

Letterhead of Friends of the Earth

**Friends of the Earth (Hong Kong)'s Submission
to Legco Panel on Transport**

Shenzhen Western Corridor and Deep Bay Link

5 November 2001

Friends of the Earth (FoE), established in 1983, is a charitable organization dedicated to protecting and improving Hong Kong's environment. We are gravely concerned about the lack of holistic transport planning and the environmental impacts of the proposed Shenzhen Western Corridor (SWC) and the Deep Bay Link (DBL). Our comments are outlined as below.

1. Deficiency in Transport Planning

The increase in traffic flow stimulated by The SWC will be diverted to

1) Yuen Long Highway and Tuen Mun Road and 2) Route 3. It should be noted that the Transport Bureau has two flawed arguments concerning the transport planning as follows:

- a) The Transport Bureau has estimated that these two routes will have sufficient capacity to cope with the increase in traffic flow. However, since Route 3 is a tolled road while Yuen Long Highway is a non-tolled road, and Route 3 is farther away from the SWC than Yuen Long Highway, it is hard to see how traffic congestion in Yuen Long Highway and Tuen Mun Road can be avoided if there is no economic incentive to divert traffic to Route 3. It is foreseeable that the traffic will be heavily concentrated in the non-tolled Yuen Long Highway, which will lead to congestion. The fact that nowadays a considerable number of truck drivers prefer the more time-consuming but non-tolled Tai Po Road to the tolled Lion Rock Tunnel has already illustrated that economic incentive has significant impacts on drivers' behaviour.

- b) The Administration also appears to disguise the congestion problem by claiming that Route 10, to be completed by 2010, will be the long-term solution to the problem. It is noteworthy that the SWC will be completed by 2005, 5 years earlier than the completion of Route 10. It is inevitable that Yuen Long Highway and Tuen Mun Road will be exposed to high risk of congestion during the 5-year time-lag.

The costs of traffic congestion and air pollution to health, business, tourism or individuals could deal a heavy blow to Hong Kong's economy. It is unfortunate that the Transport Bureau has failed to demonstrate a well-planned transport policy in regard to the SWC.

2. Air pollution derived from the cross-border traffic should be dealt with high-level governmental cooperation across the border.

Standards of fuel quality vary between Hong Kong and Shenzhen, and even among provinces on the Mainland. How to ensure that the in coming traffic from the Mainland will not worsen the air quality in Hong Kong will definitely be one of the focal points of environmental concerns. Due to the cross-border nature of this problem, it cannot be resolved at a project level. High-level governmental cooperation across the border is a must. However there is still no sign of such cooperation in due course.

3. Consultation should be conducted in an early stage with sufficient and non-biased information.

Various recent controversial cases including Long Valley Spur Line and Route 7 have demonstrated that the efficiency of public consultation was seriously hampered by late-stage consultation with insufficient, incomplete and even biased information.

Whilst FoE appreciates that the consultation of the SWC has been introduced in a relatively early stage, we urge the Administration to provide the public with sufficient, non-biased and complete information to the best of its ability so that the public can input in a timely, efficient and constructive manner.

3. Ecological Impacts

FoE also has grave concerns about the ecological impacts of the projects. However, due to the nature of this panel we would not discuss our concerns in this aspect at length in this submission.

Our Conclusion

In conclusion, effective transport planning must be based on good understanding of a project's various social, environmental and economic impacts, which is unfortunately lacking at this stage. FoE urges the Legislative Councillors to seriously scrutinize the SWC and its associated projects in regard to the lack of holistic transport planning and environment impacts.

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