticipated.</p> <p>As stated in the approved EIA report, perimeter wall will be built at the interface between the WRA and the residential area, to ensure no public access to the WRA.</p> <p>The <u>3m</u> site hoarding is stated in the Environmental Permit, for the approved scheme with +10mPD houses along the boundary of the WRA, while the WRA is at +5mPD. This kind of site hoarding is to screen the major source of disturbance during construction, i.e. the site workers, while the noise from work will be further minimized by quieter construction method and equipment.</p> <p>The buffer planting between the WRA and the adjoining 3-storey houses, is also considered as</p>

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	<p>effective, with reference to the adjacent existing residential area. Buffer planting with total of 7.5m in width along the interface is anticipated to be effective in screening the indirect impact to the WRA. The WRA design also considered the potential impact, hence the microhabitat closer to the residential portion has been planted with continuous reed.</p> <p>Further clarification has been supplemented to Section 8.5 for the evaluation of the potential impact.</p>
<p>- The "management issue related to the management plan and EM&A of the implemented WRA" mentioned in the RtC and failure to meet the management objectives, mitigation requirements and targets set out in the Wetland Restoration Plan would render the WRA inadequate to mitigate the impacts identified in the subject EcolA. Please review the existing performance of the WRA and reconsider if additional measures shall be adopted with reference to the 5-yearly review reports submitted by the project proponent under EIAO.</p>	<p>The current performance of the WRA has been reviewed and included in Section 4.2.</p> <p>The current performance could be enhanced with management actions, instead of additional mitigation measures in the residential portion.</p>
<p>- As advised in the RtoC, the whip buffer planting in WRA will be kept unchanged, while an additional 5m buffer planting will be provided in the residential portion. Please clarify if the subject additional buffer planting is located in the approximate 7m "garden" area between the WRA and "house type A" in the architectural drawings (Appendix 3 of last submission, Page 3, Cross Section B).</p>	<p>The 5m buffer planting within residential portion, has been illustrated in the architectural cross-section drawing.</p>
<p>- Please overlay in relevant figures the design and location of the "existing access track of 3.5m(W) provided for WRA maintenance" on the proposed residential development plan. By our on-site observation, the current entrance access of WRA did not satisfy the condition as stated in the RtC. We understand from the existing management agent of the WRA that some of the habitat management actions listed in the WRP, including fish stocking, removal of exotic trees along the fringe</p>	<p>Noted. The design and location of the access track is subject to detailed design at a later stage.</p>

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of the WRA and water drawdown during wintering season were hindered.	
<p>RtC on DIA & Figure 6</p> <p>- In view of the significant level differences between the WRA and the development portion and the potential increase of runoff Curve Number (CN) value in the development mentioned in the DIA, please clarify in relevant sections and Figure 6 if and how the surface runoff/flow from the development portion would be collected and diverted away from the WRA to avoid pollution and impacts on the created wetlands (e.g. soil and bank erosion, sedimentation, damage to wetland habitats after heavy rain) as well as the irrigation structures currently maintained in the WRA. Provision of additional drainage system within and along the northern end of the development portion to avoid overflow to the WRA should be considered. The cross-section of the area in between the WRA and the development portion should also be provided in Figure 6.</p>	<p>A bund wall (or solid protective barrier) and a surface channel are proposed along the boundary between the residential area and WRA, to prevent pollution and impacts on the WRA and its irrigation structures caused by surface runoff from the residential portion. The bund wall will stop the runoff from flowing into the WRA and ensure it is retained in the residential area until drained through the surface channel. The examples of bund wall or solid protective barrier are shown below.</p>  <p>The design of surface channel will be considered at the detailed design stages, and ensure there would not be runoff/flow into the WRA.</p> <p>The cross-section of the area in between the WRA and the development portion will be provided in Figure 6.</p>
Comments from the perspective of Sam Po Shue Wetland Conservation Park:	

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<p>Planning Statement Section 6.3.1: 1. The San Tin Technopole Outline Zoning Plan No. S/STT/2 was approved on 20 September 2024, please revise the first sentence accordingly.</p>	<p>Noted. Please find the replacement p.16 of the Planning Statement in Addendum 3.</p>
<p>Section 8.5: 2. It seems like only part of Section 8.5.3 is shown in the revised Planning Statement, and our previous comment was not addressed. Please update this Section to summarise the potential ecological impacts of the proposed development to the SPS WCP.</p>	<p>Please refer to the revised EcoIA, Section 8 (Addendum 2), for a summary of the potential ecological impacts of the proposed development to proposed SPS WCP.</p>
<p>Appendix 8: Ecological Impact Assessment Section 8.4: 3. Anticipated enhancement in habitat quality after the establishment of SPS WCP is irrelevant to whether the development would cause indirect impacts to fauna species of conservation importance. Please remove the last sentence accordingly.</p>	<p>The sentence has been removed.</p>
<p>Section 8.7: 4. The EcoIA made reference to that of the San Tin Technopole (STT), while it is noted that the distance between the proposed high-rise buildings (10-storey buildings) in the application site seems to be much closer to the SPS WCP than those that are of similar heights in the STT to the SPS WCP. The EcoIA failed to address the additional impacts of the proposed amendments to the SPS WCP. The conclusion of “minimal impact to the SPS WCP” is not justified. Please revise accordingly.</p>	<p>The EcoIA made reference to that of STT, as requested by AFCD comment in last RtC. The comment here said, “the proposed high-rise buildings (10-storey buildings) in the application seems to be much closer to the SPS WCP than those similar heights in the STT to the SPS WCP”, is not accurate.</p> <p>With reference to Figure 10.8 in approved EIA of STT, the illustration of indirect disturbance from proposed development on wetland habitats. The high-rise zone (>35mPD) to the nearest SPS WCP is only 35m NBA in between, i.e. near Tam Kon Chau Road; while the nearest high-rise building under current application has been considered carefully at least 50m away from the fishpond areas.</p> <p>Nonetheless, both low-rise zone and high-rise zone of STT included direct loss of wetland area to be compensated. However, for the current application, the direct wetland loss has already been compensated with the implemented WRA, approximately one fourth of the Application Site, while the proposed residential</p>

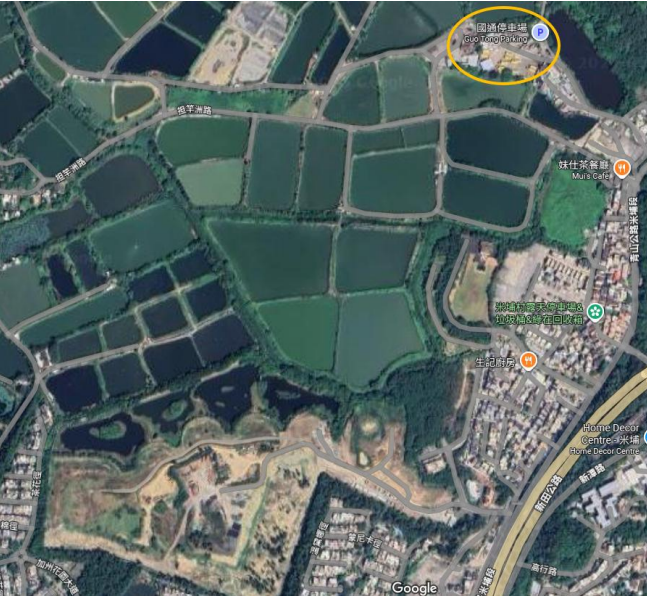
Further Comments (received 22.5.2025) from AFCD (Contact person: Dr Azaria Wong; Tel: 2150 6932)	Response(s): circulated (Informal) Draft FI Submission (23.6.2025) to AFCD
	<p>portion is sandwiched between existing residential areas, i.e. Royal Springs, Palm Springs and Mai Po San Tsuen.</p> <p>The additional impacts has been evaluated in Section 8.5 to conclude the anticipated impact is minimal.</p>
<p>Section 9:</p> <p>5. Please revise the first paragraph to read: "...the implemented WRA, and wetland habitats in the WCA, <u>and the proposed SPS WCP.</u>"</p>	<p>Section 9 has been revised.</p>
<p>6. Please revise Section 9 based on comment #4 above.</p>	<p>Please see response to comment #4 above.</p> <p>Section 9 has been revised.</p>
<p>We defer to CEDD and/or other Department(s) to comment on the interface issue between the SPS WCP and the proposed development from technical perspectives.</p>	<p>Noted.</p>

Response to Dept Comments of AFCD (received 11.7.2025) [responded w Draft FI 22.8.2025]

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
<p><u>General Comments</u></p> <p>In the latest proposal, the 10-storey building closest to the WCA is proposed to be lowered to 8 storeys, and the bore pilling activities for this building will be restricted during winter. However, there is still no convincing evidence showing that the potential ecological impacts from the increased building height and higher population density of the latest development scheme could be mitigated adequately.</p>	<p>Addendum 3</p> <p>In Section 8 of the revised Ecological Impact Assessment (EcolA) (enclosed), potential additional impacts from the increased building height and higher population density, in terms of potential indirect impacts (including noise, light and human disturbance) are evaluated as insignificant, especially in view of the low number of potentially impacted wildlife. The original mitigation measures will be applied in the latest scheme, according to the approved EIA (AEIAR-120/2008), including:</p> <ul style="list-style-type: none"> - A 3 m site hoarding will be placed between the WRA and the construction works for residential areas so that a visual barrier is maintained between the construction work and wetland habitats. - Night-time light disturbance will be minimised by limiting the amount of lighting in the construction site, and by situating this away from the WCA fishponds. The lighting units will be directional and hooded where appropriate to minimize unnecessary light spill. - Orientation of the 3-storeys houses abutting the WRA, is such that all will face towards the residential area, eliminating the need for public access next to the WRA. - As human activity will be greatest at the front of the buildings, the potential sources of impacts to waterbirds (including noise and night-time lighting) will be directed/concentrated away from the WRA; therefore, impacts to waterbirds will be minimised. - Good site practice within the construction site, selection of quiet equipment to minimise noise disturbance, minimisation of night-time lighting and location of this away from the wetlands, and prevention of human and dogs from accessing the construction site.

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	<p>Nonetheless, additional mitigation measures that have been proposed in the latest development, include:</p> <ul style="list-style-type: none"> - For the 6-/8-/10-storeys buildings, the proposed setback distances from the WCA as shown in Figure 7; - Restriction on the duration and method of construction activities on-site; - lighting design of building/ streetscape (subject to detailed design) to minimize disturbance; - wider buffer planting and 2m-high solid wall at the interface of WRA and residential portion.
	<p>The planning applications No. Y/YL-NSW/7 and Y/YL-NSW/8 for the same "OU(CDWRA)" zone as our application site, were recently approved in October 2023 and February 2025, respectively. Both are located adjoining the WCA (and the proposed Nam Sang Wai Wetland Conservation Park), with higher plot ratio and all high-rise (15 to 29 storeys or +61.5mPD to +115mPD) domestic towers.</p> <p>In the approved planning application Y/YL-NSW/7, it was proposed plot ratio of not more than 1.5, with seven 15-storeys (or +53.95mPD) towers and a Wetland Restoration Area. The nearest two towers are 30m of landscape buffer from the WCA and the nearest tower from the WRA is 6m landscape buffer.</p> <ul style="list-style-type: none"> - In the approved planning application Y/YL-NSW/8, it was proposed plot ratio of not more than 2.2, with 24 towers in stepped profile from 15-storeys (closer to WCA) to 29-storeys (furthest away from WCA) and a Wetland Restoration Area. The nearest six towers are approximately 30m from the WCA (and the proposed Nam Sang Wai Wetland Conservation Park), with part of the Wetland Restoration Area in between. In both RNTPC Paper No. Y/YL-NSW/7B and RNTPC Paper No. Y/YL-NSW/8A, Comments of the Director of Agriculture, Fisheries and Conservation, stated "has no objection to the application from nature conservation point of view."

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
~Continued	<p>In comparison with this Application, the proposed plot ratio is no more than 1.3 with stepped-building height profile from 3-storeys to 10-storeys. The nearest high-rise building (10-storey) is 80m away from the WCA. Only 3-storeys houses are proposed abutting the WRA and the WCA at the eastern portion. All 6-/8-storeys building (low-rise <35mPD) have been proposed with at least 50m setback from the WRA, while most of these buildings are actually at least 100m away from the WCA. The high-rise buildings (10-storeys) are located furthest away as possible from the wetland habitats, at the same time optimizing the development potential of the residential portion, and minimizing the visual impact on the immediate low-rise neighbourhood developments. The potential noise, light and human disturbance at lower storeys will be effectively screened off by the 7.5m wide buffer planting and 2m-high solid wall at the interface between the WRA and residential portion. At higher storeys, the potential impact will be further mitigated as the proposed setback of 80m to 215m has significantly increased the distance between the domestic sources of disturbance and the wetland habitats.</p> <p>The potential additional impacts are assessed as insignificant, while mitigation measures have been proposed in addition to those committed in the approved EIA report (AEIAR-120/2008). The potential ecological impacts would be mitigated adequately.</p> <p>It is our understanding that the WRA is not in a deteriorating state. Refer to EcolA Section 4.2.2., based on literature review, the WRA habitat size has remained the same, and its habitat function has already induced ecological gain within the Application Site. The WRA consistently attracts higher number in species of conservation importance, than it's been originally constructed and established for. Three target species, i.e. Chinese Pond Heron, Eastern Cattle Egret and Little Egret have been monitored monthly. It is not appropriate to conclude the WRA is not effective only based on the reduction in abundance of Eastern Cattle Egret (EcolA Section 4.2.3), one of the</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:														
	<p>three target species. The reduction in abundance of Eastern Cattle Egret is not site-specific, i.e. related to any construction activities of the Project. The target level should be reviewed as the baseline data (dated April 2005 – June 2006) in the approved EIA has been nearly 20 years ago; however, it is more appropriate to review the target level in the corresponding Environmental Permit submission, under the EIAO.</p> <p>The 2nd 5-yearly review for the Wo Shang Wai WRA is in progress, and yet to be published. However, based on site observations by the NGO managing the current site and conduct regular ecological monitoring within WRA and outside WRA, the car park mentioned with increase in traffic flow is marked with circle in the map below, and along the Tam Kon Chau Road. The nearest egrettry to Wo Shang Wai is Mai Po Village, where there also showed a declining trend in Little Egrets nests from 2018 with 99 nests to 2022 with 73 nests, and dramatic decline in ardeids nests in Deep Bay in 2022 (HKBWS, 2022), which indicated a general decrease in breeding ardeids in the Deep Bay.</p>  <p>Some Little Egret data extract from the HKBWS for your reference:</p> <p>The number of Little Egret nests at surveyed colonies in Hong Kong in 2017 - 2022</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Mai Po Village (MPV)</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>99</td> </tr> <tr> <td>2018</td> <td>99</td> </tr> <tr> <td>2019</td> <td>91</td> </tr> <tr> <td>2020</td> <td>70</td> </tr> <tr> <td>2021</td> <td>54</td> </tr> <tr> <td>2022</td> <td>73</td> </tr> </tbody> </table>	Year	Mai Po Village (MPV)	2017	99	2018	99	2019	91	2020	70	2021	54	2022	73
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Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	<p>To supplement a bit on the low record of Eastern Cattle Egret, it is noted that during the baseline ecological surveys for the EIA report, Eastern Cattle Egret had been occasionally recorded in 4 counts only within the Project Area (i.e. 1 count with 5 individuals on 16 May 2005, 1 count with 1 individual on 15 May 2006, 1 count with 2 individuals on 25 May 2006, and 1 count with 14 individuals on 27 June 2006) out of the 20 bird surveys carried out. The current target level of Eastern Cattle Egret (i.e. 1.3, based on the Baseline Annual Mean), may be over-rated due to a single count of 14 individuals on 27 June 2006.</p> <p>Furthermore, the population of Eastern Cattle Egret in Hong Kong comprise largely migrant and a small breeding population. From 2013 to 2022 recorded in the long-term egret survey undertaken by Hong Kong Bird Watching Society (HKBWS), which shows the northwest New Territories is not always attractive to Eastern Cattle Egret for breeding. Although the record showed that this species has gathered in the Deep Bay area for breeding in recent years, it is noted that the majority of nests were found in Mai Po Mangrove colony of the Deep Bay, which is not in the vicinity of the WRA. In view of the above, the target level of Eastern Cattle Egret is not met mainly due to the over-rated target level which was skewed by one single record during the baseline stage on the base of a relatively low number and infrequent records, which is the general occurrence pattern of the species in the WRA and its periphery Tam Kong Chau fishpond area throughout the baseline and review period.</p> <p>At this current rezoning stage, the WRA has room to improve its performance based on an (out-dated) baseline data on the target species; however, the project is still under construction phase, and is considered acceptable for the target species levels to have not been achieved. However, should this situation continue, a review of the management of the WRA and adaptive management steps will be required. In addition, the WRA is still effectively performing as an ecological mitigation wetland, as demonstrated with increase in diversity and abundance of species of conservation importance that is connected to the WCA, as a single unfragmented wetland. The additional measures in</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	<p>this respect could be considered at the detailed design and/or EP submission stages, where the target levels could be reviewed.</p>
<p>In view of the proposed building changes in the subject application (i.e. changes in height and arrangement), the additional indirect impacts on the WRA should be reviewed and addressed. The fact that the WRA is created to serve as an ecological mitigation wetland to compensate for the loss of wetlands under the project (but not solely as "a buffer areas between the WCA") is also omitted in S.8.4.4. The project proponent should revisit the indirect impacts on the WRA and hence the effectiveness of the WRA in serving as an ecological mitigation wetland for the subject project.</p>	<p>The WRA serving as an ecological mitigation wetland was not omitted in the EcolA.</p> <p>The evaluation in S.8.4.4 merely reiterates that in the approved Wetland Restoration Plan appended in the approved EIA report (AEIAR-120/2008), " Because the proposed wetland restoration site and the area proposed for residential development is of such limited ecological value, it is not considered that construction period ecological mitigation measures are required." In other words, it is relevant to note that significant portion of the Application Site was long occupied by brownfield operation with degraded ecological value, which is the planning intention of the OU(CDWRA to eliminate the brownfields and restore the wetland areas. Nonetheless, the ecological mitigation measures during construction phase of residential portion have still been proposed in this application, based on the latest baseline condition as additional mitigation measures.</p> <p>Based on the literature review, the WRA has already induced ecological gain within the Application Site. The WRA consistently attracts higher number in species of conservation importance, than it was originally been constructed and established for. It is not appropriate to conclude the WRA is not effective only based on the reduction in abundance of Eastern Cattle Egret, one of the three target species. The reduction in abundance of Eastern Cattle Egret is not site-specific, i.e. related to any construction activities of the Project, but there has been reduction in these species in Deep Bay due to land-use changes the WRA construction works was completed in 2010 and established by 2012, while the construction works of residential portion has not yet commenced. At this current rezoning stage, the WRA has room to improve its performance based on an (out-dated) baseline data on the target species of Easter Cattle Egret; however, as the project is still under construction phase, it is considered acceptable for the target species levels to have not been achieved. However, should this situation continue, a review of the</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	management of the WRA and adaptive management steps will be required. In addition, the WRA is still effectively performing as an ecological mitigation wetland, as demonstrated with increase in diversity and abundance of species of conservation importance that is connected to the WCA. The additional measures in this respect could be considered at the detailed design and/or EP submission stages, where the target levels could be reviewed.
Given that the EcolA has failed to provide sufficient information to demonstrate that the additional potential ecological impacts arising from the latest development scheme could be mitigated adequately, based on the information in the current draft submission, we do not support the current planning application from the ecological perspective. Please see the specific comments below	<p>The EcolA has been further supplemented with requested information in accordance with the specific comments.</p> <p>In both RNTPC Paper No. Y/YL-NSW/7B and RNTPC Paper No. Y/YL-NSW/8A, Comments of the Director of Agriculture, Fisheries and Conservation, stated “has no objection to the application from nature conservation point of view”, on the two planning applications with higher plot ratio, all high-rise buildings, ≤30m from the WCA.</p> <p>In the EcolA of this Application, the potential additional impacts are assessed as insignificant, while mitigation measures have been proposed in addition to those committed in the approved EIA report (AEIAR-120/2008). The potential impacts would be mitigated adequately.</p>
<p><u>Specific Comments</u></p> <p>Section 6.2.5</p> <p>For clarity, please revise as “...7 bird individuals <u>per survey hour</u> were recorded...”. Please revise Section 6.2.8 similarly.</p>	Section 6.2.5 and 6.2.8 have been revised accordingly.
<p>Section 6.2</p> <p>The locations of bird and bat species of conservation importance are shown on the habitat map in a number of approved EIA Reports including San Tin/ Lok Ma Chau Development Node EIA. Please also provide such information on the habitat map for the current project for better</p>	Indicative locations of bird and bat species are supplemented in Figure 3b, with reference to Figure 6a, by zoning into Exclusion Zone, Reduced Density Zone and Undisturbed Zone.

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
understanding of the wildlife distribution in the area.	
<p>Section 8.5</p> <p>It seems that only birds are evaluated. Please beef up regarding the indirect impact to non-avifauna species.</p>	<p>Supplemented in Section 8.4 and 8.5. Most of the non-avian species of conservation importance utilising the wetland habitats, will be near water, at ground level or lower. It is anticipated there is no additional impact from the increase in building height and population density, as their presence are more prone to the wetland habitat quality and foraging opportunities, rather than potential indirect impact.</p>
<p>Section 8.5</p> <p>Please compare the extent of reduced density zone and exclusion zone of the latest scheme with the approved application no. A/YL-MP/344, and demonstrate whether the measures proposed in the approved EIA and the additional measures could address the additional disturbance impacts during the construction phase and operation phase.</p>	<p>Figure 6d and 6e, have been supplemented to illustrate the maximum predicted extent of potential disturbance impacts during construction phase and operation phase, respectively, under approved scheme of A/YL-MP/344, in the absence of mitigation measures.</p> <p>Figure 6a and 6b, illustrate the maximum predicted extent of potential disturbance impacts during construction phase and operation phase, respectively, under the proposed scheme in this application, in the absence of mitigation measures.</p> <p><u>During Construction Phase</u></p> <p>Comparing Figure 6a with Figure 6d, the maximum Reduced Density Zone (RDZ) of latest scheme extends to 400m, while the maximum RDZ of the approved scheme extends to 200m from building footprint. The potential increase in RDZ of latest scheme compared to the approved scheme is only due to the potential disturbance impacts from the proposed 10-storey, categorized as high-rise buildings with a larger RDZ extent. However, the potentially impacted wildlife (or fauna species of conservation importance) in the latest scheme's RDZ are in the WRA or the ponds to the north, and these have been assessed to have minimal disturbance impact in section 8.5. The maximum exclusion zone (EZ) of latest scheme extends to 200m, while the maximum EZ of the approved scheme extends to 100m from building footprint. The potential increase in EZ of latest scheme compared to approved scheme is concentrated in the surrounding developed/urbanized areas (i.e. west, east, and south), which do not have impact on any wildlife;</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	<p>while the potential increase to the north, including the WRA and ponds (no. 51 and 52), are insignificant.</p> <p><u>During Operation Phase</u></p> <p>Comparing Figure 6b with Figure 6e, the maximum RDZ of latest scheme extends of latest scheme extends to 200m, while the maximum RDZ of the approved scheme extends to 100m from building footprint. The potential increase in RDZ of latest scheme compared to the approved scheme can be seen with a slightly larger extent at Pond 51 and 52, as well as to the surrounding developed/urbanized area (i.e. west, east and south). The increase is only due to the potential disturbance impacts from the proposed 10-storeys, categorized as high-rise buildings with a larger RDZ extent. However, the potentially impacted wildlife (or fauna species of conservation importance) in the latest scheme's RDZ are in the WRA or the ponds to the north, and these have been assessed to have minimal disturbance impact in section 8.5. The maximum exclusion zone (EZ) of latest scheme extends to 100m, while the maximum EZ of the approved scheme extends to 50m from building footprint. The EZ extent is almost the same, in fact, most of the extent does not extend beyond the WRA and is slightly smaller in the latest scheme at Pond 52. As shown in the RDZ and EZ comparison diagrams, the potential additional impact is anticipated to be insignificant, even in the absence of mitigation measures; therefore, the mitigation measures in the approved EIA and the proposed additional mitigation measures are considered sufficient to minimize the disturbance impacts.</p>
<p>Section 8.5.7</p> <p>It is stated that "the disturbance impacts to these species of conservation importance from this Project are anticipated to be minimal". It seems not consistent with Table 30 which states that the indirect impact to fauna species of conservation importance will be moderate to high during construction phase and moderate during operation phase. Please review.</p>	<p>In Table 30, "Moderate to High Severity" during construction phase and "Moderate" during operation phase are Overall Impact Severity evaluated in the absence of mitigation measures, when considering the habitat quality and species of conservation importance.</p> <p>However, Section 8.5.7 evaluated the potential disturbance impacts to the disturbance-sensitive waterbirds as minimal, based on the insignificant number of individuals potentially displaced by the Project, in the predicted Exclusion Zone and Reduced</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	Density Zone. Therefore, this demonstrates that the potential additional impact from the increase in building height and population density is not significant .
<p>Section 8.5.8</p> <p>It is stated that “The approved mitigation measures during construction phase and operation phase are considered sufficient to minimize the disturbance impacts.” Please provide evidence to prove this claim</p>	<p>Comparing Figure 6a with Figure 6d, the potential increase in maximum predicted extent during the construction phase is only due to the proposed 10-storeys buildings; however, the potentially impacted wildlife is assessed to be minimal in section 8.5.</p> <p>Comparing Figure 6b with Figure 6e, the maximum predicted extent is almost the same. As the potential additional impact is anticipated to be insignificant, the approved mitigation measures during construction phase and operation phase are considered sufficient to minimize the disturbance impacts.</p>
<p>Section 8.8.2</p> <p>Please beef up regarding the impacts on WCA by noise, human activities and traffic due to high-building heights during the construction phase and increased population intake during operation phase.</p>	<p>Supplemented in Section 8.8.2.</p> <p>As mentioned in S.8.5.3, the proposed 10-storeys have been located further away from the WCA (also the proposed SPS WCP); also, those at the eastern portion of Project Site have been considered at less ecologically sensitive area (i.e. farthest away from Deep Bay) and located at least 80m away from the fishponds in WCA. With reference to noise impact assessment, there will be no adverse impacts due to the increase in building height during construction; while in operation, the domestic noise at distant is anticipated to be insignificant. Human activities and traffic will be restricted within the residential portion, at lower level would be entirely screened off by the buffer planting and perimeter wall while at high level would be minimized by the distance (and the setback). Hence, no additional impact is predicted to the wetland habitats in the WCA.</p>
<p>Section 8.9</p> <p>A number of measures claimed to be additional mitigation measures have actually been proposed in the approved EIA Report for low-rise development (e.g. constructing the houses abutting the WRA first). Please distinguish those previously proposed measures from the additional measures clearly.</p>	<p>The sentence on constructing the houses abutting the WRA first has been removed from the section 8.9 (additional mitigation measures). The paragraph has been revised.</p>


Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
<p>Sections 8.9.2 – 8.9.3</p> <p>It is noted that the high-rise buildings in the central and southern portions are at least around 200m away from the WCA with WRA and low-rise buildings in between. However, for the eastern portion, there is no WRA as buffer between the WCA and the buildings, and the increase in building height and population will result in more significant disturbance impacts as compared with the approved scheme. Please consider taking additional measures (e.g. moving the high-rise buildings further away from the WCA, further restriction the time period of noisy construction works etc.) to minimize the disturbance impacts during the construction phase and operation phase.</p>	<p>The eastern portion of the Application Site has been considered as less ecologically sensitive location according to the approved EIA (AEIAR-120/2008). Originally, it was occupied by open storage and container vehicle yards. The planning intention of "Other Specified Uses" annotated "Comprehensive Development to include Wetland Restoration Area" i.e. "OU(CDWRA)", is to eliminate these brown fields and restore the degraded wetland areas which were scattered in patches within the Application Site twenty years ago. The brown fields have been eliminated and one-fourth of the Application Site has been established into the WRA, adjoining the WCA. Instead of longer in shape of WRA buffering the entire Application Site from the WCA, the current implemented WRA is more attractive wetland habitat, which the pond bunds are located further away from the residential portion. Furthermore, the ecological value of fishpond abutting the eastern portion is very limited by the existing disturbance from the adjacent village, car park and agricultural land outside the Application Site.</p> <p>With reference to approved EIA report of San Tin Technopole, high-rise buildings are defined as (>35mPD in height), as such, under current Application, this would refer to 10-storeys (+42mPD) only, while all the other buildings are low-rise are defined as (<35mPD in height). Comparing Figure 6a with Figure 6d, during the construction phase at the eastern portion of site, the predicted EZ and RDZ have a larger extent than the approved scheme due to the high-rise buildings (10-storeys), in the absence of mitigation measures. However, the potentially impacted wildlife within these zones is assessed to be minimal, based on the ecological survey findings. Therefore, the increase in building height and population is not anticipated to have "more significant" disturbance impact at this location. In fact, the potential additional disturbance impacts (both direct and indirect) have been assessed as insignificant in Section 8.</p> <p>Comparing Figure 6b and Figure 6e, during the operation phase at the eastern portion of site, especially at Pond 52, the predicted EZ and RDZ of the latest scheme is slightly smaller than the approved</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	<p>scheme. This means the extent of disturbance impact of the latest scheme is slightly less than the approved scheme. The reduction of the Tower C2-1 from 10-storeys to 8-storeys in the current MLP, is able to minimize the disturbance impact at this location, in the absence of mitigation measures and with reference to the approved scheme.</p> <p>In conclusion, further moving the 10-storeys away from the WCA is considered not necessary. Nonetheless, additional mitigation measures have been proposed in the construction stage, including restricting construction activities in the residential portion between the hours of 7pm to 7am (in the next day), scheduling the foundation works for the nearest building (C2-1) from the WCA between mid-March to mid-November only, and the use of only bore piling construction method. In operation stage, lighting unit including the building/streetscape should be directional and minimize unnecessary light spill by hooding or lower intensity, subject to detail design. At the interface between the WRA and the 3-storey houses, it is proposed increase in 2.5m width of buffer planting within the residential area. During operation, there will be a total of 7.5m width of buffer planting plus a 2m solid wall, to screen off the disturbance from residential area. The 6-/8-/10-storey buildings have been considered carefully to minimize the potential impact, by setback of at least 50m away from the WRA and the WCA (see Figure 7).</p>
<p>Section 8.9.2</p> <p>What is a WCA buffer zone? Please clarify.</p>	<p>This has been removed to avoid confusion. There is no WCA buffer zone but at least 50m setback from the WRA and WCA, as illustrated in Figure 7.</p>
<p><u>Comments from the Management Perspective of WRA</u></p>	
<p>RtC on indirect impacts on WRA, Sections 8.2-8.5, 8.8, 8.9 & 9 of the revised EcolA our previous comments provided via our emails on 9.5.2025 & 19.6.2025 remain unaddressed. According to the</p>	<p>While the following information has already been presented in the assessment, we would like to clarify as follows:</p> <ol style="list-style-type: none"> 1. S.8.5 and Figures 6-7 not only included assessment of potential indirect impact from

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
<p>development proposal, the Wetland Restoration Area (WRA) is avoided but still located in the Exclusion Zone during both the construction and operational phases. Additional information provided in S.8.5 and Figures 6-7 only assessed the indirect impacts on the WRA resulting from the 10-storey buildings, leaving those related to the rest of the proposed development unaddressed. The fact that the WRA is created to serve as an ecological mitigation wetland to compensate for loss of wetlands under the project (but not solely as "a buffer areas between the WCA") is also omitted in S.8.4.4. The project proponent should revisit the indirect impacts on the WRA and hence the effectiveness of the WRA serving as an ecological mitigation wetland under the subject project.</p>	<p>10-storey buildings, but also the low-rise development (3-/6-/8-storeys).</p> <ol style="list-style-type: none"> 2. Figure 6a and 6b illustrated the <u>predicted maximum</u> zones of potential disturbance during construction phase and operational phase, in the absence of mitigation measures. Although the EZ extent is within the WRA, the originally approved EIA mitigation measures together with the proposed additional mitigation measures would be put in place to mitigate the potential indirect impact. 3. Refer to Appendix C presented the maximum distance of each disturbance-sensitive bird species of conservation importance to be potentially displaced during construction phase and operational phase. The indirect disturbance impact is anticipated to be minimal, as the mean number of individuals recorded within the maximum disturbance zone is low. 4. The assessment does not omit the WRA as compensatory wetland. It has already been stated throughout the report, especially in beginning of Section 4.1. 5. As stated in the Section 4 Literature Review, the EM&A monitoring findings indicated the WRA has already induced ecological gain within the area. 6. Based on the initial 5-year wetland restoration area review, the monitoring findings already suggested a single unfragmented wetland has been formed in connection with neighbouring WCA, the habitat quality has been significantly improved. The enhanced ecological value is also reflected in the number and diversity of the fauna species recorded in the monitoring, including wetland fauna species of conservation importance that not recorded in previous project site prior to construction, although the target species annual mean for Eastern Cattle Egret and Little Egret were not achieved in recent years, which was mainly due to the land use changes in close proximity to the WRA (i.e. outside the project site were turned into open car park and storage and the

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	<p>shift of the egrettry from Tom Kon Chau to Hop Shing Wai) that resulted in overall decrease in Little Egrets and Cattle Egret usage around the wetland area closer to WRA. Therefore, the WRA has been effective as an ecological mitigation wetland up to this time in the project construction phase.</p> <p>In addition, the project is still in construction phase, therefore the WRA is still acting as a buffer to mitigate for the disturbance impact to the wetland conservation area (or SPS Wetland Conservation Park), and thus the effectiveness of the WRA in mitigating for the operation of the original development scheme is still too early to conclude.</p>
<p>RtC on indirect impacts on WRA, Sections 8.2-8.5, 8.8, 8.9 & 9 of the revised EcolA</p> <p>Please review if the species of conservation importance recorded in the WRA, including those in the EIAO 5-yearly reports and the on-going ECF projects, shall be verified and included in Sections 8.4-8.5 and Figure 3b of the revised EcolA to facilitate impact assessment</p>	<p>Recent 12-months of EM&A reports have been reviewed in Section 4 and list of species is summarised in Appendix A.</p> <p>Location information is not available in these reports. Only within WRA or survey area outside WRA was reported. It is not appropriate to be included in Figure 3b.</p> <p>Review of bi-annual EM&A reports including ECF survey findings, have been supplemented in Section 4.</p>
<p>RtC on change of ground level and resulting building height and S.8.4 of the revised EcolA</p> <p>Please clarify if the 5-m elevation differences between the WRA and the residential portion was approved under EIAO and the S.16 scheme; and if negative, whether indirect impacts on the WRA resulting from the 5-m gradient differences were assessed and confirmed acceptable under the approved schemes. This comment also applies to the change of building heights in the residential portion.</p>	<p>For clarity, in the previous approved application A/YL-MP/344, the elevation difference between the WRA and the residential portion was approximately 2m, in accordance with the architectural drawing, from +5.0mPD (ground level of WRA southern bund) to +6.8mPD (ground level of residential portion).</p> <p>There is no change to the elevation difference in this application compared with the previously approved schemes.</p> <p>The increase in building heights is assessed in the Section 8.</p>
<p>RtC on change of ground level and resulting building height and S.8.4 of the revised EcolA</p> <p>According to the EIAO submissions and the ECF progress reports, light-sensitive species including waterbirds,</p>	<p>In S.8.4.2, revised to "there is no significant ecological <u>light-sensitive receiver</u> within the WRA, ..., i.e. no significant population of fireflies and ardeid night roosts."</p> <p>As for nocturnal species of conservation importance, which are generally light-sensitive, it is shown in the</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
<p>herpetofauna and mammal species are recorded in the WRA. It is factually incorrect to state in S.8.4.2 of the EcolA that "there is no ecological light-sensitive receiver within the WRA".</p>	<p>review of recent 12-months EM&A reports and the 12-month ecological surveys, these species recorded within WRA are not prone to being a light impact receiver. Please refer to the following:</p> <ul style="list-style-type: none"> - Leopard Cat is primarily nocturnal but also active in daytime. Only scats have been recorded within the WRA. WRA has provided suitable habitat and foraging opportunities for this mammal species. Its occurrence is more likely prone to the presence of human or feral dogs. Light/glare impact to this species is not anticipated. - Black-crowned Night Heron is widely distributed in Hong Kong, with numerous records of foraging in urban setting. Light/glare impact to this species is not anticipated. - Greater Painted-snipe is primarily crepuscular and nocturnal while hides in dense vegetation during daytime. Light/glare impact to this species is not anticipated due to their preference on microhabitats, i.e. dense aquatic vegetation. - Many-banded Krait is nocturnal species often found near water sources. This species primarily eats other snakes but also consume rodents and frogs. WRA has provided suitable habitat and foraging opportunities for this reptile species. Light/glare impact to this species is not anticipated as they are moving at ground level or in water, where will be entirely screened by the vegetation. - For most of the amphibians and reptiles (herpetofauna) being nocturnal, is due to effect of temperature and humidity on their anatomy, instead of light. As no lighting will be directly shining towards the wetland or onto these fauna individuals, no potential impact is anticipated. <p>The following discussion on light intensity are not considered necessary but included for reference. As there is no significant population of fireflies within the 500m Assessment Area, the predicted light level from the current Application is not comparable to literature of any potential impact receiver. Nonetheless, the light impact to the adjacent WRA and WCA is anticipated to be insignificant. Unlike commercial centre, the residential buildings will not</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	<p>have extensive exterior lighting. All exterior lighting for management or security purpose could be installed at lower storeys where will be entirely screened off by the buffer planting. Regarding the domestic lighting, the interior setting will not be directly pointed at the wetland. Even assuming worst-case scenario, the windows facing the wetland will never be 100% switched on with domestic light. During night-time, rather than view, the resident will be more concerned with privacy, thus applying curtains/blinds/shutters at their window, which will minimize or even eliminate the light spill from a single unit.</p> <p>By simple physics calculation, for a single light source straightly pointing at the target area, light intensity decreases as the square of the distance increases. If a light source has an intensity of 100 lux at a distance of 1 meter, then at a distance of 2 meters, the intensity would be 25 lux ($100 / 2^2 = 25$). For a living room generally need 150 lux, from ceiling to floor around 3m in height; from a 30m distance, the light intensity is already less than 1 lux.</p> <p>In addition, light level reading was taken from the nearby wetland from the overnight operating Lok Ma Chau Station, where the buffer planting in between is not densely canopied, visually observable at the pond bund approximately 50m from the Station. The light level reading at 50m is already less than 1 lux. The Station with limited exterior lighting didn't pose significant light impacts, even the interior lighting is switched on overnight and visible via the curtain wall.</p> 

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
<p>RtC on installation of site hoardings and provision of buffer plantings</p> <p>It remains uncertain whether the 3m site hoarding and the perimeter wall would be built within the residential area, and whether it would be maintained by the project proponent during the operational phase. Information (e.g. precedent with proven success) has yet to be provided to demonstrate the effectiveness of the 3m hoarding and the 7.5m buffer plantings in screening indirect impacts, including ecological and visual impacts on the WRA during both the construction and operational phases. Please review and supplement.</p>	<p>In the existing site conditions, the 3m site hoarding has been installed and maintained by the project proponent at the interface between the WRA and the residential portion, within the residential area. The perimeter wall would be built in line with the construction of the residential portion.</p> <p>The proposed mitigation measures of site hoarding and buffer plantings are at the same level of dimensions (e.g. 3m-high hoarding) as those in the approved EIA report (AEIAR-261/2024) of San Tin Technopole, which is for a much larger scale and more extensive development. In addition, the 3m site hoarding was a mitigation measure that was accepted by authorities in the approved EIA report (AEIAR-120/2008). Following the approval of this rezoning application, the effectiveness of 3m hoarding and 7.5m buffer planting could be explored at the detailed design stage and will be monitored and evaluated as EM&A requirements under the EP.</p> <p>Considering this Application alone, the EcoIA assessment has evaluated the potential additional impacts on the WRA from the increase in building height and population density is not significant, and can be mitigated with the originally proposed mitigation measures in the approved EIA report and the proposed additional mitigation measures. The overall impact severity in the absence of mitigation measures remains unchanged as in the approved EIA report; hence, the proposed mitigation measures are adequate.</p>
<p>RtC on "management issues related to the management plan and EM&A of the WRA"</p> <p>Please provide details on how the current performance of the WRA, which is located immediately adjacent to the residential portion, could be further enhanced during the construction and operational phases of the subject project.</p>	<p>In general, implementation of management practices including fish-stocking and drain-down, have proven effective in attracting waterbirds, which could further enhance the current performance of the WRA.</p> <p>The monitoring findings already suggested a single unfragmented wetland has been formed in connection with neighbouring WCA, the habitat quality has been significantly improved. The enhanced ecological value is also reflected in the number and diversity of the fauna species recorded in the monitoring, including wetland fauna species of conservation importance that not recorded in previous project site prior to construction, although the target species annual mean for Eastern Cattle</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	<p>Egret and Little Egret did not achieve in recent years, which may due to the land use changes in close proximity to the WRA outside the project site were turned into open car park and storage and the shift of the egretry from Tom Kon Chau to Hop Shing Wai that resulted in overall decrease in Little Egrets and Cattle Egret usage around the wetland area closer to WRA.</p> <p>Other than enhancing the WRA itself, the Landscape Master Plan of the proposed scheme included landscape gardens/wildlife ponds/butterfly garden, the wildlife utilisation across the entire Application Site will also benefit the WRA, when compared with existing bare ground or original brown fields/degraded wetland.</p>
<p>RtC on the "existing access track for WRA maintenance"</p> <p>Our previous comment remains unaddressed. In view that "the design and location of access track is subject to detailed design" and hence not available in the subject submission, it is uncertain whether unauthorised human access and dogs could be excluded from the WRA while proper access could be provided for WRA maintenance during both the construction and operational phases. Please review and specify.</p>	<p>The existing access track has been used for maintenance since the WRA was established. With respect to unauthorized human access and dogs, a gantry is proposed to be installed as an entrance to the WRA in the eastern residential portion, and locked with key access, only available for management parties.</p>
<p>S.4.2</p> <p>In view of the existing performance in WRA, please review the target level in this EcoIA, and reconsider if additional measures shall be adopted to prevent further deterioration to the mitigation wetland's performance.</p>	<p>It is our understanding that the WRA is not in a deteriorating state. Refer to EcoIA Section 4.2.2., based on literature review, the WRA habitat size has remained the same, and its habitat function has already induced ecological gain within the Application Site. The WRA consistently attracts higher number in species of conservation importance, than it's been constructed and established. Three target species, i.e. Chinese Pond Heron, Eastern Cattle Egret and Little Egret have been monitored monthly. It is not appropriate to conclude the WRA is not effective only based on the reduction in abundance of Eastern Cattle Egret (EcoIA Section 4.2.3), one of the three target species. The reduction in abundance of Eastern Cattle Egret is not site-specific, i.e. related to any construction activities of the Project. The target level should be reviewed as the baseline data (dated April</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:								
	<p>2005 – June 2006) in the approved EIA has been nearly 20 years ago; however, it is more appropriate to review the target level in the corresponding Environmental Permit submission, under the EIAO. At this current rezoning stage, the WRA has room to improve its performance based on an (out-dated) baseline data on the target species of Eastern Cattle Egret; however, it is still effectively performing as an ecological mitigation wetland, as demonstrated with increase in diversity and abundance of species of conservation importance that is connected to the WCA. The additional measures in this respect could be considered at the detailed design and/or EP submission stages, where the target levels could be reviewed.</p>								
<p>S.7.1, Table 13</p> <p>Naturalness: Please review and specify on whether the “mitigation wetland” is an artificial wetland created under the approved WSW EIA project to mitigate wetland loss and to provide suitable habitats for a variety of species including waterbirds, dragonflies and amphibians.</p>	<p>Noted and included.</p>								
<p>S.7.1, Table 13</p> <p>Size: The targeted and the existing habitat types and sizes recorded in the "mitigation wetland" should be presented in the table.</p>	<p>The ecological value of the WRA as a mitigation wetland was evaluated as a whole area. The Table 13 has been updated to Table 15 in the EcolA.</p> <p>The table below has summarized the originally targeted microhabitats in the Wetland Restoration <u>Plan</u>. These were never considered as fixed values as they will be dependent on various habitat management practices. For example, the habitat area of “Open Water” has been adjusted with one of the management practices of drain-down procedure.</p> <table border="1" data-bbox="724 1792 1375 1993"> <thead> <tr> <th>Microhabitats within WRA</th><th>Targeted Area (ha)</th></tr> </thead> <tbody> <tr> <td>Grassland</td><td>0.33</td></tr> <tr> <td>Reedbed</td><td>1.12</td></tr> <tr> <td>Open Water</td><td>2.37</td></tr> </tbody> </table>	Microhabitats within WRA	Targeted Area (ha)	Grassland	0.33	Reedbed	1.12	Open Water	2.37
Microhabitats within WRA	Targeted Area (ha)								
Grassland	0.33								
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Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:	
	Tall grass/shrubs	0.12
	Tall trees/shrubs	0.66
	Non-vegetated island	0.14
	Total area of WRA	4.74
	<p>With the completion of planting as scheduled in the approved Habitat Creation and Management Plan (HCMP) in August 2012, establishment work at the WRA is completed [except small areas along the eastern and southern boundary where the planting is affected by the existing noise barrier, and for which an approved Variation to Environmental Permit (EP-311/2008/D) to defer planting at these locations applies], and the 30-month establishment period was concluded in October 2012.</p> <p>Notwithstanding, the subtle difference in the targeted and the existing microhabitats will not result in any change in the evaluation of the "Ecological Value" of the WRA.</p>	
<p>S.7.1, Table 13</p> <p>Rarity: The rarity status of the species of conservation importance found in the "mitigation wetland" are missing.</p>	<p>Noted and the information has been supplemented in Table 15.</p>	
<p>S.7.1, Table 13</p> <p>Nursery/breeding ground: Considering the management objective of the WRA, please review if waterbirds should also be included in the list.</p>	<p>Noted and included.</p>	
<p>Table 31</p> <p>Direct Loss of habitats in Application Site: As mentioned above, the WRA was created to mitigate ecological impacts resulting from the original/approved scheme which are of much lower development density. Please review and include additional potential impacts resulting from the latest development plan as well as the additional mitigation measures required in the table.</p>	<p>Refer to the EcoIA Table 33, to supersede Table 31. The habitats within the Application Site in the past (i.e. original/approved scheme) and now (i.e. current application), are low/ low to moderate in ecological value. The direct loss of these habitats has been mitigated by the approved mitigation measure of establishing the WRA, with compensatory habitats for the potentially affected wildlife.</p> <p>There will not be any additional potential impacts, as the loss of habitats have been fully compensated within the WRA, and the residential portion remains the same. Despite the higher building height and</p>	

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
	population of the latest development plan (i.e. current application), the WRA intention to mitigate the direct loss of habitat in the Application Site has been carried out with the establishment of the WRA.
<p>Table 31</p> <p>The evaluation on the indirect impact to WRA and the species of conservation importance there are missing. Please review and supplement.</p>	<p>The evaluation on the impact severity has been supplemented under the column "Additional Potential Impact" in Table 31.</p>
<p>Table 31</p> <p>Please clarify if a 7.5m width (instead of 5m) buffer planting plus a 2m solid wall will be provided. The architectural cross-section drawing should be updated to reflect the provision.</p>	<p>In the approved scheme, there will be 2.5m width of buffer planting within the WRA and 2.5m width of buffer planting within the residential portion. This remains unchanged in the current Application.</p> <p>Under current Application, the buffer planting within the residential portion will be increased from 2.5m to 5m width. Hence, including the 2.5m buffer planting within the WRA, then there will be in total 7.5m width of buffer planting at the interface of the WRA and the residential portion. In addition, a 2m-high solid wall will be provided.</p> <p>Enclosed, Figure 8 the architectural section B drawing has been updated accordingly.</p>
<p>RtC on DIA & Figure 6</p> <p>The project team is advised to consult relevant authorities (i.e. DSD and EPD) if the proposed installation of "bund wall and a surface channel" would effectively collect and divert surface flow (and pollutants) to the WRA. We have to reserve our comment before the detailed design and practicability of the proposed drainage system become available.</p>	<p>In this rezoning stage, the concern on potential drainage flow (and pollutants) from residential portion would enter the WRA, is responded to with a proposed drainage installation of bund wall and surface channel to collect and divert surface flow (and pollutants), which is a standard practice.</p> <p>Following the approval of this rezoning application, the detailed design of the proposed drainage system would become available at the s16 planning application stage, where technical assessments of the layout scheme will be provided on the drainage conditions and mitigation measures, if any. The relevant departments would be consulted in the s16 application processing stage. Same as in previous approved planning applications of the subject site, there would be a planning mechanism in place to ensure that there would not be adverse drainage impact to the WRA.</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
<p>Figure 1</p> <p>The boundaries of the Mai Po Nature Reserve and the Mai Po Inner Deep Bay Ramsar Site are inaccurate. Please rectify.</p>	<p>Figure 1 has been revised accordingly.</p>
<p><u>Comments from the perspective of Sam Po Shue Wetland Conservation Park</u></p>	
<p>Section 8.8</p> <p>Please beef up this Section by making reference to Section 8.5.3 and discuss how the proposed layout of the development has been carefully considered to minimise the potential indirect impacts to the WCA and SPS WCP.</p>	<p>Noted and supplemented in Section 8.8.</p>
<p>Section 8.8</p> <p>We defer to CEDD and/or other Department(s) to comment on the interface issue between the SPS WCP and the proposed development from technical perspectives.</p>	<p>Noted.</p>
<p>Section 8.8</p> <p>We have also made some comments on the Planning Statement. It is supposed the revised Planning Statement will be circulated for our further comment in due course.</p>	<p>The revised Planning Statement will be provided in the formal FI submission.</p>

Comments from the Director of Agricultural, Fisheries and Conservation (Received 11.7.2025) (Contact Person: Dr Azaria Wong; Tel: 2150 6932)	Applicant's Response(s) in Draft FI 22.8.2025:
<p>In the RtC and the latest EcolA, further elaboration on the additional ecological impacts by the proposed increase in development intensity has been provided, such as the disturbance impacts in terms of light, noise, human activities and traffic, the disturbance impacts on different taxa groups, and the extent of disturbance zones under the latest scheme as compared with the approved scheme. It is claimed that the additional impacts resulted would be insignificant under the latest scheme with a further setback of the closet 10-storey building and proper implementation of the proposed mitigation measures, e.g. restriction on constriction activities, increase in the width of buffer planting, avoiding direct lighting to the WRA.</p>	<p>Noted.</p>
<p>Given that there are no change in the development footprint and no major bird flightlines over the residential portion, and the additional disturbance impacts on the WCA and associated wildlife would be minimized with the setback of higher buildings and other mitigation measures, we have no further comments on the revised EcolA and no strong view against the proposed development at this rezoning stage from nature conservation perspective. Please be reminded that an updated EcolA with further details on the implementation of the proposed mitigation measures would be required to support the future s.16 application.</p>	<p>Noted.</p>
<p>Given the above, it is considered that a meeting on the subject rezoning application is not necessary.</p>	<p>Noted.</p>

Response to Dept Comments of EEB (received 9.4.2025) (responded w Draft FI 2.5.2025)

Comments from the Secretary for Environment and Ecology (received 9.4.2025) (Contact Person: Ms Sophia Hui; Tel: 3151 7190)	Response(s) in Draft FI 2.5.2025:
<p>In the planning statement and ecological impact assessment, the applicant stated the following:</p> <ul style="list-style-type: none"> - “no change is proposed to the design or operation of the WRA with reference to the Wetland Restoration Plan (WPR) in the approved EIA”; - “the approved and completed WRA component will not be affected by this application and will continue to meet the requirements of this Guideline”; - “with the implementation of all mitigation measures, no additional ecological impact is predicted compared to the approved scheme and that the findings of the approved EcoIA under planning Application No. A/YL-MP/229 remain valid”; and - “on 25 January 2021, the Applicant made a one-off lump sum donation to the Environment and Conservation Fund (“ECF”). An agreement between the Applicant and the ECF was made on 26 January 2021. The conservation agent of the Applicant has been carrying out the maintenance and management plan and the funding agreement is fully applicable to this application.” 	<p>Noted.</p>
<p>On the other hand, AFCD commented that:</p> <ul style="list-style-type: none"> - “the design and operation of the WRA aim to mitigate the ecological impacts from the original development scheme. The proposed increase in no. of storeys will potentially bring additional disturbance impacts to the WCA during the construction phase and operation phase. There is currently not sufficient information to demonstrate that the WRA could mitigate the additional impacts from the revised development scheme. The applicant should quantify such potential additional impacts, elaborate clearly how the existing WRA and other measures proposed in the original EcoIA could mitigate the additional impacts, and list out clearly any additional measures required under the new scheme. 	<p>Noted.</p>

<p>The current Application Site at Wo Shang Wai (“WSW Project”) had previously obtained s.16 planning approvals, with planning application no. A/YL-MP/229 (MP229) approved in February 2015 and planning application no. A/YL-MP/291 (MP291) approved in July 2020. The two planning applications have the same domestic GFA and plot ratio but different numbers of blocks and building height. Under the aforesaid s.16 planning applications, the applicant proposed to follow the funding arrangements of the original option under the Public-Private-Partnership Scheme of the New Nature Conservation Policy, i.e. project proponent to make a lump sum contribution to the Environment and Conservation Fund (ECF) sufficient to generate recurrent incomes to support the pledged conservation programmes (in the case of the WSW Project, the long-term maintenance and management of the WRA). Conditions pertaining to the aforesaid funding arrangements were imposed for the concerned planning approvals.</p>	<p>Noted.</p>
<p>On 26 January 2021, ECF received a lump sum contribution of \$75M from the applicant for the purpose of supporting the long-term maintenance and management of the WRA, and a relevant funding agreement was signed between the applicant and the ECF Trustee on the same date for fulfilling the relevant approval conditions of planning application no. MP291.</p>	<p>Noted.</p>
<p>Subject to the applicant’s responses to AFCD’s comments, if there is need for the applicant to implement any additional measures to mitigate any additional ecological impacts, this may have an implication on the amount of funding needed so as to sufficiently support the long-term maintenance and management of the WRA, and hence there may also be a need to review and/or adjust the amount of funding that has to be made to the ECF to support the long-term maintenance and management of the WRA as well as the signed funding agreement.</p>	<p>As demonstrated in our responses to AFCD, it is anticipated there would not be additional ecological impacts, based on the increased development intensity of the proposed rezoning scheme.</p>

Response to Dept Comments of EEB (received 10.6.2025)

Further Comments received from Secretary for Environment and Ecology on 10.6.2025	Responses:
<p>From the ecological perspective, AFCD assessed that given that the application has failed to provide</p>	<p>Noted.</p>

<p>sufficient information to demonstrate that the WRA could mitigate the additional impacts arising from the revised development scheme in the current application (the revised scheme has more than two times higher of gross floor area (from not more than 82,963.2m² to 265,847m²), plot ratio (from not more than 0.4 to 1.3) and building height (from 3 storeys to a maximum of 10 storeys), they do not support the current planning application. EEB agrees with AFCD's assessment, especially that there is no sufficient and convincing information and justifications to prove that the WRA as it is without any change/additional measures can adequately mitigate the additional ecological impacts arising from the substantially increased development intensity under the revised development scheme. Therefore, based on the information in the current draft submission, EEB does not support the current planning application from the ecological perspective.</p>	
<p>From the perspective of funding arrangements under the NNCP PPP Scheme, if there is a need for the applicant to implement any additional measures to mitigate any additional ecological impacts, this may have an implication on the amount of funding needed so as to sufficiently support the long-term maintenance and management of the WRA, and hence there may also be a need to review and/or adjust the amount of funding that has to be made to the ECF to support the long-term maintenance and management of the WRA as well as the signed funding agreement. We note that the applicant has maintained its position that no additional ecological mitigation measures are required despite AFCD's previous comments, and are thus not in a position to support the application based on the currently available information.</p>	<p>Noted.</p>

Response to Dept Comments of EEB (received 11.7.2025) (responded w Draft FI 22.8.2025)

Comments from the Secretary for Environment and Ecology (Received 11.7.2025) (Contact Person: Mr Tony Hung; Tel: 3151 7076)	Applicant's Response(s) in Draft FI 22.8.2025:
<p>The draft FI submission filed on 23 June 2025 included a revised Ecological Impact Assessment (EcolA) and responses to AFCD's previous comments on the planning application. From the ecological perspective, AFCD assessed that given that the application</p>	<p>Further information has been included in the EcolA and RtC, for AFCD's review. The information has demonstrated that the potential additional impact of increased building height and population density in the current planning application, in terms of noise, light and human disturbance to the WRA and WCA are</p>

has failed to provide sufficient information to demonstrate that the additional impacts arising from the latest development scheme could be mitigated adequately, based on the information in the current draft FI submission, they do not support the current planning application. EEB agrees with AFCD's assessment, especially that there is no sufficient and convincing information and justifications for the additional impacts on the WRA and the effectiveness of the WRA in serving as an ecological mitigation wetland for the increased development intensity under the revised development plan of the project. Therefore, based on the information in the current draft submission submitted on 23 June 2025, **EEB does not support the current planning application from the ecological perspective.**

insignificant (Figures 6a to 6e), even in the absence of mitigation measures. Nonetheless, the potential additional disturbance impact could be mitigated by the proposed mitigation measures of the approved EIA (AEIAR-120/2008), and additional mitigation measures in the latest development scheme.

The assessment method of disturbance impact and proposed mitigation measures in the current application are similar to those in the San Tin Technopole approved EIA (AEIAR-261/2024), which is for a development of much greater scale and density. Furthermore, there have been similar planning applications in the same zoning of "OU(CDWRA)" that have been **recently approved** for a higher plot ratio and building height, and even closer to the WCA than the current scheme.

Presently, the WRA is still effective as an ecological mitigation wetland, in terms of its compensatory role for the habitat loss in wetland area and function of the original site conditions; mitigate the disturbance to wildlife in the WCA during construction phase; habitat function for species of conservation importance; and consistent size and connection to the neighbouring WCA as a single unfragmented wetland. The issue on meeting its target species levels could be reviewed at a later stage, and is not necessary in the rezoning stage. Especially when the project site is still in a construction phase, the status of meeting the target species (with out-of-date target levels) is on-going, and needs to be reviewed.

The technical justifications to support the latest development scheme, is sufficient in terms of the level of detail needed in a rezoning application. Some of AFCD comments has requested the level of detail that is beyond what is needed to be reviewed at a rezoning stage, and we would like to defer to the detailed design stage, when the layout scheme would be refined and more certain.

The request by AFCD on providing evidence and detailed assessments in this rezoning stage is unreasonable and unfair to the Applicant. With reference to the decision of the Nam Sang Wai Town Planning Appeal No. 1 of 2017, the Appeal Board considered that matters of increased building height and population of the development is a matter of planning intention and judgement, not ecological

	<p>impact. The Appeal Board considered that AFCD provided input on matters of scale and intensity, outside its area of expertise.</p> <p>According to the DevB GC 1/2024, good practices should be followed by government departments to put in place measures to facilitate the application process and avoid delay, especially the para. 8 (g), (j) and (k).</p> <p>The latest development scheme has gone through a lengthy design process to balance the factors of minimizing ecological impact to wetlands (to the north), optimizing development potential of the site, and minimizing the impact to the existing surrounding developments (to the east, west and south). Therefore, the Applicant believes that the presented information has demonstrated to a reasonable degree for a rezoning proposal, that the increased building height and density of the latest development scheme, would not impose adverse ecological impact on the WRA or WCA (SPS WCP).</p>
<p>From the perspective of funding arrangements under the NNCP PPP Scheme, if there is a need for the applicant to implement any additional measures to mitigate any additional ecological impacts, this may have an implication on the amount of funding needed so as to sufficiently support the long-term maintenance and management of the WRA, and hence there may also be a need to review and/or adjust the amount of funding that has to be made to the ECF to support the long-term maintenance and management of the WRA as well as the signed funding agreement. We note that the applicant has maintained its position that no additional ecological mitigation measures are required despite AFCD's previous comments, and are thus not in a position to support the application based on the currently available information.</p>	<p>The current planning application has proposed additional mitigation measures; however, at this juncture, there is no indication that they would affect the funding needed to support the long-term maintenance and management of the WRA.</p> <p>At the later detailed design stage, should there be a need to review the implications of the additional mitigation measures (if any), which may have implication on the amount of funding support of ECF, the Applicant is willing to collaborate with relevant government bureau/departments to carry out this review and conduct the necessary statutory procedures to make amendments. Besides, upon approval of the planning application, a lease modification would be carried out, which would include a review on the ECF.</p>

Response to Dept Comments of EEB (received 16.9.2025) CURRENT

Comments from the Secretary for Environment and Ecology (Received 11.7.2025) (Contact Person: Mr Tony Hung; Tel: 3151 7076)	Applicant's Response(s):
<p>I refer to the Consultant's email dated 22 August 2025, separate email to AFCD on 2 September 2025, the RtoC table and revised EcolA attached in the two emails.</p> <p>We note that AFCD has no further comment on the revised EcolA and has no strong view on the proposed development for the rezoning application from the nature conservation perspective, and stated that an updated EcolA with further details on the implementation of the proposed mitigation measures would be required to support the future s.16 application. To this end, we have no strong view on the latest proposed development scheme in the rezoning application from the nature conservation perspective at this stage, subject to further detailed assessment at the s.16 planning application stage.</p>	<p>Noted.</p>
<p>From the perspective of funding arrangements under the NNCP PPP Scheme, if any change in the development scheme results in a need for the applicant to implement additional measure(s) to mitigate additional ecological impacts, this may have an implication on the amount of funding needed to sufficiently support the long-term maintenance and management of the WRA. In this case, there may be a need to review and/or adjust the amount of funding that has to be made to the ECF to support the long-term maintenance and management of the WRA as well as the signed funding agreement. We note that the applicant is committed to collaborate with relevant government bureau/departments "should there be a need to review the implications of the additional mitigation measures (if any), which may have implication on the amount of funding support of ECF" and "conduct the necessary statutory procedures to make amendment". To this end, we have no further comment from the perspective of the funding arrangement under the NNCP PPP Scheme.</p>	<p>Noted.</p>

In this regard, it is considered that a meeting on the subject rezoning application is not necessary.	Noted.
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Response to Dept Comments of Water Supplies Department (received 18.6.2025)

Comments from the Chief Engineer/ Construction, Water Supplies Department (received 18.6.2025) (Contact Person: Mr. Eddie He; Tel: 2152 5746) based on our (Formal) FI Submission 28.5.2025	Response(s) sent out on 8.9.2025:
Please note the following further comments on the submission:-	The following comments have been addressed and the relevant changes in the report have been marked in green highlight.
a) Para. 1.2.2 - Please clarify whether the total number of units should be 3571 or 3751.	The total number of units is 3571 but the number of units in residential blocks should be 3443 instead of 3623. We have revised this in the report. Update: due to AFCD comments, the total number of units and units in residential blocks of 3571 and 3443 have been revised to 3562 and 3434.
b) Para. 2.4 - Please review whether the following planned developments should be taken into account in the WSIA:- 1. Y/YL-MP/6: https://www.tpb.gov.hk/tc/plan_application/Attachment/20230303/s12afi_Y_YL-MP_6_11_gist.pdf 2. Y/YL-MP/8: https://www.tpb.gov.hk/en/plan_application/Y_YL-MP_8.html 3. A/YL-MP/384	The proposed developments in these three applications should not be taken into account, as they are applications under processing and have not been considered nor approved by the Town Planning Board.
c) Para. 3.1.1 - Please clarify whether the total number of units should be 3571 or 3751. Please advise how the population (in residential block) of 9641 are calculated.	The total number of units is 3571 is already correct. The population of 9641 is calculated by multiplying the number of units in the residential tower, which is 3443 by 2.8 person per house (assumed based on the data for Yuen Long District in the 2021 population census). We have added extra information in the report for clarification. Please refer to the Appendix C for more details of calculation. Update: due to AFCD comments, the total number of units, number of units in residential tower, and population, of 3571,

	3443, and 9641 have been changed to 3562, 3434, and 9975.
d) Para. 3.1.2 - "...the freshwater demand in R3 settlements..." should be read as "...the fresh water unit demand for the proposed 6-10 storey residential blocks..."	We have revised this in the report.
e) Para. 3.2.4 and Para. 3.2.5 - Please provide details on how the total water demand can be calculated.	<p>Freshwater demand of each building is calculated by multiplying the number of units by 2.8 as the average occupier per unit (from the population census 2021 in Yuen Long district), by the unit demand factor of water (m³/person/day). Then the total freshwater demand is calculated by adding all the water demand of the 29 buildings.</p> <p>The total flushing water demand is calculated similarly using the flushing unit demand factor. We have added details for clarification in the report. Please refer to the Appendix C for more details of calculation.</p> <p>We have revised the total freshwater demand and the flushing water demand in the report since the previous values were wrong.</p>
f) Para. 3.3.1 - For DN 700 - DN 375, the flow velocity should be limited to 0.9 m/s to 2.5 m/s. Please review.	The maximum velocity of the pipes has been changed to 2.5 m/s, calculation has been updated, and the related values have been changed in the report.

Response to Dept Comments of Water Supplies Department (received 10.9.2025) CURRENT

Comments from the Chief Engineer/ Construction, Water Supplies Department (received 18.6.2025) (Contact Person: Mr. Jeffrey Ho; Tel: 2152 5778)	Response(s):
<p>While I have no further comment on the proposed water supply scheme, the applicant shall update the WSIA in their formal submission taking into consideration my observations below:</p> <p>(a) Paragraph 3.1.1 - The estimated total population of 9974 is not tally with 9975 as mentioned in the R-to-C table.</p>	<p>The estimated total population of 9,975 was corrected to 9,974. Please ignore the outdated number in previous RtC.</p> <p>(Addendum 10)</p>

(b) Paragraph 3.1.2 - "..., the fresh water demand for the proposed 6-10 storey residential blocks is assumed to be 0.300m ³ per person per day, with..." shall be read as "..., the fresh water demand for the proposed 6-10 storey residential blocks and the proposed new private houses are assumed to be 0.300m ³ and 0.390 m ³ per person per day respectively, with..."	Updated (Addendum 10)										
(c) Paragraph 3.3.1 - "..., the maximum advisable flow velocity..." shall be read as "..., the maximum flow velocity..."	Updated (Addendum 10)										
<p>(d) Paragraph 3.3.1 - While the maximum flow velocity in water mains is 3 m/s, the flow velocity limit recommended in the table below shall be followed in determining the suitable pipe sizes for a fresh water network.</p> <table border="1"> <thead> <tr> <th>Pipe Size Range</th><th>Recommended Flow Velocity Limit under Peak Flow Condition</th></tr> </thead> <tbody> <tr> <td>> DN700</td><td>≤ 3 m/s</td></tr> <tr> <td>DN700 - DN 525</td><td>≤ 2.5 m/s</td></tr> <tr> <td>DN450 - DN375</td><td>≤ 2 m/s</td></tr> <tr> <td>DN300 - DN200</td><td>≤ 1.5 m/s</td></tr> </tbody> </table>	Pipe Size Range	Recommended Flow Velocity Limit under Peak Flow Condition	> DN700	≤ 3 m/s	DN700 - DN 525	≤ 2.5 m/s	DN450 - DN375	≤ 2 m/s	DN300 - DN200	≤ 1.5 m/s	<p>The sentence “While the recommended flow velocity limit for different pipe size ranges is given in the table below, which is followed to determine the suitable pipe sizes for the freshwater network” and the recommended flow velocity table (Table 3-2) have been supplemented as in Paragraph 3.3.1. (Addendum 10)</p>
Pipe Size Range	Recommended Flow Velocity Limit under Peak Flow Condition										
> DN700	≤ 3 m/s										
DN700 - DN 525	≤ 2.5 m/s										
DN450 - DN375	≤ 2 m/s										
DN300 - DN200	≤ 1.5 m/s										
(e) Paragraph 3.3.2 - When discussing the capacity of water main, please use the maximum flow velocity of 3 m/s in your calculation.	<p>(Assuming the comment refers to calculation in Appendix C which was mentioned in Paragraph 3.3.2)</p> <p>Updated (Addendum 10)</p>										
(f) Paragraph 4.1.4 - "...Coefficient is taken as 120 for pipe with diameter larger than 600mm, and 110 for pipe with diameter ..." shall be read as "...Coefficient is taken as 120 for fresh water main with diameter equal to or larger than 600mm, and 110 for fresh water main with diameter ..."	Updated (Addendum 10)										
(g) Appendix C - Please include Planning Application Y/YL-MP/10, which is approved on 4 July 2025, and the two light public housing sites at Yau Pok Road in your calculation.	Updated (Addendum 10)										
(h) Appendix D - The Hazen-Williams Coefficient for DN600 fresh water main shall be 120.	Updated (Addendum 10)										

Response to Dept Comments of Director of Environmental Protection (received 18.6.2025)

Comments from Director of Environmental Protection (received 18.6.2025) (Contact Person: Mr. Chris Wong; Tel: 2835 1000) based on our (Formal) FI Submission 28.5.2025	Response(s):
Please note that we have no further comment on the revised Environmental Assessment (EA) and revised Sewerage Impact Assessment (SIA), except the minor textual ones as listed below:-	
<u>Air Quality</u> a) Section 1.2 – 7th paragraph: Please delete “Apart from Shatin district” in line 2.	Noted and deleted. Addendum 11 – updated pages has been highlighted in the (Revised) Environmental Assessment.
b) Section 1.4.1 – 1st and 2nd paragraphs: Please delete “Table 1.3” and “Table 1.4” in the last sentences of both paragraphs respectively.	Noted and deleted.
c) Section 1.5.1 – 10th paragraph:- 1. Re. R-t-C #8, please state if the identification of concurrent project is carried out by site surveys, desktop review and/or approved planning/EIA applications, etc. 2. Please check if dust monitoring will also be implemented by the concurrent project. If affirmative, please add “and the concurrent project” after “proposed Project” in the last line.	1) Section 1.3.1. has been updated to confirm that the concurrent project was identified during desktop review of approved EIAs and planning applications in the area. 2) That’s correct. The text has been updated accordingly. (Addendum 11)
d) Section 1.5.2 – 3rd paragraph: Re. R-t-C #11, please add the 2nd last sentence (“These will be designed to be located facing away from any nearby ASRs as far as practicable”) in the last submission at the end of this paragraph.	Noted and updated. (Addendum 11)
e) Section 1.5.2 – 4th paragraph: Please supplement at the end of this paragraph if the potential odour impact will be further reviewed and assessed when the option for sewage treatment is confirmed and more details become available at a later detailed design stage.	Noted and supplemented accordingly. (Addendum 11)
f) Section 1.5.2 – 5th paragraph: Please confirm if the temporary on-site STP will no longer be in use after it is abandoned. If affirmative, please add “and it will no longer be in use” after “proposed Development” in line 10.	It is confirmed that the temporary on-site STP will no longer be in use after it is abandoned. The text has been updated accordingly.

g) Section 1.5.2 – 8th paragraph: Please add “of the proposed development” after “nearest air-sensitive use” in line 8.	Noted and updated. (Addendum 11)
<u>Noise</u> h) S.2.1 Introduction: Please explicitly advise at which stage a NIA submission will be made (i.e. future s.16 planning application).	Revised.
i) S.2.1.2 Fixed Noise Assessment / Legislations, Standards, Guidelines and Criteria: Since majority of the site will be screened from San Tin Highway by the planned 10-levels building blocks, the statement that of majority of the area would be indirectly affected by IF is incorrect. Please revisit the situation. Such clarification is required for the determination of the noise criteria for the design of planned fixed noise source within the development.	Noting that some area of the site may be screened from San Tin Highway by the planned building blocks, the statement for degree to which NSR is affected by IF is revised. A remark is also added under Table 2.8 for specifying the fixed noise criteria for representative NSR identified for fixed plant noise assessment. (Addendum 11)
j) S.2.1.2 Fixed Noise Assessment / Legislations, Standards, Guidelines and Criteria: In any event, the ASR assumed in this report is for indicative assessment only. It should be noted that the noise emanating from any place other than domestic premises, a public place or a construction site is controlled under Section 13 of the Noise Control Ordinance. At the time of investigation, the Noise Control Authority shall determine the noise impact from concerned sources on the basis of prevailing legislation and practices being in force and taking account of contemporary conditions/situations of adjoining land uses. Nothing in this report shall bind the Noise Control Authority in the context of law enforcement against all the sources being assessed.	Noted.
k) S.2.2.1 Road Traffic Noise (RtC item 18): Please explicitly state in S.2.2.2 that there will be no diagnostic rooms or wards included in the RCHE under the proposed development area. As a result, the stricter noise criterion for road traffic of 55 dB(A) for L10 (1hr) will not be adopted.	Note is added under Table 2.2.
l) S.2.2.2 Planned Fixed Noise Sources (RtC item 20): While no quantitative assessment has been carried out for planned fixed noise source, it is premature and factually incorrect to conclude that there will be no adverse fixed noise impact from the planned fixed noise source. The applicant should be made known of	The developer would ensure that the planned fixed noise source meeting the planning requirement for the planned fixed noise source, i.e. 5dB(A) below the acceptable noise level (ANL) or the prevailing background noise level, whichever is lower. The relevant details

the noise planning requirement for the planned fixed noise sources, i.e. 5dB(A) below the acceptable noise level (ANL) or the prevailing background noise level, whichever is lower. Depending on the location of the planned fixed noise source, the design criteria will also be different (see comment on s.2.1.2). Such information should be supplemented. Should the design parameters are not available at this stage, please commit to review the noise impact of the planned fixed noise sources when they become available.	will be provided in the later detailed design stage. Depending on the location of the planned fixed noise source, the representative NSR as well as the respective ANL may be different. S.2.5.2 is revised. (Addendum 11)
m) S. 2.5.2 (RtC item 21): Respective document of TD's agreement remains outstanding. Please document TD's agreement on the traffic forecast data in the report once available. In case TD has no comment on the methodology for traffic forecast only, the consultant should provide written confirmation from the respective competent party (e.g. traffic consultant) that TD's endorsed methodology has been strictly adopted in preparing the traffic forecast data, and hence the validity of traffic data can be confirmed.	TD's confirmation is still pending. Endorsement from TD will be provided once received.
n) Blank page on table 2.2, page 15 of EA Rev. D. is noted. Please rectify.	Rectified.
<u>SIA</u> o) S.2.4 2nd bullet – Please revise as “rising mains / sewers”.	Noted and revised
p) Table 4.1 – The “Total ADWF” for “Amended Scheme of this Application” should be calculated as “3,744.86”.	After recalculation, the total ADWF for Amended Scheme of this Application is 3788.04 (=3699.26+22.4+43.18+19+4.2).
q) S.5.6 – Please add “An updated SIA will be submitted to the satisfaction of EPD assessing the potential sewerage impact to the San Tin Technopole sewerage system for conducting the hydraulic assessment and verifying the assumptions adopted in the current assessment when San Tin Technopole sewerage system is confirmed and becomes available.”	Noted and revised
r) Heading of S.6 & S.7 – Please revise as “Fallback Option 1” and “Fallback Option 2” respectively.	Noted and revised
s) S.7.1 – Please revise as “...and then pump through a proposed twin rising main / sewers to ...”	Noted and revised

t) S.7.3 to S.7.6, Appendix B, S.9.4 – Please delete.	Noted and revised
u) S.7 – Please add a “An updated SIA will be submitted to the satisfaction of EPD if Option 2 is pursued.”	Noted and revised
v) S.9.7 – Please revise as “An updated SIA report for the selected sewage disposal arrangement will be submitted to the satisfaction of EPD...”	Noted and revised
w) S.9.8 – Please revise as “The updated SIA will assess...” and move to the second sentence of S.9.7.	Noted and revised
x) S.9.9 – Please revise as “If Fallback Option 2 is pursued, an updated SIA will be submitted to the satisfaction of EPD assessing the impact to the existing and planned sewerage system and the sizing of the new rising mains / sewers ...”	Noted and revised
<u>General</u> y) Please note that the proposed development is covered under an EIA report approved (AEIAR-120/2008) and an Environmental Permit issued (EP-311/2008/E) under the EIAO. The Applicant should review the EIAO implications at later stage and confirm with the EPD, and observe and ensure the proposed development will comply with all statutory requirements under the EIAO.	Noted.
z) Please provide full set of revised EA and SIA with changes highlighted and their comments addressed in the next submission for their record.	Noted.

Response to Dept Comments of Director of Environmental Protection (received 15.9.2025)

CURRENT

Comments from Director of Environmental Protection (received 18.6.2025) (Contact Person: Mr. Chris Wong; Tel: 2835 1000) based on our 3rd Draft FI	Response(s):
Please be advised that our previous textual comments on the EA and SIA have been addressed, except the followings to enhance the consistency and clarity:	Noted and background has been updated. Addendum 11

i. Please state in the Background of the EA that "As the proposed development is covered under an EIA report approved (AEIAR-120/2008) and an Environmental Permit issued (EP-311/2008/E) under the EIAO, the Applicant should review the EIAO implications of the proposed development at later stage and confirm with the EPD. The Applicant should also observe and ensure the proposed development will comply with all statutory requirements under the EIAO."	
ii. S.2.2.2 of EA: Please state in the NIA that should the design parameters are not available at this stage, please commit to review the noise impact of the planned fixed noise sources when they become available.	Noted and section 2.8.2 has been updated. Addendum 11
iii. Table 4-1 of SIA: While it is understood from the RtC that the total recalculated ADWF is 3788.04, the number in the table and S.5.4 is 3779.16. Please clarify and rectify if necessary.	The final total ADWF is 3779.16 m3/day. (Addendum 12)
iv. There is a mismatch on the total no. of units shown in EA (i.e. 3751 under indicative development parameters) and s.1.7 of SIA (i.e. 3562). Please clarify and rectify if necessary.	No rectification is required for the SIA report.
v. Please clarify the designed capacity of the temporary onsite STP as 3,779.16 m3/day (S.6.5 of SIA refers) or 7,471.96 m3/day (S.6.8 refers). Please clarify and rectify if necessary.	Revised in S6.8, and the value of 7,471.96 m3/day refers to the excess flow. (Addendum 12)
It is noted that the applicant is required to apply for s16 planning application in future. We wish to reiterate our advice that there should be a mechanism (i.e. the future s.16 planning application) for the applicant to submit a proper NIA report to review, explore, demonstrate and implement appropriate noise mitigation measures for full compliance with the relevant noise criteria and requirements under ProPECC PNs, HKPSG and NCO in both construction and operation phases of the proposed developments. Similarly for sewerage infrastructure, an updated SIA report should be submitted by the applicant under such mechanism to assess the potential sewerage impact with the detailed scheme and ensure the implementation of mitigation measures, if required.	Noted. A proper NIA report and updated SIA report will be submitted by the applicant at the future s.16 planning application stage.

Considering the above and the draft Further Information submitted, I wish to reiterate our previous stance that, with implementation of mitigation measures, the proposed development will unlikely cause adverse environmental impacts. We have no objection to the subject application from environmental planning perspective.	Noted.
Please note that the proposed development is covered under an EIA report approved (AEIAR-120/2008) and an Environmental Permit issued (EP-311/2008/E) under the EIAO. The Applicant should review the EIAO implications at later stage and confirm with the EPD. The Applicant should also observe and ensure the proposed development will comply with all statutory requirements under the EIAO.	Noted.
Please provide a full set of the finalized EA and SIA with incorporation of the amendment pages and with our above comments addressed in the next submission for our record.	Noted.

Response to Dept Comments of UD&L on Landscape and AVA (received 18.6.2025)

Comments from UD&L (received 18.6.2025) (Contact Person: Ms. Nicole Lee (Urban Design Unit); Tel: 3565 3945/ Mr. Samuel Hui (Landscape Unit); Tel: 3565 3957) based on our (Formal) FI Submission 28.5.2025	Response(s):
<u>Landscape</u> Having reviewed the Further Information (FI-1), it is noted that no new landscape information is provided in the submission compared with the previous draft submission. We remain our view of having no adverse comment from landscape planning perspective.	Noted.
<u>Air Ventilation</u> Our observations/comments from an air ventilation perspective are as follows. (a) Value of H (Section 5.1, 2nd para. and Table 5.1) – According to the consultant’s argument stated in first paragraph of Section 5.1, the Assessment Area	According to Technical Circular No. 1/06, <i>“Occasionally, it may be necessary to include an assessment area larger than that defined above so that special surrounding features and open spaces are not omitted.”</i> In this case, the original 1H (42m) has been extended to a larger 1H (150m) to incorporate special surrounding

(150m) should be 3.6H, while the Surrounding Area (300m) should be 7.2H. The consultant should revise the texts where appropriate.	features and open spaces beyond the original Assessment Area. Therefore, the new 1H is 150m and 2H is 300m instead of 3.6H and 7.2H. (Addendum 9)
(b) Summary of SAVRs under annual wind condition (Section 6.2) – For complete information, the consultant should explicitly state that the Proposed Scheme would result in lower SAVR at Castel Peak Road – Mai Ro, Road 1, Road 2, Fishponds 1 and Fishponds 2 when compared to the Baseline Scheme under annual wind condition.	Section 6.2 is revised accordingly to include the aforementioned areas. (Addendum 9)
(c) Summary of SAVRs under summer wind condition (Section 6.3) – For complete information, the consultant should explicitly state that the Proposed Scheme would result in lower SAVR at Castel Peak Road – Mai Ro, Road 2, Palm Springs – Arcadia, Wo Shang Wai Village and Fishponds 2 when compared to the Baseline Scheme under summer wind condition.	Section 6.3 is revised accordingly to include the aforementioned areas. (Addendum 9)

Response to Dept Comments of UD&L on Visual and AVA (received 12.9.2025) CURRENT

Comments from UD&L (received 18.6.2025) (Contact Person: Ms. Nicole Lee (Urban Design Unit); Tel: 3565 3945/ Mr. Samuel Hui (Landscape Unit); Tel: 3565 3957)	Response(s):
General i. According to the updated MLP, the building height of the block C2-1 is revised from 42mPD to 35mPD. The applicant is reminded to update relevant assessments including VIA and AVA to tally with the updated MLP.	Noted. The layouts have been updated in all the reports.
Urban Design and Visual Perspectives ii. Para. 8.7.1 of Planning Statement – The predicted visual impact of the OZP compliant Scheme ranging from slightly adverse to negligible appears incorrect. According to the VIA, the visual impact of Proposed Scheme compared against the OZP Compliant Scheme should range from moderately adverse to negligible.	Noted. The para. 8.7.1 has been updated accordingly in Planning Statement. (Addendum 8)

Air Ventilation Perspective iii. Para. 8.8.1 of Planning Statement – According to the simulation results, the overall performances of the Baseline and Proposed Schemes on pedestrian wind environment are comparable under both annual and summer conditions. As such, the consultant should update this paragraph accordingly.	Noted. The para. 8.8.1 has been updated accordingly. (Addendum 8)
iv. AVA – Value of H (Section 5.1, 2nd para. and Table 5.1) – According to the consultant’s argument stated in first paragraph of Section 5.1, the Assessment Area (150m) should be 3.6H, while the Surrounding Area (300m) should be 7.2H. The consultant should revise the texts where appropriate.	Noted, section 5.1 and Table 5.1 have been updated. (Addendum 9)

Response to Dept Comments of Drainage Services Department (received 27.6.2025)

Comments from DSD Chief Engineer/ Mainland North (received 27.6.2025) (Contact Person: Mr. Jacky Leong; Tel: 2300 1432) based on our (Formal) FI Submission 28.5.2025	Response(s) in our Draft FI submission 8.9.2025:
I have no further comments on the Sewerage Impact Assessment.	Noted.
Please find our comments below on the DIA report: 1. Appendix G: Please supplement the hydrographs of the pre-development subject to the same rainfall profile to demonstrate that the respective drainage impact was properly mitigated by the proposed scheme.	Supplementation of pre-development hydrographs in Appendix G cannot accurately demonstrate the mitigation impact of the WRA, because the WRA catchment area in the pre-development scenario (MP02A-02) differs from that in the post-development scenario (MP02A-a9) due to differences in catchment delineation, as shown in Figures 4 and 5. However, Appendix H can reflect the mitigation impact on runoff from the Application Site.
2. Please also supplement the key dimensions of the proposed wetland restoration area.	Noted, the key dimensions of the WRA have been supplemented in Table 8-1.
3. As per bullet 6 of your RtC, it was advised that the wetland restoration area was not to be considered as the pre-development scenario. However, referring to Table 7-1, the wetland restoration was considered as pre-development area. Please review and revise as appropriate.	The Application Site before development is considered as vacant lot with CN value of 85, so Table 7-1, Table 7-2, Table 9-1, Table 9-2, Appendixes F, H, and I have been revised, accordingly.

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Response to Dept Comments of Drainage Services Department (received 15.9.2025) CURRENT

Comments from DSD Chief Engineer/ Mainland North (received 27.6.2025) (Contact Person: Mr. Jacky Leong; Tel: 2300 1432)	Response(s):
I have no further comment on the SIA.	Noted.
For the DIA, the applicant is requested to confirm whether the twin 225mm pipe and the 4m-wide emergency bypass spillway referred to in Section 8.2.4 are included as part of the “stormwater retention facilities” described in Section 11. In this regard, it is also assumed that the applicant will take up the maintenance responsibility for these drainage structures.	The applicant will be responsible for the maintenance of the twin 225mm pipes and the 4m-wide emergency bypass spillway, as these components are part of the stormwater retention facilities.

Response to Dept Comments from the Commissioner for Transport (received 9.7.2025)

Comments from Commissioner for Transport (received 9.7.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our (Formal) FI Submission 28.5.2025	Applicant's Response(s) in Draft FI to TD on 15.8.2025
<u>Comments from Traffic Engineering Perspective</u>	
<p>a)</p> <p>RtC 1: It is noted in Drawing No. 4.4 of TTIA that the development traffic flow from Shek Wu Wai Road to San Tin Highway eastbound is 140 pcu/hr which is more than 100 pcu/hr (one-way) on strategic road. Hence, 2-Tier Modelling should be adopted to provide a more realistic forecast. You are reminded to take into account the latest toll fee of Tai Lam Tunnel in the traffic model submitted.</p>	<p>2-tier model has been adopted in the forecast. The toll fee changes of Tai Lam Tunnel is also considered in the traffic forecast of the revised TIA. (Addendum 15)</p>
<p>b)</p> <p>RtC 2:</p> <p>1. Please review the provision of private car parking spaces for flat sizes 40<FS<70 and 70<FS<100 by adopting R3 of 1.10 for the proposed domestic plot ratio of 1.28.</p>	<p>R3 of 1.10 has been adopted for the calculation of parking provision.</p>
<p>2. Please provide breakdown of the accessible parking space.</p>	<p>The no. of accessible parking spaces is revised.</p>
<p>3. Please adopt MC parking provision at a ratio of 1:83 flats for residential development.</p>	<p>The MC parking provision is revised accordingly.</p>
<p>4. Please advise the loading/unloading arrangement for house.</p>	<p>Please note that there is no requirement for houses in the lease. Nevertheless, the loading/unloading activities for houses would be assisted by management staff.</p>
<p>5. Please refer to Guideline of Provision of Bicycle Parking Space in Annex B of Checklist of Traffic Impact Assessment (TIA) for development Projects published in TD website below: https://www.td.gov.hk/en/publications_and_press_releases/publications/free_publications/index_categoryid_8.html?print=1</p>	<p>Please note that the provision for bicycle parking spaces is derived from Chapter 8 of HKPSG, which is also adopted by the recent approved planning application Y/YL-MP/10. The provision rate has been updated under the assumption of the distance to future rail station. Please also note that Annex B of Checklist of Traffic Impact Assessment (TIA) is for NDAs., which is not applicable to our site.</p>
<p>6. Please provide additional references of RCHE in operation with similar scale and public transport coverage, and advise whether there are any visitor parking provision for RCHE.</p>	<p>An additional traffic survey on 2 adjacent RCHEs was conducted in mid-July 2025. The</p>

Comments from Commissioner for Transport (received 9.7.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our (Formal) FI Submission 28.5.2025	Applicant's Response(s) in Draft FI to TD on 15.8.2025
	survey result is also included in the revised TIA for reference. (Addendum 15)
<p>c)</p> <p>RtC 3: It is noted that there would be a roundabout adjoining Mai Po South Road. Please clarify whether there would be drop bars controlling ingress/egress at Mai Po South Road. If there would be drop bars, please provide analysis to demonstrate that traffic at Mai Po South Road would not be affected.</p>	<p>Please note that there would be no drop bar at the main entrance of development. Therefore, traffic at public road would not be affected.</p>
<p>d)</p> <p>RtC 4: Taking into account the size of the development and there would be additional public transports routing through San Tin Interchange and the connecting roads to support the development, please provide assessment of relevant roads and junctions.</p>	<p>Please note that the additional PT trips would be minimal to the adjacent road network.</p>
<p>e)</p> <p>Section 2.3.3: Please also take into account the location and the public transport coverage of the referenced RCHE to determine whether they are suitable for reference.</p>	<p>An additional traffic survey on 2 adjacent RCHEs was conducted in mid-July 2025. The survey result is also included in the revised TIA for reference.</p>
<p>f)</p> <p>Table 3.1: Please include the signalized junction of Castle Peak Road – San Tin and slip roads to/from San Tin Interchange.</p>	<p>Please note that the additional PT trips would be minimal to the adjacent road network.</p>
<p>g)</p> <p>Section 3.3.1: Taking into account the size of the development, the walking distances of most of the building blocks exceed 500m to public transport services. Please review this section.</p>	<p>Please note that the 500m coverage of PT service was adopted in approved S16 TIA for the same subject site. The usage of public transport services would also be reviewed upon the population intake of the development.</p>
<p>h)</p> <p>Section 4.1.1:</p> <p>1. The proposed development is a large scale development and may affect the development potential of San Tin Technopole. Please also assess the traffic performance of relevant road and junction in a design year after the full population intake of San Tin Technopole to ensure that the proposed development would not affect the development potential of San Tin Technopole</p>	<p>Based on the virtual meeting with TD on 25 July 2025, a sensitivity test for the full population intake of San Tin Technopole (STT) in design year 2039 is included in the revised TIA report.</p>
<p>2. As the proposed design year is 2034, please clarify whether the commissioning of Northern Link (NOL) has been taken into account in the assessment. Please also clarify whether the latest toll fee of Tai</p>	<p>Please refer to the revised TIA. The commissioning of NOL would expect to share the burden of road traffic and help to improve the road junction</p>

Comments from Commissioner for Transport (received 9.7.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our (Formal) FI Submission 28.5.2025	Applicant's Response(s) in Draft FI to TD on 15.8.2025
Lam Tunnel has been taken into account in the assessment.	performance. The toll fee changes of Tai Lam Tunnel is also considered in the traffic forecast of the revised TIA.
i) Table 4.2: Please clarify whether the development trips have taken into account the full population intake of San Tin Technopole	Based on the virtual meeting with TD on 25 July 2025, a sensitivity test for the full population intake of San Tin Technopole (STT) in design year 2039 is included in the revised TIA report.
j) Sections 4.2.4 and 4.2.5: Please take into account the development proposal of Ngau Tam Mei in the assessment.	Please note that the Ngau Tam Mei development has been considered in the assessment.
k) Tables 4.4 and 4.5: 1. The flat sizes in the table do not tally with Table 2.2. Please review.	Please refer to the remark of Table 2.2 for the nos. of unit under different flat sizes.
2. The trip rates of RCHE should be reviewed according to the comment in item (e) above.	An additional traffic survey on 2 adjacent RCHEs was conducted in mid-July 2025. The survey result is also included in the revised TIA for reference.
l) Table 4.6: Taking into account the larger flat size (average housing size 74.5m ²) in the proposed development, please critically review whether the average domestic household size of 2.8 and the estimated population of 9,999 are underestimated.	Please note that the current usage of average domestic household size of 2.8 is based on the 2021 by-census data for the small TPU 542 covering our site. Reference was also made to nearby applications, including Y/YL-MP/10, Y/YL-NSW/8, Y/YL-NSW/9, Y/YL-NSW/7, and the LSPS002 of the Tung Shing Lei site, which have adopted person-per-flat ratios ranging from 2.5 to 2.8. This aligns with Hong Kong 2030+ and government policies promoting home space enhancement, supporting larger living spaces to improve livability.
m) Section 4.3.5: It is noted that there would be one-way of approximately 1,622 pax/hr of public transport demand. Please review whether the footpath and pedestrian crossing facilities at Mai Po South Road could cater for the two-way pedestrian flows without provision of shuttle bus mentioned in Section 4.3.6.	The LOS assessment of footpath at Mai Po South Road is included in the revised TIA. Subject to the TD's meeting on 25 Jul 2028, the shuttle bus service would be divided into short haul service and long-haul service in the assessment. Please note that new franchised bus service would be applied, subject to further agreement and the review of PT usage upon population intake for the subject site.

Comments from Commissioner for Transport (received 9.7.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our (Formal) FI Submission 28.5.2025	Applicant's Response(s) in Draft FI to TD on 15.8.2025
n) Section 4.4.1: Please clarify whether "Year 2034 Reference Case" has taken into account the traffic generation/attraction of San Tin Technopole.	The STT flow up to 2034 has been considered in The Year 2034 Reference Case.
o) Section 5.1.1: 1. Please be advised that the cycle time of new junction should be limited to 90 seconds with RC greater than or equal to 25% according to TPDM. Hence, please review the junction calculation. For example, please reduce the cycle time of junction B to 90 seconds.	Please kindly note that the usage of cycle time (105 second) of junction B is based on the extract of CEDD's study.
2. Please provide the formulation of lost time adopted in the junction calculation. For example, it is noted that the lost time of Junctions A and B are only 16 and 22 respectively.	Please find the formulation of lost time of calculation in the revised TIA for reference. (Addendum 15)
3. Please review the junction calculation of priority junctions. For examples, the lane width of Castle Peak Road – Mai Po are less than 4.2m adopted in the junction calculation of Junction I.	The parameters of junction calculation is reviewed in the revised TIA. (Addendum 15)
p) Section 5.1.3 and RtC 12a: If the applicant of Y/YL-MP/10 does not implement the proposed junction improvement works, please advise whether the applicant of this application would undertake the junction improvement works.	Noted. The applicant of this application would undertake the junction improvement works if necessary.
q) Table 5.1: As the additional public transports supporting the proposed development might route through SanTin Interchange and Castle Peak Road – San Tin. Please include San Tin Interchange, the signalized junctions of Castle Peak Road – San Tin, Castle Peak Road – Chau Tau and the slips road to/from San Tin Interchange and the junction of Castle Peak Road – San Tin and Kwu Tung Road.	Please note that the additional PT trips would be minimal to the adjacent road network.
r) Table 5.3: 1. It is noted that the development traffic flow from Shek Wu Wai Road to San Tin Highway eastbound is 140 pcu/hr. Please assess the traffic flow at San Tin Highway eastbound at the north of Shek Wu Wai Interchange with the additional development traffic flow.	The road section of San Tin Highway is included in the revised TIA.
2. Remark (3): Shek Wu Wai Road is not a PD. Please review the design capacity.	Since the concerned Shek Wu Wai Road should be considered as part of the signal junction, the road link assessment would be excluded in the assessment.

Comments from Commissioner for Transport (received 9.7.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our (Formal) FI Submission 28.5.2025	Applicant's Response(s) in Draft FI to TD on 15.8.2025
3. As mentioned in item h) above, please assess the traffic performance in a design year after the full population intake of San Tin Technopole, and mention the effect of commissioning of NM Highway to San Tin Highway in the report.	Based on the virtual meeting with TD on 25 July 2025, a sensitivity test for the full population intake of San Tin Technopole (STT) in design year 2039 is included in the revised TIA report. The effect of commissioning of NM Highway is included in the revised TIA.
s) Section 5.2: 1. As mentioned in item m) above, please conduct pedestrian assessment from the entrance/exit of the proposed development to the public transport facilities at Castle Peak Road – San Tin.	The LOS assessment of footpath at Mai Po South Road is included in the revised TIA.
2. Please review if cycle track could be provided to connect the proposed development and the existing cycle track at Castle Peak Road – Mai Po.	Based on the virtual meeting with TD on 25 July 2025, provision of cycle track is not feasible due to the adjacent private lots.
t) Section 5.3.3 and Drawing 5.8: Please consider to provide signalized junction and shift the bus stop away from the proposed junction.	Based on the virtual meeting with TD on 25 July 2025, relocation of bus stop is not feasible due to the adjacent private lots.
u) Section 5.3.7: Similar to item h) above, please assess the traffic performance of relevant road and junction in a design year after the full population intake of San Tin Technopole.	Based on the virtual meeting with TD on 25 July 2025, a sensitivity test for the full population intake of San Tin Technopole (STT) in design year 2039 is included in the revised TIA report.
v) Section 5.3.9: Please clarify what is the further junction improvement in later stage and consider to take up the further junction improvement if other developments are unable to take up the work.	Please refer to the Section 5 in the revised TIA. (Addendum 15)
w) Table 5.12: Similar to item r) above, please assess the traffic flow at San Tin Highway eastbound at the north of Shek Wu Wai Interchange with the additional development traffic flow.	The road section of San Tin Highway is included in the revised TIA.
x) Noted there is a change on the directional split of the trips generated from the subject Site. Trips using Fairview Park Interchange has been reduced significantly from 180 pcu/hr to 120 pcu/hr. Please justify.	Please note that the direction split of the development trips has been reviewed and made reference to the application Y/YL-MP/10.
y) Y/YL-NSW/8 and Y/YL-NSW/9 have been approved by the Town Planning Board on 28.2.2025, and should be included in the assessment under 2034 Design Case instead of sensitivity test.	Please note that both applications of Y/YLNSW/8 and Y/YL-NSW/9 have been considered in 2034 reference case.

Comments from Commissioner for Transport (received 9.7.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our (Formal) FI Submission 28.5.2025	Applicant's Response(s) in Draft FI to TD on 15.8.2025
<p>z)</p> <p>Please holistically review the report content related to the junction improvement works for Fairview Park Interchange. It has been noted that several planning applications have been quoted for providing junction improvement in Junction H i.e. Y/YL-MP/7, Y/YL-MP/10, Sha Po Public Housing Development, etc.. A drawing showing the ultimate state of Junction H incorporated all the junction improvement works should be provided and used in the junction calculation checking. Please supplement.</p>	<p>Please note that the Drawing 5.3 in the revised TIA has incorporated the junction improvement under different planning applications at Fairview Park Interchange.</p>
<p>aa)</p> <p>Understand that junction improvement works from Y/YL-MP/10 has been assumed in this TTIA but the trips generated from Y/YL-MP/10 has not been included in the assessment. Please explain.</p>	<p>The traffic flow of Y/YL-MP/10 has been considered in the revised TIA.</p>
<p><u>Comments from Transport Operation Perspective</u></p> <p>bb)</p> <p>Sections 4.3.6 and 4.3.7; based on the mode hierarchy of public transport services, please note that shuttle bus/coach would only be considered if no other public transport services are available. The project proponent should not assume their proposed shuttle bus would be approved by TD. Hence, it should be assumed that the feeder demand for railway/SPB should be redistributed to franchised bus/GMB and review the total peak hour demand for these public transport services/proposed routes and their need for additional public transport facilities (inside and/or outside the development Site with due consideration of item g) above as appropriate.</p>	<p>Subject to the TD's meeting on 25 Jul 2028, the shuttle bus service would be divided into short haul service and long-haul service in the assessment. Please note that new franchised bus service would be applied, subject to further agreement and the review of PT usage upon population intake for the subject site.</p>
<p>cc)</p> <p>In view of the updated estimated peak hour PT demand (i.e. over 1,600 passengers during the peak hour) and the above updates to the demand of franchised bus and GMB services, please ascertain if the associated public transport facilities (e.g. lay-bys within walking distance) should be enhanced further to support the strengthened/additional PT services if required.</p>	<p>Subject to the TD's meeting on 25 Jul 2028, the shuttle bus service would be divided into short haul service and long-haul service in the assessment. Please note that new franchised bus service would be applied, subject to further agreement and the review of PT usage upon population intake for the subject site.</p> <p>The LOS assessment of footpath and queuing space for the assigned Franchised bus passengers have been included and revised in the assessment.</p>

Response to Dept Comments from the Commissioner for Transport (received 2.9.2025)

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s) in our Draft FI to TD on 10.9.2025:
<p>1. RtC(b):</p> <p>- Please follow the Checklist of TIA for bicycle parking provision, and advise the loading/unloading arrangement for houses.</p>	<p>The bicycle parking provision is revised accordingly. Please refer to the revised Chapter 2.3 for the loading/ unloading arrangement for houses.</p>
<p>- Please provide breakdown of visitor parking spaces to demonstrate that each block has sufficient visitor parking spaces, and clarify whether there are any pick-up/drop-off laybys and motor cycle parking spaces/bicycle parking spaces for RCHE.</p>	<p>Please refer to Table 2.2 in the revised TIA for breakdown of visitor parking spaces. As indicated in Table 2.2, there will be proposed provision of private car parking space, HGV L/UL bay, ambulance lay-by and light-bus lay-by for RCHE.</p>
<p>- Please also clarify whether the visitor parking spaces of the residential development could be shared to RCHE, and seek comment from BD on the provision of accessible parking spaces as appropriate.</p>	<p>The visitor parking spaces would not be shared with RCHE. BD comment on the provision of accessible parking spaces would be sought if necessary.</p>
<p>2. RtC (d), (f) & (q): Taking into account the scale of the proposed development, please provide assessment of relevant roads and junctions from San Tin Interchange to/from the proposed development. For examples, assessment of Junctions J & K (similar to Table 3.2) and the signalized junctions connecting San Tin Interchange should be provided in design years including the sensitivity tests.</p>	<p>Please find the revised TIA for reference for Junction J&K for review. Since new Section 16 Application would be required in later stage, the assessment for the signalized junctions connecting San Tin Interchange would be further reviewed.</p>
<p>3. RtC (g): According to TPDM, the ideal walking distance to a bus stop should not exceed 400 metres. Please critically review the walking distances from the building blocks of the proposed development to public transport services (particularly from the western portion of the site to public transport facilities), and whether additional provision/enhancement of public transport facilities are required (e.g. extension of bus laybys, etc.).</p>	<p>The walking distance to nearest NB bus stop and SB bus stop (San Tam Road) is around 410m and 540m, respectively. It is noted that the ideal walking distance to bus stop should not exceed 400m. However, the distance between 2 bus stops in Castle Peak Road – Mai Po is already over 800m. Therefore, the PT trips to the nearest bus stop have already been considered. Also, if shuttle bus is not approved, potential pick-up/drop-off to allow bus service would be provided within the subject site, which has similar function of residential shuttle bus to share the PT trips. It would subject to further</p>

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s) in our Draft FI to TD on 10.9.2025:
	review of actual passenger demand upon occupation of the subject development and further review and agreement with the corresponding public transport operators and government departments, if necessary.
<p>4. RtC (h):</p> <p>- In Drawing No. 4.4, it appears that there are only minimal enhanced PT traffic generation. Please review.</p>	Subject to Table 4.7 and 4.9, the additional PT traffic generation is minimal.
<p>- In Drawing No. 4.5, it is noted that the traffic flows at Junction I have been further increased to the similar order as the observed traffic flow at Junction B in Drawing No. 3.13 (which has flare lane at Shek Wu Wai Road). Please critically review whether the proposed priority junction arrangement would induce conflict between the vehicles leaving/entering Mai Po South Road and the main flows along CPR and whether signalized junction arrangement and/or other local junction widening works is required.</p>	Please note that the junction I would operate within capacity in Design Year 2034 with the existing junction layout. Nevertheless, please refer to Annex G regarding the indicative improvement layout with the calculation spreadsheet for Junction I in the revised TIA for review.
<p>- Please check the traffic flows in all the flow diagrams as well as the junction/link performance calculation. For example, in Drawing No. 4.5, the traffic flow at Junction C heading CPR-ST southbound is 790 (i.e. 765+25) (AM), however, it is reduced to a total of 415 (i.e. 180 + 235) (AM) in Junction I. Please review and explain.</p>	Further to the phone conversation with Mr. Ma (TD), the traffic flows in all the flow diagrams and calculations have been reviewed in the revised TIA.
<p>5. RtC (i):</p> <p>- It is noted in Tables 5.16 and 5.17 that the DFC of Junction C and V/C of Link L3 and L4 are about 0.9, which are above 0.85. Please seek agreement from CEDD as this might affect the development potential of San Tin Technopole and other potential public developments (e.g. NTM development) and propose mitigation measures to improve junction performance to $DFC < 0.85$ as appropriate.</p>	Please find the revised TIA for reference. The DFC of junction C would be 0.78, and V/C of L4 would be 0.91 in Sensitivity Test 3 in Design Year 2039. $V/C \text{ ratio} \leq 1.0$ implies the road has sufficient capacity to cope with the anticipated traffic volume. CEDD comment would be sought if necessary.
<p>- Please review the traffic performance of L5 and L6 which have V/C higher than 1, and assess the routing mentioned in item 2 above. As the V/C of L5 and 6 are higher than 1, please review the descriptions in Paras. 5.3.22 & 5.3.23.</p>	Please find the revised TIA for reference. $1.0 \leq V/C \text{ ratio} \leq 1.2$ indicates a manageable degree of congestion along the road.

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s) in our Draft FI to TD on 10.9.2025:
6. RtC (j): Please clarify whether the traffic flows from NTM development have been included in the reference case of 2034.	Please note that the Ngau Tam Mei development has been considered in the assessment.
7. Table 4.5 and Paras. 4.3.6 & 4.3.7: Please advise the formulation of the induced mechanized trips and provide assessment if the coach service mentioned in Para. 4.3.7 cannot be provided as discussed in the previous meeting.	If shuttle bus is not approved, potential pick-up/drop-off to allow bus service would be provided within the subject site, which has similar function of residential shuttle bus to share the PT trips. It would subject to further review of actual passenger demand upon occupation of the subject development and further review and agreement with the corresponding public transport operators and government departments, if necessary.
8. RtC (l): We have no further comment provided that PlanD have no comment on the proposed household size.	<p>Noted.</p> <p>Please note that the current usage of average domestic household size of 2.8 is based on the 2021 by-census data for the small TPU 542 which covers our site, the San Tin Constituency Area, and the Yuen Long District. Reference was also made to nearby applications of similar comprehensive development, including A/YL-KTN/663, A/YL-NSW/242, A/YL-MP/287, and A/YL-MP/247, which have adopted person-per-flat ratios ranging from 2.58 to 3.28, while larger average flat size in some application sites. Also, this aligns with Hong Kong 2030+ and government policies promoting home space enhancement, supporting larger living spaces to improve livability.</p> <p>Enclosed, please find justification email dated 27.8.2025 from Masterplan to DPO regarding person-per-flat ratio.</p> <p>(Addendum 14)</p>
9. RtC (m): As mentioned before, please assess the performance of footpath and crossing facilities without provision of shuttle bus as it might not be approved. In addition, for Drawing No. 5.7, it is noted	If shuttle bus is not approved, potential pick-up/drop-off to allow bus service would be provided within the subject site, which has similar function of residential

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s) in our Draft FI to TD on 10.9.2025:
that there are some narrow footpaths in the vicinity of the bus bays. Please review whether the width of footpath along the bus bays could be widened and whether the length of the laybys could be extended to address the demand of future public transport.	shuttle bus to share the PT trips. It would subject to further review of actual passenger demand upon occupation of the subject development and further review and agreement with the corresponding public transport operators and government departments, if necessary.
10. Para. 4.4.1: As mentioned in the previous meeting, please assess the scenarios if shuttle bus is not approved.	If shuttle bus is not approved, potential pick-up/drop-off to allow bus service would be provided within the subject site, which has similar function of residential shuttle bus to share the PT trips. It would subject to further review of actual passenger demand upon occupation of the subject development and further review and agreement with the corresponding public transport operators and government departments, if necessary.
11. RtC (o): - For Tables 5.3 & 5.13, please review the traffic performance of L3, L4, L5 and L6 which have V/C higher than 0.85 in 2034.	V/C ratio ≤ 1.0 implies the road has sufficient capacity to cope with the anticipated traffic volume. V/C ratio above 1.0 indicates the onset of mild congestion and a $1.0 \leq \text{V/C ratio} \leq 1.2$ indicates a manageable degree of congestion along the road.
- The V/C of L5 is higher than 1. Please review the descriptions in Paras. 5.3.12 & 13.	Please find the revised TIA for reference. $1.0 \leq \text{V/C ratio} \leq 1.2$ indicates a manageable degree of congestion along the road.
- Furthermore, please check the junction calculation. For example, please check the major road width for junction calculation of Junction C.	The parameters of junction calculation are reviewed in the revised TIA.
12. RtC (s): As mentioned in the previous meeting, please take into account the impact if no shuttle bus can be provided, and explain why it is not feasible to provide cycle track.	The provision of cycle track is not feasible due to the adjacent private lots. Please refer to Annex F in revised TIA for reference.
13. RtC (t): As mentioned in the previous meeting, please elaborate the site constraints and review if there are any other possible locations for setting up the bus stop.	The relocation of bus stop at Castle Peak Road – San Tin is not feasible due to the adjacent private lots. Please refer to Annex F in revised TIA for reference.

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s) in our Draft FI to TD on 10.9.2025:
<p>14. RtC (bb) & (cc): As mentioned in the previous meeting, we emphasised that shuttle bus/coach services should only be considered if no other public transport options are available. Therefore, the project proponent should not assume their proposed shuttle bus will be approved by the Transport Department (TD). Please request the consultants to reallocate the feeder demand to franchised buses or green minibuses (GMB), review the total peak hour demand for these public transport services/proposed routes, and assess the need for additional public transport facilities (either inside or outside the development site (within walking distance) as necessary. As a remark, if public transport provision is insufficient, future residents of the proposed development might consider other transport modes such as taxi or hire car, which would further increase the traffic generation/attraction of the proposed development and might overload the nearby junctions, especially Junction I.</p>	<p>If shuttle bus is not approved, potential pick-up/drop-off to allow bus service would be provided within the subject site, which has similar function of residential shuttle bus to share the PT trips. It would subject to further review of actual passenger demand upon occupation of the subject development and further review and agreement with the corresponding public transport operators and government departments, if necessary.</p>

Response to Dept Comments from the Commissioner for Transport (received 12.9.2025) CURRENT

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s):
<p>- RtC 3: As the original population density is relatively low, the distance between the bus stops is longer. However, as the proposed development would significantly increase the population density, please consider to provide additional bus stops with bus bays within 400m walking distance to support the proposed development if necessary.</p>	<p>For the induced franchised bus trips, the additional NB bus stop heading to Sheung Shui direction would be subject to further liaison and agreement with the corresponding public transport operators and government departments, if necessary.</p> <p>However, for the SB bus stop, since the existing routing heading to Yuen Long direction turns to San Tam Road at the Castle Peak Road – Mai Po / San Tam Road junction (Junction C), passengers will still need to walk through the pedestrian footbridge to the nearest SB bus stop near Maple Gardens.</p>

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s):
	Since new Section 16 Application would be required in later stage, the public transport service would be further reviewed. (Addendum 15)
- RtC 4: As discussed with MVA, please review the traffic flows and the associated junction calculation, particularly for Junctions C and I. In addition, the proposed junction improvement works in Annex G should comply with the requirements in TPDM and should be implemented by the applicant.	The traffic flow and calculation have been reviewed in the revised TIA. The proposed junction improvement works in Junction I (as shown in Annex G would comply with the requirements in TPDM and would be undertaken by the applicant.
- Para. 4.2.5: Please consider to add "The population intake programme of the proposed development will take into account the commissioning programme of NOL and the capacity of road network to ensure that the proposed development would not cause any significant traffic impact to the road network." after the last sentence.	Noted. The TIA has been revised accordingly. (Addendum 15)
- Table 4.6: It is noted that 11% of residents would take PV/Taxi. Please allow sufficient pick-up/drop-off spaces and taxi stands within the proposed development.	Noted. Sufficient pick-up/drop-off spaces and taxi stands within the proposed development would be provided, and reviewed in later detailed design stage.
- Para. 4.3.6: Please provide the formulation of 64.2% and 35.8%.	Please refer to Remark (5) and (7) for consideration. The split of 64.2% is the proportion of Rail/LRT and Shuttle Bus in PT modal trips: $(48.3\%+4.1\%)/81.7\% = 64.2\%$. The remaining 35.8% is the proportion of Bus and PLB in PT modal trips: $(25.8\%+3.5\%)/81.7\% = 35.8\%$.
- Para. 4.3.7: Please clarify what is SPB.	The SPB should be revised as Shuttle Bus, please find Para 4.3.7 in the revised TIA for review.
- Para. 4.3.12: The design of the potential bus stops and related facilities provided within the subject development should comply with relevant design requirements of TD. In addition, please add "other public transport" and "and public transport" after "Potential bus stops and" and "to allow bus route" respectively, or consider to provide a Public Transport Interchange.	Noted. Please find Para 4.3.12 in the revised TIA for review.
- Para. 4.4.1: Please clarify whether the induced bus trips include coach trips.	The coach trips are included in the induced bus trips.

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s):
- Para. 5.1.6: Please review the presentation of this para. as the V/C is no more than 1 for L5 and advise whether there are any future improvements to the performance of road link.	Noted. Please find Para 5.1.6 in the revised TIA for review.
- Para. 5.2.5: As mentioned in previous RtC (m), it is noted in Drawing No. 5.7 that there are some narrow footpaths in the vicinity of the bus bays. Please review whether the width of footpath along the bus bays could be widened and whether the length of the laybys could be extended to address the demand of future public transport.	Please note that the footpaths in the vicinity of the bus bay have been reviewed, the result is as shown in Table 5.5 and indicated in Drawing 5.6. The result shows that the identified footpaths would operate in LOS A and B. The extension of bus bay would be subject to further review and agreement with the corresponding public transport operators and government departments, if necessary. The further widening of footpath near the bus stop would be subject to review in later stage.
- Tables 5.13 & 5.17: Please review the name of L5.	Noted. Table 5.13 and 5.17 are revised accordingly.
- Paras. 5.3.12 & 5.3.22: For L5, please review the presentation of these paras. and advise whether there are any future improvements to the performance of road link by other projects.	Noted. Please find Para 5.3.12 and 5.3.22 in the revised TIA for review.
- Para. 6.1.7: Please add "other public transport" and "and public transport" after "Potential bus stops and" and "for the potential bus route" respectively, or consider to provide a Public Transport Interchange.	Noted. Please find Para 6.1.7 in the revised TIA for review.
- Para. 6.1.11: Similar to the above comments, please review the presentation of this para.	Noted. Please find Para 6.1.11 in the revised TIA for review.
Comments by TO/NT (Contact Person: Mark WONG)	
<p>R-to-C</p> <p>Noting point (3) of the R-to-C stated that the walking distance to the nearest bus stops exceeds the ideal walking distance, please review whether the "existing nearby public transport services" are accessible to the residents of the subject development site. Additionally, assess whether the transport demand would be shifted to and adequately served by the proposed public transport services within or near the development site.</p>	<p>For the induced franchised bus trips, the additional NB bus stop heading to Sheung Shui direction would be subject to further liaison and agreement with the corresponding public transport operators and government departments, if necessary.</p> <p>However, for the SB bus stop, since the existing routing heading to Yuen Long direction turns to San Tam Road at the Castle Peak Road – Mai Po / San Tam Road junction (Junction C), passengers will still need to walk through the pedestrian</p>

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s):
	<p>footbridge to the nearest SB bus stop near Maple Gardens.</p> <p>The actual passenger demand would be further reviewed upon occupation of the subject development and further review and agreement with the corresponding public transport operators and</p>
Please provided further details of the recommended public transport facilities (e.g., additional lay-bys or a Public Transport Interchange)	Since new Section 16 Application would be required in later stage, the details of the potential public transport facilities would be further reviewed.
<p>TIA Report</p> <p>Para 4.3.6: Please provide further details of the recommended "potential bus service." For example, advise the number of proposed routes, their proposed routing (both bounds), headway, and vehicle allocation for the proposed short-haul and long-haul bus routes.</p>	Since new Section 16 Application would be required in later stage, the details of "potential bus service" would be further reviewed.
<p>Para 4.3.12: Please confirm whether the potential bus stops and related facilities would accommodate the operation of 12.8m bus vehicles and whether relevant bus ancillary facilities would be provided to support the terminating routes (if any).</p>	Since new Section 16 Application would be required in later stage, the 12.8m would be accommodated within the development. Details will be further reviewed in the Section 16 Application.
<p>Table 4.7: Please review whether the "shuttle bus trips" or "coach" mentioned in remarks (5) and (6) should be replaced by the "proposed bus services," and supplemented with the necessary details.</p>	Remarks (5) and (6) are updated in the revised TIA. Since new Section 16 Application would be required in later stage, details will be further reviewed.
<p><u>Comments by Donald Leung E/BP, TE/NTW Transport Department Tel. 2399 2778</u></p> <p>On top of the comments provided by Victor in preceding email, please find my comments related to Fairview Park Interchange (Junction H) below:-</p> <p>Please provide the rationale for the change of traffic flow towards Yuen Long direction in AM peak from 315 pcu/hr (first submission) to 215 pcu/hr (this Draft FI-3 submission).</p>	Please note that the direction split of the development trips has been reviewed and made reference to the application Y/YL-MP/10, generally 40% trips (around 140 pcu/hr) to Sheung Shui bound and 60% trips (around 210 pcu/hr) to Yuen Long bound for residential and RCHE trips. For the proposed bus service, the "long haul service" to Kowloon/Hong Kong Island, which equals to approximately 5 pcu/hr, would also be included in the trips to San Tin Highway SB.
Out of the 215 pcu/hr towards Yuen Long direction in AM peak, please provide justification on why 120 pcu/hr would go north to use Shek Wu Wai Road	Out of the 215 pcu/hr generation trips heading to Yuen Long bound in AM peak, 95 pcu/hr would go north and approach

Comments from Commissioner for Transport (received 2.9.2025) (Contact Person: Mr. Victor Ma; Tel: 2399 2727) based on our Draft FI Submission 15.8.2025	Response(s):
<p>instead of going south to use Castle Peak Road - Tam Mi.</p>	<p>San Tin Highway SB at future Shek Wu Wai Interchange, while 120 pcu/hr would go south to use Castle Peak Road – Tam Mi. The split of these two routes of Yuen Long bound traffic is derived based on the travelling distance and travelling time. The distance to San Tin Highway southbound (close to the slip road from Fairview Park Interchange) using Castle Peak Road – Tam Mi is approximately 2.5 km, while the distance using future Shek Wu Wai Interchange to the same point is approximately 5.4 km. With consideration of travelling speed, 50kph at Castle Peak Road and 100kph at San Tin Highway, with the consideration of the junctions through the respective routes, the travelling time through Castle Peak Road - Tam Mi is approximately 4 mins, while the travelling time for the new route via Shek Wu Wai Interchange is approximately 5.6 mins. Therefore, by proportion, approximately 60% of the Yuen Long bound traffic would make use of the Fairview Park Interchange and the remaining would make use of future Shek Wu Wai Interchange, which is also adopted in the assessment.</p>
<p>Para. 5.1.3: please state clearly which part of the improvement works at Junction H would be taken up by the applicant. If not all the junction improvement works as illustrated in Drawing 5.3 are to be carried out by the applicant, please demonstrate that Junction H could still performance satisfactorily after the implementation of junction improvement work by the applicant.</p>	<p>Please note that the entire junction improvement works would be undertaken by the applicant, if there is programme mismatch.</p>