



香港城市設計學會
Hong Kong Institute of Urban Design

Reference Number: PAC/23/006

2 August 2023

By email: info@nm-santintech.hk

Dear Sirs,

Re: HKIUD's comments on "San Tin Technopole"

On behalf of the Hong Kong Institute of Urban Design, we would like to submit the attached file for your consideration our comments on "San Tin Technopole".

We are also pleased to meet relevant officers to further explain the contents therein if necessary.

Should further information be required, please kindly contact me or Ms. Cherry Lau, our Senior Administrative Officer at 2235 9057.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Jacky Cheung', written over a horizontal line.

(Jacky CHEUNG)

Deputy Chairman, Public Affairs Committee, HKIUD

Cc: Mr. FONG Hok Shing, Michael, JP, Director of Civil Engineering and Development

Email: michael.fong@cedd.gov.hk

Mr. CHUNG Man Kit, Ivan, JP, Dir of Planning

Email: imkchung@pland.gov.hk

Hong Kong Institute of Urban Design Limited

香港金鐘金鐘道89號力寶中心第二座5樓503室 Unit 503, 5/F, Tower Two Lippo Centre, 89 Queensway, Admiralty, Hong Kong
Tel: (852) 2235 9057 Fax: (852) 3007 3607 Web: www.hkiud.org Email: inq@hkiud.org



香港城市設計學會
Hong Kong Institute of Urban Design

HKIUD's comments on San Tin Technopole

Legco Paper:-

<https://www.legco.gov.hk/yr2023/english/panels/dev/papers/dev20230523cb1-506-3-e.pdf>

Consultation Website: <https://nm-santintech.hk/en/>

Excerpt from Legco Paper of 23 May 2023	Institute's comments
<p>I&T Park</p> <p>4. The I&T Park is located mostly to the north of San Tin Highway/Fanling Highway (land parcels coloured yellowish brown at Annex A). Underlining Government's strong commitment to I&T development, the I&T Park and the Hong Kong-Shenzhen Innovation and Technology Park (HSITP) at the LMC Loop will collectively provide 300 ha I&T land, accounting for half of the total development area of over 600 ha in San Tin Technopole. The 300 ha I&T land are capable of accommodating 7 million sqm of gross floor area, equivalent to 17 Science Parks, and comparable to the size of the 300 ha I&T zone in Shenzhen on the other side of the Shenzhen River.</p>	<p>Excessive Land Grant and Plot Ratio</p> <ul style="list-style-type: none"> - 7 million s.m. of development over 300ha of land. There is no clear justification for this astoundingly large quantity of land, no clear demand from industry and no indication that HK can attract such business in the face of competitors. Clear justifications on how this figure is reached are absent but essential. Explanations that it is the same quantity as on the Shenzhen side is not a reasonable justification; the situations are not comparable. - Assuming 35% land for open space and infrastructure, that will translate to a plot ratio of 3.6 which maybe too high for developments capped at only 100m in height and right adjacent to ecological sensitive area. - It is furthermore difficult to accept the land demand in the context of parallel development of Kau Yi Chau and its population target of 500,000 people and 270 jobs.
<p>5. Within the I&T Park, land parcels of various sizes, are designed to meet I&T facilities of varying scales and purposes, including a piece of 20 ha of government land to be released from the LMC Control Point when the co-located new Huanggang Control Point commences operation. To provide flexibility to respond to the ever-changing I&T</p>	<p>Flexible Zoning Concept needs Refinement</p> <ul style="list-style-type: none"> - While "flexible zoning" is an interesting new planning control mechanism, it also renders that there is NO planning control on building height, open space network, etc. This is not ideal for developments right next to ecological sensitive areas. There is no EIA report attached to the

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needs, flexible zonings permitting multiple uses and non-conventional land disposal means may be adopted (see paragraph 15 below). The I&T Park will be served by two major cross-boundary rail links, namely the proposed Northern Line (NOL) Spur Line connecting to the future co-located Huanggang Control Point, with new stations near Chau Tau and the HSITP at LMC Loop and the existing LMC Spur Line with LMC Station. On current planning, the first batch of unformed I&T land is expected to be available in the latter half of 2024 for works to start and become formed sites in 2026. The proposed Sam Po Shue Wetland Conservation Park (SPS WCP) outside but adjoining San Tin Technopole provides a unique wetland backdrop for the I&T hub while creating environmental capacity for its development.

Legco paper and the institute believes that, for public interest, any preliminary finding should be made known to the public.

Mass-transit Provision for IT Park

- While the Legco paper cited that the proposed I&T Park is serviced by two railways, it in fact is not served by any of them “directly”. They are at best in the fringe of the IT Park. Hong Kong is very successful in the design and implementation of Transit Oriented Developments (TOD) and the institute wonders why this successful model is not to be employed for this very important IT Park for the future of Hong Kong.
- At the least, the government shall consider implementation of other EFTS to serve the I&T Park from the 2 planned stations.

Avoid Monolithic Usage

- The sheer size of the proposed I&T Park is already quite a large town by itself. For good urban design and livelihood of the future users and residents, it should be of a more or less self-sustaining, mixed-use development with civic centre functions, open space network, community and institution facilities and residential flats, etc. A pure I&T Park, is an older planning concept, with poor previous outcomes in Hong Kong. It will render itself to become a dead peri-urban area after business hours. The IT Park should be fully integrated into, and as an extension of, the adjacent rural villages and San Tin New Town. This should be developed to provide educational, social and accommodation needs in a non-segregated manner.
- While we welcome having talent accommodation within the proposed I&T



	<p>Park, for a balanced and vibrant community, traditional residential uses and hotel facilities should also be included within San Tin to create a San Tin I&T Town. This should be within the 300 ha allocation.</p> <ul style="list-style-type: none">- The government shall release their proposed parameters on open spaces, GIC facilities, etc. for the I&T Park.
<p>6. San Tin Town Centre is located to the south of San Tin Highway/Fanling Highway. Built around the proposed San Tin Station of the NOL Main Line, San Tin Town Centre will supply about 50 000 public and private housing units, mostly within 500m walking distance from the station, starting from 2031 onward. The area is planned as a self-sufficient, integrated neighbourhood with comprehensive public and community facilities including an iconic recreational and cultural complex, comprehensive G/IC facilities and open space network. It can also provide daily support to those working and residing in the I&T Park.</p>	<p>Town Centre, Village, I&T Park Integration</p> <ul style="list-style-type: none">- The town centre as planned, from an Urban Design perspective, seems to be very isolated from its neighbours, no matter the I&T or existing villages. There is seemingly no town plaza with supporting GIC functions, etc. Cultural facilities which are planned relatively far from the two planned stations are not ideal.- There is no clear indication of pedestrian and cycling network in the PODP. We also opine that N-S pedestrian connection between the town and I&T Park shall be addressed.



<p>Development Parameters</p> <p>7. To put the land resources into optimal use, higher development parameters have been adopted for San Tin Technopole, including domestic plot ratio (PR) 6.5 for public housing sites and a maximum PR 6 for I&T land. Indigenous villages will be preserved and urban design will be adopted to foster urban-and-rural integration. Open spaces of varying sizes are also planned throughout San Tin Technopole to increase vibrancy of the community and make the outdoor environment more enjoyable. The I&T Park and San Tin Town Centre will together create 165 000 jobs or above (including 120 000 or more on I&T sites), improving home-job balance in the New Territories and reducing burden on public transportation to and from the traditional urban area.</p>	<p>Better Urban and Village Zone Integration</p> <ul style="list-style-type: none"> - Leaving indigenous villages all alone may not be the best solution. They should be more innovative mechanism not only to allow characters of indigenous villages be kept but enhanced for the enjoyment of the future residents and users. The development rights of indigenous village dwellers should also be considered through any innovative but acceptable means. - Ample studies need to be conducted for Heritage & Cultural Inventory, and we strongly suggest that the government need to urgently conduct social and cultural heritage assessment as a basic tool to better direct development opportunities. San Tin Village is traditional having a water body at its side, we believe for both environmental and fung shui reasons; it is currently proposed to be surrounded by developments and entirely cut of from any water bodies.
	<p>Other Comments:-</p>
	<p>Environmental Impact Assessment, Wetland Mitigation and Bird Flight Path</p> <ul style="list-style-type: none"> - Since the proposed developments are very close to environmentally sensitive area, the release of EIA, which is not available at the moment, to the public is essential. - In this connection, we are wondering where and how the government is going to compensate the vast area of wetland that will be consumed by the technopole and how the RAMSAR migratory bird flight paths can be “compensated”.



香港城市設計學會
Hong Kong Institute of Urban Design

	<p>Priceless Green Assets</p> <ul style="list-style-type: none">- The I&T park infringes massively on the existing greenfield, fishponds and ecological corridors adjacent to the Shenzhen River. This is a significant change from the original proposal for the technopole and threatens the overall balance of the strategy plan in ecological and landscape terms. No landscape buffer is provided between the I&T Park and Conservation Area which is standard conservation practice.- Government must realign its perceptions on land assets in the face of environmental & climate emergency and consider green space as assets for long term land value accrual and not short term exploitation. Myriad case studies exist globally to indicate development policy out of touch with objectives if attracting talent and quality development.
-	<p>Climate Emergency</p> <ul style="list-style-type: none">- Climate Emergency is bringing more severe living conditions globally. Conducting Climate Mapping Analysis is essential for the whole development area. Flood Plain development is at significant risk from serious flooding in the future and there is a presumption against such development. Ample studies should be undertaken to demonstrate that sufficient drainage can be undertaken, with an emphasis on nature based systems. Trends in insurance premiums for development in in such a vulnerable situation suggest such development is potentially unviable in future. <p>-</p>

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香港金鐘金鐘道89號力寶中心第二座5樓503室 Unit 503, 5/F, Tower Two Lippo Centre, 89 Queensway, Admiralty, Hong Kong
Tel: (852) 2235 9057 Fax: (852) 3007 3607 Web: www.hkiud.org Email: inq@hkiud.org



香港城市設計學會
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	<p>Envisioning a quality driven future</p> <ul style="list-style-type: none">- Current proposals are heavily encumbered by standard Hong Kong development approaches, which are no longer relevant in a global setting when trying to create quality living environments that are able to attract top notch talents. Developments that are founded on high environmental and social values, good quality of living conditions, and a connection with nature are intrinsic. A new sustainable planning & design strategy is needed for NM, out of the conventional way of developing new towns.
	<p>Significant Further Review</p> <ul style="list-style-type: none">- The proposals as tabled are extremely concerning and HKIUD seeks that the Government undertake significant further investigation, review, envisioning and consensus building before committing to the development. This requires prudent re-consideration of the programmed delivery as scheduled, which it would appear is being pushed through without necessary regard for fundamental understanding of the baseline or benchmarking of the market.

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