

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/STT/26

- Applicant** : Kenwell Limited represented by Lawson David & Sung Surveyors Limited
- Site** : Lot 764 RP (Part) in D.D. 99, San Tin, Yuen Long, New Territories
- Site Area** : About 163,181m²
- Lease** : Block Government Lease (demised for agricultural use)
- Plan** : Approved San Tin Technopole Outline Zoning Plan (OZP) No. S/STT/2
- Zoning** : “Other Specified Uses” (“OU”) annotated “Innovation and Technology” (“OU(I&T)”)
[subject to a maximum building height (BH) of 75mPD]
- Application** : Proposed Filling of Ponds for Permitted Innovation and Technology (I&T) 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 and Warehouse (excluding Dangerous Goods Godown))

1. The Proposal

- 1.1 The applicant seeks planning permission for proposed filling of ponds at the application site (the Site), which falls within an area zoned “OU(I&T)” on the OZP (**Plan A-1**), for a proposed I&T Hub comprising permitted uses, including 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 and warehouse (excluding dangerous goods godown). According to the Notes of the OZP for the “OU(I&T)” zone, while the aforementioned uses of the proposed I&T Hub are Column 1 uses which are always permitted, filling of ponds requires planning permission from the Town Planning Board (the Board)¹.
- 1.2 The Site is currently accessible from San Tin Tsuen Road and Castle Peak Road – San Tin via local tracks, and will be accessible from the planned Road L13 in future (**Plans**

¹ According to the Notes of the OZP for “OU(I&T)” zone, on land previously falling within “OU” annotated “Comprehensive Development and Wetland Enhancement Area” (“OU(CDWEA)”) on the approved San Tin OZP No. S/YL-ST/8, any filling of pond (except all works as required/co-ordinated/implemented by the Government), requires planning permission from the Board. The Site is located at an area previously falling within the said “OU(CDWEA)” zone.

A-1 and A-2). The majority of the Site consists of ponds in its eastern portion, whereas the south-western portion is paved and occupied by brownfield operations, including open storage of containers and warehouses (**Plans A-2 and A-4a to A-4c**).

- 1.3 The proposed filling of ponds, together with filling of land², is to facilitate the proposed I&T Hub with low-altitude economy operation, while providing space for logistics use which could facilitate the relocation of existing logistics operations³ affected by the implementation of the San Tin Technopole (the Technopole). According to the applicant, the ponds located at the eastern portion of the Site (about 117,445m² / about 72%) are proposed to be filled with soil with concrete on top for a depth of not exceeding 5.9m, for raising the site level from a range of +0.1mPD to +3.19mPD to +6mPD for site formation. The remaining land portion of the Site (about 45,736m²/ about 28%) is proposed to be filled with soil with concrete on top for a depth of not exceeding 5.18m, for raising the site level from a range of +0.82mPD to +5.36mPD to +6mPD (**Drawing A-1**).
- 1.4 While the proposed I&T Hub is a permitted use at the Site, the applicant has submitted an indicative proposal to demonstrate the genuine need for the proposed filling of ponds under the current application. According to the indicative proposal, the proposed I&T Hub⁴, with a total plot ratio (PR)⁵ of about 4.24 and total gross floor area (GFA) of about 691,498m², comprises 14 blocks with BHs ranging from two storeys to 19 storeys (about 21mPD to 75mPD), an Eco-Park at the north-western corner of the Site fronting the San Tin Western Main Drainage Channel (STWMDC) to be revitalized, as well as landscaped areas at ground, podium and roof levels (**Drawings A-2a and A-2b**). The proposed pond/ land filling plan, master layout plans and floor plans are at **Drawings A-2a to A-2g**, and the major development parameters of the proposed I&T Hub are at **Appendix II** for reference.
- 1.5 In support of the application, the applicant has submitted a Planning Statement, Environmental Assessment (EA), Sewerage Impact Assessment (SIA), Drainage Impact Assessment (DIA) and Construction Traffic Impact Assessment (CTIA).

Ecology and Environment

- 1.6 The Site falls within the Wetland Conservation Area (WCA) (about 81%) in its eastern portion, with the remaining area in its south-western portion located within the Wetland Buffer Area (WBA) (about 19%) of the Deep Bay Area under Town Planning Board Guidelines No. 12C on 'Development within the Deep Bay Area under Section 16 of the Town Planning Ordinance' (TPB PG-No. 12C) (**Plan A-1**). An Ecological Survey

² According to the Notes of the OZP for "OU(I&T)" zone, filling of land does not require planning permission from the Board.

³ According to the applicant, five existing logistics sites managed by the applicant will be affected by the implementation of the Technopole. These logistics sites involve operations related to port-backup uses, logistics centre, container vehicle park and vehicle repair workshop, warehouses, car beauty service, cargo handling and forwarding facilities, open storage, motor vehicle showroom, etc.

⁴ Major uses include warehouses, industrial uses, research and development (R&D) laboratories, offices, staff quarters, commercial uses (including shops, supermarkets and restaurants, etc.), data centre with automatic parking system, ancillary visitor and education centre, cooling centre and substation.

⁵ While there are no PR/ GFA restrictions for the "OU(I&T)" zone stipulated in the Notes of the approved San Tin Technopole OZP No. S/STT/2, the Explanatory Statement (ES) of the OZP indicates that the "OU(I&T)" zone would accommodate a total GFA of about 5.7 million m².

Methodology Paper has been submitted to outline desktop researches and propose survey methodology of ecological survey which has not been started. The applicant also indicates that an Ecological Impact Assessment (EcoIA) will be submitted to address ecological impacts upon approval of the application.

- 1.7 The Site also falls within the project boundary of the Environmental Impact Assessment (EIA) Report (No. AEIAR-261/2024) submitted by the Civil Engineering and Development Department (CEDD) in support of the development of the Technopole, which was approved with conditions by the Director of Environmental Protection (DEP) under the EIA Ordinance (EIAO) on 17 May 2024⁶. The applicant commits to adhering to the recommendations and requirements as listed in the approval conditions⁷ of the approved EIA Report and that no pond filling works will be carried out prior to the commencement of construction of the ecologically enhanced fishponds at the planned SPS WCP by CEDD. Upon approval of this application and subject to the commencement of the construction of the ecologically enhanced fishponds by CEDD, the applicant anticipates that the proposed pond filling works, which will take about 12 to 18 months to complete, will commence in 2028 to facilitate the completion of the proposed I&T Hub in 2033. The applicant also commits to implementing the mitigation and conservation measures to safeguard and upgrade the existing ecosystem along with submission of further technical assessments upon approval of this application.
- 1.8 An EA has been submitted by the applicant to assess the air quality, noise, water quality, waste management and land contamination aspects of the proposed pond filling works and the proposed I&T Hub, which concludes that no insurmountable adverse impacts arising from the proposed pond filling and other associated works for the I&T Hub are anticipated. The applicant commits to complying with all relevant environmental related legislation and adopting good site practices to avoid nuisances to the surrounding areas during construction phase, such as implementation of standard dust suppression measures recommended in the Air Pollution Control (Construction Dust) Regulation, not allowing the direct dumping of drained water from ponds to nearby watercourses, installation of suitable silt removal facilities and perimeter channels to manage surface runoff, etc.

⁶ To take forward the development of the Technopole, about 90 hectares (ha) of existing ponds (including those at the Site) are required to be filled. The approved EIA Report, which was conducted under the Investigation Study on “First Phase Development of the New Territories North – San Tin/Lok Ma Chau Development Node”, concluded that the planned Sam Po Shue Wetland Conservation Park (SPS WCP), with the implementation of the proposed ecological and fisheries enhancement measures, is anticipated to improve the connectivity of wetland habitats in the region and enhance the ecological and fisheries functions of the wetlands, thereby achieving no-net-loss in ecological function and capacity of the wetlands concerned.

⁷ The approval conditions of the approved EIA Report, amongst others, specified that the project proponent (i.e. CEDD) shall submit a detailed Habitat Creation and Management Plan (HCMP) and an Interim Wetland Enhancement Plan (IWEP) to the DEP for approval no less than nine months before commencement of pond filling works for the project (i.e. the Technopole); set up a working group with the Agriculture, Fisheries and Conservation Department (AFCD) no less than three months before commencement of construction of the project to coordinate the programme and progress of pond filling works and implementation of the planned SPS WCP; and no pond filling works shall be allowed prior to commencement of construction of the ecologically enhanced fishponds at the planned SPS WCP. According to CEDD, the IWEP has been submitted to DEP for approval, while the working group has been formed. Besides, the Advisory Council on the Environment has also been consulted on the draft HCMP before its formal submission to DEP. The establishment of ecologically enhanced fishponds in planned SPS WCP is expected to commence by CEDD in 2026/2027 the earliest.

Sewerage and Drainage

- 1.9 SIA and DIA have been submitted to demonstrate that no adverse sewerage and drainage impacts are envisaged from the proposed pond filling and other associated works for the I&T Hub. The submitted DIA reveals that the ponds will be filled to levels of not lower than about +6mPD, taking into account the projected extreme sea level rise with a 200-year return period under climate change scenario. With the construction of drainage system comprising peripheral channels and underground drains (**Drawing A-3**), the surface runoff will be collected and discharged directly into the STWMDC to be revitalised by CEDD, and no insurmountable drainage impact on the Site and the low-lying areas is anticipated.

Traffic

- 1.10 In terms of construction traffic, according to the submitted CTIA, the construction vehicles for the proposed pond filling works will access the Site via San Tin Tsuen Road and Castle Peak Road – San Tin (**Drawing A-4**). The CTIA concludes that all key junctions in the vicinity will operate within capacity during the construction period and carrying out of the proposed pond filling and other associated works for the I&T Hub would not generate adverse traffic impact on the surrounding road network.
- 1.11 In support of the application, the applicant has submitted the following documents:
- (a) Application Form received on 3.6.2025 and (Appendix I)
Supplementary Information (SI) received on 6.6.2025
 - (b) Planning Statement received on 3.6.2025 (Appendix Ia)
 - (c) Further Information (FI) received on 30.9.2025* (Appendix Ib)
 - (d) FI received on 21.1.2026# (Appendix Ic)
- * accepted and exempted from publication and recounting requirements
accepted and not exempted from publication and recounting requirements
- 1.12 On 1.8.2025 and 21.11.2025, the Rural and New Town Planning Committee (the Committee) of the Board agreed to the applicant's request to defer making a decision on the application for two months each.

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in the Application Form, SI and FI at **Appendices I to Ic**, and can be summarised as follows:

- (a) The proposed filling of ponds is to facilitate development of the permitted I&T Hub at the Site in the Technopole, which aims to be developed into a world-class I&T hub. As demonstrated in the technical assessments submitted, the proposed filling of ponds and associated works for the permitted I&T Hub will not cause adverse impacts on the Site and its surrounding areas in respect of environment, traffic, drainage and sewerage.
- (b) The proposed permitted I&T Hub is in line with the planning intention of the "OU(I&T)" zone on the OZP. The approval of the application for proposed filling of ponds to support the permitted I&T Hub would not set an undesirable precedent as the permitted I&T Hub aligns with the Government's initiatives to develop the I&T and low-altitude economy sectors, while addressing the relocation needs of the existing operators affected by the land

resumption of the development of the Northern Metropolis (NM) and upgrading the existing logistics operations.

- (c) One of the objectives of the proposed I&T Hub is to accommodate the five existing logistics sites (including the one falling within the Site) being affected by the land resumption of the Technopole, which are all managed by the applicant. Operators at these logistics sites will be arranged to be relocated to the Site upon approval of the application and completion of the I&T Hub, which could expedite the site clearance of the existing logistics sites for site formation works. According to the applicant's proposal, the first three floors of the proposed I&T blocks are reserved for smart warehouse for storage of goods/ stocks, operation and testing areas for modern logistics/ low-altitude economy operations, and industrial use, which could allow relocation of the existing logistics operations at the five sites as mentioned above. The remaining floors are reserved for R&D laboratories and offices.
- (d) The proposed I&T Hub will accommodate a range of I&T industries, including robotics and automation, artificial intelligence (AI), data-driven technologies, clean and renewable energy technologies and related smart manufacturing activities. It will adopt an "embedded industry-specific infrastructure" model which supports a full industrial cycle from R&D, prototyping, and testing to small-scale production, manufacturing, exhibition, and delivery within a single integrated building. Being a comprehensive supply chain management infrastructure, the proposed I&T Hub could increase operational efficiency which aligns with the "Conceptual Outline of Development Plan for Innovation and Technology Industry in San Tin Technopole" (the Conceptual Outline) promulgated by the Innovation, Technology and Industry Bureau (ITIB) (details at paragraph 5.2 below).
- (e) The proposed I&T Hub will adopt a "co-living with nature" concept, promoting harmonious co-existence between human activities and bird habitats. The design of the proposed I&T Hub has taken into account birds' flight paths through the incorporation of responsive design such as non-reflective building materials, terraced massing, aligned wind corridors and buffer zones.

3. Compliance with the "Owner's Consent/Notification" Requirements

The applicant is not a "current land owner" of the private land within the Site but has complied with the requirements as set out in the Town Planning Board Guidelines on Satisfying the "Owner's Consent/Notification" Requirements under Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31B) by publishing notices in local newspapers and sending notice to San Tin Rural Committee. Detailed information would be deposited at the meeting for Members' inspection.

4. Town Planning Board Guidelines

The Site is mainly located within WCA (about 81%), with the remaining area within the WBA (about 19%) in Deep Bay Area (**Plan A-1**). TPB PG-No. 12C is relevant to the application. Relevant extract of the Guidelines is at **Appendix III**.

5. Background

5.1 In October 2023, the Government promulgated the NM Action Agenda (NMAA) and

amongst the four major development zones proposed for the NM, the Technopole comprising the Hong Kong-Shenzhen Innovation and Technology Park (HSITP) at the Loop and the San Tin area forms part of the ‘I&T Zone’. The Technopole is positioned as the core of industry development of NM and a hub of clustered I&T development that creates synergy with Hetao Shenzhen-Hong Kong Science and Technology Innovation Co-operation Zone (Hetao Co-operation Zone) and contributes to the development of the ‘South-North dual engine (finance-I&T)’ industry pattern for the territory. To achieve the greatest synergy effect, a total of about 300 ha of I&T land is planned, comprising the 87-ha HSITP at the Loop⁸ as its core and an additional about 210 ha of I&T land in the San Tin area, which is zoned “OU(I&T)” on the OZP (the I&T sites), centred around and radiated from the Loop. While suitable flexibility has been allowed under the OZP, more detailed planning and design control should be achieved through the Planning and Design Brief (PDB) for these I&T sites in the Technopole. Endorsed by the Board on 3.10.2025⁹, the PDB is an administrative document which sets out the broad planning parameters, key development requirements and urban design considerations for guiding the design and implementation of the future I&T developments. To ensure that the planning and design requirements under the endorsed PDB will be implemented in the future I&T developments in the Technopole, Master Plan(s) should be submitted by the project proponent(s) for consideration and approval by the Designated Committee under the Development Bureau (DEVB). The Site at Area 19B of the San Tin Technopole OZP falls within I&T Cluster 3¹⁰ under the endorsed PDB (**Plan A-5**).

- 5.2 In November 2025, ITIB promulgated the Conceptual Outline, which provides a top-level design for the 210 ha of I&T land in the Technopole, including the Site, in terms of development vision, objectives and positioning, industrial spatial layout, and development model, thereby setting a clear development strategy for the Technopole. In terms of industry development, the Technopole can provide land of larger scale to support the development of strategic I&T industries such as life and health technology, AI and robotics, microelectronics and smart devices, new materials, new energy, and green technology. According to the Conceptual Outline, the Site falls within an area designated for “Life and Health, AI and Robotics” and “Microelectronics, Smart Devices, New Materials, New Energy, and Green Technology” zones (**Plan A-6**). Being part of the Phase 1 Stage 4 development under the Conceptual Outline, which refers to large-scale construction stage of the Technopole to form an industrial cluster effect, the Site is targeted to be developed between 2027 and 2035. In terms of development model, following the principle of a capable government and an efficient market, consideration can be given to the establishment of a dedicated company to take forward the development of the Technopole in collaboration with the market, thereby leveraging market resources to accelerate development and optimise development costs. As

⁸ The 87-ha HSITP at the Loop falls within the approved Lok Ma Chau Loop OZP No. S/LMCL/2.

⁹ The endorsed PDB is available at <https://www.nm.gov.hk/downloads/pdb-for-iandt-sites-on-the-san-tin-technopole-ozp-oct-2025.pdf>.

¹⁰ According to the endorsed PDB for I&T Cluster 3, the total GFA is about 909,300m² and major potential I&T uses for this Cluster include life and health technology, AI and robotics, microelectronics and smart devices, and advanced industries (e.g. new materials, energy and green technology). Supporting facilities such as exhibition and venture capital platform, data centre and computing facilities, professional services, research and academic institutions, knowledge exchange venues and retail and dining facilities may be included, subject to ITIB’s agreement. The endorsed PDB also requires, amongst others, which are relevant to the Site, the provision of two non-building areas each with a minimum width of 15m aligning in north-west to south-east direction linking the San Tin ‘Seven Villages’ to wetlands in Sam Po Shue, with at least 300m separation distance in between and encourages a stepped BH profile for building(s) descending towards the existing villages in vicinity of Cluster 3.

announced in the 2026-27 Budget, a dedicated company for the Technopole will be established this year to take forward the development while leveraging market resources to accelerate the progress.

5.3 In respect of site formation and engineering infrastructure works, the Site falls within Phase 1 Stage 2 development of the Technopole and it is targeted to seek funding approval from the Legislative Council (LegCo) in 2026/2027 for the associated works. After the establishment of ecologically enhanced fishponds in planned SPS WCP, which is expected to commence by CEDD in 2026/2027 the earliest, the pond filling works¹¹ at the area where the Site is located will tentatively commence by CEDD in mid-2027. Given the works and land resumption programme, the estimated dates of departure for the Site are partly not earlier than second half of 2026 and partly not earlier than first half of 2027.

5.4 The Site is not subject to any active planning enforcement action.

6. Previous Applications

The Site, in whole or in part, is the subject of seven previous applications (No. A/DPA/YL-ST/19, 20, 24, 28, and A/YL-ST/20, 45 and 91) for open storage of container trailers and tractors, temporary container trailer park, container vehicle parking and servicing uses, etc., with two approved and five rejected by the Committee or the Board upon review between 1993 and 2000. Considerations of these previous applications are not relevant to the current application due to different uses involved. Details of the previous applications are summarised at **Appendix IV** and their locations are shown on **Plan A-1**.

7. Similar Application

There is no similar application within the same “OU(I&T)” zone on the OZP in the past five years.

8. The Site and Its Surrounding Areas (Plans A-1 to A-5)

8.1 The Site is:

- (a) mainly occupied by ponds in its eastern portion, whereas the south-western portion is paved and occupied by brownfield operations including open storage of containers and warehouses;
- (b) currently accessible from San Tin Tsuen Road and Castle Peak Road – San Tin via local tracks and will be accessible from planned Road L13;
- (c) mainly located within WCA (about 81%) in its eastern portion, with the remaining area in its south-western portion located within WBA (about 19%) of Deep Bay Area; and

¹¹ One of the approval conditions of the approved EIA Report specified that no pond filling works shall be allowed prior to commencement of construction of the ecologically enhanced fishponds at the planned SPS WCP.

- (d) falling within the larger “OU(I&T)” zone in Area 19B of the San Tin Technopole OZP for planned I&T development at the Technopole, and I&T Cluster 3 under the endorsed PDB.

8.2 The surrounding areas are currently rural in character, predominated by ponds and brownfield uses which fall within the “OU(I&T)” zone for planned I&T development within the Technopole. Across the planned Road L13 to the east are existing village settlements which will not be affected by the development of the Technopole. To the further north is the planned SPS WCP.

9. **Planning Intention**

9.1 The planning intention of the “OU(I&T)” zone is primarily to provide development space for accommodating a variety of I&T uses, including research and development, production activities, data centre, staff accommodation/talent apartment, supporting commercial/retail facilities and other complementary infrastructure.

9.2 According to the ES of the OZP for “OU(I&T)” zone, as filling of pond may cause adverse drainage impacts on the areas and adverse impacts on the environment, permission from the Board is required for such activities.

10. **Comments from Relevant Government Bureaux/Departments**

10.1 The following government bureaux/departments have been consulted and their views on the application are summarised as follows:

I&T Development

10.1.1 Comments of the Secretary for Innovation, Technology and Industry (SITI):

- (a) does not support the application;
- (b) the application is not in line with “park-led” model for the Technopole. ITIB is inclined to adopt a “park-led” model for developing the land in the Technopole 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 times. A more “fragmented” development mode by individual private lot owners/ developers would and could unlikely achieve such objectives; and
- (c) the application is not in line with the planned uses of the I&T sites as set out in the Conceptual Outline promulgated by ITIB in November 2025, the Site (Phase 1 Stage 4 as suggested in the Conceptual Outline) is designated for “Life and Health, AI and Robotics” and “Microelectronics, Smart Devices, New Materials, New Energy, and Green Technology” zones (**Plan A-6**). Based on the information provided by the applicant, the main development component is mainly

related to the supply chain management/ smart logistics which do not fall under the industries planned for the I&T sites in the Technopole.

Project Interface

10.1.2 Comments of the Secretary for Development (SDEV):

the implementation mode or disposal of I&T land in the Technopole is under the purview of ITIB. DEVB noted that ITIB does not support the application, having considered that the application is not in line with the “park-led” model which ITIB is inclined to adopt for developing the I&T land in the Technopole, as well as the planned uses of the I&T sites as set out in ITIB’s promulgated Conceptual Outline. Accordingly, she does not support the application from the perspective of coordinating the overall development of the NM.

10.1.3 Comments of the Project Manager (North), Civil Engineering and Development Department (PM(N) of CEDD):

- (a) the Site falls within Phase 1 Stage 2 development of the Technopole. The pond filling works at the area where the Site is located will tentatively commence in mid-2027;
- (b) if the proposed pond filling works for the I&T Hub is taken forward by the applicant entirely under private initiative without coordination by the Government (e.g. CEDD), the effectiveness and comprehensiveness of the implementation of the relevant requirements/ recommendations/ proposed mitigation measures and approval conditions in the approved EIA Report at the Site could not be ascertained;
- (c) the applicant should observe the requirements/ recommendations/ proposed mitigation measures in the approved EIA Report and its approval conditions, associated Environmental Monitoring and Audit Manual, submissions specified in the approval conditions, and Environmental Permits issued/ to be issued for the Designated Projects as stated in the approved EIA Report, that are applicable to the Site and associated development and pond filling proposal, in particular:
 - (i) the applicant should liaise and coordinate with CEDD and relevant authorities regarding the pond filling sequence and programme to ensure that potential adverse impacts to the wetlands due to proposed construction activities can be minimised; and
 - (ii) no pond filling works shall be allowed prior to commencement of construction of the ecologically enhanced fishponds at the planned SPS WCP; and
- (d) the construction access routes proposed by the applicant will traverse, and may consequently be affected by, the proposed site formation

works, roadworks and the revitalisation works of STWMDC. The applicant should keep close liaison with CEDD.

Land Administration

- 10.1.4 Comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL of LandsD):
- (a) has adverse comment on the application;
 - (b) the Site falls within portions of private lot, i.e. Lot 764 RP in D.D. 99, which is an Old Schedule Agricultural Lot held under the Block Government Lease. No structure shall be erected without prior written approval of the Government; and
 - (c) no approval from any relevant authority(ies) has been given for the development of the proposed I&T Hub.

Agriculture, Fisheries and Nature Conservation

- 10.1.5 Comments of the Director of Agriculture, Fisheries and Conservation (DAFC):
- (a) does not support the application from nature conservation perspective;
 - (b) the Site involves pond filling works which have interface with the site formation works under the development of the Technopole to be carried out by CEDD as well as the approved EIA and its approval conditions;
 - (c) the applicant aims to establish a large-scale 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 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 operation and management of the SPS WCP were provided in the Planning Statement and/or other application materials;
 - (d) the Site is in close proximity to a constructed wetland provisioned under a drainage project, namely San Tin Constructed Wetland (Lotus Pond) (**Plan A-3**). 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 New Nature Conservation Policy Management Agreement projects administered by Countryside Conservation Office;
 - (e) as no EcoIA has been submitted by the applicant to demonstrate that the proposed filling of ponds will not lead to wetland loss and will not

cause negative impacts on the ecological value of the WCA, he cannot comment on whether the proposed filling of ponds for the permitted I&T Hub is acceptable from nature conservation perspective; and

- (f) there is no information related to fisheries except for the applicant's confirmation that no pond filling works will be carried out prior to commencement of construction of ecologically enhanced fishponds in SPS WCP. He cannot comment on whether the proposed filling of ponds for the permitted I&T Hub is acceptable from fisheries perspective.

Aviation Safety

10.1.6 Comments of the Secretary for Transport and Logistics (STL):

- (a) cross-boundary operation of low-altitude flights is one of the application scenarios tested under the Low-altitude Economy Regulatory Sandbox X. Based on the information provided, it does not appear that the applicant is involved in applications submitted under Sandbox X. Any future operation of such application scenarios would be subject to the prevailing policies and regulatory guidelines to be promulgated taking into account the experience of Sandbox X;
- (b) the Planning Statement and the submission materials has not specified any flight routes for cross-boundary low-altitude flying activities. While the Site is in close proximity to the North Border and ecologically sensitive areas (including Mai Po Nature Reserve and the planned SPS WCP), no specific mention has been made by the applicant to the potential bird strike hazard on the low-altitude flying activities. Further details on how aviation and public safety of low-altitude flying activities will be safeguarded against the potential bird strike hazard are necessary for the Transport and Logistics Bureau and Civil Aviation Department to provide more specific comments; and
- (c) noting the Site is in the vicinity of ecologically sensitive areas, the applicant should consult the related environmental groups, local communities and bureaux/departments.

Traffic

10.1.7 Comments of the Commissioner for Transport (C for T):

- (a) no comment on the application from traffic engineering perspective; and
- (b) advisory comments are detailed in **Appendix V**.

10.1.8 Comments of the Chief Highway Engineer/New Territories West, Highways Department (HyD):

- (a) no comment on the application from highways maintenance point of view; and
- (b) advisory comments are detailed in **Appendix V**.

Environment

10.1.9 Comments of the Director of Environmental Protection (DEP):

- (a) no adverse comment on the application from environmental planning perspective;
- (b) based on the submitted EA and SIA, it is considered that the proposed filling of ponds for permitted development would not cause insurmountable environmental problems;
- (c) considering that the proposed I&T Hub is always permitted within “OU(I&T)” zone in the OZP, an appropriate mechanism (i.e. land lease) is required on the submission and implementation of the measures identified in the Noise Impact Assessment for the proposed staff quarters of the proposed I&T Hub to demonstrate the compliance of the relevant noise criteria in Hong Kong Planning Standards and Guidelines/ Noise Control Ordinance, as well as on the submission and implementation of the measures identified in the SIA;
- (d) there is no substantiated environmental complaint pertaining to the Site in the past three years; and
- (e) advisory comments are detailed in **Appendix V**.

Landscape

10.1.10 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L of PlanD):

- (a) no adverse comment on the application from landscape planning perspective;
- (b) based on the aerial photos taken in December 2024/ January 2025, the Site is located in an area of rural coastal plain landscape character comprising fishponds, village houses, temporary structures, open storage and scattered tree groups;
- (c) with reference to the site photos taken in January 2026, the majority of the Site is fishponds and open storages are found in the southern part of the Site;
- (d) according to site visits conducted in June 2025, some existing trees are observed along the boundary of the open storage area and the dykes of the fishponds within the Site. They are of common species and generally of small/medium size and in fair/poor condition;

- (e) the Site falls within an area zoned “OU(I&T)” on the OZP and the proposed filling of ponds for the development of permitted I&T Hub is considered not incompatible with the landscape setting of planned developments in the proximity;
- (f) according to applicant’s submission, the proposed filling of ponds will neither cause adverse landscape impact nor tree felling. Landscape treatments such as minimum site coverage of greenery, buffer planting and ecological floating island are proposed. Significant adverse landscape impact arising from the proposed filling of ponds not anticipated; and
- (g) advisory comments are detailed in **Appendix V**.

Drainage

10.1.11 Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN of DSD):

- (a) no in-principle objection to the application from drainage point of view;
- (b) the Site is located in the vicinity of a flood prone area in San Tin. A large portion of area would be paved after the proposed filling of the existing ponds and it is anticipated that such change in catchment characteristics would result in additional runoff from the Site, which would likely increase the risk of flooding in the area, in view of the sensitive site location and the limited capacity of the existing drainage facilities. In order to holistically review the potential impacts caused by the proposed filling of ponds, a revised DIA should be submitted before commencement of the filling of ponds; and
- (c) advisory comments are detailed in **Appendix V**.

Fire Safety

10.1.12 Comments of the Director of Fire Services (D of FS):

- (a) no specific comment on the captioned application;
- (b) any excavation/construction works shall under no circumstances cause obstruction to nearby fire hydrants and their control valves in-situ. Should any relocation/blanking-off of fire hydrants be necessary, prior consent from this Department has to be sought; and
- (c) advisory comments are detailed in **Appendix V**.

10.2 The following government departments have no objection to or no adverse comment on the application and their advisory comments, if any, are provided in **Appendix V**:

- (a) Chief Engineer/Railway Development 1-1, Railway Development Office, HyD;
- (b) Head of Geotechnical Engineering Office, CEDD (H(GEO), CEDD);

- (c) Project Manager (West), CEDD;
- (d) Chief Engineer/Construction, Water Supplies Department;
- (e) Director of Electrical and Mechanical Services;
- (f) Chief Building Surveyor/New Territories West, Buildings Department;
- (g) Commissioner of Police; and
- (h) District Officer (Yuen Long), Home Affairs Department.

11. Public Comments Received During Statutory Publication Periods

The application was published for public inspection on 10.6.2025 and 27.1.2026. During the statutory public inspection periods, 16 public comments were received, including five supporting, six objecting to and five providing views on the application. Full set of public comments is at **Appendices VIa to VIc**. Their major views are summarised as follows:

Supporting Comments (Appendix VIa)

11.1 The supporting comments as summarised below are from the San Tin Rural Committee, Lok Ma Chau-Hong Kong Freight Association, and companies:

- (a) the proposed I&T Hub could provide warehouse and logistics spaces to address the shortage of logistics space, thereby providing relocation space for existing logistics industries and other affected operators in the Technopole, safeguarding livelihoods and employment stability;
- (b) the proposed I&T Hub could promote the upgrading of traditional logistics business by incorporating modern facilities, AI, and low-altitude economy applications, which could enhance Hong Kong's role as a cross-border logistics hub;
- (c) local economy could be promoted as the proposed I&T Hub could attract high value-added industries and create job opportunities for the local community, while providing community facilities; and
- (d) the applicant proposes an ecological buffer zone and other ecological mitigation measures in safeguarding environmental sustainability, while supporting the development of modern agriculture.

Objecting Comments (Appendix VIb)

11.2 The objecting comments as summarised below are from the Hong Kong Bird Watching Society and individuals:

- (a) no technical assessments, such as EcoIA, have been conducted. The ecological sensitivity and importance of the wetlands have not been considered and therefore not in line with WCA and the principle of "no-net-loss in wetland";
- (b) the applicant has provided misleading information in the submission in relation to the background of the Site, including its consent from and relationship with the registered landowner, as well as the operation history; and

- (c) the proposal is related to logistics operation rather than I&T facilities, which does not align with the Government's policy and is incompatible with the future I&T development, potentially causing noise and air pollution.

Providing Views (Appendix VIc)

- 11.3 Comments providing views as summarised below are from the Conservancy Association, Kadoorie Farm & Botanic Garden Corporation, and individuals:
- (a) as an important breeding ground and foraging ground for birds, wetland should be protected from pollution caused by pond filling works;
 - (b) insufficient information is provided regarding the implementation of the approval conditions of the approved EIA Report and the PDB, rendering it premature to approve any application involving filling of ponds;
 - (c) no technical assessments have been conducted to demonstrate that there will be no net loss in wetland function and adverse ecological and environmental impacts; and
 - (d) there is interface with the construction of the Technopole and the planned SPS WCP. It is uncertain whether the proposed pond filling works will contravene the approval conditions of the approved EIA Report.

12. Planning Considerations and Assessments

- 12.1 The application is for proposed filling of ponds for about 117,445m² (about 72% of the Site) with soil with concrete on top for a depth of not exceeding 5.9m at the Site zoned "OU(I&T)" (**Plan A-1**). According to the applicant, the proposed filling of ponds is to facilitate the development of a proposed I&T Hub subject to a PR of about 4.24, GFA of about 691,498m² and BHs of about 21mPD to 75mPD. Whilst the proposed uses to be accommodated at the proposed I&T Hub (as mentioned in paragraphs 1.1 and 1.4 above) are always permitted within "OU(I&T)" zone, filling of ponds requires planning permission from the Board.

Technical Considerations on Proposed Filling of Ponds

- 12.2 Filling of ponds in the "OU(I&T)" zone may cause adverse drainage impacts on the areas and adverse impacts on the environment, and requires planning permission from the Board. The applicant has submitted SIA, DIA and EA in support of the application. In this regard, CE/MN of DSD and DEP have no in-principle objection to and no adverse comment on the application from drainage and environmental planning perspectives respectively. Nevertheless, CE/MN of DSD considers that a revised DIA should be submitted before commencement of the filling of ponds in order to holistically review the potential impacts caused by the proposed filling of ponds. On traffic aspect, the applicant has submitted CTIA which concludes that carrying out of the proposed pond filling works would not generate adverse traffic impact on the surrounding road network, and C for T has no comment on the application from traffic engineering perspective. While the Site is currently occupied by ponds in its eastern portion and brownfield operations at its south-western portion, it falls within an area zoned "OU(I&T)" which is planned for I&T development. CTP/UD&L of PlanD has no adverse comment on the application from landscape planning perspective and considers

that the proposed filling of ponds for the proposed I&T Hub is not incompatible with the landscape setting of the planned developments in the proximity.

TPB PG-No. 12C and Ecological Aspect

- 12.3 The Site falls within WCA and WBA under TPB PG-No. 12C. The intention of the WCA is to conserve the ecological value of the fishponds which form an integral part of the wetland ecosystem in the Deep Bay Area, and any development within the WCA should be supported by an EcoIA. However, no EcoIA is submitted by the applicant. Although the applicant claims that an EcoIA would be submitted after the approval of the application, it is necessary to confirm the ecological acceptability of the proposed filling of ponds before the Committee considers granting a planning permission. In this regard, DAFC does not support the application from nature conservation perspective as no EcoIA has been submitted to demonstrate that the proposed filling of ponds would not lead to wetland loss and would not cause negative impacts on the ecological value of the WCA. As such, the applicant fails to demonstrate that the proposed filling of ponds would not have adverse ecological impact within the WCA and the proposed filling of ponds is considered not in compliance with TPB PG-No. 12C. Besides, for the low-altitude economy operation proposed for the I&T Hub, STL and DAFC consider that no information has been provided by the applicant on how aviation and public safety of the proposed low-altitude flying activities will be safeguarded against the potential bird strike hazard, and on the potential impacts from ecological perspectives.

Comprehensive Planning and Implementation of the Technopole

- 12.4 The Site falls within Phase 1 Stage 2 Development of the Technopole, which involves site formation works including filling of ponds, to be carried out by CEDD. The Site also falls within the project boundary of the approved EIA Report subject to approval conditions as detailed in paragraph 1.7 above. The applicant has committed to adhering to the recommendations and requirements of the approval conditions of the approved EIA Report and that no pond filling works will be carried out prior to the commencement of construction of the ecologically enhanced fishponds at the planned SPS WCP by CEDD. In fact, the project proponent (i.e. CEDD) shall comply with the approval conditions of the approved EIA report. PM(N) of CEDD also advises that should the proposed pond filling works for the I&T Hub be taken forward by the applicant entirely under private initiative without coordination by the Government, the effectiveness and comprehensiveness of the implementation of the relevant requirements/ recommendations/ proposed mitigation measures and approval conditions in the approved EIA Report at the Site could not be ascertained. Besides, SDEV does not support the application from the perspective of coordinating the overall development of the NM. In view of the above, the approval of the planning application would jeopardise the comprehensiveness of the overall development of the Technopole, including site formation and pond filling works, to be coordinated by the Government.
- 12.5 According to the NMAA, the Technopole forms part of the 'I&T Zone' and will become a hub for clustered I&T development that creates synergies with the Hetao Co-operation Zone. The "OU(I&T)" zone within the Technopole is intended for providing development space for accommodating a variety of I&T uses. To provide a clear development strategy for the development of the 210-ha I&T sites in the Technopole, ITIB promulgated the Conceptual Outline as detailed in paragraph 5.2 above. According to the Conceptual Outline, the Site is designated for "Life and Health, AI and Robotics" and "Microelectronics, Smart Devices, New Materials, New Energy, and

Green Technology” zones (**Plan A-6**). The Conceptual Outline also recommended a development model with the establishment of a dedicated company to take forward the development in collaboration with the market, and under the 2026-27 Budget, the Government has announced that a dedicated company will be established for the implementation of the Technopole.

- 12.6 According to the applicant, the proposed I&T Hub with low-altitude economy operation to be taken forward solely by private initiative will provide both I&T space and relocation space for the existing logistics operators affected by the implementation of the Technopole. However, the applicant did not provide detailed information on how the existing logistics operations, such as logistics centre, motor vehicle showroom, vehicle repair workshop, etc., will be relocated to and accommodated at the proposed I&T Hub, and how they are related to the proposed I&T Hub. In this regard, SITI does not support the application as the proposed I&T Hub is not in line with the “park-led” model for the Technopole, which aims to develop the I&T land in the Technopole in a more coordinated and holistic manner. SITI also considers that the proposed I&T Hub, with a focus on supply chain management/ smart logistics, is not in line with the I&T uses (as mentioned in paragraphs 5.2 and 10.1.1(c) above) recommended in the Conceptual Outline.
- 12.7 To achieve more detailed planning and design control for I&T sites under the OZP, a PDB for I&T sites on the OZP has been endorsed by the Board to guide the design and implementation of the future I&T developments. As required under the endorsed PDB, its planning and design requirements will be implemented via the submission of Master Plan(s) by project proponent(s) for consideration and approval by the Designated Committee under DEVB. The Site falls within I&T Cluster 3 under the endorsed PDB (**Plan A-5**). In the absence of a Master Plan for consideration and approval by the Designated Committee under DEVB, compliance with the planning and design requirements under the endorsed PDB cannot be ascertained at this stage. In addition, DLO/YL of LandsD has adverse comment on the application as no approval from relevant authority(ies) has been given for the proposed I&T Hub at the Site.
- 12.8 While the uses involved within the proposed I&T Hub are always permitted under the OZP, taking into account the comments of SITI, SDEV, PM(N) of CEDD and DLO/YL of LandsD above, it is considered that the applicant fails to demonstrate that the proposed I&T Hub is in line with the Government’s development policy of comprehensive planning and implementation of the Technopole and hence, there is no strong justification for the filling of ponds for the proposed I&T Hub.
- 12.9 Regarding the public comments as stated in paragraph 11 above, the planning considerations and departmental comments above are relevant.

13. Planning Department’s Views

- 13.1 Based on the assessments made in paragraph 12 and having taken into account the public comments as mentioned in paragraph 11, PlanD does not support the application for the following reasons:
- (a) the proposed filling of ponds is not in line with the Town Planning Board Guidelines for ‘Application for Developments within Deep Bay Area under Section 16 of the

Town Planning Ordinance' (TPB PG-No. 12C) in that there is no ecological impact assessment in the submission to demonstrate that the proposed development would not result in a net loss in wetland function and negative disturbance impact; and

- (b) there is no strong justification for the proposed filling of ponds to be carried out by the applicant for the proposed I&T Hub as the proposed I&T Hub is not in line with the Government's development policy of comprehensive planning and implementation including the site formation and pond filling works of the Technopole coordinated by the Government.

13.2 Alternatively, should the Committee decide to approve the application, it is suggested that the permission shall be valid until 13.3.2030 and after the said date, the permission shall cease to have effect unless before the said date, the development permitted is commenced or the permission is renewed. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval conditions

- (a) no filling of ponds should commence before commencement of the construction of the ecologically enhanced fishponds at the planned Sam Po Shue Wetland Conservation Park;
- (b) the submission of an ecological impact assessment and fisheries impact assessment for the proposed filling of ponds, and the implementation of the ecological and fisheries mitigation measures identified therein before commencement of the filling of ponds to the satisfaction of the Director of Agriculture, Fisheries and Conservation or of the Town Planning Board;
- (c) the submission of a revised drainage impact assessment before commencement of the filling of ponds to the satisfaction of the Director of Drainage Services or of the Town Planning Board;
- (d) in relation to (c) above, the implementation of the drainage proposal identified in the revised drainage impact assessment upon completion of the proposed filling of ponds to the satisfaction of the Director of Drainage Services or of the Town Planning Board; and
- (e) if any of the above planning condition (a), (b), (c) or (d) is not complied with, the approval hereby given shall cease to have effect and shall be revoked immediately without further notice.

Advisory clauses

The recommended advisory clauses are attached at **Appendix V**.

14. Decision Sought

14.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.

- 14.2 Should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.
- 14.3 Alternatively, should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the date when the validity of the permission should expire.

15. Attachments

Appendix I	Application Form received on 3.6.2025 and SI received on 6.6.2025
Appendix Ia	Planning Statement received on 3.6.2025
Appendix Ib	FI received on 30.9.2025
Appendix Ic	FI received on 21.1.2026
Appendix II	Major Development Parameters of the Proposed I&T Hub
Appendix III	Relevant Extract of TPB PG-No. 12C
Appendix IV	Previous Applications
Appendix V	Recommended Advisory Clauses
Appendix VIa	Public Comments (supporting)
Appendix VIb	Public Comments (objecting)
Appendix VIc	Public Comments (providing views)
Drawing A-1	Proposed Pond and Land Filling Plan
Drawings A-2a to A-2b	Master Layout Plan
Drawings A-2c to A-2g	Floor Plans
Drawing A-3	Proposed Stormwater Management Plan
Drawing A-4	Proposed Access Route for Construction Vehicles
Plan A-1	Location Plan with Previous Applications
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4a and A-4c	Site Photos
Plan A-5	Clusters of I&T Sites in the PDB for the Technopole
Plan A-6	Planning Framework of the Technopole in the Conceptual Outline

**PLANNING DEPARTMENT
MARCH 2026**