

**Letterhead of The Hong Kong Institute of Architects**

7 February 2001

**Submission to LegCo Panel on Environmental Affairs  
And LegCo Panel on Transport Regarding Transport  
And Related Environmental Issues**

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1. Preference on rail over roads

Whenever possible, the Institute is of the view that priority should be given to use of rail as the mode of transportation of people and freight rather than roads. Rail offers the advantage of being underground and therefore eliminating noise at source; and the advantage of overhead where the use of advanced modern electric rail cars would keep noise impact to a minimum as well minimizing on air pollution. It should also be noted that rail has advantages in terms of traffic volume which it can carry and the high speed that it can travel at.

2. Roads to be submerged for better environment and urban space utilization

Where major new roads are to be designed and built, attention should be given to investigate the feasibility of submerging the roads below ground to reduce on the noise impact and to provide a more 'user-friendly' utilization of space at ground/street level. This would provide more land to be available for other uses instead of land being sterilized on both sides of the highway as is the case at West Kowloon. Proper ventilation and lighting, however, should be carefully incorporated into these submerged roads to ensure that the environmental qualities are not substandard.

3. Introduction of multi-level urban development concept

More opportunities should be given to permit some form of development both above and below the roads. This would on one hand serve as a form of enclosing the noise generated from traffic at source and on the other hand serve as a means of linking development on either side of the road.

4. 3-dimensional study of the City

While transport is a major issue in the design of urban space, it should be considered in a 3-dimensional context of the city.

Previously, planning studies tend to be transport-led. So much so that planning and other land use allocation only start after the transport engineers have set out the highways.

Planning studies should start with a 3-dimensional concept of the study area and only then to fit in the engineering requirements and vice versa.

5. Pedestrianization

In dense urban areas, the Institute strongly supports the introduction of pedestrian zones which reduce the noise and air pollution associated with vehicular traffic.

6. Luxury residential development in key urban areas

As in other major world-class cities, there will always be a portion of the population who will prefer to live in the heart of the city because of its vitality and its proximity to offices, retail centres and cultural complexes. To impose strict noise-impact control on these buildings without flexibility would result in buildings which are inward-looking with only kitchens and bathrooms fronting the streets. To satisfy the noise-impact controls, these buildings ignore the spectacular views available from the site. Government should permit some flexibility in the control of noise for these buildings.

7. Finally, the Institute is in full support of measures introduced to restrain heavy vehicles from using certain roads at certain times as well as eliminating transport noise at source.