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7 May 2024

Ms. HO Pui Ling, Doris, JP
Permanent Secretary for Development (Planning & Lands)
Development Bureau
18/F, West Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

pspl@devb.gov.hk

Dear Ms. HO,

HKIA's Representation on Draft San Tin Technopole OZP No. S/STT/1

The Hong Kong Institute of Architects (HKIA) supports the draft OZP in principle as it addresses the acute shortages of land supply and housing units in Hong Kong while capturing the potential synergy with Shenzhen and fostering long-term benefits for the development of Hong Kong. HKIA have submitted the attached comments and suggestions for amendment of the OZP to the Town Planning Board on 7 May 2024.

HKIA kindly request the Town Planning Board's consideration of these comments and suggestions and we are committed to supporting the sustainable growth of Hong Kong and look forward to further engagement in the planning process.

Should there be any enquiries, please contact Mr. Nick KONG of the HKIA Secretariat at 2511 6323 or email to council@hkia.org.hk.

Yours Sincerely,

Benny CHAN Chak Bun, FHKIA, R.A.
President
The Hong Kong Institute of Architects

Encl.

Cc: Ms. LINN Hon Ho, Bernadette, JP, Secretary for Development, Development Bureau dev@devb.gov.hk

Cc: Mr. YAU Cheuk Hang, Vic, JP, Director, Northern Metropolis Co-ordination Office, Development Bureau d.nmco@devb.gov.hk

HKIA's Representation on Draft San Tin Technopole OZP No. S/STT/1

HKIA Support the Draft San Tin Technopole OZP No. S/STT/1 in principle, as it would ease the acute shortages of land supply and housing units in HK; capture the synergy with the Shenzhen in term of infrastructural and I&T development, cultural and ecological conservation and tourism, as well as education and nurturing of talents; and also capitalize the long-term benefits for future development of HK.

We have the following comments and suggestions for amendment of the draft OZP:

1. Public Open Space for Recreational Uses

Provision of public open space for active and/or passive recreational uses serving the needs of residents as well as the general public is supported. In addition to the uses proposed, community farms or agricultural uses should be permitted within Open Space to preserve existing rural assets.

2. Mixed Uses and OU developments around San Tin Station

Mixed Uses and OU developments around proposed San Tin Station is supported. Flexibility in height variations should be allowed especially for the "town centre" of the technopole, to achieve an interesting urban morphology. The current morphology has room for improvement. Instead of relying on a minor relaxation mechanism, there shall be a comprehensive review of the allowable building height arrangement. Alternatively, the maximum allowable GFA could be adjusted for some sites, while the overall development density remains unchanged.

3. Residential Elements in OU(I&T) Zone

Residential Elements within OU(I&T) Zone are supported. Staff quarters type of flat use is always allowed in column 1 of OU(I&T) zone will give possible round-the-clock activities within the Park. To further promote livability to retain talents, normal residences rather than just staff quarters shall also be allowed with the I&T Park. "Flat" use is allowed on Column 2. To encourage such a use, the government may indicate in the Remarks that, based on the individual merits, private residential developments occupying not more than a certain percentage, say 50% of intended no. of residential units may be considered.

4. Existing Drainage Channels STEMDC and STWMDC

Revitalization of the two existing drainage channels as part of the blue green infrastructure in the NBA is supported. They are more than 1km and 2km in length respectively. Instead of purely functional drainage channels, they can be planned alongside with recreational uses, parks, nodal points, and other amenity facilities together with creative landscape design for public enjoyment and leisure use.

The alignments of the two drainage channels cutting across the OZP as proposed could be more interesting and less restrictive. Consideration to allow a relatively easy mechanism to refine the alignments and extents of the two drainage channel zones should be included in the Remarks, to allow flexibility for more interesting urban design.

Part of the existing San Tin Technopole site is wetland and has the function as buffer zone during flooding period. The two drainage channels should also have an integrated flood resilient design, as part of the risk management measures.

It is also suggested in the Explanatory Statement that the two channels shall be more explicit in details on the flood resilient, amenity and biodiversity consideration design.

Only the STWMDC is zoned as 'O' or Open Space in the draft OZP. STEMDC should also be zone as 'O' to allow better use of the zone.

5. Landscape Deck at the junction of San Tin Highway and Road L14

San Tin communities will be bisected by the new San Tin Highway and new developments should be planned to bridge the divided areas wherever possible. Therefore, the provision of a landscape deck at the junction of San Tin Highway and Road L14 is supported.

Landscape deck should be zoned as OU instead, similar to Tin Shui Wai Public Market above Tin Fuk Road.

6. Statutory control in OU (Innovation and Technology) Zone on major development parameters.

Adequate statutory control in OU (Innovation and Technology) Zone over major development parameters such as Sustainability KPI, open space and greening ratio, preservation of the existing wetland, etc is desirable. Without clear statutory control, the future development is only resorted to administrative control through drafting of the lease, which is not transparent to the public and does not provide adequate safeguard to public interest for a highly environmentally, culturally and ecologically sensitive area.

Urban design guidelines including the concept of urban-nature integration, as well as urban-rural integration should be proposed.

7. Inappropriate Land Uses allowed under column one in OU(Innovation and Technology) Zone

Uses such as off-course betting centre and warehouse are not related to Innovation and Technology, and may be potential abuse. Such uses should be placed under column two instead.

8. Building Height Restriction adjacent to village zone

There are no clear building height restriction considerations for new developments around existing culturally sensitive historic villages/ buildings. Government's intention of urban-rural integration might be jeopardized.

Guidelines for achieving NM Action Agenda Vision 6 – Preserving Local Cultural Heritage should be established, including building height restrictions around existing cultural sensitive historic villages/ buildings, villages shrines, and fung shui trees.

9. Filling of fishponds and reduction of wetland area in area 19B and 19C

Rezoning of area 19B and 19C OU (Innovation and Technology) requires filling of fishponds and reduction of wetland area. The northern part of the STLMC area of the Technopole falls within the Wetland Conservation Area (WCA) or Wetland Buffer Area (WBA) (about 247 ha). Under the TPB-PG No.12C, Clause 5, the principle of "no-net-loss in wetland is adopted, and the no-net-loss can refer to both losses in "area" and "function". It is also noted in TPB-PG No.12C that the Guidelines are intended for "general reference only, and the decision to approve or reject an application rests entirely with the Town Planning Board, and will be based on individual merits and other specific considerations of each case".

Environmental protection and climatic resilience are of prime importance for the coming era. We hope that the Town Planning Board would ensure that the objectives under TPB-PG No.12C are met, and that net loss of wetland area is fully justified, information for which is not yet available to the public.

10. Urban-Rural Integration

Opportunities for urban-rural integration as stated in para 3.10 of TPB Paper No. 10954 have not been fully explored, as Village Type Development zone Area 22 is excluded from the zoning exercise. The building height restriction remain 8.23m, which is highly incompatible with the adjacent high-density development.

The new urban development should respect and integrate the original historical, cultural, social and environmental background as the elements of hybrid new planning which can have its own characteristic and growth with the new users for a successful co-living.

Many “Villages inside City” (城中村) on the Mainland have been turned into vibrant cultural recreational, RDE and tourist destinations and even becoming supportive residential supply sources. They are usually results of government facilitated private enterprise and villager cooperative efforts. In certain similar efforts elsewhere in the Mainland, as compensation to the villagers, low to medium rise residential buildings are allowed within the transition zone between village and urban areas.

Government should review comprehensively the possibility of urban-rural integration and development into cultural, retail & tourist destinations along with residential uses. Such objective should be indicate in the “Planning Intention” of “V” zone. In this connection, we suggest the adding of “Exhibition” and “Place of Recreation, Sports and Culture” to column 1, and the removing of the wordings of (Holiday House only) from Hotel use on column 2. A buffer area should be incorporated into adjacent zones for step down of height to existing communities.

11. OU (Mixed-Use) Zone – Mixed Domestic and Non-domestic Uses

In post COVID work culture, mixed use is the current lifestyle trend, and therefore is supported. Under Remarks (f), Section 16 application is required for mixed domestic and non-domestic uses in a building. It is suggested to streamline such clumsy procedure.

12. Locations of MTR Station

From the public consultation information, 2 stations are proposed to serve the San Tin area, which are unsatisfactory as they are very remote from the OU (Innovation and Technology) Zone. We note that only one can be identified in the current Plan.

Considerations shall be given to optimum locations for MTR station(s), reducing the reliance on road traffic, provision of centralized carparks at the peripheral, thus leaving more land for green spaces or developments. Green internal transportation networks e.g. bike links, and alternative sources of energy/ renewable energy vehicles that can reduce carbon emissions are encouraged to be used in this future I&T Park.

13. Urban-Nature Integration – Sensitive Interface

A more sensitive interface between Sam Po Shue Wetland Conservation Park and Technopole is desirable. Instead of arbitrary straight or curved boundaries that truncate the fishponds abruptly, Alternative idea on meandering boundaries following the footprints of the fishponds has been suggested to Government before, as shown in the conceptual ideas shown in Appendix A (Hard Copy will be sent by mail). It will create an interesting waterfront with longer interface with nature, for public enjoyment. Some existing fishponds inside the Technopole could be retained as ecological water features in the public open space.

**The Hong Kong Institute of Architects
7 May 2024**

NM : Idea on Alternative Interface between Technopole and Wetland



Current proposal in OZP No. S/STT/1

- Arbitrary boundary between nature and urban area, with fishponds along the boundary truncated.



Possible alternative

- Possible alternative boundary following existing fishpond footprints.
- Close integration of nature and urban area,
- Longer waterfront for human-nature interaction.
- Preservation of some existing fishpond as ecological water features in open space.

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- Close integration of nature and urban area,
- Longer waterfront for human-nature interaction.
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