

**Table A: Responses-to-Comments (16.6.2023)**

Departmental Comments		Applicant’s Responses
<b>A. Environmental Protection Department (received on 17.5.2023)</b>		
<b>Environmental Assessment</b>		
1.	<p><u>Air Quality</u> Section 2.3.2 - The PATH background air quality should not be compared to the AQOs for checking compliance. Please revise line 6 as “...would be lower than the AQO limit, except for 8-hour ozone”. Please revise the last sentence to read "The operation of the current proposed residential development under this Application will not be an emission source."</p>	Text in S.2.3.2 has been revised accordingly.
2.	Section 2.4.1 – Other than residential area, the RCPs should be located away from any existing ASRs and planned air sensitive uses of the proposed development to minimize any odour nuisance. Please revise accordingly.	Text in S2.4.1 has been revised as “...Standard refuse collection point will be provided and located away from residential area, any existing and planned air sensitives uses of the proposed development to minimize potential odour nuisance.”
3.	Section 2.4.5 – Please add “– Tam Mi” after “Castle Peak Road” in line 1. Suggest to state clearly that Castle Peak Road – Tam Mi is considered as Primary Distributor based on TD's view instead of a rural road.	“– Tam Mi” has been added after “Castle Peak Road” accordingly. According to TD’s latest reply, it is understood that the concerned Castle Peak Road – Tam Mi should be a Rural Road. Please refer to Appendix 2.2 for TD’s reply.
4.	Sections 2.4.7 and 2.4.9 - Since this project constitutes a DP, a site survey on the area within 500 m from the proposed project site boundary is recommended for this planning case or it shall be conducted during the EIA stage. Please also note that the provision of sufficient buffer distance in accordance with the HKPSG's requirements alone is insufficient for checking compliance with the AQOs and hence a detailed AQIA is required at the EIA stage.	A sentence is added to S2.4.7 & S2.4.9 accordingly that a site survey on the area within 500 m from the proposed project site boundary will be conducted during the EIA stage, as well as a detailed AQIA.
5.	Section 2.4.8 - Please review if the design of the proposed SPS shall follow the "Environmental Guidance Note for Sewage Pumping Stations which is not a Designated Project" instead of the guidelines for the Design of Small Sewage Treatment Plants published by EPD for the environmental considerations and mitigation measures to	Text in S.2.4.8 has been revised. The design of the SPS shall follow the guidelines stipulated in Environmental Guidance Note for Sewage Pumping Stations which is not a Designated Project published by EPD.

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	minimize any odour impact and revise the text accordingly. Please state clearly that 15m is the closest separation distance between the exhaust of the proposed SPS and the nearby ASR. It is noted that there is a proposed carpark at the basement level, please ensure that the exhaust (if any) of the carpark shall be located away from any nearby ASRs including the proposed development.	<p>The current design has allowed a separation distance of not less than 15m between the exhaust point of SPS and the nearby sensitive users.</p> <p>Since the proposed residential development is still in early planning stage, the exhaust location of the carpark has not yet been determined. The proposed carpark will be designed and operated to meet the requirements in EPD's ProPECC PN 2/96 on Control of Air Pollution in Car Parks. The exhaust (if any) of the proposed car park shall be located away from any nearby ASRs including the air-sensitive uses of the proposed development as far as possible. Text has been added in S2.4.1 accordingly.</p>
6.	Section 2.4.9 - We would like to remind the applicant that it should be the responsibility of the applicant and their consultants to ensure the validity of the chimney data by their own site surveys. Should the information of industrial chimneys be subsequently found to be incorrect, the assessment result as presented in the planning application would be invalidated.	Noted.
7.	Sections 2.5.3 and 2.5.11 - Since the site is not small and there are some ASRs (e.g. Man Yuen Chuen) located close to the project site boundary, it is suggested that an EM&A programme shall be implemented during the construction stage to ensure that the nearby ASRs will not be subject to adverse constructional air quality impact.	Noted. Subject to recommendations of the EIA Study, an EM&A program will be implemented during the construction stage will be considered to ensure that the nearby ASRs will not be subject to adverse constructional air quality impact. Text in S2.5.3 and S2.5.11 has been added.
8.	Section 2.6.1 – Please add "Since the proposed development constitutes a DP, an AQIA is required to demonstrate the compliance of the criteria stipulated in the EIAO-TM." to the last line.	Revised. The sentence is added to the last line of Section 2.6.1.
9.	Figure 2.1 (a) According to Appendix 3.1 and Figure 2.1, it is noted that an access road (i.e. link ID 9A in NIA) connecting to the vehicular entry of the proposed development is located to the west of the application site. Please provide the road type (with TD's	It is understood the concerned access road connecting to the vehicular entry of the proposed development will be a private road. TD has been consulted that no particular road classification can be assigned for this private access road. According to Chapter 3, Volume 2 of Transport Planning and Design Manual (TPDM) issued by Transport Department (TD), Rural Roads are defined as roads

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	endorsement or other justification) of this access road and show its buffer zone from the road kerb in Figure 2.1 to evaluate if sufficient buffer is allowed for any air-sensitive uses of the proposed development. On the other hand, if no buffer will be allowed for this road, please provide the justification.	connecting the smaller centres of population or popular recreation areas with major road networks. Since the concerned access road will be connecting to Kam Pok Road East and the proposed development (with small centres of population), the access road connecting to the vehicular entry of the proposed development is considered as Rural Road (RR) from traffic engineering point of view. Text has been added in S2.4.5 accordingly.
	(b) Please supplement "recreational uses in open space" in the legend " Area Prohibited for Air Sensitive Uses (e.g. Fresh Air Intake, Openable Windows, Sitting-out Areas, etc.)".	Revised. “Recreational Uses in Open Space” is added in the legend of Figure 2.1.
10.	Appendix 2.1 - Some entries under “10 min SO <sub>2</sub> ” are missing and incorrect. Please supplement and rectify. For grid (28,49) and (28,50), it is noted that most of the entries are found not tally with the data from the PATH v2.1 model. Please double check all the presented data to ensure that they are correct.	Appendix 2.1 is checked and updated.
11.	Appendix 2.2 – It is noted that TD’s endorsement on the road type of Castle Peak Road – Tam Mi, Kam Pok Road and Kam Pok Road East was obtained more than a year ago. Please check with TD to confirm if all the road type classification provided in Appendix 2.2 are still valid.	TD’s latest endorsement on road classification has been provided in Appendix 2.2.
12.	Please highlight the changes/amendments in the next submission for easy review.	Noted, changes are tracked in the document.
13.	<u>Noise</u> S.4.6.3 - Based on the EA, open storage sites S10 and S11 each involve three and two lorry movements with cranes, respectively. However, it has been noted that the consultant conducting the fixed noise impact assessment only assessed one lorry movement with a crane (such as NSR E13-02, E19-02, E42-04, E44-03, E1912, E19-13, E22-11, etc.). Please double-check to ensure that all potential fixed noise sources are included in the assessment.	Please be clarified that there should be only one lorry at each noise source at S10 and S11. As explained in S4.3.1, notional noise source location has been used for the current noise assessment. Accordingly, for each noise source S10a, S10b, S10c, and S11a, S11b as shown in Fig 4.1 and its legend, are then derived to represent the corresponding notional noise source location with respective to different noise testing points. Therefore, the current noise assessment presented in Appendix 4.2 is correct.

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

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14.	S.3.4.2 – 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 endorsement on traffic forecast data is provided in Appendix 3.1.
15.	<u>Water Quality</u> S5.4.5 to S5.4.7 - Regarding filling of existing ponds, please seek AFCD advice.	Noted. AFCD will be further consulted at the detailed design stage.
16.	S5.4.17 and S5.6.8 – i. Noted the application site is currently unsewered, the wastewater will be collected and conveyed to the planned public sewerage system and existing public sewer network to YL STW via NSW SPS. In this connection, please be reminded to incorporate the recommendation and conclusion from SIA in this section.	Text in S5.4.17 and S5.6.8 has been amended accordingly.
	ii. Please add Figure 2.1 (SIA) as supplementary information.	Figure 2.1 from SIA report has been extracted and presented as Figure 5.2 in the EA.
	iii. Please confirm the sewerage connection system will be ready before in operation.	Text in S5.4.17 has been amended accordingly.
17.	S5.7 i. Please include wastewater being connected and conveyed to public sewerage system, Nam Sang Wai Sewage Pumping Station and Yuen Long Sewage treatment Works during operation phase in the conclusion.	Text has been added in S5.7.3.
	ii. Please include the stormwater drainage system conveying the drainage to the Ngau Tam Mei Drainage Channel in the conclusion.	Text has been added in S5.7.1.

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18.	<p><u>Land Contamination</u> As the Application Site may fall within the area of high natural background level of Arsenic (i.e. 306 - 1080 ppm) in soil, the project proponent/ consultants should address this issue in the EIA study.</p>	Noted, relevant issue of high natural background level of Arsenic will be addressed in EIA study. Text has been added in S1.3.4 accordingly.
<b>Sewage Impact Assessment (SIA) Report</b>		
	General – Please state the population intake year of the project.	Current planned population intake year is around 2025. It is also indicated in Section 1.3.1 in the SIA.
	<p>Section 2.4.1 Table 2-2</p> <p>i. Please provide reference of the Average Household Size.</p> <p>ii. Row 1c: “Private R2” should read “Private R3”.</p>	<p>i. An Average Household Size of 3 as adopted in the Planning Statement is now been used for the calculations. Table 2-2 has been updated accordingly.</p> <p>ii. Noted and revised to “Private R3” accordingly.</p>
	<p>Figure 2.1, Appendix 2.1 and Appendix 2.2</p> <p>i. Please provide the ADWF of the catchment 1-4 respectively and their corresponding planning applications.</p> <p>ii. As there are planned developments in the vicinity of the proposed application, the sewer P1 to P15 which will become public sewers should provide sufficient capacity for those developments.</p>	<p>It is understood sewage capacity of around 15,000 m<sup>3</sup>/d should be provided for other nearby planned development and twin 675 mm gravity sewers are suggested from sewer P1 to P15. This has been incorporated in the revised SIA. Section 2.5 and Figure 2.1 have been updated.</p> <p>The hydraulic calculation in Appendix 2.1 and 2.2 have been updated accordingly. Appendices 3.1 and 4.1 are also added as a result.</p>
	<p>Appendix 2.1 &amp; 2.2</p> <p>i. MH235 to P1 - Please note that when the maximum velocity of peak flow is over 3 m/s, extra care must be paid to avoid internal abrasion</p> <p>ii. It is noted that the self-cleansing flow velocity could not be met for most pipes. Please check.</p>	<p>i. Noted and revised accordingly.</p> <p>ii. Noted and revised accordingly.</p>
<b>B. Agriculture, Fisheries and Conservation Department (received on 29.5.2023)</b>		
General		
a.	<p>Firstly, according to the EcoIA, around 100 species of fauna including 15 species of birds, 1 dragonfly, 1 reptile and 1 mammal of conservation importance were recorded in the application site. While the applicant has suggested how some of the components of</p>	<p>The habitat of the Application Site is majorly abandoned ponds that were left without active management. Traditional fish pond management, continuous support and participation by fishpond operator were not observed during the survey period. With the lack of annual drain-down of fishpond and the operation</p>

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<p>the proposed WRA could attract certain groups of birds, the information is limited and there is no information regarding non-avifauna. It is unclear how the wildlife usage (especially the species of conservation importance) of the proposed WRA could be increased significantly.</p>	<p>of pond aeration system, the feeding opportunities for waterbirds are very limited in the abandoned ponds in the Application Site. Thus, the usage of abandoned ponds by wildlife is in turns considered very limited.</p> <p>Water zones with different depths are proposed in the WRA, based on the consideration of the utilization of a more diversified group of waterbirds. Shallow water zone could provide feeding opportunities to a group of non-swimming waterbirds, such as the sandpipers and egrets. Deep and middle water zones are also proposed in the WRA to provide swimming area for dabbling waterbirds (e.g. Little Grebe, Cormorant). Wood logs placing in the middle of the water zones also provide roosting places for the dragonfly species. Section 4.2.7 and Section 4.2.8 of WRP are revised accordingly.</p> <p>The proposed WRA is composed of a variety of micro-habitat, such as the reedbed area surrounding the water zones will provide increased cover and feeding habitats for mammals, insects, other invertebrates, amphibians, reptiles and birds, such as bitterns, smaller herons, rails, crakes and dragonflies. The establishment of such reed species will help to enhance the overall biodiversity value of the ponds, making them more attractive habitats for a broader range of species. Section 4.2.1 of WRP is revised.</p> <p>By the provision of a diversified habitats, the potential ecological value of the proposed WRA will be increased significantly, when comparing to the current status of the Application Site.</p>
<p>b. Secondly, there is no information on the target performance of the proposed WRA and indicators for evaluating the performance. The proposed monitoring programme does not cover taxa groups with records in the application site other than birds. There are no contingency plans (e.g. in case of drought) and no recommended actions to take in case of failure in meeting the targets. It is unclear how the enhancement could be assessed and ascertained.</p>	<p>The major mitigation target is the provision of habitats that are favorable for the wetland associated species in the proposed WRA. Specific habitat condition targets where applicable are supplemented in Section 2.3 &amp; Table 2.1 of WRP.</p> <p>Taxa groups that were recorded in the Application Site are covered in the monitoring programme are supplemented in Section 7.1.6 of WRP, including the dragonfly, reptile and mammal.</p>

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		The contingency actions are supplemented in Section 7.1.10 of WRP. In case of drought, the water levels will be kept within tolerance levels.
c.	Thirdly, while the applicant has raised Lok Ma Chau Spur Line Wetland as an example of mitigation wetland, it seems that the size of compensation wetland versus the size of wetland loss, the types of enhancement measures etc. are not comparable between that project and the current project. Further elaboration on how the quoted example or other examples could show the feasibility of compensating the wetland loss by enhancing a much smaller wetland area is required.	The management measures implemented in the wetland of the Lok Ma Chau Spurline Wetland include the re-profile of pond levels to create shallow feeding habitats, fish stocking and management of water levels. These management measures are also adopted in the current WRP, which could maintain the wetland habitats favorable for the wetland associated species. Even though the size of the compensation wetland of Lok Ma Chau Spurline Wetland is not comparable with the current project, the provision of habitats and the management measures proposed to be adopted in the current project could greatly enhance the ecological value of the Wetland Restoration Area when comparing to the current abandoned status of the ponds within the Application Site. Section 3.2.12 of WRP is revised.
d.	Moreover, major construction works for the residential portion will be commenced in dry season and before the WRA is well established. The WRA hoardings will be removed partially after the nearest building units are constructed. As such, there would be disturbance impacts by the residential development on the WRA and thus reducing its wetland function.	The WRA hoardings are proposed to be removed section by section, after the nearest building units are constructed, as stated in Section 9.3.9 and 9.3.11 of the EcoIA report. The constructed units could act as a buffer to screening out the disturbance caused by the construction of the remaining units. In the meantime, the WRA will still be separated by the hoarding from the units under construction. As the proposed residential development only involves 2 storeys to 4 storeys housing unit, no piled foundation is needed. Heavy machinery is thus not required in the proposed development. No noisy construction works are involved in the proposed development. With the screening capacity of the constructed units and the erected hoardings for the units under construction, the disturbance impacts by the residential development on the WRA is considered insignificant even during dry season.
e.	From the fisheries perspective, it is noted that a Fisheries Impact Assessment has not been conducted despite the anticipated loss of existing fish ponds as part of the development. Should any development in the area conceivably affect aquaculture activities, fisheries resources and habitats, and aquaculture sites (fish ponds) a Fisheries Impact Assessment (as per Annex 9 and 17 of the TM	Noted. The Fisheries Impact Assessment will be conducted in later stage where applicable.

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	of EIAO) shall be conducted to assess and evaluate such potential/actual direct and indirect impacts, due to all activities related to the construction, operation and maintenance of proposed developments. Corresponding mitigation measures shall also be proposed as necessary. Potentially affected fishermen should also be consulted at an appropriate juncture.	
f.	As regard the funding arrangement, a detailed funding proposal would be required for assessing whether the long-term management of the proposed WRA could be supported.	Noted. The detailed funding arrangement is be provided in <b>Annex E</b> .
Ecological Impact Assessment (EcoIA)		
a.	8.2.6-8.2.7, Table 16 As it is assumed that the portions of the abandoned ponds outside the application site (~ 0.72 ha) will also lose their wetland functions, such loss would be permanent. Due to the permanent nature of the impact and the low-to moderate value of these ponds, the impact should not be minor.	The impact is still considered minor in Section 8.2.6, 8.2.7 and Table 16 due to the loss is still very likely to be temporary as the abandoned ponds outside the Application Site will not require drain down during construction or will be refilled with water right after the separation.  Even in a rare chance, if the pond will only be a brief duration for the outside portion without water and most likely it will happen outside wintering season during the construction period. Because of the much smaller size of the abandoned ponds outside Application Site and the low ecological value due to the existing fragmentation of the ponds by the surrounding developed area. Thus, even if there is a rare chance of temporary loss of the abandoned ponds outside the Application Site, the potential impacts are considered minor due to the size (much smaller than the size of abandoned pond within the Application Site) and ecological value (were of fragmentation by the surrounding developed area).
b.	Table 15 The construction period of WRA (including planting works) in Table 15 does not tally with s.8.2.5 and the table of “Timetable of the construction of the WRA” in the WRP.	Noted, the Table 15 is revised accordingly.

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c.	S.9.4.5 The provision of planting prior to the site clearance and formation works in the residential portion as stated in s.9.4.5 does not tally with s.9.3.8.	Noted. Section 9.4.5 and 9.3.8 are revised accordingly.
Wetland Restoration Proposal (WRP)		
a.	S.2.2.4 The figures about areas do not tally with other parts of the submission.	Noted. The figures are revised in Section 2.2.4.
b.	S.6.4.3 Please provide the width of the buffer planting.	Section 6.4.1 is revised, the reed zone of about 0.59 ha will be the buffer.
c.	Figure 4.2 and the appendices are missing.	The original Figure 4.2 is integrated in the Figure 4.1 of the current report version. Relevant text has been removed from the WRP report.
<b>C. Chief Town Planner/ Urban Design &amp; Landscape Section, Planning Department (received on 29.5.2023)</b>		
	While the applicant claimed that the situation (i.e., the assumption of remaining sites within the same "OU(CDWRA)" zone will be implemented in the long run) did not apply to the weighting of the overall resultant visual impact, such assumption still forms part of the VIA discussion. Since such assumption is considered not appropriate and not in line with the TPB PG-No 41, please revise the relevant paragraphs in the VIA.	Relevant paragraphs in the report of VIA have been revised accordingly ( <b>Annex F</b> ).