

LETTERHEAD OF NOMOMETRIC DESIGN AND PLANNING CONSULTANTS LTD

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The Honourable Mrs. Miriam Lau Kin Yee, JP
Chairman,
Panel on Transport, Legislative Council
Legislative Council Building,
Central, Hong Kong

By Fax and by Hand

Dear Mrs. Lau,

Issues and Observations about the Proposed Route 10

I am writing in my professional capacity as a Town Planner on the captioned subject.

In the first instance, I would like to point out that Hong Kong is still keeping certain notable pieces of fairly recent infrastructure under-utilized, which is astonishingly contrast with its efficient and functional international image. **Hong Kong would be a much more efficient city if existing infrastructure are better utilized.**

I would particularly like to expound on the following few points:

1. **The Government ought not risk taxpayer's money on an unjustifiable 'alternative' traffic link**

The proposed Route 10 - which, when completed, will be geographically and alignment-wise closely duplicating with the existing Tuen Mun Road/ Castle Peak Road. Besides, it will be in a direct and keen competition with a well established (not withstanding the fact that it is privately owned) and capacity-wise roomful existing link - the Route 3 Country Park Section.

The likely effect of the combined effect of these two situations is --- Failure. Failure to attract enough traffic patronage and failure to share traffic loadings of the old road links. Since the existing Tuen Mun Road/ Castle Peak Road is

a free road, the Route 10 will easily be out-competed from lay drivers' logic of choice. Another likely effect would be the two tunnels (the proposed Route 10 and the existing Route 3) both suffer sustained losses.

From an overall point of view, this is like a lose-lose game benefiting nobody but hurting everyone. The worst scenario would be that eventually both tunnels (Route 10 and Route 3) are bounded to raise their fees due to inadequate patronage. There will only be more congestions at Tuen Mun Road / Castle Peak Road. The victims? the public at large of Hong Kong!

2. **Present Alignment of Route 10 not the most exhaustive option to expedite HK-PRD Logistics**

The Government's benign intention to expedite the realization of the Hong Kong - Pearl River Delta logistic pathway and the link to Disney by way of a system of consecutive highways from the airport all the way up to the core of the Pearl River Delta is appreciated. *That is only that the current alignment of Route 10 is not the most exhaustive option.* In my opinion, it is merely a 'comparable' option over the Route 3 already there! I would recommend the Legislative Council and the Government to think about seriously a real alternative - a subterranean and submarine tunnel leading straight down the Deep Bay Link via Tuen Mun to the Chek Lap Kok airport vicinity, which is supposed to be a much more efficient and apt solution to Hong Kong's aspiring logistic needs, rather.

3. **The proposed Route 10 is geographically biased, serving a biased sector hence risking the fate of becoming a white elephant when economic climate changes**

After analyzing the proposed highway networks from Chek Lap Kok via Deep Bay Link to the Western Coastal Highway of Shenzhen and further up, we come to recognize that the main function of the Route 10 is for the transportation of goods / logistics and not for passenger travel. It is also very geographically biased, mainly for serving the Lantau Island. Therefore, it seems to neglect other parts of Hong Kong and the need to also taking care for them. Is that goods sources and destinations must center around Lantau and nowhere else in the SAR? What about the Tai Po Industrial Estate, Junk Bay Industrial Estate, the Science & Technology Park at Pak Shek Kok, Sha Tin, or

even the Cyberport?

I trust that the modern world needs fast, adaptive, versatile (ie. multipurpose not unipurpose) type of facility to remain agile and competitive, but clearly the proposed Route 10 fail such criteria. Under contingent situations such as changed economic climate, it would easily become just another white elephant but nothing else, Japan has expensive examples. Indeed, the existing Route 3, in my observation, is geographically more optimally located; which means that choices are open for drivers wanting to reach other destinations. This is an important point, since sources and destinations of goods are often dispersely rather than singularly located!

Also, the Government seems attempting hard to try to differentiate patronage of Route 10 (emphasis on cross boundary inter-city goods transportation, or logistics) with Route 3 (emphasis on intra-city domestic trips). Nevertheless, the real world is complex; are the transport functions be so easily differentiable at will like zoning of land use? In fact, is it really so important to segregate goods traffic from domestic traffic? Are possibilities of multipurpose trips be given considerations, at all? Will traffic increase as predicted at She-Kou of Shenzhen? Or in fact drivers will still want to go through old routes at San Tin or Man Kam To where majority of 'informal' but much cheaper 'Container Storage Yards' are located around? Before such queries are thoroughly explored, permitting the Route 10 as proposed is perhaps immature and risky.

4. The Ability of creating spin-off benefits to the Greater Community

The Route 10 has no obvious spin-off benefits, that is, it could not benefit the community as a whole. Specifically speaking, while there are many distinguished examples for highway spin-off towns, the Route 10 will beget no new population settlements en-route whereby the Government could generate premiums by land sales and help to house new population quantum of the SAR. As a comparison, the continued use and increased patronage of the existing Route 3 will make convenient the rural township of Kam Tin and turn it into a promising large next generation new town! The sheer socio-economic benefits are much greater indeed.

In short, I am of the opinion that it is better to postpone the currently proposed route

10 Programmes until better planning is at hand for the eventual benefit of the community at large.

Yours sincerely,
for and on behalf of
Nomometric Design and Planning Consultants Ltd.

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