

Annex G

Strategic Clarification on the Proposed Land Use Amendment for
San Tin Technopole

- (a) Letter to the Innovation, Technology and Industry Bureau dated 8.12.2025
- (b) Letter to the Innovation, Technology and Industry Bureau dated 15.1.2026

Registered post



8th Dec 2025

The Innovation, Technology and Industry Bureau
20/F, West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Attention: Professor Dong SUN, JP

Dear Sir,

Strategic Clarification on the Proposed Land Use Amendment for San Tin Technopole

1. Please refer to Section 16 Planning Application (A/STT/26) dated May 2025, as attached at Appendix 1. We commend the Bureau's release of the ***San Tin Technopole I&T Industry Development Conceptual Outline***, which provides a clear roadmap for Hong Kong's ambition as an international I&T hub. We particularly note the directives on **pages 22–23**:

"Infrastructure support should target upstream-downstream integration of the industrial ecosystem... and incorporate industry-specific infrastructure to achieve efficient vertical integration."

"Convenient logistics facilities—including timely global delivery, efficient warehousing, precision packaging, and real-time tracking—are essential to enhance supply chain efficiency."

2. Yet, industry-specific infrastructure—such as GMP pilot workshops for life sciences, cleanroom packaging lines for microelectronics, application testbeds for AI robotics, and intelligent logistics systems for advanced manufacturing—is highly specialized and deeply coupled with production processes, making it difficult for a single centralized facility to serve all needs.

3. Our project's core value stated in our submission mentioned in Para. 1 above lies in adopting an "embedded industry-specific infrastructure" model -integrating pilot production, manufacturing, and smart logistics within each industrial building and further upgrading logistics space into a "supply chain finance enabler," thereby activating capital flows for I&T enterprises and truly realizing the Outline's vision of "efficient vertical integration."

4. Strategic Positioning: A Pilot for the “Technology–Industry–Finance” Virtuous Cycle

China’s upcoming 15th Five-Year Plan emphasizes “new quality productive forces,” which hinges on 打通 the bottlenecks between technological innovation, industrialization, and financial support. Hong Kong’s I&T sector has long suffered from “strong technology, weak manufacturing, and scarce capital.”

Our concerned project aspires to become STT’s first **I&T value-realization hub**, establishing a closed-loop mechanism:

R&D → Pilot Validation → Small-Batch Manufacturing → Brand Orders → Custodied Inventory → Supply Chain Financing

This is not merely physical infrastructure, but **institutional innovation**—a foundational layer for value creation.

5. Unique Advantage: Real-World Demand Driving Innovation

While our current tenants are logistics operators, they represent a powerful network of multinational brands across food, fashion, and health products. This network offers I&T enterprises:

- High-frequency, multi-scenario validation opportunities;
- Rapid market feedback and commercialization pathways;
- Cross-sector collaboration as an innovation catalyst.

This “demand-driven innovation” model has been validated globally and aligns with trends like nearshoring and agile supply chains.

6. Industry Alignment with STT Priorities

Focus Sector	Key Facilities
Life & Health Tech	Temp-controlled pilot workshops, sterile zones, cold-chain sample management
AI & Robotics	Automated integration testbeds, sensor calibration platforms
Microelectronics & Smart Devices	Cleanroom packaging lines, EMC chambers, smart assembly units
Green Tech & Advanced Materials	Biodegradable processing demo lines, circular economy validation zones

7. Upgrading “Convenient Logistics” into a Finance Enabler

Building on the Outline’s recognition of “efficient warehousing and real-time tracking,” we propose:

- **Third-party custodied inventory** under attested control;
- **IoT + automation** for tamper-proof, real-time visibility;
- Use of this data as **collateral for supply chain finance**, enabling asset-light I&T firms to secure funding against verified inventory or confirmed orders.

This transforms logistics from a cost centre into a **credit node**, unlocking liquidity.

8. Embedded vs. Centralized: Complementary, Not Competitive

We understand the government may develop a centralized logistics hub. However, for **small-batch, high-mix, rapid-iteration advanced manufacturing** (e.g., C2M fashion, personalized health products), **embedded logistics modules within each building** offer superior efficiency:

- Minimizes inter-zone material movement;
- Enables end-to-end “design–prototype–produce–ship” cycles;
- Allocates 15–25% of floor area per building to internal logistics, serving only intra-park collaboration;
- Accepts phased adjustments to align with STT’s overall rollout.

This approach fully aligns with the Outline’s goal of “enhancing supply chain efficiency,” while better serving flexible manufacturing needs.

9. Collaborative Role: Supporting Phase 1 Ecosystem

As our client’s private project adjacent to Phase 1, we commit to:

- Opening logistics data APIs to Phase 1 enterprises for supply chain financing;
- Exploring with the future platform company the co-creation of a “Trusted STT Logistics Data Pool”;
- Complying with government standards on warehousing, data security, and carbon emissions.

10. Global Reference

- **Germany’s Fraunhofer**: Contract research enabled Industry 4.0 demo lines;
- **Japan’s Tsukuba**: Shared prototyping workshops accelerated industrial adoption;
- **Singapore’s A*STAR**: DBS offers IP-backed loans.

Our project will similarly enable “custodied inventory + supply chain finance” to unlock capital for innovators.

Conclusion

We aim to upgrade the Outline's "convenient logistics facilities" into a **comprehensive supply chain management infrastructure**, ensuring STT possesses not only technology and manufacturing, but also **liquid capital and efficient value realization**.

At a pivotal moment when China is advancing "new quality productive forces" and the "technology–industry–finance" virtuous cycle, our project aspires to serve as a **pilot for institutional innovation** in the Greater Bay Area—delivering a replicable, scalable private-sector model for Hong Kong's new-type industrialization.

We respectfully request the ITIB's favourable consideration of this application. If required, we like to make a presentation of the unique innovative ingredients that fall into the zoning ambit of government's innovative intentions as stated in Para.1 above.

Yours faithfully,



Kammy Leung

Founder, KS Solutions Limited
Vice Chairman, Hong Kong E-commerce Logistics Association
Executive Committee Member, Hong Kong Shipping and Logistics Association
Former General Manager, Cainiao Smart Logistics Network, HK
Former Director, ZTO International Logistics, HK

Encl.: Appendix 1 - Section 16 Planning Application (A/STT/26) dated May 2025

c.c. Clients

Development Bureau (Attn.: Ms. Bernadette Linn)

Deputy Financial Secretary (Attn.: Mr. Wong Wai Lun, Michael)

關於 KS Solutions Limited 及創辦人梁金源先生的背景說明

致：創新科技及工業局（ITIB）

KS Solutions Limited（奇思解決方案有限公司）由梁金源先生（Kammy Leung）於 2025 年 3 月創立，專注於產業整合、智慧基礎設施規劃及供應鏈數位化轉型，致力推動香港新型工業化與創科生態建設。

梁金源先生為資深物流與供應鏈戰略專家，擁有逾二十年跨領域實戰經驗，橫跨國際快遞、跨境電商、智慧物流生態及高附加值航空服務。其職涯始於 FedEx，歷任清關管理、機坪作業、分撥中心營運及亞太區樞紐運營等要職，並深度參與 2009 年 FedEx 亞太區樞紐由菲律賓遷移至廣州的重大的項目，主導跨境陸路運輸與多式聯運流程設計，為粵港澳大灣區高效物流網絡奠定實務基礎。

其後，梁先生於 LINEX、中通國際等企業推動電商物流創新，建立自動化電商倉儲標準，並成功拓展國際網絡至澳洲、歐洲及日本市場。

2018 年，梁先生加入阿里巴巴旗下菜鳥網絡，出任香港總部總經理，期間實現多項突破：

- 成功打造香港首個跨境電商 OTC（非處方藥）合規解決方案；
- 建設機場物流園區內首個物聯網（IoT）智能倉庫，日均訂單處理量由數百躍升至數萬；
- 提出「Cargo Village」物流生態圈概念，成為「菜鳥智慧港」項目的核心架構；
- 主導「經珠港飛」貨運項目，善用港珠澳大橋實現空陸聯運，提升區域機場群協同效率；
- 代表菜鳥與中國商飛簽署《香港航空器材中心合作備忘錄》，籌建亞太航材供應鏈中心，支持國產飛機海外運營。

梁先生長期關注土地規劃與產業政策協同。2018 年曾參與團結香港基金「政策．正察」項目，以洪水橋地區倉庫為案例，探討電商物流與棕地發展的互動關係。任職菜鳥期間，積極倡議「產業 1+」及「四流合一」（商流、物流、訊息流、資金流），並就放寬

「菜鳥智慧港」部分樓宇用途作食品加工中心提出專案建議，雖因審批時程過長未能落地，但展現其推動多功能混合用途產業空間的前瞻性思維。

2025 年創立 KS Solutions 後，公司迅速展現執行力：

- 協助 GKE Metal Logistics 建立 LME 認可的金屬交割倉庫，三個月內引入逾 5,000 噸銅、鎳、錫交易，躍居香港市場首位；
- 作為國際知名諮詢公司外部顧問，參與「北部都會區」洪水橋發展區投標項目，提出「產業互聯多層解決方案產業園」概念，主張以物流產業為骨幹，拉動生物科技與智慧製造發展，並整合人工智能與綠色科技；
- 設計務實商業模型，確保項目財政表現符合投資者預期，同時契合公共政策目標。

梁先生現任香港電商物流協會副主席及香港航運物流協會執行委員會成員，持續推動行業創新轉型與可持續發展。

KS Solutions 的核心理念，是透過嵌入式產業基建與供應鏈金融增信機制，補足創科生態中「從技術到產品、從產品到資金」的關鍵缺口 - 這正是當前香港發展新質生產力所需之民間協作力量。

Background Brief: KS Solutions Limited and Mr. Kammy Leung

To: The Innovation, Technology and Industry Bureau ^{**}(ITIB)

KS Solutions Limited was founded by Mr. Kammy Leung in March 2025, with a mission to advance industrial integration, smart infrastructure planning, and supply chain digital transformation, thereby supporting Hong Kong's new-type industrialization and I&T ecosystem development.

Mr. Leung is a seasoned strategic expert in logistics and supply chain management, with over two decades of cross-sector experience spanning international express delivery, cross-border e-commerce, smart logistics ecosystems, and high-value-added aviation services.

He began his career at FedEx, holding key roles in customs clearance, ramp operations, hub distribution, and Asia-Pacific hub management. He played a pivotal role in the landmark 2009 relocation of FedEx's Asia-Pacific hub from the Philippines to Guangzhou, where he led the design of cross-border road transport and multimodal logistics workflows—laying practical foundations for the Greater Bay Area's efficient logistics network.

Subsequently, at LINEX and ZTO International, Mr. Leung drove e-commerce logistics innovation, establishing automated warehouse standards and successfully expanding international networks into Australia, Europe, and Japan.

In 2018, he joined Cainiao Smart Logistics Network (Alibaba Group) as General Manager, Hong Kong, delivering several breakthroughs:

- Launched Hong Kong's first compliant cross-border OTC e-commerce solution;
- Built the airport logistics park's first IoT-enabled smart warehouse, scaling daily order volume from hundreds to tens of thousands;
- Pioneered the "Cargo Village" logistics ecosystem concept, which became the architectural core of the "Cainiao Smart Gateway" project;
- Spearheaded the "Fly Via Zhuhai–Hong Kong" freight initiative, leveraging the Hong Kong–Zhuhai–Macau Bridge to enable seamless air-land intermodal transport and enhance regional airport cluster efficiency;
- Represented Cainiao in signing a Memorandum of Understanding with COMAC to establish a Hong Kong-based Aviation Spare Parts Centre, supporting overseas operations of domestically produced aircraft.

Mr. Leung has long engaged in brownfield land use planning. In 2018, he contributed to the Our Hong Kong Foundation's "Policy Insight" study, using two brownfield warehouses in Hung Shui Kiu as case studies to examine the nexus between e-commerce logistics and land development. During his tenure at Cainiao, he championed the "Industry 1+" and "Four-Flow Integration" (commercial, logistics,

information, and financial flows) frameworks. He also proposed re-zoning part of the Cainiao Smart Port for food processing - a submission that garnered positive inter-departmental feedback from the Development Bureau, Transport and Logistics Bureau, and Planning Department, though ultimately withdrawn due to prolonged approval timelines. This reflects his forward-looking vision for multi-functional, mixed-use industrial spaces.

Since founding KS Solutions in 2025, Mr. Leung has demonstrated rapid execution capability:

- Assisted GKE Metal Logistics in establishing an LME-approved metal delivery warehouse; within three months, the facility attracted over 5,000 metric tons of copper, nickel, and tin trading, becoming Hong Kong's market leader;
- Served as an external advisor to a leading international consultancy on the Northern Metropolis Hung Shui Kiu development bid, proposing an "Interconnected Multi-Storey Industrial Park" model that positions logistics as the backbone to catalyse biotech and smart manufacturing, integrated with AI and green technologies;
- Designed pragmatic commercial models that align investor returns with public policy objectives.

Mr. Leung currently serves as Vice Chairman of the Hong Kong E-commerce Logistics Association and Executive Committee Member of the Hong Kong Shipping and Logistics Association, actively promoting industry innovation and sustainable development.

At its core, KS Solutions seeks to bridge critical gaps in Hong Kong's I&T ecosystem—specifically, the transition from technology to product, and from product to capital—through embedded industrial infrastructure and supply chain finance enablers. This represents precisely the kind of private-sector collaboration needed to realize Hong Kong's ambition in developing new quality productive forces.

Registered Post

15 Jan 2026

The Innovation, Technology and Industry Bureau
20/F, West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Attention: Professor Dong SUN, JP

Dear Sir,

Strategic Submission in Support of the STT Land Use Amendment – Advancing New-Style Industrialisation

Please refer to my previous letter dated 8/12/2025, as attached in Appendix I. We appreciate your continued guidance and support for the industrial development of the Northern Metropolitan Area. Regarding the previously submitted urban planning application for this project as attached in Appendix II, we would like to supplement key strategic details to clarify how the project operationalises the national “new quality productive forces” strategy and the HKSAR Government’s “new-style industrialisation” agenda, thereby reinforcing Hong Kong’s role as a globally competitive supply chain hub.

I. Implementation Plan – A Phased Approach to Building an Ecosystem

The project will be developed in three stages:

- **Phase One (Infrastructure):** focuses on infrastructure, including site formation, roads, water, electricity, and other essential utilities.
- **Phase Two (Industrial Experimental Field Implementation):** The project involves the construction of approximately eight 15-meter-high steel-structure buildings (each with two floors), providing approximately 1.6 million square feet of high-specification space, focusing on a “four-in-one” operating model (logistics + commerce + information + capital). Initially, it will pilot

the project in consumer goods industries such as food and apparel to validate the "manufacturing + logistics" upgrade path. Simultaneously, it will introduce LME-approved commodity delivery and warehousing companies, using basic metal inventory as an anchor to attract new materials and precision manufacturing companies to set up production lines, and collaborate with financial institutions to develop commodity spot financial products. The main logistics infrastructure includes a intermodal transport hub, a fully automated parcel sorting center + smart warehousing + LAE Vertiport, which will become the first and only logistics node in Hong Kong to integrate road-based freight with a certified LAE vertiport, directly enabling next-generation cross-border e-commerce and on-demand delivery.

- **Phase Three (Ecosystem Expansion):** The project will be constructed in phases, including a high-tech complex, a green data center, mixed-use office space, and conservation-oriented urban agricultural space, to achieve integrated "research-production-sales-finance"..

II. Methodology – Strength Through Partnership, Growth Through Tenants

One of the most critical challenges in any industrial park development is tenant acquisition. However, the applicant, Kenwell, and its affiliated consortium have operated logistics warehouses in the region for many years, currently managing six facilities with a total area of 43,030 square metres (approximately 463,000 square feet). Our tenants include international logistics companies such as Maersk, DB Schenker, Kerry Logistics, as well as numerous local SMEs. We serve over 50 brands, including Maxim's Group, Ferrero, Nestlé, Kinder, GAP, PUMA, Under Armour, Adidas, Skechers, FILA, and DKNY. Our annual rental income amounts to HKD 156 million. Moreover, many of our existing partners hold portfolios of additional domestic and international brands across various industries, ready for expansion when conditions are right.

Additionally, our partner Ks Solutions has a core client, GKE Metal Logistics Pte Ltd, which is one of the first LME-approved delivery warehouses in Hong Kong, accounting for more than half of stock in Hong Kong. The company is actively seeking land to expand its operations, aiming to bring 50,000 tonnes of non-ferrous metals into Hong Kong by 2026, requiring no less than 100,000 square feet of warehouse space.

We also note that the Hong Kong-Shenzhen Innovation and Technology Park (HSITP) has officially opened, attracting over 60 enterprises, a quarter of which are from overseas. Our Phase One facilities are ideally positioned to meet downstream needs such as R&D piloting, small-batch production, and logistics. These are real, tangible opportunities already within our grasp — the very seeds needed to catalyse development in the Northern Metropolis. We firmly believe that once the "industrial upgrading testbed" of Phase One is successfully launched, it will generate a strong magnet effect to attract more enterprises.

Financial projections indicate that Phase Two can achieve payback within five years. Beyond generating stable cash flow for Phase Three, this will build solid market confidence. More importantly, operational experience from Phase Two will enable us to refine and tailor Phase Three precisely to market demands.

III. Organisational Structure: Combining practical experience and industry resources



Member	Role	Core Competencies
Leader Union Development Limited	Fundraising, park design and operation	The Director of Leader Union previously led the construction and management of a 50-acre (approximately 100-hectare) toy factory in a production park in Guangdong Province.
Kenwell Limited	Existing customer transition, business development execution	The Director of Kenwell is currently the owner of logistics assets in the area and able to convert tenants immediately.
Ks Solutions	Industrial planning and introduction of the new economy	The Director of Ks Solutions is a former senior executive at Cainiao, FedEx, and ZTO Express, and a key figure in pushing for the LME warehouse to be located in Hong Kong.

IV. Strategic Value: Preserving and upgrading Hong Kong's logistics advantages to prevent industrial outflow.

This project does not replace the existing logistics industry but rather upgrades it instead of relocating it. Forcibly clearing out existing logistics facilities could lead many international brands to relocate to the Greater Bay Area or Southeast Asia, causing irreversible economic losses. We have chosen a pragmatic path: using real customers as a springboard, the supply chain as a carrier, and the "integration of four flows" as an engine, ultimately achieving the "new industrial closed-loop ecosystem" envisioned by STT.

Given the strategic alignment, financial viability, and tenant certainty outlined above, we respectfully propose that this project be recognised as a flagship demonstration of new-style industrialisation in the Northern Metropolis. We stand ready to work closely with your Bureau to realise this vision.

Your Sincerely,

Kammy Leung

Founder, KS Solutions Limited
 Vice Chairman, Hong Kong E-commerce Logistics Association
 Executive Committee Member, Hong Kong Transport and Logistics Association
 Former General Manager, Cainiao Smart Logistics Network, HK
 Former Director, ZTO International Logistics, HK

Encl.: Appendix I - Letter dated 8 Dec 2025

Appendix II - Section 16 application with all enclosed documents

c.c. Development Bureau (Attn.: Ms. Linn Hon Ho, Bernadette)

Deputy Financial Secretary (Attn.: Mr. Wong Wai Lun, Michael)

Clients