



香港建築師學會
The Hong Kong Institute of Architects

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By Email and By Post
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Mr. CHAN Pai Ming, Jimmy, JP
Director of Highways,
Highways Department,
5/F, Ho Man Tin Government Offices,
88 Chung Hau Street,
Ho Man Tin, Kowloon

Dear Mr. CHAN,

Strategic Studies on Railways and Major Roads beyond 2030

The Hong Kong Institute of Architects (HKIA) appreciates the Transport and Logistics Bureau's invitation to join the Focus Group Meeting on 7 February 2023. It was a valuable opportunity for HKIA to contribute to the strategic development of our future transport network, which will enhance the backbone connectivity of the territory both within and beyond our border, steering the development of the city. We trust that our representatives' comments during the meeting were constructive to your studies, and we would like to reiterate herewith some of our more critical concerns below for your consideration:

Sustainability and Optimization

1. More railway as the major form of transportation is welcomed and supported. Meanwhile, we believe the needs for accommodating more roads and cars in Hong Kong should be minimized/optimized to achieve our net zero carbon and land use optimization goal.
2. We support the Government's advocacy on 'Capacity Creating', but the 'Infrastructure-led' principal has its drawbacks and should be more tactical. The principal should be re-examined in light of the demand on land take for our housing and development needs. Land use should be well planned before major roadways consume and dictate/restrict developments in the New Development Areas (NDA).
3. Hong Kong has a housing crisis with a shortage of land supply. It is unfortunate that the percentage of land use for roads (over 25%) is higher than that for housing (approx. 20%). The Government should work across bureaus to optimize the land required for roads and consider building developments above major highways like Transported Oriented Development (TOD) above railway stations, when Hong Kong architects have been leading this specialized typology in the world.



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Future City Vision

4. The studies should be broadened to review the whole of urban mobility beyond just rail and road developments. Design and planning for roads should not be prioritized towards cars, buses and lorries. Electric personal transportation, bicycles and pedestrians should be given the same level of consideration.
5. Before the railway infrastructure is executed, urban planning should consider road-based transport as well. Given that bus companies are gradually changing their fleet from petrol to electric / hydrogen buses, development should not wait till railways are ready before a town is built/ transformed. In any event, road-based alignments are needed for emergency services, logistics dispatch/ delivery services; and most importantly, as an alternative for people to travel when the railway services break down, which does happen sometimes. Providing alternative route/ transport mode is also essential to the planning of infrastructure. Road-based transport will also speed up the implementation of building / transforming/ upgrading (new) towns.
6. As the studies are prompted by the Northern Metropolis (NM) initiative which by itself is to draw from the synergy of neighbouring Shenzhen, the studies should indicate the transportation plan of the Greater Bay Area (GBA), particularly the more immediate Shenzhen, in order to have a holistic view of the needs and proposed routings/linkages.
7. From the Planning Department's (PlanD) previous study 'Hong Kong 2030+', an Eastern Knowledge and Technology Corridor from Hong Kong-Shenzhen Innovation and Technology Park (HKSITP) to Hong Kong University of Science and Technology (HKUST) through Hong Kong Science & Technology Park (HKSTP) was outlined, but it is not included in the strategic studies. It is understood that improvement to capacity along Tolo Highway is proposed, but the actual distance and time between these institutions will not be changed. This strategic relationship made in PlanD's 2030+ study to strengthen Hong Kong's Information and Communications Technology (ICT) position in the NM has not been addressed in the current studies.
8. The studies propose a new MTR line and major trunk road through the Kau Yi Chau Artificial Island (KYCAI). Water-based transportation in and around the Central Water should be examined in tandem with the rail and road proposal as KYCAI is located in the hub of marine traffic to the outer islands. The role of the Central Ferry terminal and also economic development of Hong Kong's outer islands can be positively transformed. In association with the road and rail studies, the Transport and Logistic Bureau (TLB) should study how slower forms of transportation such as ferry services can enliven our harbour and improve the city's liveability to attract international talent to Hong Kong.
9. The Central Business District (CBD) 1 at Central and CBD 2 at Kowloon East are lacking connectivity. If the Government is planning to create synergy amongst these CBDs with the



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new CBDs (at NM and KYCAI), there ought to be strategic connectivity as well. Having noted this, the strategic positioning of these CBDs are not well defined. Further strategic positioning of these CBDs and their functional requirements must first be established before the actual traffic requirements and forecast among all the CBDs can be decided.

Financial Viability and Traffic Analysis

10. Rail planning will traditionally consider passenger demand and viability first, but the current proposals are mostly requiring tunnels through remote part of the New Territories. The Government should review rough estimated costs even in the preliminary stage to avoid over expectation.
11. The proposed Central Rail Link would overburden Kowloon Tong MTR Station and existing East Rail, Kwun Tong and Tsuen Wan Lines, which are already at high capacity. Further traffic analysis is required to justify the proposed link and resolve the potential bottleneck.
12. The current studies seem to have negated previous proposals, such as the secondary rail link to TKO extension from Po Lam. With the increased population in Area 137, the existing TKO line will be overburdened and a potential 4th cross-harbour rail link to connect TKO and HK Lines should be considered.

We shall be grateful for your further information and response to the above comments. We would be happy to participate in future focus group workshops to co-create a better roadmap for Hong Kong's future.

Yours Sincerely,

CHAN Chak Bun, Benny, *FHKIA, R.A.*

President

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