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Designing Hong Kong's views on the Strategic Studies of Railways and Major Roads beyond 2030

Designing Hong Kong is writing to express our views and concerns over the *Strategic Studies on Railways and Major Roads beyond 2030* which was published on 2 December 2022.

Hong Kong-Shenzhen Western Rail Link (Hung Shui Kiu – Qianhai)

- We are highly concerned about the proposed railway building across the Deep Bay which is an ecologically sensitive area. We believe the construction and operation of the rail will interrupt the existing environment and habitats.
- According to the Northern Metropolis Development Strategy Report, the coastline near Lau Fau Shan is designated as Wetland Conservation Park, Coastal Protection Park and Waterfront Promenade. The construction and operation of the rail hinder public enjoyment and the effectiveness of protecting the landscape and environment in the area.

Central Rail Link

- We are highly concerned over the alignment of the proposed railway that may pass through and go underneath several Country Parks in Hong Kong.
- The construction of the railway and its associated infrastructure including excavation, construction of stations and construction of ventilation facilities may directly affect the Country Park or its surrounding

buffer areas.

- The construction of the railway is aimed to divert passengers from the Tuen Ma Line to the East Rail Line. However, since the extension of the East Rail Line to Hong Kong Island, the reduction from 12 cars to 9 cars per train, together with the increase of passengers on Hong Kong Island, makes the East Rail Line always crowded during rush hours. We are sceptical about the diversion would further add pressure to the existing East Rail Line system.
- Besides, apart from the North Kwai Chung and Tsuen Wan regions, there is a lack of existing residential clustering along the route. With limited catchment area for passengers, we are worried the construction of the Central Rail Link will bring huge disruption to the existing Country Park system but only a limited amount of people benefit from this proposal.

Tseung Kwan O Line Southern Extension

- We note that the proposed Tsueng Kwan O Line Southern Extension required land reclamation. We urge the Departments to discuss and keep close communication with related stakeholders including environmental groups to alleviate the possible damage to the environment and ecology in the area.
- The existing Tseung Kwan O Line operates with a branch line that connects to LOHAS Park. With the expected increase of population in Area 137, we are concerned about the capacity of the Tseung Kwan O Line as the line already serves a huge population in Hang Hau and Po Lam areas, we worry the further southern extension may scarify the existing demand of the city centre and overload the capacity of the existing rail line.

Northern Metropolis Highway

- We are highly concerned about the possible alignment of the highway as the area is surrounded by high ecological sensitive areas. We worry the construction and operation of the highway will bring adverse environmental impacts to the nearby farmlands, fishponds, wetlands, Ramsar site and Country Parks in the area.
- We consider the at-grade or above-ground option will bring damage to the natural environment during both the construction and operation period, especially during winter when thousands of migrating birds rely on the wetlands and fishponds in the area for food and shelter.

Shatin Bypass

- We are highly concerned over the alignment of the proposed bypass that may pass through and go underneath several Country Parks and Nature reserves in Hong Kong.
- The construction of the railway and its associated infrastructure including excavation, construction of emergency exits and construction of ventilation facilities may directly affect the Country Park or its surrounding buffer areas.

Tseung Kwan O-Yau Tong Tunnel

- With the newly opened Tseung Kwan O – Lam Tin Tunnel and Cross Bay Link, we consider the function of the proposed tunnel to be overlapped.
- We are concerned the construction and operation of the tunnel may also cause noise pollution to the nearby residents as both Tseung Kwan O and Yau Tong region has already well-developed.
- Even though the area surrounding Devil's Peak and Black Hill is not considered a high conservation value such as Conservation Area or Country Park, the area acts as a green buffer of the city and provides places for residents nearby for various activities. The area is one of the very few remaining natural shorelines and landscapes within the urban area in Hong Kong, we urge the government to protect the environment and landscape as much as possible.

Conclusion

- The proposed projects by the government can somehow strengthen the connectivity by expanding the existing road network to a wider area, however, it does not mean it could improve the efficiency of the transport network, especially for the three major proposals.
- It is widely understood that the construction of new roads will attract more vehicles and will have a higher chance of congestion. Besides, the expansion of the road network will also increase the incentive for the general public to own a private vehicle. It will further increase road usage and intensify the congestion problems and lower efficiency.
- Besides, if more cars are on the road, there are also higher emissions of greenhouse gases, which is against the carbon neutrality goals proposed by the Government.
- Instead of building new infrastructure, we suggest the government also investigate the existing road usage data, limiting the number of vehicles in the territory and further integrate different public transportation modes to ensure efficient and affordable public transport is delivered across the territories to strengthen the connectivity and efficiency of the transport system in Hong Kong.

Here we submit our comments and concerns for your consideration. Thank you for your kind attention.

Regards,

Designing Hong Kong Limited