



宋梓華
Sung Tze Wah
FRICS FHKIS MSISV MCIREA ACIArb R.P.S.(GP)

吳恆廣
Ng Hang Kwong, BBS
FRICS FHKIS R.P.S.(GP)
Honorary World Valuer (WAVO)

李霧儀
Lee Mo Yi
MPIA RPP MUDD BA (Hons)

林桂金
Daniel K.K. Lam
MRICS MHKIS MCIREA R.P.S.(GP) BSc

宋樹鴻
Sung Shu Hung
FRICS MHKIS R.P.S.(GP)(PD) MCIREA
MHIREA BSc (Hons)

趙慧姿
Chiu Wai Chi
MRICS MHKIS MSc BBus (MKfg)

Consultant :

陳志凌
Elwyn C. Chan
RPE PMgr CEnv FIHE FCIQ8 MICE
MHKIE MSOE FCMI MCIArb MSc

劉志光
Lau Chi Kwong
FRICS FHKIS ALS MHKIS
R.P.S.(LS)(PFM) MSC

潘孝維
Pun How Wai
B.Arch.HK RIBA

By Email and Hand

Date : 21 January 2026

Your Ref.: TPB/A/STT/26

Our Ref. : LDS/PLAN/7108

Secretary
Town Planning Board
15/F, North Point Government Offices
333 Java Road
North Point, Hong Kong

Dear Sir/Madam,

**Application for Planning Permission for
Proposed Filling of Ponds for Permitted Innovation and Technology Hub (including
Permitted Cargo Handling and Forwarding Facilities, Creative Industries, Eating Place,
Flat (Staff Quarters only), Industrial Use, Information Technology and
Telecommunications Industries, Office, Public Utility Installation, Research, Design and
Development Centre, Shop and Services, Warehouse (excluding Dangerous Goods
Godown)) at Lot No. 764 RP (Part) in D.D.99, San Tin, Yuen Long, N.T.**

(Application No. A/STT/26)

We refer to the captioned application and submit herewith our response to departmental comments and relevant technical assessments and additional information for your consideration.

Should there be any queries, please contact our Ms. Cannis Lee or Ms. Yancy Fung at [REDACTED]

Yours faithfully,
For and on behalf of
Lawson David & Sung Surveyors Limited




Encl.

c.c. DPO/FSS&YLE (Attn.: Ms. Karen Chan) – By Email only
Client

Your Assets for Growth

Table 1: Responses to Comments from Government Departments on Planning Application No. A/STT/26 (21 January, 2026)

COMMENTS	RESPONSES
<p>1. Environmental Protection Department (EPD)</p> <p>Please note the following comments:</p> <p><u>Environmental Planning Perspective</u></p> <p>(a) We consider that given the large scale and scope of the project (covering superstructures and pond filling), adverse environmental impact such as water quality, waste management, sewage disposal/treatment impacts and noise impacts are anticipated. However, there are no technical assessments provided by the applicant to demonstrate the environmental acceptability of the project including the potential environmental impacts arising from the development and any measures to mitigate such impacts. As such, the applicant is requested to address the potential environmental impacts in the form of EA and SIA so as to determine the environmental acceptability of the development proposal.</p>	<p>(a) Please refer to the Environmental Assessment (see Annex A) and Sewerage Impact Assessment (see Annex B) attached.</p> <p>EPD and DSD's comments received on 15 January 2026 on the SIA report have been addressed (see Annex B).</p>
<p><u>Interface with approved EIA report on the San Tin / Lok Ma Chau Development Node</u></p> <p>(b) Given CEDD is the project proponent, the applicant is asked to closely liaise with CEDD on the project implementation, and the compliance with the recommendations of the EIA report and approval conditions</p>	<p>(b) Noted.</p>

COMMENTS	RESPONSES
<p>(c) We will provide further comments on the planning application upon receipt of the technical assessments prepared by the applicant for determining the environmental acceptability of the development proposal.</p>	<p>(c) Noted.</p>
<p>2. Agriculture, Fisheries and Conservation Department (AFCD)</p>	
<p>Please note the following comments:</p> <p>(a) It is noted that the application site involves pond filling works which have interface with the site formation works to be carried out by CEDD as well as the approved EIA for San Tin/ Lok Ma Chau Development Node and its approval conditions. We would reserve our comments on the application upon resolution of the aforesaid interface issues.</p>	<p>(a) Noted.</p>
<p>(b) In Section 4.4 of the Planning Statement, it was stated that the applicant aims to establish a largescale I&T base for the emerging low-altitude economy interface in Hong Kong with a point-to-point low-altitude logistics linkage with Futian Free Trade Zone in Shenzhen. The proposed point-to-point low-altitude logistics linkage with Futian Free Trade Zone in Shenzhen would inevitably pass through the fishponds and wetlands in the proposed Sam Po Shue Wetland Conservation Park (SPS WCP), which forms part of the flight path for migratory birds. However, no specifics of such linkage, as well as the potential impacts from the perspectives of ecology and daily</p>	<p>(b) The proposal is in response to the Chief Executive's 2024 Policy Address, in which the government promoted the concept of creating new productive forces through technological empowerment. Both the I&T sector and the low-altitude economy were highlighted as key industries for future development. The Application Site has the potential to become a large-scale pioneer base for the low-altitude cross-boundary interface between Hong Kong and Mainland China. Further exploration of future operations will be undertaken in liaison with the Government.</p>

COMMENTS	RESPONSES
<p>operation and management of the SPS WCP were provided in the Planning Statement and/or other application materials. We will provide more specific comments on the concerned planning application upon the receipt of additional information that addresses our above comments.</p>	
<p>(c) The application site is in close proximity to a constructed wetland provisioned under a drainage project, namely San Tin Constructed Wetland (Lotus Pond). The applicant shall consider any indirect ecological impacts affecting the Lotus Pond arising from the project and the interface with other ongoing/planned projects in the vicinity, including the NNCP Management Agreement projects administered by CCO.</p>	<p>(c) A methodology paper has been submitted to AFCD and comments from AFCD were received on 12.12.2025 (see Annex C). An EcoIA report will be submitted to address any ecological impacts.</p>
<p>3. Drainage Services Department (DSD)</p>	
<p>Please note the following comments:</p> <p>(a) The site area covered by the application is substantial, and significant land and pond filling works are proposed under the application. A drainage impact assessment should be submitted to DSD for DSD's acceptance prior to the commencement of works.</p>	<p>(a) Please refer to Drainage Impact Assessment (see Annex D) attached.</p>
<p>(b) Additionally, a sewerage impact assessment should be submitted for DSD's acceptance and SIG/EPD's approval to address the handling of sewerage generated from the</p>	<p>(b) Please refer to Sewerage Impact Assessment (see Annex B) attached.</p>

COMMENTS	RESPONSES
development under the application.	
4. Transport Department (TD)	
<p>Please note the following comments:</p> <p>(a) The applicant should provide a construction Traffic Impact Assessment (TIA) for its proposed pond filling as the associated mud dredging/earth filling works are anticipated to induce significant amount of vehicle trips.</p>	<p>(a) Please refer to the Construction Traffic Impact Assessment (CTIA) (see Annex E) attached.</p> <p>TD's comments received on 14 January 2026 on the CTIA have been addressed.</p>
<p>(b) It is noted that a total of 1,611 parking spaces and 506 loading/unloading spaces are proposed in Appendix 2 of the Planning Statement. Grateful if the applicant could advise the ratios adopted from HKPSG for the formulation of the proposed parking and loading/unloading provisions. For bicycle parking provision, the applicant should also make reference to Annex A of the checklist of TIA for Development Projects promulgated by Transport Department.</p>	<p>(b) The nos. of parking spaces and loading/unloading spaces have been updated and the ratios adopted from HKPSG for the formulation of the proposed parking and loading/unloading provision is provided (see Annex F). The Applicant has made reference to Annex A of the checklist of TIA for Development Projects promulgated by Transport Department for bicycle parking provision.</p> <p>TD's comments received on 14 January 2026 on the parking table have been addressed.</p>
<p>(c) Please provide details of the proposed automatic parking system mentioned in Section 4.7(c) of the Planning Statement.</p>	<p>(c) Parking spaces for the proposed I&T hub will be mainly located at basement level, where an Automated Parking System (APS) is proposed to optimize space efficiency and minimize surface traffic.</p> <p>The proposed underground automatic parking system (APS) will serve both staff and visitors, and will also be available for public parking use upon appointment. The APS is therefore not limited solely to private use.</p>

COMMENTS	RESPONSES
	<p>The system will be designed and implemented in accordance with the “Guidelines for Implementing Mechanized Vehicle Parking Systems” issued by the Electrical and Mechanical Services Department (EMSD). One of the key design considerations is to provide sufficient and efficient parking facilities while minimizing land take and surface traffic impact on the site.</p> <p>The introduction of a high-efficiency automatic parking system helps optimize parking provision and supports the overall operational and environmental objectives of the development.</p>
(d) In Section 4.13 of the Planning Statement, please clarify whether the transport lay-by for Green Minibus (GMB) is located within the Site or at Road L13.	(d) The transport lay-by for Green Minibus (GMB) is located within the Application Site (see plan below).

COMMENTS	RESPONSES
	 <p>Transport lay-bys for Green Mini bus GMB service between the proposed development and Transport interchange Hub station is proposed to enhance public transport services. 1 GMB layby will be provided for passenger pick up/drop off</p>
(e) Please coordinate with Civil Engineering and Development Department (CEDD) for the road works at	(e) Noted.

COMMENTS	RESPONSES
Road L13 to enable the proposed vehicular access point.	
<p>5. Innovation, Technology and Industry Bureau (ITIB)</p> <p>Please note that Innovation, Technology and Industry Bureau (ITIB) does not support the captioned application. Detailed considerations are set out below –</p> <p>(a) Not in line with “park-led” model for San Tin Technopole (STT) – ITIB is inclined to adopt a “park-led” model for developing the land in STT. This is to ensure that the overall development of the area can be at any point of time in a more coordinated and holistic manner, have more synergy (in terms of, for example, industry mix and/or provision of shared facilities), and be closely in keeping with Hong Kong’s strategic positioning vis-à-vis the fast-changing global I&T landscape at all time. A more “fragmented” development mode by individual private lot owners/developers would and could unlikely achieve such objectives.</p>	<p>Please refer to the letters to ITIB dated 8.12.2025 and 15.1.2026 prepared by the Applicant’s consultant (see Annex G).</p>
<p>(b) Not in line with the planned uses of the I&T sites – The Government’s intention is to develop specific I&T uses in different I&T value chain (i.e. upstream (research and development (“R&D”)), midstream (prototype or application development) or downstream (manufacturing) processes), the infrastructure and supporting facilities as required, etc. in STT. Based on the information provided by the applicant, the main development component is</p>	

COMMENTS	RESPONSES
<p>mainly related to the logistics industry albeit the applicant claimed that AI technology will be used and that these activities are still under Column 1 of the OZP. Logistics activities (smart and/or green or not) or pure use of AI/robotics in logistical processes do not fall under the industries planned for the subject I&T sites in STT (i.e. life and health technology; artificial intelligence and robotics, microelectronics and smart devices; advanced industries (e.g. new materials, energy and green technology, etc.)).</p>	
6. District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD)	
<p>He has adverse comment on the application:</p> <p>(a) The Application Site falls within portions of private lot, i.e. Lot no. 764 RP in D.D. 99, which is an old scheduled agricultural lot held under Block Government Lease. No structure shall be erected on the lot without prior written approval of the Government.</p>	<p>(a) Noted. All existing structures on the Application Site will be removed for the proposed development.</p>
<p>(b) No approval has been given for the development of the proposed “I&T Hub” as mentioned in para. 4 of the Planning Statement.</p>	<p>(b) Noted.</p>
7. Planning Department (PlanD)	
<p>General Comments</p> <p>1. Please provide the estimated number of working population and residential population (staff quarters) in the I&T hub. Please also clarify the number of units to be</p>	<p>1. (a) Estimated number of working population = 24,130 (b) Residential population (staff quarters) in the I&T hub = 7,650 (c) Number of units to be produced by the staff quarters = 1,680</p>

COMMENTS	RESPONSES
<p>produced by the staff quarters.</p>	<p>Detail refer Annex H1.</p>
<p>2. As the site is located in close proximity to the birds' flight path, please advise whether bird-friendly design will be adopted for the development.</p>	<p>2. Concept of Human–Bird Co-Living The development adopts a “co-living with nature” concept, extracted diagram Annex H2, promoting harmonious coexistence between human activities and bird habitats. Rather than separating built form and ecology, the master plan integrates human use areas with protected ecological zones through careful spatial planning and design control.</p> <p>Key principles include:</p> <ol style="list-style-type: none"> Spatial Zoning and Buffering Human activities are concentrated within clearly defined zones, while bird habitats such as wetlands, rice fields, and water ponds are preserved and enhanced with appropriate buffer distances to minimize disturbance. Design for Shared Environment Buildings and landscape features are designed to respond to bird movement and behavior, including aligned wind corridors, non-reflective building materials to avoid glare, and terraced massing to reduce visual and physical barriers along bird flight paths. Controlled Human Access (operation hours) The eco-park visitor paths are managed through two key measures to minimize disturbance to wildlife: (i) the number and alignment of paths are designed in response to natural tidal conditions,

COMMENTS	RESPONSES
	<p>primarily located at +5.5 to +6.0 m and locally at +6.5 m; and (ii) AI-based visitor headcount control will be implemented. Together, these measures help provide a favorable and well-protected environment for birds and other wildlife.</p> <p>Public access is carefully managed through limited and elevated eco-park pathways, designed around tidal levels, with AI-based visitor headcount control to prevent overcrowding and ecological stress.</p> <p>4. Habitat Enhancement within Human Landscape Productive landscapes such as open rice fields and water ponds support bird feeding and nesting while also forming part of the human experience, fostering environmental awareness and stewardship.</p> <p>“城鄉共融” This co-living strategy ensures that human presence does not dominate the site but instead coexists with and supports the long-term sustainability of bird habitats and the wetland ecosystem.</p> <p>By integrating environmental well-being (E), social co-existence with nature (S), and robust management and governance mechanisms (G), the development aims to create long-term shared value. This approach supports ecological protection while enhancing human well-being and sustainable economic potential.</p>
3. Please clarify the type of I&T industries involved for the I&T hub. In addition, please clarify how the proposed I&T	3. The proposed I&T hub will accommodate a range of innovation and technology industries, including robotics and automation, artificial

COMMENTS	RESPONSES
<p>hub is related to low-altitude economy as mentioned in the planning statement.</p>	<p>intelligence (AI) development, data-driven technologies, clean and renewable energy technologies, and related smart manufacturing activities. The hub is envisioned as a pilot platform for the implementation of clean-energy systems, demonstrating the integration of advanced technologies into future living and working environments.</p> <p>The I&T hub is planned as a compact innovation ecosystem that supports the full industrial cycle—from research and development, prototyping, and testing to small-scale production, manufacturing, exhibition, and delivery—within a single integrated building cluster. This arrangement enhances operational efficiency, shortens innovation cycles, and supports collaboration between research, industry, and application.</p> <p>In relation to the Policy Address 2024 that low-altitude economy (LAE), the proposed I&T hub provides technological and infrastructural support for emerging low-altitude applications. LAE refers to economic activities utilizing airspace below 1,000 m, including drones, eVTOLs, and related systems for logistics, inspection, emergency response, environmental monitoring, and smart mobility. The hub's focus on robotics, AI, smart systems, and clean energy directly supports the development, testing, and deployment of LAE technologies.</p> <p>The integration of LAE-related research and applications within the I&T hub aligns with future smart-city development, promotes new</p>

COMMENTS	RESPONSES
	<p>industrial chains, and supports sustainable and innovative economic growth.</p> <p>Diagram of pg. 1 of Appendix 2 on MLP are showing the upstream, midstream and downstream to promote innovated design made in Hong Kong and be an intentional gateway.</p> <p>Upon further announcement on relevant policy and regulation of low-altitude transport arrangement by the government, the Applicant will also incorporate landing zones for low-altitude transportation within the proposed development. Further exploration of future operations will be undertaken in liaison with the Government.</p>
4. Please advise if phased development will be adopted for the proposed I&T hub.	4. Phased development is proposed for the I&T hub to ensure seamless integration and continuous operation of the existing logistics centre and warehouse facilities. The phasing strategy allows development to proceed in stages while minimizing disruption and maintaining operational efficiency throughout the construction and implementation period.
5. Please advise the minimum site coverage of greenery for this site.	5. The proposal provides a total greenery area of approximately 107,601 m ² , representing about 65.9% of the site area. The greenery comprises landscaped areas at ground level, podium level, and roof level. <p>The proposed greenery area, including that at MLP, exceeds the minimum site coverage of greenery requirement of not less than 30%</p>

COMMENTS	RESPONSES
	<p>of the overall site area, i.e. no less than 20,000 m², in accordance with PNAP APP-152.</p> <p>Please refer to Annex H3 for details.</p>
6. Please advise whether the proposed Eco-Park could be accessible by the public.	<p>6. The proposed Eco-Park will be accessible to the public. The Eco-Park is designed as an inclusive and educational green space, incorporating environmental education trails, wind corridors, solar-energy features, and eco-tourism and learning elements.</p> <p>Public access is provided primarily from the eastern side of the site at transport lay-by by public transport or drive-in with APS parking system, with barrier-free pedestrian routes connecting to key amenities for users and occupants. The Eco-Park features permeable and eco-friendly paving materials and is spatially separated from vehicular traffic to ensure safety and environmental quality.</p> <p>The landscape design enhances visual permeability and provides accessible greenery, allowing the public to experience the ecological features of the site while minimizing disturbance to sensitive habitats.</p>
7. Please clarify if the commercial uses in the commercial and staff quarter blocks are ancillary to the staff quarters/I&T hub.	7. The commercial uses within the commercial and staff quarter blocks are primarily ancillary to the staff quarters and the I&T hub, providing daily amenities and services for staff, workers, and hub users. In addition, these commercial uses are designed to also serve visitors and the surrounding community.

COMMENTS	RESPONSES
	<p>The commercial components are mainly located along the southern side of the site next to San Tin Tsuen Road that away from the pond and ecologically sensitive areas. This location provides convenient access for the existing village, supporting daily needs and encouraging community interaction.</p> <p>The integration of these commercial uses helps strengthen connectivity between the new development and the existing village, thereby softening and dissolving the physical and social boundary between them.</p>
<p>8. Please clarify the location of different parking spaces, e.g. whether they will be located in basement level. Please also clarify whether any basement level will be involved in the proposed I&T hub.</p>	<p>8. Parking spaces for the proposed I&T hub will be mainly located at basement level, where an Automated Parking System (APS) is proposed to optimize space efficiency and minimize surface traffic.</p> <p>At ground level, dedicated parking and operational areas will be provided for heavy goods vehicles (HGVs), light goods vehicles (LGVs), trailers, and container loading/unloading activities. Adequate queuing and waiting spaces will be allocated for each logistics block to ensure smooth operation and avoid traffic congestion.</p> <p>Basement level(s) will therefore be involved in the proposed I&T hub to accommodate parking functions, while ground-level areas are primarily reserved for logistics operations and vehicular circulation.</p>
<p>Specific Comments</p>	
<p>9. <u>Para. 1.19</u> – noting that one of the intentions of the I&T hub is to accommodate the existing logistics operators</p>	<p>9. As mentioned in Item 4 above, phased development is proposed to ensure a seamless transition from existing operations at the original</p>

COMMENTS	RESPONSES
<p>affected by the development of the San Tin Technopole, please explain the interim arrangement before the I&T hub is developed. Besides, noting that G/F of the seven I&T blocks are reserved for accommodating the affected logistics operators, please explain whether the floor space is sufficient.</p>	<p>location. The development is planned in clusters, with each block designed as a self-sustaining building accommodating a mix of uses, including warehouse functions at G/F ground floor level, and industrial and research and development (R&D) uses on the upper floors.</p> <p>As explained in Item 3 above, the self-contained and streamlined development approach enables feasible phased development and phased construction while maintaining operational continuity.</p> <p>Floor space planning and layout have been determined in accordance with the Hong Kong Planning Standards and Guidelines (HKPSG), with reference also made to the Unified Facilities Criteria (UFC) – Warehouses and Storage Facilities, to ensure logistics efficiency.</p> <p>The overall development and planning strategy aligns with relevant Government policies announced in 2023. Architects and infrastructure consultants with strong experience in logistics planning have been engaged at an early stage to support the formulation of an efficient and well-coordinated development proposal.</p>
<p>10. <u>Pg. 5 of Appendix 2</u> – it is noted that a proposed plot ratio of 4.24 was mentioned across application form and the planning statement. However, a proposed PR of 4.5 was found on Pg. 5 of Appendix 2. Please clarify whether the plot ratio is 4.24 or 4.5.</p>	<p>10. The proposed plot ratio for the development is 4.24.</p> <p>The reference to a plot ratio of 4.5 on Pg.5 of Appendix 2 reflects an earlier design iteration. Following further refinement of the building layout, height restrictions, and site setting-out, the proposed plot ratio has been rationalized and finalized at approx.4.24.</p>

COMMENTS	RESPONSES
	<p>The proposed plot ratio of 4.24 is well within the maximum permissible plot ratio of 15 under the First Schedule of the Buildings Ordinance. The plot ratio for the proposed development will be further explored in detailed design stage.</p>
<p>11. <u>Para. 4.7(c)</u> – please clarify if the automatic parking system would not be a public vehicle park and whether it is only for the use of staff and visitors.</p>	<p>11. The proposed underground automatic parking system (APS) will serve both staff and visitors, and will also be available for public parking use upon appointment. The APS is therefore not limited solely to private use.</p> <p>The system will be designed and implemented in accordance with the “Guidelines for Implementing Mechanized Vehicle Parking Systems” issued by the Electrical and Mechanical Services Department (EMSD). One of the key design considerations is to provide sufficient and efficient parking facilities while minimizing land take and surface traffic impact on the site.</p> <p>The introduction of a high-efficiency automatic parking system helps optimize parking provision and supports the overall operational and environmental objectives of the development.</p>
<p>12. <u>Para. 4.7(d)</u> – please supplement the intention for setting up a visitor and education centre, and its operation hours.</p>	<p>12. With reference to the Outline Zoning Plan (OZP), a visitor and education centre is proposed as part of the I&T hub development. The facility aims to promote eco-tourism and environmental education along the site perimeter, showcasing the co-existence of development and nature, and reflecting the concept of 城鄉共融 (urban-rural integration).</p>

COMMENTS	RESPONSES
	<p>As mentioned under Item 1 above, Key Principle (3) on controlled access will be adopted. Public access within the Eco-Park will be carefully managed through controlled operation hours and designated pedestrian routes. In particular:</p> <ul style="list-style-type: none"> (i) the number and alignment of eco-park pathways are designed in response to natural tidal conditions, primarily located at +5.5 m to +6.0 m and locally at +6.5 m; and (ii) AI-based visitor headcount control will be implemented, together with operational coordination with relevant Government departments. <p>Public access is therefore provided through limited and elevated eco-park pathways, designed to prevent overcrowding and minimize ecological disturbance. These measures help ensure a well-protected and favorable environment for birds and other wildlife while allowing controlled public enjoyment and education.</p>
Appendix 2	
13. <u>Pg. 9</u> - For the whole transport layby, please clarify if the entire transport layby is solely for 1 GMB layby.	13. A variety of public transport services will be provided along San Tin Tsuen Road. Sufficient lay-by space is proposed at the eastern corner of the site to form the transport lay-by, which is designed to accommodate more than one green minibus in accordance with planning requirements.
14. <u>Pg. 23 to 25</u> – please advise the respective levels for ground level, podium level MLP and typical level MLP.	14. The respective levels of the development are as follows: <ul style="list-style-type: none"> • Ground level: approximately +6.0 mPD • Podium level (MLP): approximately +35.0 mPD

COMMENTS	RESPONSES
	<ul style="list-style-type: none"> • Roof level: approximately +75.0 mPD, in compliance with the maximum building height restriction under the relevant Outline Zoning Plan (OZP) • Details of other typical floor levels and Main Lobby Platform (MLP) levels are provided in Annex H5 for reference.
<p>15. <u>Pg. 23</u></p> <ul style="list-style-type: none"> - Please clarify the meaning of Eco-R&D and whether it is an outdoor space. - Please clarify if the uses involved in the SMART Logistic Centre. 	<p>15. Eco-R&D refers to research and development activities related to ecological and environmental technologies. The proposed Eco-R&D areas comprise dedicated outdoor research and demonstration spaces, such as ecological floating islands, which are an environmental research initiative of interest to the Drainage Services Department (DSD) and also intended to showcase ecological R&D outcomes to the public.</p> <p>Refer Annex H4 for example</p> <p>The Eco-R&D uses are separate from and not part of the SMART Logistics Centre. The SMART Logistics Centre accommodates logistics-related industrial and operational functions, whereas Eco-R&D areas are provided specifically for environmental research, testing, and public demonstration purposes.</p>
<p>16. <u>Pg. 24</u></p> <ul style="list-style-type: none"> - Please clarify if the building blocks in the I&T hub are all interconnected with podium/bridge as shown on the podium level MLP. - Please clarify the use of 'Rice Field'. 	<p>16. All building blocks within the I&T hub are interconnected at podium level by podium decks and pedestrian bridges, as shown on the podium level MLP. The interconnected podium system also provides access to the Automated Parking System (APS) and other ancillary facilities.</p>

COMMENTS	RESPONSES
	<p>The green podium serves as a secure and segregated circulation layer, separating public access from upper-level user-only areas where necessary. It provides safe and convenient pedestrian connections between blocks, as well as leisure walking spaces. The podium landscaping also functions as a buffer zone to mitigate noise and visual impacts from ground-level logistics operations.</p> <p>Through the podium and bridge network, all blocks can access commercial areas, APS parking, and ancillary facilities without passing through ground-floor logistics and warehouse areas, thereby enhancing safety, operational efficiency, and overall productivity of the I&T hub.</p> <p>The proposed “Rice Field” refers to an urban farming and green roof concept integrated within the development. It functions as a multifunctional landscape element, providing accessible greenery, urban food production, rainwater management, microclimate moderation, and environmental education opportunities.</p> <p>In addition to environmental and social benefits, the rice field and green podium contribute to economic value by enhancing the quality of the working environment, improving place-making, and increasing the long-term attractiveness of the I&T hub to innovation-driven industries and talent. The integration of productive landscapes and public-oriented green spaces also supports eco-tourism, education-related activities, and community engagement, thereby generating indirect economic benefits and supporting sustainable, resilient development.</p>

COMMENTS	RESPONSES
<p>17. <u>Pg. 26</u></p> <ul style="list-style-type: none"> - The current master layout plan could not show sufficient essential details of the proposed scheme. Please supplement the MLP with the following: <ul style="list-style-type: none"> (i) building height for each building block (in both mPD level and no. of storeys); (ii) proposed uses (which should tally with those mentioned in pg. 8 to 9 of the planning statement); (iii) site formation level;(iv)run-in/out; and (v) transport layby (as shown on pg. 9 of Appendix 2 on MLP), and parking spaces, if any. - Please consider not blurring the landscape features on the ground level. 	<p>17. Refer to Annex H5 for our proposal</p> <ul style="list-style-type: none"> i) Annex H5-1 ii) Annex H5-3 to Annex H5-6 iii) Annex H5-1 iv) - v) Annex H5-1
<p>18. According to the explanatory statement of the approved San Tin Technopole Outline Zoning Plan No. S/STT/2, provision of at least two effective breezeways/ air paths aligned in northwest to south-east direction across Area 19B is recommended. Hence, two 15m-wide NBAs are required under the endorsed Planning and Design Brief (full document available in the public domain). Please clarify if the required breezeways/air paths would be provided.</p>	<p>18. The recommended breezeways / air paths will be provided in accordance with the Explanatory Statement of the approved San Tin Technopole Outline Zoning Plan No. S/STT/2 and the endorsed Planning and Design Brief.</p> <p>The proposed development incorporates a total of six breezeways across the site, exceeding the minimum requirement of two 15 m-wide non-building areas (NBAs). These breezeways are generally aligned in the northwest–southeast direction to facilitate effective air ventilation across Area 19B. Refer to rendering Annex H6 and Annex H5-1 for the separate distance.</p> <p>The breezeways have been strategically planned with consideration of</p>

COMMENTS	RESPONSES
	<p>multiple design requirements, including ecological bird movement corridors, visual permeability, building separation, and safe and efficient circulation for container trucks and internal roads. At ground level, the breezeways provide a minimum clear width of approximately 19 m, with building separation ranging up to approximately 60 m through a step-terraced building design.</p> <p>The provision of multiple, wider-than-required breezeways enhances site permeability, improves micro-climatic performance, and ensures full compliance with the planning and urban design requirements of the OZP</p>
19. Clarifications of the Applied Uses (a) Public Utility Installation	19. (a) The proposed PUI includes a cooling centre and a substation, which will provide utility services to the proposed I&T Hub and support the government's development of the San Tin Technopole.
(b) Visitor and Education Centre	(b) A visitor and education centre is proposed as an ancillary use to the I&T hub development. The facility aims to promote eco-tourism and environmental education along the site perimeter, showcasing the co-existence of development and nature, and reflecting the concept of 城鄉共融 (urban–rural integration).
(c) Creative Industries	(c) The proposed I&T hub will accommodate a range of innovation and technology industries, including robotics and automation, artificial intelligence (AI) development, data-driven technologies, clean and renewable energy technologies, and related smart

COMMENTS	RESPONSES
	manufacturing activities.
Draft FI dated 5.1.2026	
20. <u>R-to-C item 2(c)</u> – please supplement the methodology paper provided to AFCD on 12.12.2025 and AFCD's comments as part of the FI submission.	20. Please refer to Annex C .
21. <u>Annex F</u> – it is noted that the applicant of the planning application No. A/STT/26 is Kenwell Limited. Please explain the relationship between KS Solutions (the party who prepared the letter) and the applicant.	21. The Applicant has appointed KS Solutions as their consultant.
22. <u>Para 1.3.4, Annex A</u> – please clarify whether no pond filling works will be carried out prior to commencement of construction of ecologically enhanced fishpond.	22. It is confirmed that no pond filling works will be carried out prior to commencement of construction of ecologically enhanced fishpond.
8. Urban Design and Landscape Section, Planning Department (UD&L, PlanD)	
(a) With reference to applicant's submission, the proposed filling of ponds will neither cause adverse landscape impact nor tree felling. Nevertheless, no information about the existing trees and landscape proposal have been provided.	(a) It is noted that the Environmental Impact Assessment (EIA) Report submitted by the Civil Engineering and Development Department for the San Tin/Lok Ma Chau Development Node (Application No. EIA-302/2023) was approved with conditions by the EPD on 17 May 2024. The EIA report includes a tree survey and landscape impact assessment. As the Application Site is mainly occupied by ponds and a brownfield site, there are not many existing trees. Therefore, a tree survey and landscape proposal were not considered necessary.
(b) The applicant should provide (i) a survey on trees (with site photos showing the existing conditions) with trees	(b) See our response in 8(a).

COMMENTS	RESPONSES
treatment; and (ii) landscape proposal to ameliorate the impacts of ponds filling, as appropriate.	
(c) The applicant is advised that approval of the application does not imply approval of tree works, if any, such as pruning, transplanting and felling. Application for any tree works should be submitted direct to relevant authority(ies) for approval.	(c) Noted.