

Hong Kong Institute of Planners

Route 10, Shenzhen Western Corridor and the Deep Bay Link

Submission to the LegCo Panel on Transport

Introduction

1. The Hong Kong Institute of Planners (HKIP) welcomes the decision of the Transport Bureau to review the alignment and extent of Route 10 and the Deep Bay Link. However, there is a similar concern to that which we previously expressed in relation to Route 7, concern that the review has been carried out without due reference to the future planning context for the North West New Territories and without a comprehensive consideration of the problem using sustainable development criteria.

Insufficient Information

2. Having reviewed the papers previously presented to the Transport Panel on Route 10 and the Deep Bay Link we consider that that information provided is insufficient to justify the proposal. There also appear to be inconsistencies and a lack of a clear function and need for the proposed Route 10 portion of the link.

Relationship to Policy Statements and Study Findings

3. We again find that there is little consistency between policy statements on transport and the decision making process in relation to transport infrastructure implementation. It has been stated as a policy that land use, transport and environmental planning would be closely integrated. However, the North West New Territories Study remains unfinished and details of the proposals for the Hung Shui Kiu New Development Area have not been finished or made public. It is therefore premature to propose a major road through this area until the land use planning context has been defined and accepted.

Environmental and Sustainable Development Considerations

4. The Sustainable Development Study (SusDev21) proposed a system for considering sustainable development criteria in Government decision making. This approach was indicated as being accepted by Government and it would have been appropriate to use such an approach in reassessing the Route 10 proposal.

5. The published “Environmental Report of Transport Bureau, Transport Department and Highways Department 1999/2000” includes the following Environmental Statement/Policy

“The Transport Bureau, The Transport Department and the Highways Department are committed to providing transport infrastructure and services in an environmentally acceptable manner to ensure the sustainable development of Hong Kong”.

6. The LEGCO Paper (CB (1) 356/01-02(05)) presented by Transport Bureau for discussion on the 23 November 2001 illustrates the ad-hoc nature of the decision-making process in relation to this route. The new alignment is the result of changes in design and alignment to meet reactions from various groups without any consideration of the long term implications nor any consideration as to what would be the best combination of transport connections, taking sustainability criteria into account.

7. The relationship of the proposed Route 10 through Hung Shui Kiu cannot be considered properly until the proposals for the Hung Shui Kiu New Development Area have been made public and gazetted by the Town Planning Board under the Town Planning Ordinance. In this respect it is not possible to state, as in paragraph 10 of the paper, that a more northerly connection would be unacceptable from a town planning point of view.

Best Use of Public Infrastructure

8. The proposals for linking the northern New Territories to Lantau and Kowloon should be looked at on a comprehensive basis, and should look at the best long term solution in terms of the sustainability of the transport network. The relative low cost of Tuen Mun Road without a toll compared to the cost of using the other tolled routes, such as The Tsueng Kwan O Tunnel, Tates Cairn Tunnel, Lion Rock Tunnel, Shing Mun Tunnels and Route 3, will always result in excessive demand on the Tuen Mun Road.
9. The under-utilisation of Route 3 appears to arise from the relative cheapness of Tuen Mun Road. It would therefore seem likely that the proposed Lam Tei Tunnel and the Siu Lam - Sham Tseng Tunnel, which are proposed to be tolled (paragraph 28), and more directly parallel Tuen Mun Road than Route 3, will also be subject to under-utilisation.

Conclusion

10. The purpose of Route 10, and the need for Route 10, does not appear to be clear identified or justified. A very narrow process of assessment has been adopted with no apparent consideration of its relationship to land use planning, environmental impact of the northern section, and no consideration of sustainable development criteria.
11. The limited information provided does not appear to present a good case for the expenditure of large amounts of public funds for a road link which may not be necessary. A comprehensive approach to the demand for new infrastructure would appear to be impossible until the impact of a equitable toll structure exists on all major north-south links, including Tuen Mun Road. The best use of the existing transport infrastructure should be assured before further expenditure is required.

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