

Hong Kong Express Rail Link (XRL)

Submission 2

to Legislative Council v1.2

Case Ref.: LM(24T) to THB(T)L 10/25/3 (09)

1. 倫敦人口達一千三百萬，是一個世界級城市，也是全球最大的金融中心，更是一個政治、財務、教育、娛樂、媒介、時尚、藝術和文化大都會，與歐洲大陸的交往也非常頻繁。

北京與天津兩地有相同的政治、教育、娛樂、媒介、藝術和文化背景，兩地高鐵車程祇需 30 分鐘，天津更於去年協助北京舉辦部份 2008 奧運項目。

奧運年中，北京天津高鐵 加 英法高鐵 的乘客量的總和 也沒有政府所預測西九站每日 99,000 的七成半。請問政府對香港高鐵段乘客的估計是否過高呢？

2. 倫敦 St Pancras 國際高鐵站祇需 6 個月台，便能連接英國 68 個市鎮和歐洲大陸近百個地點。

天津高鐵站祇需 4 台 7 線便可縱貫北京、天津、上海 三大直轄市 和 河北、山東、安徽、江蘇四省，兩端連接環渤海和長三角經濟圈兩個經濟區域。

為甚麼西九站需要 15 月台那麼多？超過兩個全球最繁忙高鐵站的月台的總和！

3. 倫敦 St Pancras 國際高鐵站有通道直達 60 米處有 6 條地鐵線的樞紐。

天津高鐵站祇有 4 層，也實現了“零換乘”，旅客不出站便能直達公交區或在地鐵站地下層的 3 條地鐵線。

為甚麼西九站上下跨度達 35 米，縱深竟有 11 樓層那麼高，連一個公共交通和地鐵樞紐也沒有，而沒有不出站換乘的設計？

4. 高鐵站成功與否並不決定於是否在西九文化區，而是它銜接本地鐵路的能力。選擇高鐵站宗旨應是一個可給最多人方便使用和經濟的選址，應用 Rail Network Expansion Criteria 制定 Decision Matrix 來定高鐵站的選址。

我們是支持高鐵的發展，但反對西九的選址和設計。

(I) Introduction and Executive Summary

We support the National High-Speed Railway (XR) Network. To make sure it will success in Hong Kong, we here point out the problems with the G.N. 8022 West Kowloon Terminus scheme.

This submission will make relevant references to demonstrate why the location and design of the West Kowloon Terminus (WKT) is not suitable as a high-speed rail terminus.

The principle references are:

1. Hong Kong Highway Department's Railway Development Strategy 2000¹; particularly, its Table 2 Criteria for Formulation of Network Expansion Plans on page 8;
2. Hong Kong Transport Planning and Design Manual (TPDM) Volume 9 Chapter 8 - Public Transport Interchange; particularly its sections 8.3 Project Planning and 8.11 Passenger Facility Requirements;
3. Hong Kong Planning Standards and Guidelines on Waterfront Sites; particularly its Chapter 11 and Chapter 12²; and
4. Hong Kong RAILWAYS ORDINANCE³;

We will use Administration's own arguments and references to show the Administrative actions are capricious, beyond proportionality, and abuse of its discretion in selecting and designing of the West Kowloon Terminus.

We propose three straw-man XRL alternatives, including ProCommons' Kam Shan Road proposal. We ask the decision should made based on the above standards, guidelines and criteria and be consistent with Hong Kong's railway development strategy 2000.

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¹ http://www.hyd.gov.hk/eng/public/publications/srds_es/doc/RDS2_E.pdf

² http://www.pland.gov.hk/pland_en/tech_doc/hkpsg/full/ch11/pdf/ch11.pdf and
http://www.pland.gov.hk/pland_en/tech_doc/hkpsg/full/ch12/pdf/ch12.pdf

³ [http://www.legislation.gov.hk/blis_pdf.nsf/CurAllEngDoc/CE5120F0CB7E5B45482575EF0013298F/\\$FILE/CAP_519_e_b5.pdf](http://www.legislation.gov.hk/blis_pdf.nsf/CurAllEngDoc/CE5120F0CB7E5B45482575EF0013298F/$FILE/CAP_519_e_b5.pdf)

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(II) Put Things into their Proper Perspectives

A. National XR Network Perspectives



(source: tp_rdp1022-thb200910a-e.pdf)

From the National XR Network perspective, there is no difference in where we put the XR terminus inside Hong Kong as long as it provides convenient seamless and time-saving interchange to local metro network for connecting XR travelers to various population, employment and economic activity centers in Hong Kong.

國家高速鐵路網(四縱四橫) 接駁國家高速鐵路網，可達 16 個城市。

National High Speed Passenger Lines (Four East-West lines and Four South-North Lines) connect to High Speed Railway Network of the Mainland, reaching 16 cities. We will draw a comparison between Tianjin 天津 and Hong Kong XR termini.

Since our Government and experts like to refer to the European high-speed railroad network, here we take a closer look at the European XR network, particular to draw a parallel analogy between Hong Kong to mainland China and London to continental Europe.

European High Speed Rail Network



(source: europehighspeed.jpg)

Eurostar, the high-speed passenger train service that links UK to mainland Europe, connecting 68 UK towns and cities to Paris, Disneyland Resort Paris, Brussels and over 100 places across Europe.

(source: http://www.eurostar.com/UK/uk/leisure/about_eurostar/press_release/press_archive_2008/high_speed_1_record_year_eurostar.jsp
and http://www.eurostar.com/UK/uk/leisure/travel_information/before_you_go/route_maps.jsp)

B. Patronage – XR Passenger Trips

London has 12 million and 14 million metropolitan population and is a major global city and one of the world's largest financial centres. London's influence in politics, finance, education, entertainment, media, fashion, the arts and culture in general contributes to its global position. Hong Kong's XR patronage could not be more than that of London⁴.

Tianjin with 11,760,000 population closely tied to Beijing's politics, education, entertainment, media, arts and culture just 30 minutes away. Guangzhou residents would not take **hour-and-half to two hours**⁵ journey time to West Kowloon Cultural District for watching some Hongkongese arts and culture that they cannot relate to or even understand.

Tianjin and Beijing cohosted the 2008 Beijing Olympic in last year⁶. Adding patronage of the Tianjin XR Terminus in the busiest year plus that the busiest London XR Terminus in Europe together is still less Hong Kong Government's estimated 99,000 daily patronage of West Kowloon Terminus.

How could the dead-ended WKT be busier than London, the European's busiest XR Terminus, **plus Tainjin**, in the high traffic 2008 Olympic year 30-min from Beijing, **all together**?

Administration's XRL daily patronage 99,000 forecast is highly questionable because it is higher than the **total** patronage of the busiest UK/London to continental Europe (after 15 years of operation) XR services **plus** that of Beijing to Tianjin, two 大直轄市 just 30-min apart, in the busiest 2008 Olympic year, **all together**.

C. Numbers of XR Platforms

London XR Terminus 倫敦高鐵站

London's St Pancras International XR Terminus connecting London and other 68 cities and towns in UK to over 100 places across Europe, it takes only six (6) platforms. How could West Kowloon Terminus requested fifteen (15) platforms?

The well-developed high-speed train services from London to Europe are still not providing n-to-n connections to all European cities. Long haul XR services from London services to continental Europe use the Paris Nord or Brussels XR hub to reach out the distant European destinations⁷.

London's St Pancras International XR Terminus takes only six (6) XR platforms to serve 14 million London population and 68 UK cities and towns to over 100 places across Europe. West Kowloon Terminus for sure does not need to have fifteen (15) XR platforms.

⁴ After operating 15 years, Eurostar "broke the eight million mark for the first time with 8.26 million travellers carried". http://www.eurostar.com/UK/uk/leisure/about_eurostar/press_release/press_archive_2008/high_speed_1_record_year_eurostar.jsp

⁵ Metro from Guangzhou to Shibi and XRL from Shibi to West Kowloon.

⁶ In the year of Beijing Olympic, "京津城际铁路运送旅客 1 8 7 0 万人次" i.e. http://www.gov.cn/jrzg/2009-07/31/content_1380496.htm

⁷ http://www.eurostar.com/pdf/timetables/Continental_connections.pdf

Tianjin XR Terminus 天津高鐵站

Tianjin 天津 has 11,760,000 population. Administratively it is one of the four municipalities with provincial-level status, reporting directly to the central government, which is just 30 minutes; like 荃灣 to 中環.

Tianjin XR Terminus is not a dead-ended like the West Kowloon Terminus. Besides serving as the Beijing–Tianjin Intercity High Speed Rail, the 京滬高速鐵路 also 縱貫北京、天津、上海 三大直轄市 and serves 河北、山東、安徽、江蘇四省，兩端連接環渤海和長三角經濟圈兩個經濟區域。

Hong Kong's XR need cannot be more than that of Tianjin.

Tianjin XR Terminus takes **only 4 台 7 线** for all above XR services.

How could West Kowloon Terminus need **fifteen (15)** XR platforms?



(source: <http://www.fskx.gov.cn/BG/News.shtml?id=109064> and W020090311339568757656.jpg)

D. WKT Terminus 西九龍高鐵站 does not need 15 XR platforms; 6 XR platforms are plenty

Given a long haul train would occupy a platform for approximately 30 minutes, a good planning would allow a long haul service pair to arrive and leave a platform at every half hour frequency.

In an 18-hour day, a platform would provide 72 long-haul XR trains in and out Hong Kong; which is equivalent to 432 passenger flights⁸.

Today HKIA daily has only 71 passenger flight pairs⁹ between Hong Kong and inland China.

Long-Haul	Platform #1 Arrive >> >> Leave	Platform #2 Arrive >> >> Leave	Platform #3 Arrive >> >> Leave
0.00	T1a	train-pair frequency at every 30 minutes	
0.05	v		
0.10	v	NOT USED	NOT USED
0.15	v		
0.20	v	Or Reserved	Or Reserved
0.25	v T1d		
0.30	T2a		
0.35	v		
0.40	v		
0.45	v		
0.50	v		
0.55	v T2d		
0.60	T3a		
0.65	v		
0.70	If inter-arrival time is longer than processing time, then only 1 platform is needed.		

0:00:00 Platform Cleared

00:52.6 T1a: In-Bound Train #1 Decelerating Safely to a Full Stop at Platform

28:14.8 Occupy Platform 28 Minutes for Passengers Alight and Aboard

00:52.6 T1d: Train #1 Depart from Platform and Switch to Outbound Rail

0:30:00 Platform Cleared for Next Train's Arrival

That is, one long-haul platform is sufficient to provide more than 6 times of today's traveling demand between Hong Kong and inland China, mainland China beyond Guangzhou.

⁸ Short trains: 600 persons per train; Long trains: 1,200 persons per train; Passenger flight : 200 persons/plane

⁹ on 2009-11-25 <http://flights.ctrip.com/international/SearchFlights.aspx>

One platform can serve 36 inbound long haul XR trains receiving 43,200 XR travelers daily from inland China to Hong Kong. 43,200 are more than the total 33,908 international travelers¹⁰ flew into Hong Kong from ALL over the WORLD, including those from the whole China, in a day. Why does WKT need 9 platforms (or daily 388,800 passengers capacity) for just only 15,000 long haul patronage? Strictly speaking, we need only **one** platform for all the long haul XR train arrivals and departures.

“Nine long haul platforms are proposed and one catering for occasional delayed trains or other special circumstances. For planning purposes, each train movement will occupy an approximately 30-minute platform slot for the necessary processes.”

(source: tp_rdp1022-thb200910a-e-Main.pdf)

London’s and Tianjin’s Government and experts must have also considered all operation needs, delayed trains, special circumstances and future expansion and growth, but the **sum** of the XR platforms in these two large XR stations in Europe and in China is still **less than** the number of platforms in West Kowloon Terminus.

Are the London and Tianjin experts stupid or the mastermind behind the West Kowloon Terminus is too smart?

“Six short haul platforms for XR trains in the 1-hour range to Guangzhou.”

Even we decide to run the XL train services just like a local metro line, say a train pair at every 10 minutes frequency to and from Guangzhou. One platform is already sufficient to run a frequent train schedule at 10-minute intervals.

At 10-minute frequency, a short haul XR train platform has a capacity to support daily 129,600 passengers, which is already 47% over the Government’s 84,000 patronage.

Short-Distance	Platform #1		Platform #2		Platform #3	
	Arrive >>	>> Leave	Arrive >>	>> Leave	Arrive >>	>> Leave
0.00	T1a	train-pair frequency	every 10 min; stopping 5-8 min at platform			
0.05	v	T1d				
0.10	T2a		NOT USED		NOT USED	
0.15	v	T2d				
0.20	T3a		Or Reserved		Or Reserved	
0.25	v	T3d				
0.30	T4a					
0.35	v	T4d				
0.40	T5a					
0.45	v	T5d				
0.50	T6a					
0.55	v	T6d				
0.60	T7a					
0.65	v	T7d				
0.70	If inter-arrival time is longer than processing time, then only 1 platform is needed.					

0:00:00 Platform Cleared

00:52.6 T1a: In-Bound Train #1 Decelerating Safely to a Full Stop at Platform

08:14.8 Occupy Platform 8 Minutes for Passengers Alight and Aboard

00:52.6 T1d: Train #1 Depart from Platform and Switch to Outbound Rail

0:10:00 Platform Cleared for Next Train's Arrival

Strictly speaking, with good planning, two platforms can support all XR trains with lots of capacity to Guangzhou and mainland China. After considering the occasional delayed trains and other special circumstances, we could double it to **four** (4) platforms covering 249% contingency and future expansion, providing a capacity of 3.5 times of Government’s optimistic 99,000-patronage forecast.

Four (4), at most six (6), XR platforms should be plenty for the West Kowloon XR Terminus.

Government requesting 15 platforms has really gone beyond the principle of proportionality.

Furthermore, Hong Kong could use the New Guangzhou XR hub¹¹ and Longhua XR hub to provide long-haul XR services just as London does using PARIS NORD and BRUSSELS XR hub termini to provide long-haul XR services for UK travelers¹² daily to various continental Europe¹³ destinations.

¹⁰ on in June 2009; Hong Kong Monthly Digest of Statistics, B12100032009MM09B0100.pdf

¹¹ tp_rdp0917cb1-2582-1-e.pdf

¹² Passenger numbers broke the eight million mark for the first time with 8.26 million travelers.

Please do not abuse the RAILWAYS ORDINANCE to 霸地 and asking taxpayers to pick up the \$65B bill for a private shopping mall empire.

(III) All XR Termini, except West Kowloon Terminus, have convenient metro hub support

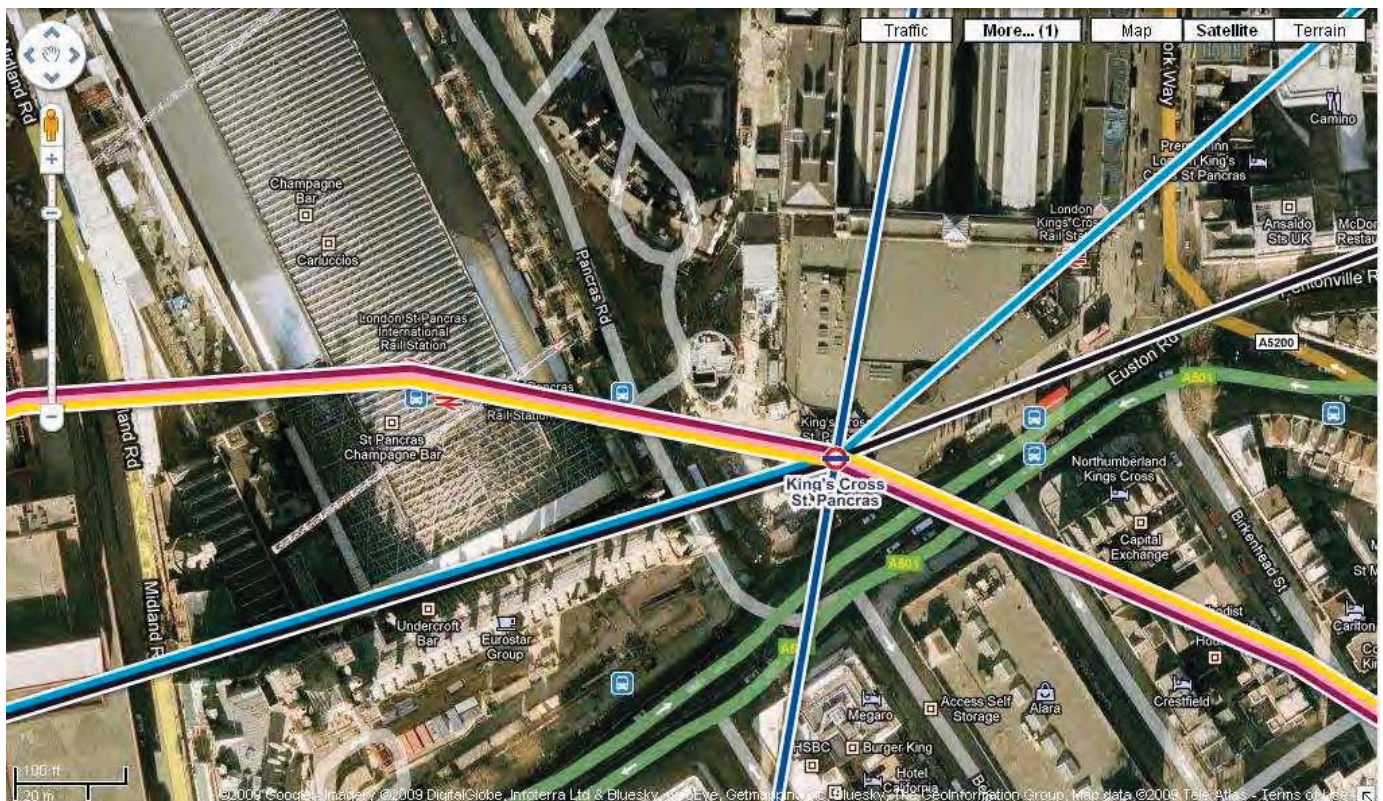
All high-speed rail stations, except West Kowloon Terminus, have a common point - they all have a metro hub conveniently connected to local metro lines.

(source: tp_rdp0917cb1-2650-1-ec.pdf)

London's St Pancras XR Terminus 倫敦高鐵站

St Pancras railway station (was opened in 1868; also known as St Pancras International) is a major railway station situated in the United Kingdom. A security-sealed terminal area was constructed for Eurostar services to continental Europe—via High Speed 1 and the Channel Tunnel—along with provisions made for domestic connections to the north and south of England through nine (9) national rails and six (6) London Underground lines (i.e. metro rails 地鐵).

(source: http://en.wikipedia.org/wiki/St_Pancras_railway_station#Requirement_for_a_new_station)



London's St Pancras International XR Terminus has an underground concourse directly link to the King's Cross metro hub just 50 meters away with six (6) London Underground (metro) lines running through it.

London's St Pancras XR Terminus has an underground concourse directly and conveniently connecting XR travelers to King's Cross metro hub with six (6) major London Underground (metro) lines for reaching out various population, employment and economic activity centers in London.

Being in the centre of London is merely a coincidence as the city grown around the 142-old station. The main reason of St. Pancras railway station chosen as the Eurostar's International XR Terminus is its 6-Underground metro hub. Being able integrated with the local rail transportation hierarchy to bring XR travelers to various city population, employment and economic activity centers is essential to the success of an XR terminus.

The Eurostar platforms do not occupy the full width of the Barlow train shed, and sections of the floor of this area have been opened up to provide natural light.

In the central of London, Europe's financial center, they have a simply but nice, welcoming and releasing XR terminus together with a congenial metro interchange conveniently connecting travelers to London's population, employment and economic activity centers.

Why can't we have something nice like this?

(source: Eurostar_at_St_Pancras_Jan_2008.jpg)



Guangzhou XR Terminus 廣州高鐵站

Guangzhou XR Terminus has an in-station metro hub with 4 metro lines connecting XR travelers to Guangzhou's and Foshan's population, employment and economic activity centers.

廣州高鐵站是個鐵路線路樞紐(transport hub)接駁不同層次的鐵路和公路網，包括一

市內地鐵：廣州 **地鐵 2 號線**（至廣州火車站和越秀區）、
 廣州 **地鐵 7 號線**（至番禺區和黃埔地區）、
 廣州 **地鐵 12 號線**（至沙灣鎮和廣州新城）及
 佛山 **地鐵 2 號線**（至佛山高明區）

as well as 高速鐵路：廣深港客運專線（至香港）、武廣客運專線（至武漢）、
 貴廣鐵路（至貴陽）、南廣鐵路（至南寧）

城際軌道：廣州-珠海城際軌道

高速公路：東新高速(至番禺)、廣明高速(至高明)、廣珠西線高速(至珠海)、
 平南高速(至南沙) 以及 現有的高速公路網路

汽車客運：廣州新客站將有公交車服務，覆蓋珠三角主要城市

(source: tp_rdp0917cb1-2582-1-c.pdf)

Tianjin XR Terminus 天津高鐵站

《天津站交通枢纽规划方案》天津站地区作为城市对外交通和城市内部交通的重要枢纽，除了现有铁路、公交等交通服务设施外，还有规划的 **地铁 2 号线**、**地铁 3 号线** 和 **轻轨 9 号线** 三条轨道线路通过该换乘枢纽站。

(source: <http://gov.finance.sina.com.cn/zsyj/2005-08-31/68173.html>)

Beijing XR Terminus 北京高鐵站

北京市內地铁 (metro)：北京**地铁 4 号线**（试运行中）站台为岛式 1 台 2 线的地下站台。

北京**地铁 14 号线**（规划中）站台为岛式 1 台 2 线的地下站台。

国铁：京沪线、京广线、京九线、京津城际铁路、京沪高速铁路

出站旅客可直接进入东西两侧的小汽车、出租车载客区和南北两侧的公交载客区完成换乘。

(source: <http://www.soufun.com/2008/2008-08-25/2032379.htm>)

Guangzhou, Beijing and Tianjin XR Termini all have an in-station Public Transport Interchange integrated with bus terminus and major metro lines.

Why can't we have a PTI in West Kowloon Terminus?

Rome XR Terminus 羅馬高鐵站

Roma Termini (or in Italian, Stazione di Roma Termini) is one of the largest train stations in Europe. The station has regular train services to all major Italian cities as well as daily international services to Paris, Munich, Genève, Basel and Vienna.

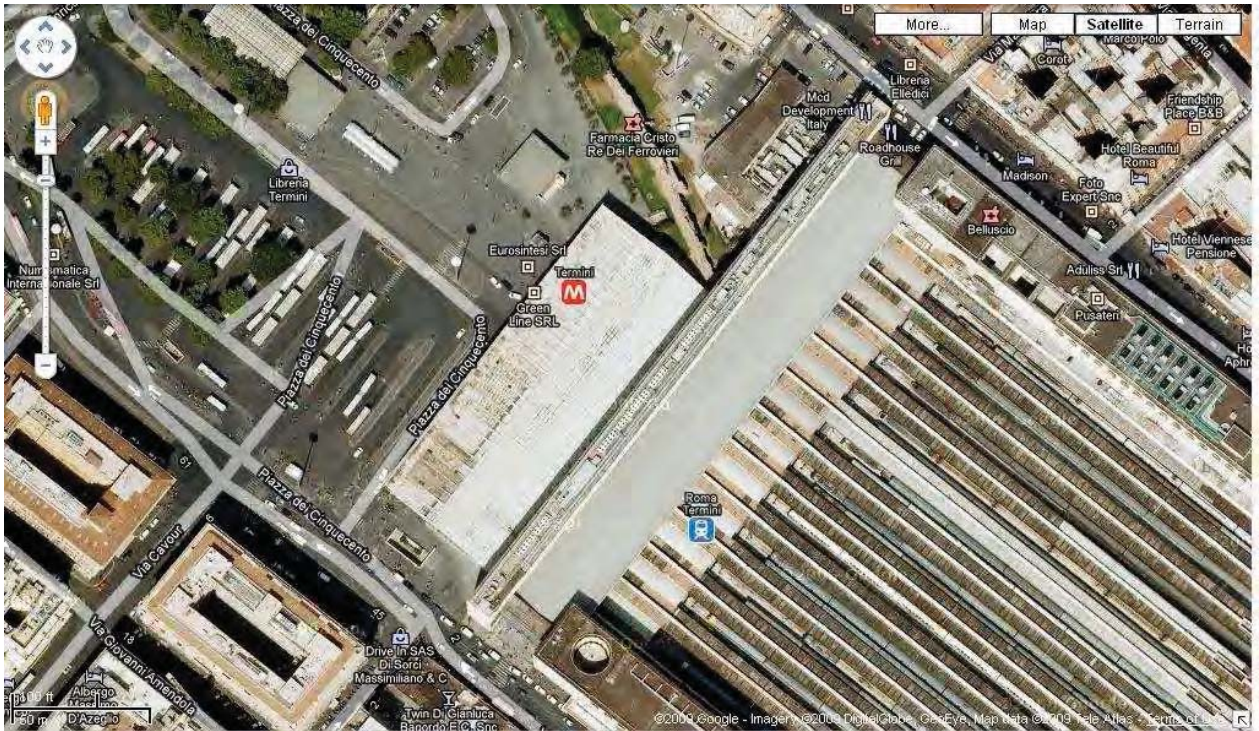
Termini is also the main **hub** for public transport inside Rome, a major bus station is located at Piazza Cinquecento, the square in front of the station and with all Metro lines (A and B) intersect at and inside the Termini.



(source: http://en.wikipedia.org/wiki/Rome_Termini_Station)

Rome's XR Termini also has a convenient and straight forward in-station interchange to all Rome's metro lines connecting XR travelers to Rome's population, employment and economic activity centers.

All high-speed rail stations, except West Kowloon Terminus, have a convenient and seamless interchange to metro hub to provide hierarchy transport services between XRL and local metro links.



Rome's XR Termini also has a public bus terminus right outside the XR Termini.

WKT Terminus 西九龍高鐵站 has no In-Station PTI bus and metro hub

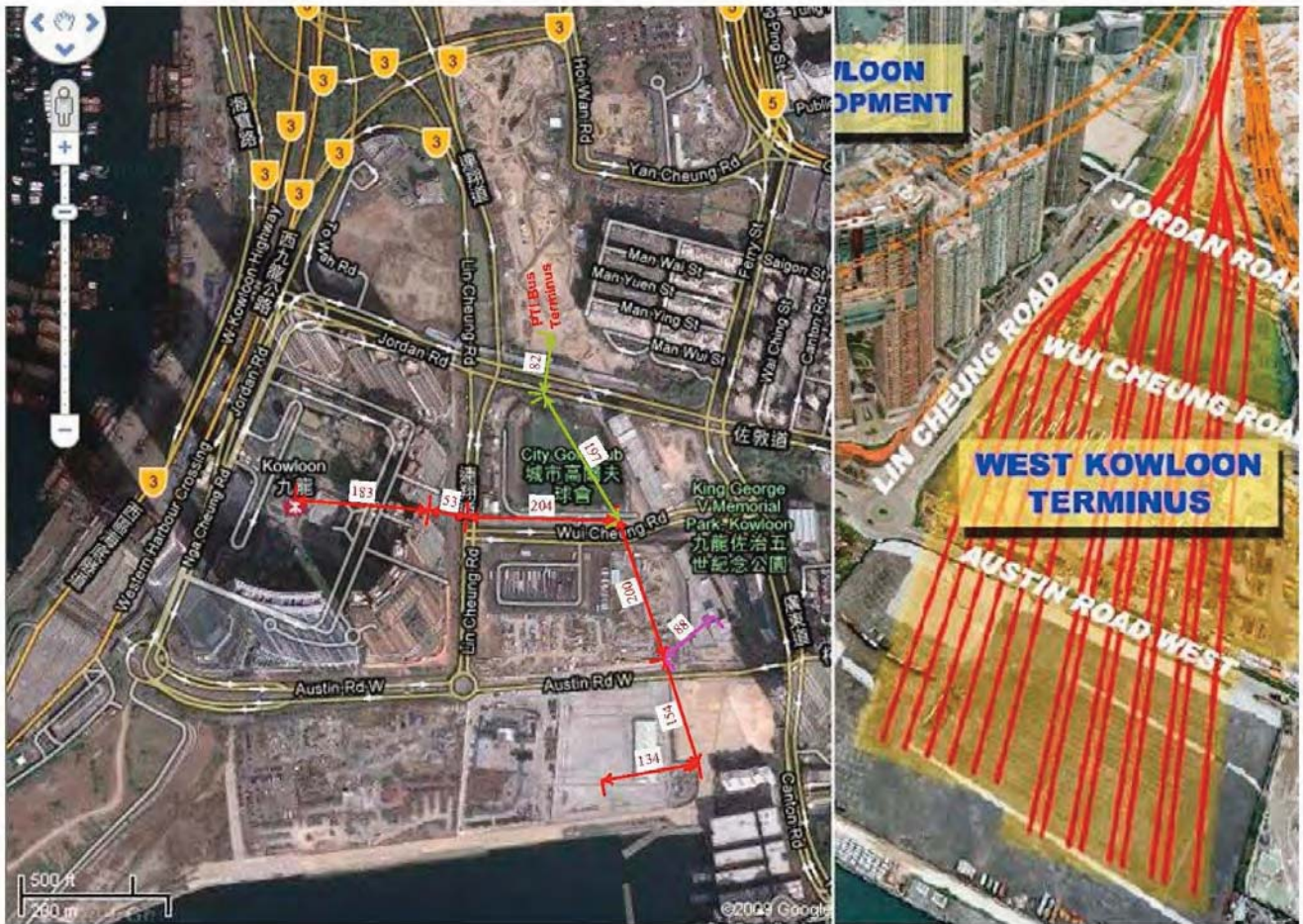
West Kowloon Terminus does **not** its in-station public bus terminus.

West Kowloon Terminus is **a station away** from a secondary metro line and **not** a metro hub with major links connecting XR travelers to Hong Kong's population, employment and economic activity centers.

The Austin Station does nothing but merely taking XR travelers double back to the New Territory.



WKT Terminus 西九龍高鐵站 has no Direct Linkage to PTI Bus Terminus or to metro station at a station-distance away.



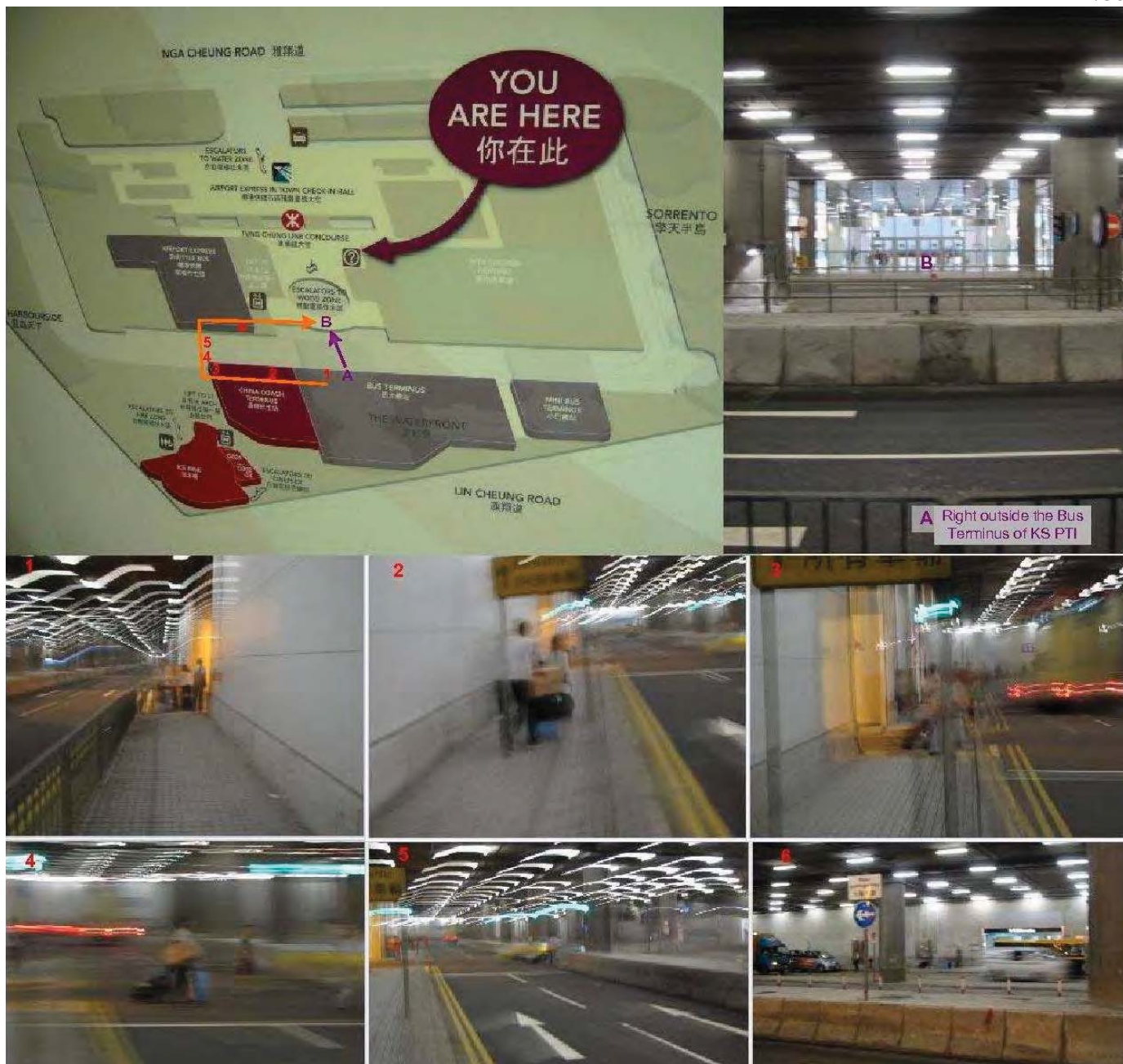
West Kowloon Terminus does not have an in-station metro hub with metro lines connecting XR travelers to Hong Kong's population, employment and economic activity centers. Its shortest path to Kowloon Station, a secondary metro line, is more than 900 meters horizontal distance away (see drawing above).

West Kowloon Terminus's public bus terminus is also more than 800 meters horizontal distance away.

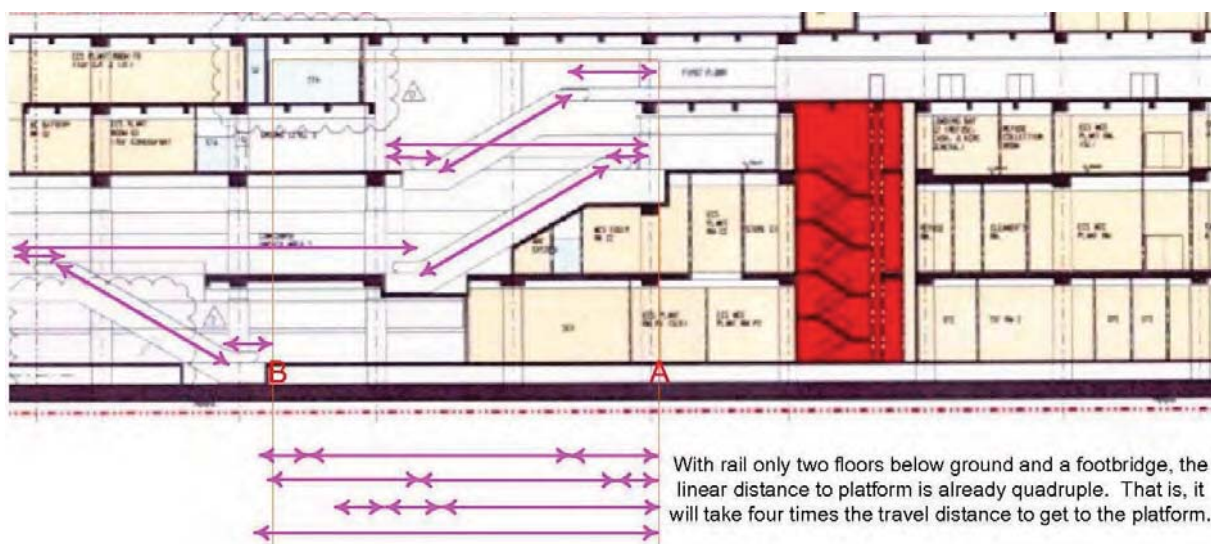
The 900 meters and 800 meters sound too far away; but the nightmare does not stop here; wait until you see how Kowloon Station's Public Transport Interchange (PTI) is implemented for the benefits of ELEMENTS shopping mall at the expense of public transportation needs.

In Kowloon Station, its PTI the Bus Terminus is directly across its MTR station and could be just seconds away (see photos follow). Instead letting the public have a direct linkage between the two transportation nodes, but by design MTRC has forced commuters and travelers to go through its two-storey high ELEMENTS shopping mall turning a seconds Public Transport Interchange (PTI) into minutes of shopping mall tour.

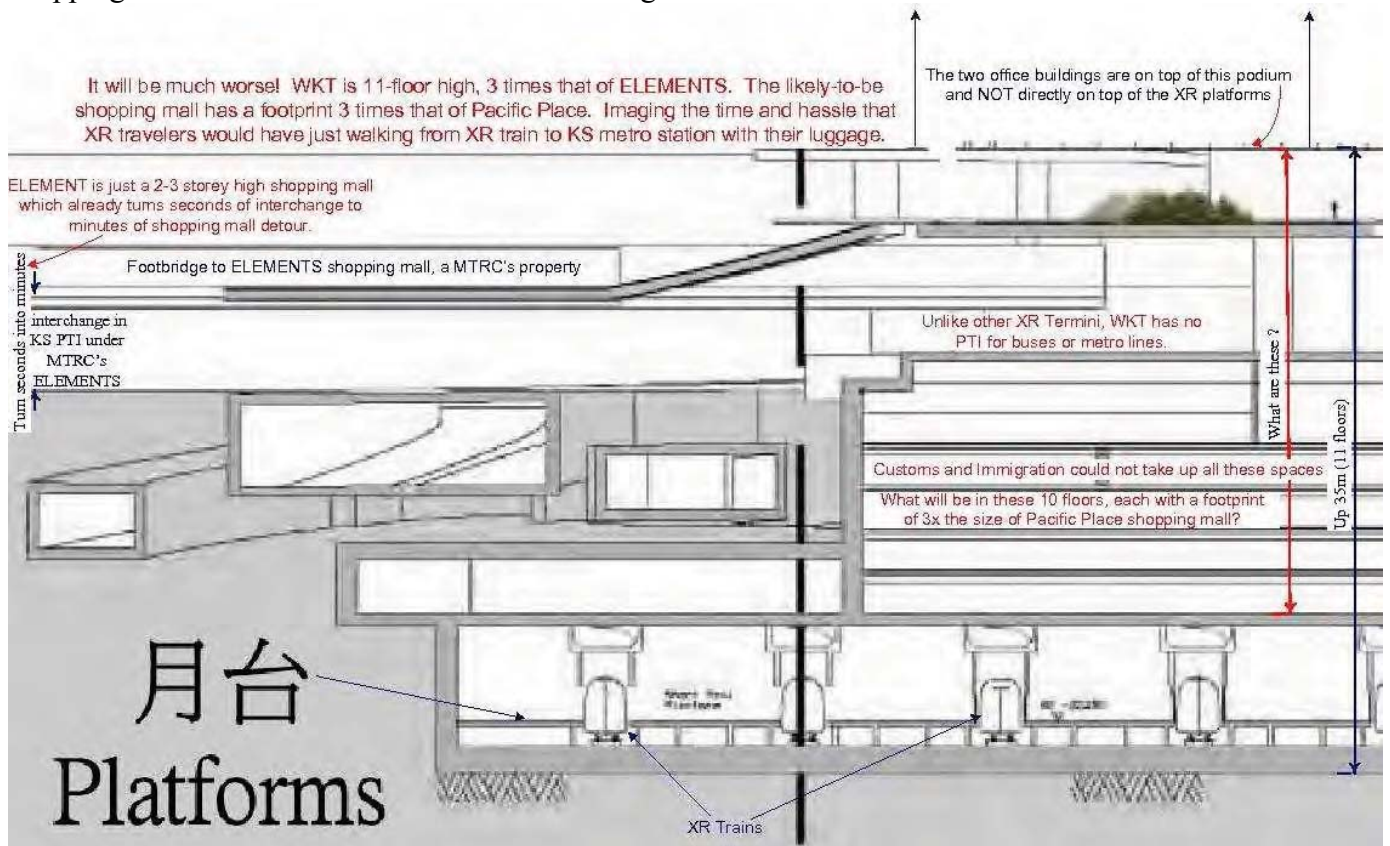
Commuters or travelers cannot or does not want to go through the shopping tour two floors above the PTI, they have no choice but dragging their luggage to take a long and unsafe detour from Bus Terminus, points 1, to 2, 3, 4, 5 and 6 to get to the MTR or Airport Express station (see drawing and photos follow).



Hence, the 456 meters line-of-sight distance between the two stations could easily be multiplied several times by design through the two gigantic MTRC's shopping malls, ELEMENTS and WKT. The 900 meters walking distance between WKT and KS could easily turn into more than 1,000 meters (1-2 km) detour as illustrated above.



The 1,000 meters (1-2 km) walking distance from WKT XR train to KS metro station is just (2-D) horizontal floor distance. It has not taken the account of the vertical travel through the 35m (11-floor) WKT shopping mall and back-and-forth repeatedly between two points zip-zap through each of the shopping floors as illustrated in the above drawing.



(source: tp_rdp0917cb1-2650-1-ec.pdf and procommons report)

The mastermind behind our Government on G.N. 8022 scheme, who also designed ELEMENTS, would also make sure XR travelers will go through its shops first in the 11-floor WKT and then through footbridges to ELEMENTS.

This time would be worse. ELEMENTS is just a 2-storey shopping mall. Now we are being asked to put up \$65B to build an 11-floor West Kowloon Terminus shopping mall for MTRC in the name of railroad development. The vertical shopping detour imposed on XR travelers would be 3-4 times of that in today in ELEMENTS.

The RAILWAYS ORDINANCE authorizes the Administration only on railway project in which "railway" means "any railway or proposed railway which is the subject of a scheme and includes all railway premises, depots, tracks, cuttings, embankments, tunnels, stations, goods and rail yards, car parks and other areas for ancillary uses but excludes non-railway developments above stations or above other railway property".

Has anyone asked what the 11-floor structure with six times the Pacific Place shopping mall floor space and footbridges to do with the "railway" infrastructure?

Hon **Audrey EU** did ask the question, "what will be on top of the (XR) platforms (月台)?" in the November 6 Legco's Subcommittee meeting. The Subcommittee Chairlady simply replied, "two office buildings would be built on it" without even touching on the 35m (11 floors) structure between the XR platform and the two office buildings. **We are talking a structure with total floor spaces could be six times that of Pacific Place shopping malls!** The mastermind behind the scheme refused to tell the whole story is now asking Hong Kong people to put up \$65B in the name of railway development.

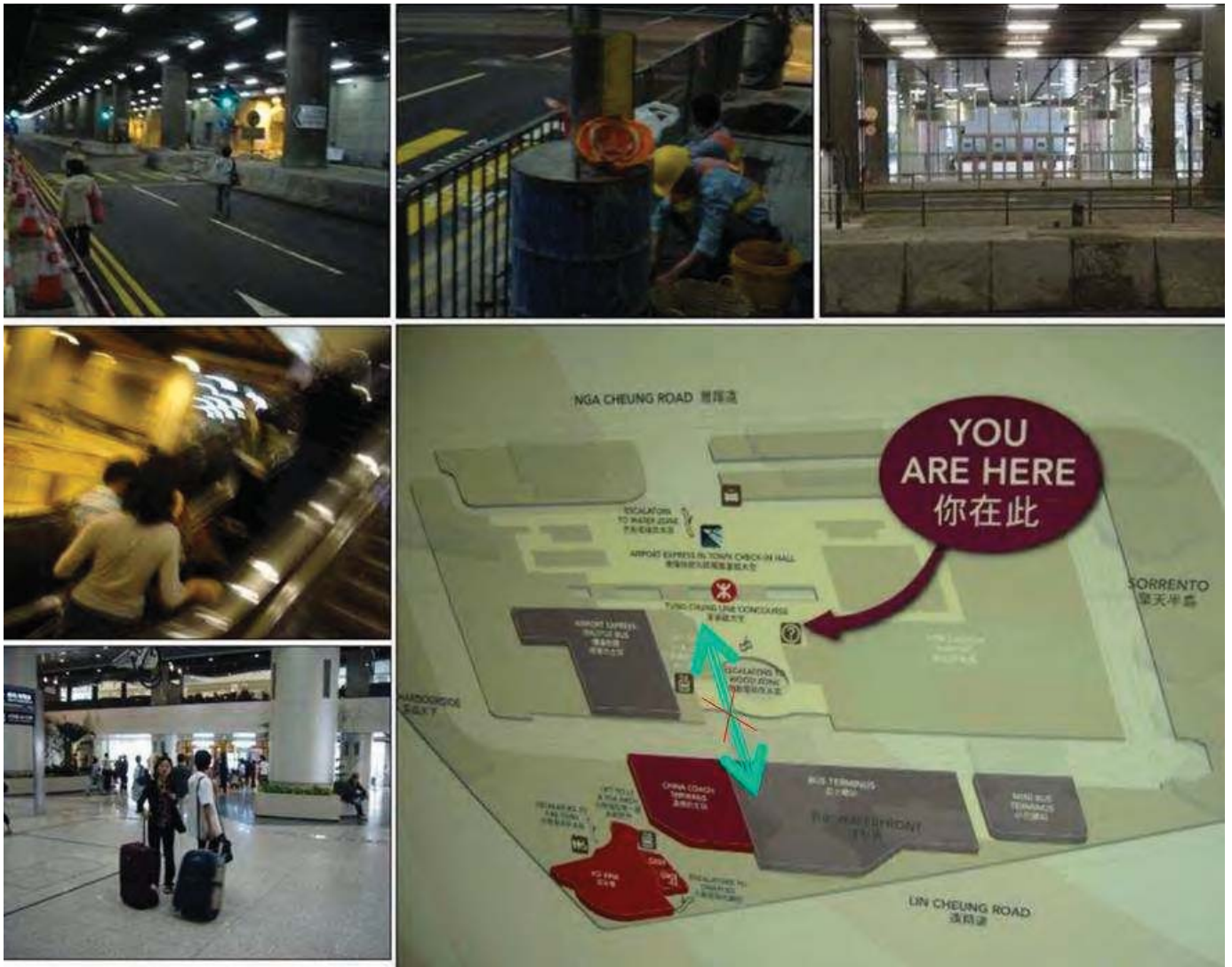
The Administration is asking Hong Kong to put up \$65B for it but no one, not even our Legco Transportation Subcommittee Chairlady, knows what it is.

XR travelers and commuters' nightmare continue ...

WKT Terminus 西九龍高鐵站 not designed for 人行优先, 便捷、高效的换乘系统

Unlike the European XR termini and China XR termini (see next section), West Kowloon Terminus is more like a gigantic shopping mall than a congenial XR terminus with efficient and time saving public transportation interchange (PTI).

The public could have a congenial linkage between PTI bus terminus and the directly opposite MTR station, just seconds apart, in Kowloon Station PTI (see below) under ELEMENTS shopping mall.



A “turn seconds into minutes” design was masterminded. Commuters and travelers have to waste time detouring through a two-storey shopping mall, waiting out the crowded escalators, confused and frustrated in finding ways to MTR station. Non-local travelers could easily lose in making wrong turn in the shopping mall maze and waste more journey time in asking direction repeatedly. Travelers not familiar with the shopping malls could take over 30 minutes to do the inter-station interchange.

In short, the inter-station interchange between West Kowloon Terminus XR trains to Kowloon Station MTR line would not be 8 minutes as Government claimed because

1. To start with, the line-of-sight distance between WKT and KS is already a metro station away.
2. WKT's line-of-sight distance would become more than 800 meters and more than 600 meters to public bus terminus in 2-D distance through WKT and KS without detouring through shops.
3. If the WKT is like KS having retail floors in it, the inter-station interchange could turn into an over kilometer (1-2km) shopping mall detour tour.
4. In vertical direction, time lost on queuing up crowded escalators.

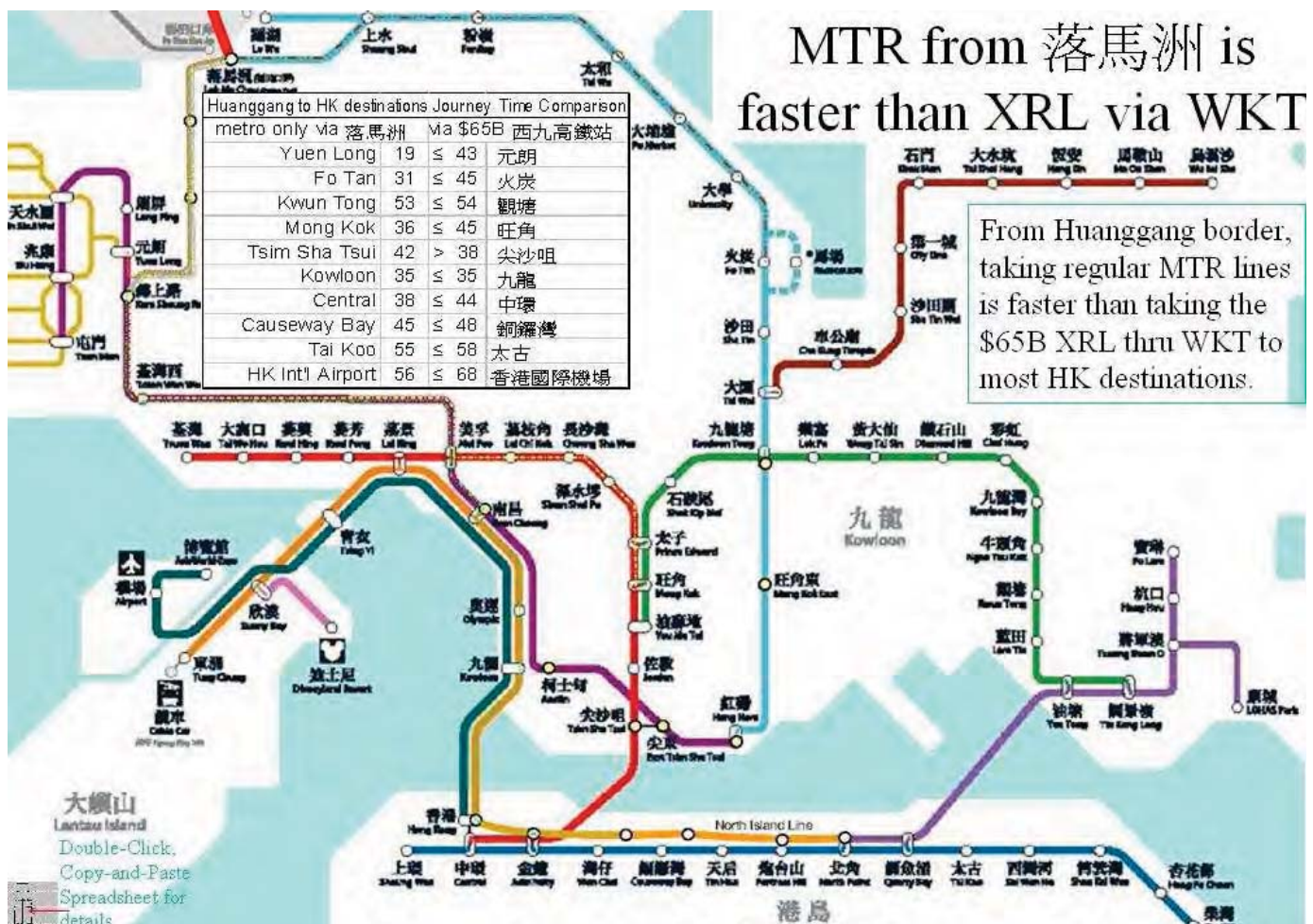
- Further time also lost in repeatedly asking direction and finding way through the maze of confusing shopping corridors.
- After the tedious and long inter-station interchange to Kowloon Station, XR travelers only reach a secondary metro line and they have to do another inter-station interchange from Hong Kong Station to the primary Hong Kong Island line before they can get to the population, employment and economic activity centers in Hong Kong.
- At the end, XR travelers will lost overall journey time; all the XR travel time saved would be nullified and wiped off on the inconvenient interchanges from West Kowloon Terminus.

E. From Huanggang border, taking regular MTR lines is faster than taking XR through WKT to most HK destinations.

Because of the inherent problems of West Kowloon Terminus's location and design, the time saved from riding high speed train on Hong Kong XRL would be wiped off by the time consuming and torturous inter-station interchange before travelers can reach most of the Hong Kong population, employment and economic activity centers.

With the 20-minutes interchange time between WKT XR train and KS MTR station and the published MTR journey times, we use spreadsheet¹⁴ to calculate the end-to-end journey times from the Huanggang border, a common point of the XRL, to the typical MTR stations representing Hong Kong's population, employment and economic activity centers.

It turns out that taking XRL via West Kowloon Terminus actually cost more end-to-end journey time to all the MTR stations, except Tsim Sha Tsui¹⁵, than taking regular MTR trains from Lok Ma Chau, 落馬洲.



¹⁴ A copy of the spreadsheet was submitted to Administration.

¹⁵ The \$65.2B XRL journey to Tsim Sha Tsui Station only buys us just 4 minutes; the 4 minutes would be lost if XR travelers made a wrong turn in the WKT shopping mall.

Taking MTR lines to Mong Kok 旺角 (9 min), Central 中環 (6 min), Causeway Bay 銅鑼灣 (3 min) and Hong Kong International Airport 香港國際機場 (12 min) is faster than taking the \$65B XRL. No need to mention, it would be much faster to take MTR and not XRL to the New Territory destinations where most of Hong Kong's population, working class families and small and medium size businesses are, like to Fo Tan 火炭 (14 min) and Yuen Long 元朗 (24 min), .

F. The \$65B West Kowloon Terminus cost can do a lot more if spent on other HK metro Infrastructures for Hong Kong commuters and XR travelers

According to Government's Hong Kong Monthly Digest of Statistics¹⁶, total daily cross-border travelers were 437,674 of which 364,079 are Hong Kong residents. That is, **over 83%** of cross-border travelers are **Hong Kong residents**.

Should our Government focus on the need of the 364,079 daily cross-border commuters/travelers more than worrying a tiny portion (if any) of the 14,125 XR travelers¹⁷ occasionally taking XR trains to the future West Kowloon Cultural District¹⁸ which is supposedly for developing local Hong Kong arts and culture?!

The \$65B is more than enough to build all the following metro lines that we have waited for 10 years:

Northern Link 北環線	\$9B	NOL
North Hong Kong Island Line 北港島線	\$10B	NIL
Tung Chung Line Extension 東涌延線	\$4B	TCL ext
West Rail Lai King Station Realignment 西鐵荔景站	\$4B	WRLK
East Kowloon Line 東九龍線	\$14B	EKL
Tai Wai to Diamond Hill Link 大圍至鑽石山	\$5B	TDL
Fourth Rail Harbour Crossing 第四條過海鐵路線	\$16B	FHC
Total cost for all these HK MTR lines 總數祇不過是	\$62B	< WKT's \$65B

(source: Cost Estimates and from rds.pdf)

If the \$65B spent on XRL West Kowloon Terminus spent on Hong Kong's comprehensive metro network, **3,596,356** daily HK commuters as well as the 99,000 XR travelers¹⁹ would be benefited.

For an example, the \$9B **Northern Link** (NOL) to West Rail would save 22 minutes cross-border journey time to Kowloon over using East Rail. NOL would also unload some of the cross-border travelers from the daily 921,997 East Rail to the faster West Rail (with only daily 197,940 passengers)²⁰.

The economic benefits of spending the \$62B on all these railways are far more, in order of magnitude, than the \$65B spent on just one XRL West Kowloon Terminus. The economic benefits generated will not be just from the 99,000 XR travelers²¹ but also the 3,596,356 daily commuters.

¹⁶ In June 2009. Table 6.8 - 6.10 Hong Kong Monthly Digest of Statistics, September 2009, B12100032009MM09B0100.pdf

¹⁷ 17% of the 84,00 short haul XR travelers

¹⁸ WKCD is "a major initiative to meet the long-term infrastructure needs of Hong Kong's arts and cultural development."

West Kowloon Cultural District Authority Bill, p.5 in b23_br.pdf

¹⁹ HK Annual Statistics showed 1,302,069,000 metro and 10,601,000 AEL passengers in 2008

²⁰ HK Annual Statistics showed 336,529,000 and 72,248,000 respectively East Rail and West Rail passengers in 2006

²¹ 84,000 West Kowloon – Shenzhen/Humen/Guangzhou + 15,000 beyond Guangzhou; tp_rdp1022-thb200910a-e.pdf

G. West Kowloon Terminus does not meet Transport Planning and Design Manual's requirements

Both the Kowloon Station and West Kowloon Terminus have not been designed in according to Hong Kong Transport Planning and Design Manual. The Public Transport Interchanges (PTI) should:

- Be designed as an integral part of the rail station with interchange at the same level with the station concourse;
- Contain a rail station, bus bays, taxi stands, public light bus (PLB) stands;
- Provision of a congenial (suited to one's needs or nature) and safe walking environment to avoid excessive crowding;
- Provide direct linkages between activity nodes;
- Provide suitable pedestrian crossing points to facilitate pedestrian circulation;
- Provide all essential services on the ground floor of an interchange;
- Allow more open spaces at grade catering for the needs of disabled and elderly;

(source: Hong Kong Transport Planning and Design Manual (TPDM) Volume 9 Chapter 8 - Public Transport Interchange)

Frankly, the modern mainland China's 交通枢纽 are much better than Hong Kong's Public Transport Interchanges masterminded by MTRC.

Let's take a look of our mainland China's XR Termini; they are much more congenial than Hong Kong's West Kowloon XR Terminus.

Tianjin XR Terminus 天津高铁站

《天津站交通枢纽规划方案》天津站交通枢纽规划布局的总体原则是以满足枢纽自身交通功能为前提，同时，规划有集停车、公交、商业服务设施等为一体的综合停车设施。新客站站场总规模为 10 台 18 线，自北向南依次为京津城际车场，4 台 7 线；津秦高速车场，3 台 6 线；普速车场，3 台 5 线。按照天津市总体规划，地铁 2、3、9 号线将引入新客站，分别位于站房地下二、三、四层。与城市其它功能相协调；按照“零换乘”的要求，充分考虑各种交通方式之间的衔接关系；人行优先，构筑独立、安全、便捷、高效的换乘系统。

(source: <http://gov.finance.sina.com.cn/zsyx/2005-08-31/68173.html>)

Beijing XR Terminus 北京高铁站

北京市内地铁 (metro)：北京地铁 4 号线（试运行中）站台为岛式 1 台 2 线的地下站台。

北京地铁 14 号线（规划中）站台为岛式 1 台 2 线的地下站台。

国铁：京沪线、京广线、京九线、京津城际铁路、京沪高速铁路

新北京南站从设计和使用功能上把握了旅客至上和人性化的人流组织原则。全方位实现了“零换乘”，随着地下二层地铁 4 号线、地下三层 14 号线的陆续开通，旅客可以在站内实现国铁与地铁的零换乘。旅客不出站就可以进行各种交通方式的互换，最远的换乘距离不超过 200 米。

H. West Kowloon Terminus also violates the Hong Kong Planning Standards and Guidelines

The Hong Kong Planning Standards and Guidelines require:

- Segregation of vehicles and pedestrians through pedestrian priority facilities (such as formal pedestrian crossings), vehicular / pedestrian underpasses, flyovers, footbridges and traffic calming measures;
- Footbridges should only be considered as last alternative for uses upon exhausting all other suitable means;
- Avoid massive elevated structures aligned by tall buildings in urban canyons
- Provide view corridors and pedestrian open space linkages to the waterfront
- Avoid projecting obstructions over breezeways/air paths;
- Avoid infrastructure projects which create visual and physical barrier

(source: http://www.pland.gov.hk/pland_en/tech_doc/hkpsg/full/ch11/pdf/ch11.pdf and http://www.pland.gov.hk/pland_en/tech_doc/hkpsg/full/ch12/pdf/ch12.pdf)

WKT's Landscape and Visual Impact

“potential landscape and visual impacts have been minimized and confined to above-ground works” from MTRC's EIS



Breezeway and View Corridor

The \$60B is more for MTRC's Element Shopping mall's interests than for Hong Kong's public interests.

But at the same time, MTRC insists on erecting **Massive Elevated Structures** and **Projecting Obstruction** over the Breezeway and View Corridor



The XR and metro rails are below ground; all essential services could be put on the ground and below ground levels. What do the footbridges have to do with XRL scheme under RAILWAYS ORDINANCE?

Here is a good reason why Hongkongers trust the mainland Central Government leaders more than Hong Kong Government leaders.

(IV) Straw-man XRL Proposal for Hong Kong XR Terminus

5-Km Radius of XR Terminus City Coverage

Administration and the Subcommittee Chairlady have been using an arbitrary justification as a requirement in selecting the XR terminus for Hong Kong by saying that the XR Terminus must be in the city center.

Let us take a closer look of this claim to see if the 5-km city center criterion is relevant or just a myth.

Tainan XR Terminus 台南高鐵站

Tainan XR Terminus was used in the Government's presentation to the Legco as a typical XR Terminus.

Even in the Government's example, the 5-meter circle around the Tainan XR Terminus is not even touching city limit of Tainan.

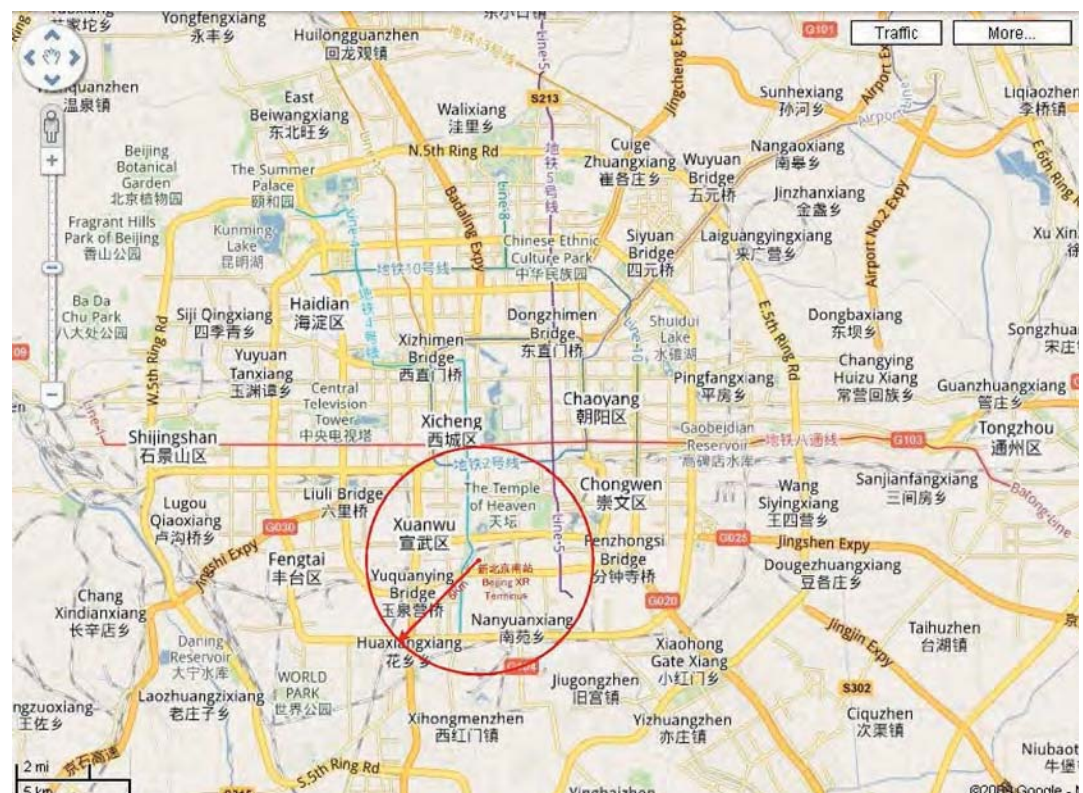
Tainan XR Terminus is not in Tainan's city center, but in an outskirt village.



(source: tp_rdp1106cb1-322-1-c.pdf)

Beijing XR Terminus 北京高鐵站

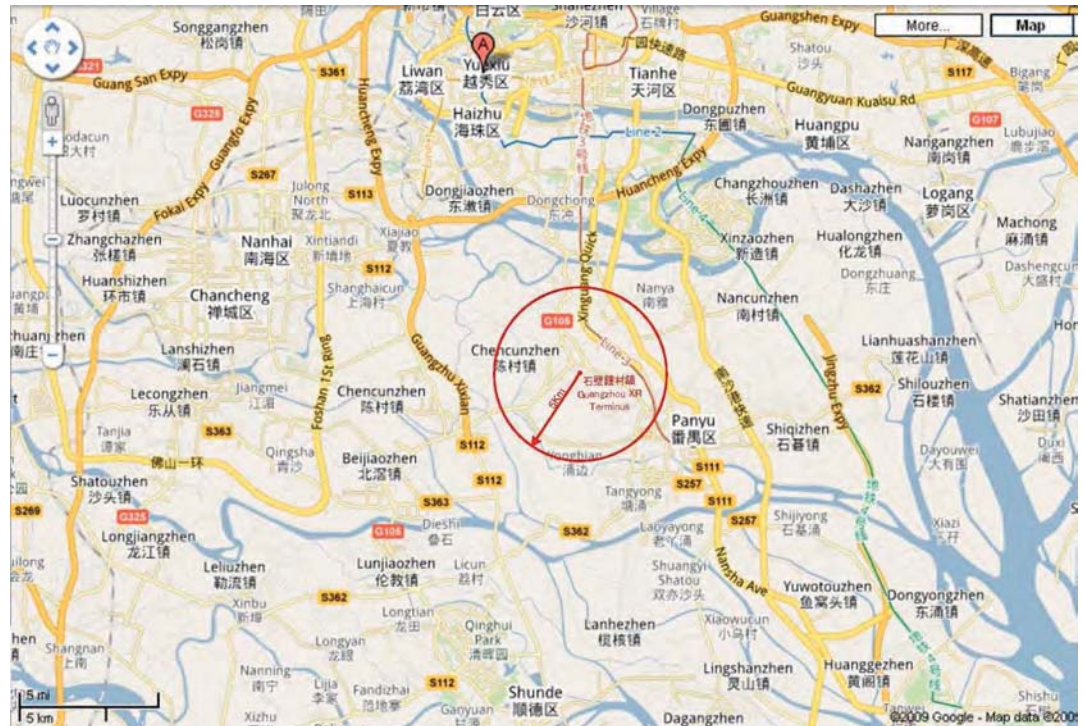
Beijing XR Terminus is also NOT in the Beijing's city center.



Guangzhou XR Terminus 廣州高鐵站

Guangzhou XR Terminus is also in an outskirt village, Zhongcun 鍾村鎮 and NOT in the 5-km Guangzhou City Center.

Hence, we conclude the Government's criterion that "an XR Terminus must be in a 5-km city center" is irrelevant but just a **myth**.



I. Kam Shan Road XR Terminus and International Hub

Government should not reject ProCommons' Kam Shan Road proposal because its terminus is not in the 5-km city center. Being in Kam Shan Road has all the good reasons that ProCommons have listed out in their proposal. At least it meets the Government's Criteria for Rail Network Expansion.

Furthermore, Hong Kong needs to develop more population, employment and economic activity centers in the north Territory as the lands in Kowloon and Hong Kong are running out and the supporting transport infrastructure are being overloaded to their maximum capacity.

The Kam Shan Road XR Terminus would facilitate new development areas in NENT, NWNT and Lantau. With an in-station metro hub would bring XR travelers to various Hong Kong population, employment and economic activity centers.

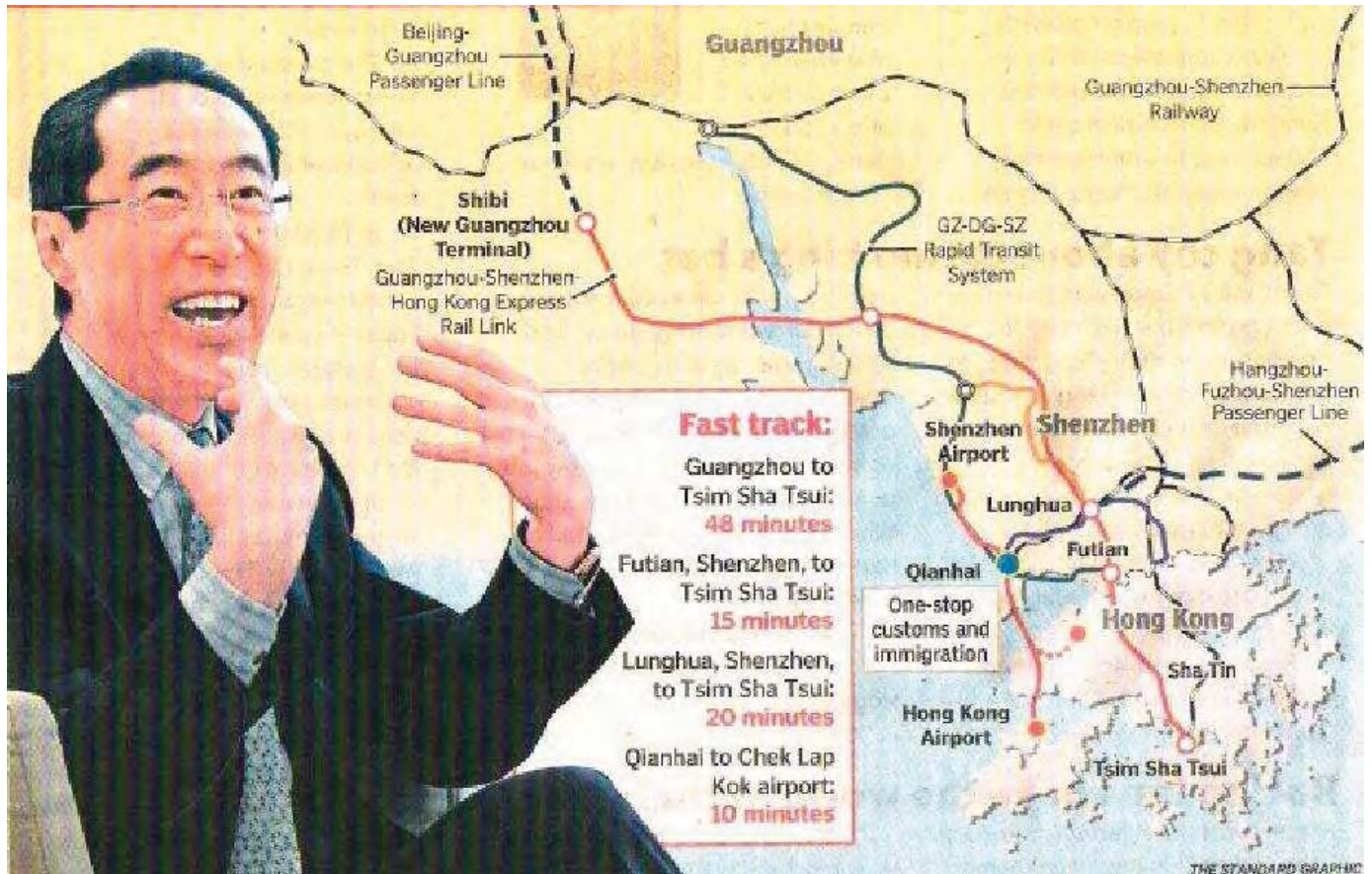
Just like what Guangzhou Government has strategically chosen Shibi, an outskirt of the Guangzhou, as their XR Terminus and not in the Guangzhou city centre.

新廣州站 - 位置圖

New Guangzhou Station - Location Plan



ProCommons' Kam Shan Road Hong Kong Interchange is also a one-stone-two-birds solution. It saves more than \$30B Hong Kong's taxpayer money on the XRL bill but also another \$50-100B on Tong's idea of having an even more expensive Shenzhen-HK Airport Express Rail through Qianhai crossing the Shenzhen Wan and the Castle Peak Bay to HKIA. Just the bridge over the Castle Peak Bay is already seven times (7x) longer than the bridge crossing the Rambler Channel. With ProCommons' proposal, we should not need to spend another \$50-100B on the SZ-HK Airport Express Rail.



(source: The Standard Monday, July 20, 2009)

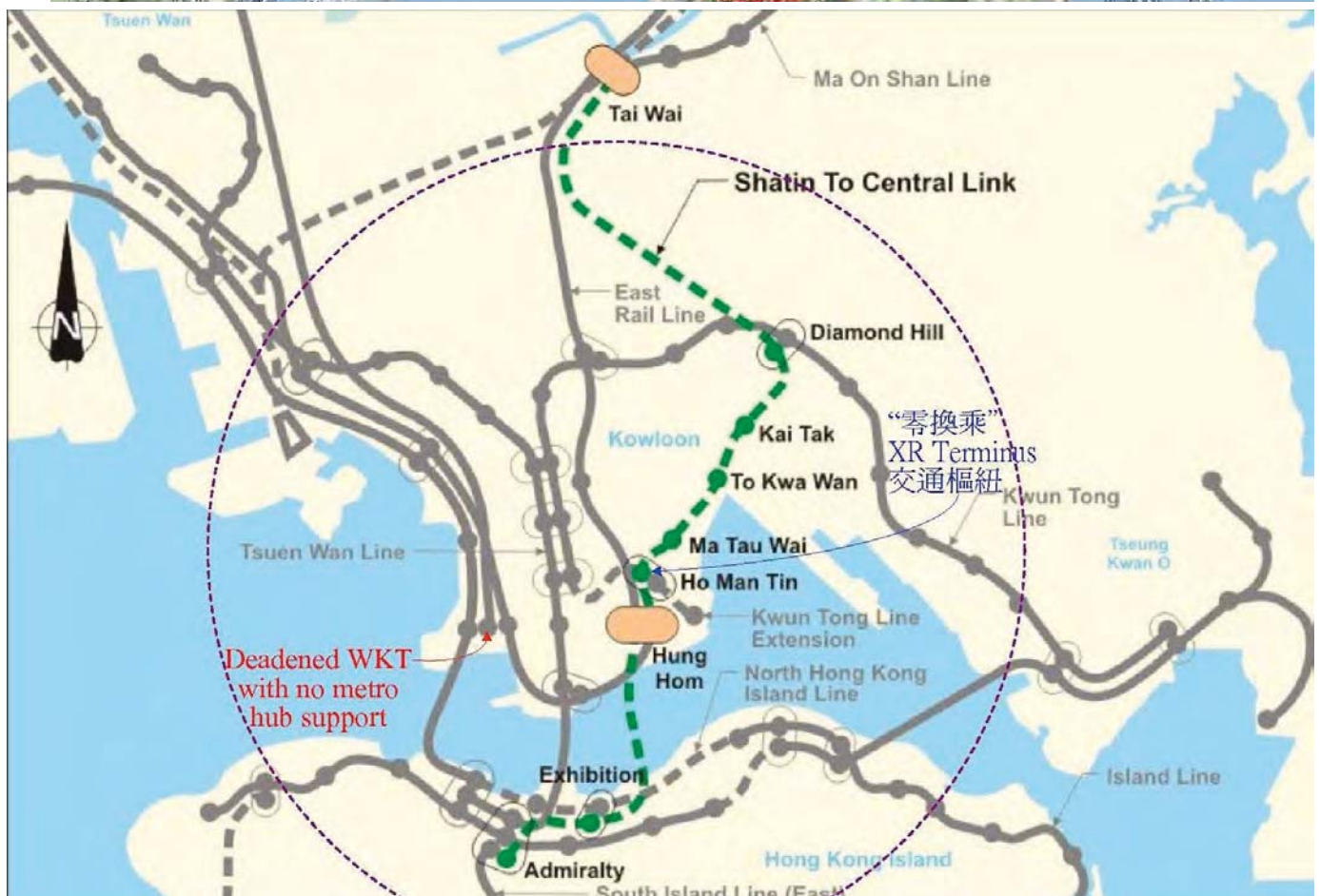
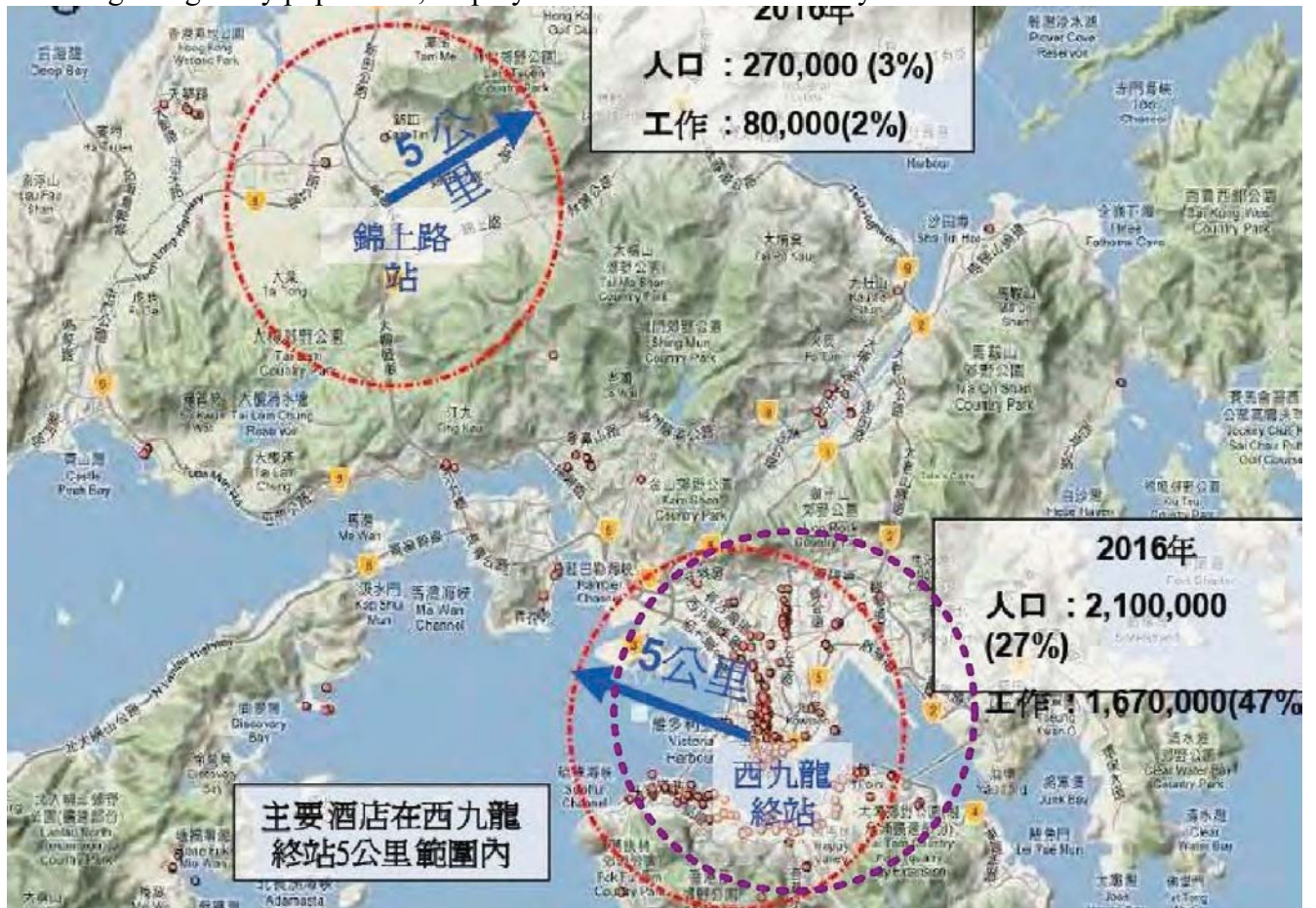
New XR termini in mainland China and Taiwan are not at their city centers but with metro lines running through them. European XR termini at city centers are coincidental as a result the cities growth around their 100-year old train stations, like London's St Pancras railway station. If it is not the metro hub, these station would not be chosen as XR termini because XRL cannot take their passengers to various population, employment and economic activity centers in their cities.

Sensible governments would not expect XR travelers to reach out a city through walking around with luggage. What good is it being in a city center without metro lines conveniently connecting the XR travelers to the city's population, employment and economic activity centers?

West Kowloon Station is isolated and deadened at the edge of the harbor without a convenient metro hub support. What good is it even it is the center of a 5-km inner city? It is a pity; our city is only 78 km² in a 5-km circle? London is a 1,706.8 km² city.

J. Ho Man Tin XR Terminus with In-station Metro Hub

If the Administration or Executive Council insists on using the 5-km city circle criterion, the circle should be shifted east, as indicated by the purple dotted circle, to include Kwun Tong and Kai Tak as they are or will be Hong Kong's key population, employment and economic activity centers.



More importantly, the Ho Man Tin²² metro hub is a good candidate to be integrated with XRL and serving as an XR terminus. A “零换乘” 交通枢纽 (transport hub) can be implemented there with in-station “seamless zero-distance” transfer to key metro lines, Tsuen Wan and Hong Kong Island/NIL Lines conveniently bringing XR travelers to Hong Kong’s population, employment and economic activity centers.

The route of the XRL to Ho Man Tin XR Terminus could be almost the same as today’s XRL to West Kowloon Terminus except it swings to right (east) to Ho Man Tin metro hub instead to left (west) to the West Kowloon Terminus cornered and dead-ended at the harbor side.

For the location of the emergency rescue station (ERS) and stabling sidings (SSS), the XRL can pick on Hong Kong Golf Club instead of Choi Yuen Tsuen. Golfers can take XR trains to play their golf in Shenzhen or Longhua. The XRL can jointly be developed with the Shatin-Central link starting at Tai Wai and terminated at the Ho Man Tin metro hub.

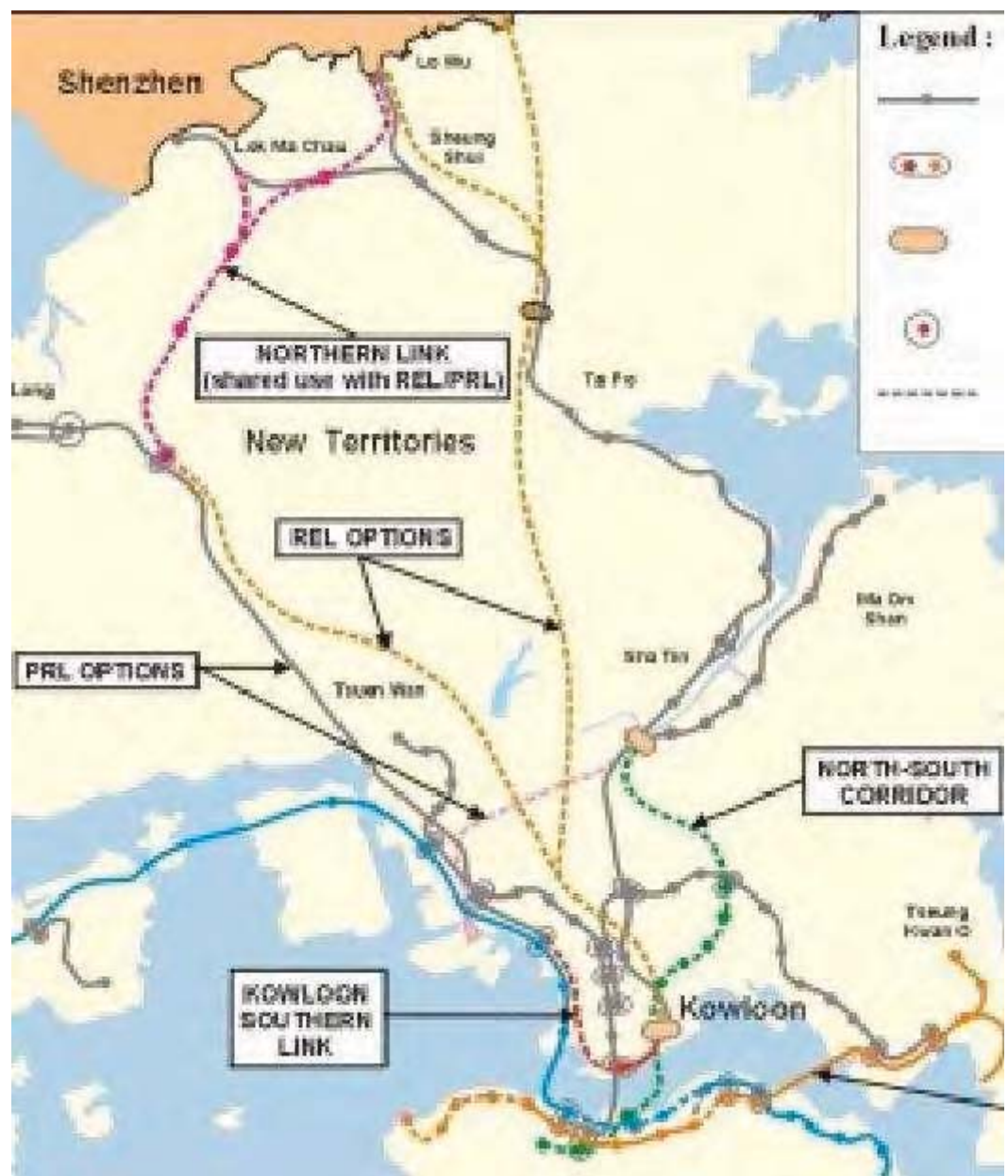
The drawing on the right was the original REL options before there was MTRC’s ELEMENTS shopping mall was there.

REL standing for Regional Express Link is now called XRL (Express Rail Link or High Speed Rail Link).

There were two options and both leading to the center of the purple 5-km city center.

One of the options was starting from Kam Shan Road.

These were options recommended by Government’s experts before MTRC taking Hong Kong in hostage after the merger.



(source: rds.pdf)

²² <http://www.hyd.gov.hk/eng/major/road/rail/scl/images/popup.jpg>

K. Lok Ma Chau XR Terminus and Cross-Border PTI

We leaders should have a vision more than 5-km circle city, which is just tiny 75 km² in comparing with London, a 1,707 km² city. We still do not understand why such a tiny city needs fifteen XR platforms while London needs only six. Hong Kong and Shenzhen combined together has about the size of London. The tiny West Kowloon is nothing if we put things into proper perspective proportionally.



In a long run after the 50-year life of HKSAR, Shenzhen and Hong Kong would be one metropolitan city.

Administration Chief Secretary, Henry Tang's vision

- By 2020, Hong Kong people could be better off living in Guangdong than staying put.
- There will be no need for home-visit permits, with those on both sides using smart identity cards to travel.
- People will be able to live in Dongguan and work in Sha Tin or Tsim Sha Tsui. It will be as convenient as if you are currently living in Sha Tin, Sheung Shui or Tai Po.
- Most households make only about HK\$20,000 a month which will not provide you with a decent quality of life if you reside in Hong Kong but which will certainly provide you with more comfort if you were to live in Lunghua, Shenzhen.

(source: The Standard Monday, July 20, 2009 - better off commuting from Guangdong than living in Hong Kong.pdf)

To be consistent with Tong's vision, Hong Kong and Shenzhen should be considered as one Metropolitan area, like London.

Lok Ma Chau is the center of metropolitan area of Hong Kong and Shenzhen combined like St Pancras International XR Terminus in London.

Besides Lok Ma Chau being at the center; in the mean time it is a logical location to be an XR cross-border public transportation interchange (PTI).



From Shenzhen to Hong Kong's population center, MTR journey time via Lok Ma Chau is faster than XRL journey time via West Kowloon Terminus.

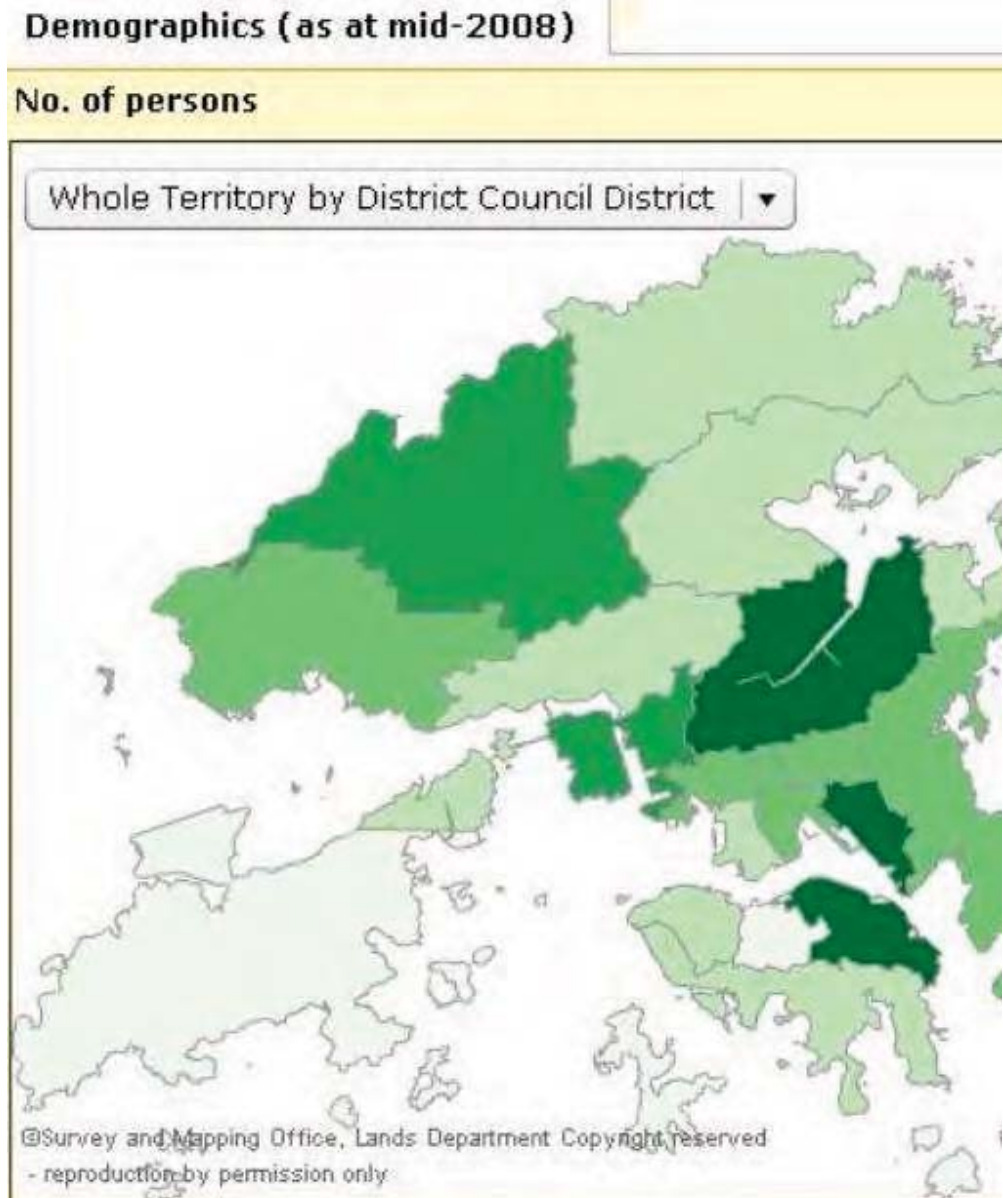
Hong Kong residents who work in China live in the **New Territory** is **26% more²³** than those live in Kowloon and Hong Kong combined.

The new towns around Shatin are Hong Kong's population centers.

A lot of small and medium size business and employment centers are also in the new towns around Fo Tan.

The XRL journey time via West Kowloon Terminus would take 38 minutes²⁴ from the common point, Huanggang border, to the geographical center of Hong Kong. It takes MTR only 31 minutes²⁵ via Lok Ma Chau station.

(source:
http://www.censtatd.gov.hk/hong_kong_statistics/statistics_on_map/index.jsp)



Why burn \$65B on a less efficient and more time consuming railroad expansion scheme?

From Guangzhou to Hong Kong's population center, today's rail services is 37 minutes faster than the XRL journey via West Kowloon Terminus.

Today rail travel time from 广州市天河区 广州东站 to 深圳 is 1 hour 6 minutes²⁶ and from Lo Wu to Tai Po Market is 17 minutes. The total rail journey time today to or from Guangzhou 广州 is 1 hour 23 minutes.

The distance between Guanzhou and Shibi is about the same distance between Lok Ma Chau to Kowloon Tong that takes 38 minutes by MTR. XR train from Shibi to Kowloon West Terminus is 48 minutes. MTR from Austin Station to Tai Po is 34 minutes (Austin→ Hung Hom→ Tai Po Market). Hence, the total XRL journey time via West Kowloon from Guangzhou to Hong Kong population center is 2 hours.

²³ http://www.censtatd.gov.hk/hong_kong_statistics/statistical_tables/index.jsp?charsetID=1&subjectID=1&tableID=156

²⁴ XR from Futian to WKT 14 min + MTR Austin → Hung Hom → Fo Tan 24 min = 38 minutes

²⁵ MTR Lok Ma Chau → Fo Tan 31 minutes

²⁶ Today's Rail from Guangzhou East to Shenzhen just 1hr 6min.pdf from http://train.8684.cn/k_%C9%EE%DB%DA/

That is, most Hong Kong commuters between Guangzhou and Hong Kong would not take XRL train via West Kowloon Terminus because it will take 37 minutes more time than taking today's railroad services.

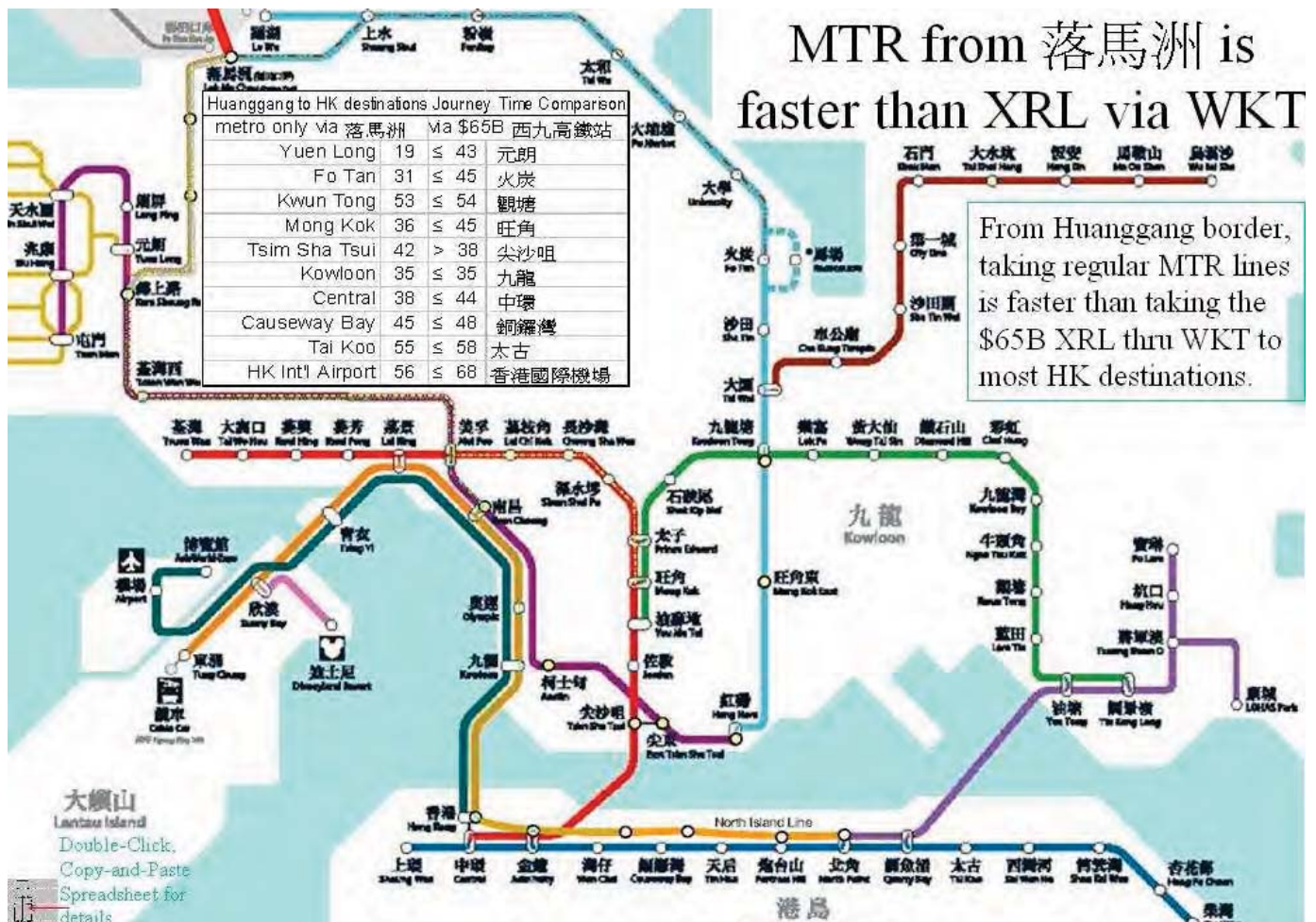
Why burn \$65B on a less efficient and more time consuming rail network?

However, if the XR terminus were in Lok Ma Chau, the total XR journey time from Guangzhou to Hong Kong population center via Lok Ma Chau XR Terminus would be shortened from 2 hours to 1 hour 35 minutes.

More Time Saving via Lok Ma Chau XR Terminus and PTI than via the dead-ended West Kowloon XR Terminus

Hong Kong has a comprehensive rail network plan for 10 years to offer 11,519,811 daily HK commuters a fast and reliable transportation throughout the SAR. The planned Northern Link (NOL) from Lok Ma Chau to West Rail would save 22 minutes journey time to Kowloon and Hong Kong as compared with the heavily used East Rail. The NOL would unload some of cross-border travelers from the daily 921,997 East Rail commuters to the faster but underutilized West Rail (197,940 daily).

The \$9B Northern Link (NOL) 北環線 would gain 22 minutes journey time saving for the 921,997 daily commuters.



The above metro map and table listed out the end-to-end journey times from 落馬洲 MTR station in Huanggang border, a common point of XRL, to popular MTR stations.

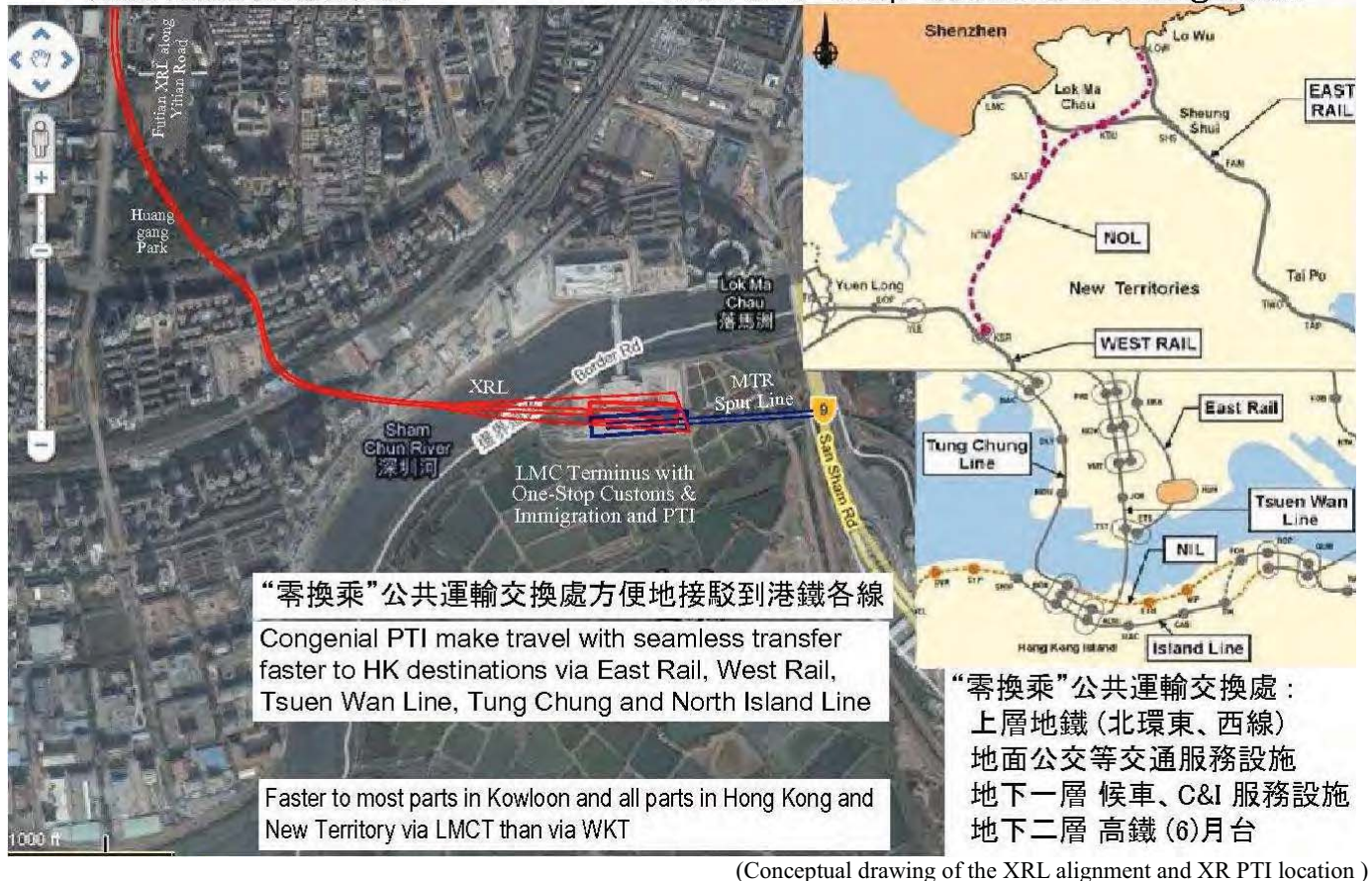
There is no or neglectable overall time saving after burning the \$65B XRL on West Kowloon Terminus as it cannot be integrated into Hong Kong's Railway Development Strategy and Expansion Plan.

Because West Kowloon Terminus does not and cannot have a congenial metro hub to provide fast and convenient interchanges to primary metro lines along Hong Kong's population, employment and economic

activity centers. The time saved from traveling on XRL would be lost if going through West Kowloon Teminus.

The Lok Ma Chau XR Terminus would transform the Lok Ma Chau station into a **Cross-Border PTI hub** integrating the national XR network with Hong Kong's local metro network bringing XR travelers more efficiently and quickly to various population, employment and economic activity centers in Hong Kong.

落馬洲高鐵站 Lok Ma Chau XR Terminus & PTI 香港過境公共運輸交匯處 with One-Stop Customs & Immigration



“零换乘”是指市民能“在同一屋檐下”换乘地铁和公交，它的意思似乎是“不用长距离行走即可换乘”；“零换乘”英文对照 seamless transfer; zero-distance transfer.

Beijing XR Terminus: 北京南站采用上下5层的立体化布局，旅客不出站就可以进行各种交通方式的互换，最远的换乘距离不超过200米。全方位实现了“零换乘”和无屏障候车。出站旅客可直接进入公交载客区完成换乘。随着地下二层地铁4号线、地下三层14号线的陆续开通，旅客可以在站内实现国铁与地铁的零换乘。

Tianjin XR Terminus: 天津站交通枢纽规划布局的总体原则是以满足枢纽自身交通功能为前提，按照“零换乘”的要求，充分考虑各种交通方式之间的衔接关系；人行优先，构筑独立、安全、便捷、高效的换乘系统；充分利用地下空间，为各功能分区间建立立体、循环衔接系统、京津城际轨道交通、城市轨道交通、公共交通以及其他交通方式为一体的综合交通枢纽，地下一层配合市政开发为交通层；地下二层为地铁2、3、9号线车站的站厅层；地下三层为地铁2、9号线的站台层和地铁3号线的设备层；地下四层为地铁3号线的站台层。

Both Tianjin and Beijing XR Termini are designed with emphasis on “零换乘” 的要求; i.e. in-station seamless transfer to metro lines and interchanges to other public transportation under the same roof. These XR Termini are designed with the principles of 人行优先，旅客至上和人性化的人流组织原则；充分利用地下空间，建立立体、高效的换乘系统。

Lok Ma Chau XR terminus could also be a “零换乘” Cross-Broder PTI 交通枢纽.

Our proposal is to run a half km (0.5 not 26 km) XRL Hong Kong segment from the Huanggang border to today's Lok Ma Chau Control Point as its terminus.

Lok Ma Chau XR Terminus will be 4-floor “零换乘” Cross-Broder PTI 交通枢纽 (not an 11-floor shopping mall). The Terminus will have six (6 not 15) XR platforms in an underground floor, a PTI Bus Terminus on the ground floor and the above ground metro hub with metro links to West and East Rails. Today's Hong Kong control point would be upgraded to an One-Stop Customs and Immigration services center together with long-haul XR passenger waiting areas and other essential services.

In contrast, the \$65B (11-floor) West Kowloon Terminus has no Public Transport Interchange for buses or underground metro rails.

Lok Ma Chau XR PTI Hub is “Free” paid by 1-year Interest generated from the \$65B saved

Without building the 26-km XRL to bring 99,000 XR travelers to window-shop in ELEMENTS and the 11-floor gigantic WKT shopping mall, Hong Kong will save \$65B. One year of interest generated from the \$65B saved would be sufficient to finance a more efficient and functional XRL and its 4-floor Terminus with a “零换乘” PTI hub that everyone would appreciate and able to use.

Lok Ma Chau XR Terminus and PTI Hub can be Completed in time of the Futian XRL Completion and Several Years Ahead of the WKT schedule

The 0.5 km XRL and Lok Ma Chau XR Terminus PTI hub can be completed in time with the Futian XRL in 2011/2012 several years ahead of the \$65B West Kowloon Terminus scheme.

The cost of having this half km XRL and the seamless congenial XR Terminus would be (\$2-5B) in order of magnitude less than the \$65B West Kowloon Terminus. The completion can be in 2011/12 in time of the Futian XRL completion, several years ahead of the West Kowloon Schedule.

Hong Kong Government's Census and Statistics also showed that the population in the Northwest Territory has been growing tremendously since 2001 (see also the Demographics map at mid-2008 in the earlier section). Recently, Government also indicated “爲應付 2030 年本港人口暴增至 840 萬的「逼爆」場面，發展局計劃將新界東北大片農田，重新打造成古洞北、粉嶺北、坪輦/打鼓嶺三個主題不同的全新市鎮 ... 立法會議員 擔心社區設施將會「爭崩頭」，隨時淪爲天水圍翻版。”

(source: 20091118 <http://hk.apple.nextmedia.com>)

In 2006, the population in the New Territory already equal to the sum of Hong Kong and Kowloon's populations. In other words, the center of population center will be shifting further north to the New Territory and further away from the West Kowloon Terminus.

We all, including the Administration, also agree that residents in the New Territory would not travel down to West Kowloon Terminus to double back to the border.

This means, the usefulness of the \$65B West Kowloon Terminus will be less and less before it even starts. On the contrary, a border XR Terminus and PTI will be more and more important and useful as the population growth is shifting closer to the border in the north territory.

Additional Use of the Lok Ma Chau XR Terminus and PTI

West Kowloon Terminus scheme is provisioned to extend the \$65B XRL to Hong Kong Station. That is, Government would probably spend another \$50B to build another XRL Terminus shopping mall for MTRC in IFC just 2 km from the West Kowloon Terminus.

If Government has planned for two XR Termini in Hong Kong, instead of just 2km apart, we rather have those 28km apart strategically placing one in the north border PTI hub and one in a south PTI hub, like in Ho Man Tin or Admiralty.

Today 27% of the working population has to commute between new towns in New Territory and employment centers in Kowloon or Hong Kong Island²⁷. That is, half million (913,373) daily commuters taking almost 2 hours²⁸ in commuting just within Hong Kong.

As the inevitable demographic change with more and more population will live in the north territory and Hong Kong will have a further polarized -- population center is in the north of the territory but the employment centers are still in the south territory. (This is why the Kam Shan Road proposal is strategically better than the West Kowloon Terminus scheme.)

If daily million of work forces have to take more time to commute just in Hong Kong than that from Guangzhou coming to Hong Kong to watch a show, how could Hong Kong be competitive?

A local XRL Corridor, say from Lok Ma Chau or Kam Shan Road to Ho Man Tin or Admiralty metro hub would save Hong Kong more than a million hours each day in commuting. Extra hour of daily family time is very precious to the busy Hong Kong families and invaluable to the quality of life and wellbeing of Hong Kong as a whole.

Burning \$65B for to save a few minutes of only maybe 14,125 XR travelers to watch Hong Kong's local art in West Kowloon Cultural District is manifestly contrary to the weight of the society needs and people's legitimate expectations.

²⁷ http://www.censtatd.gov.hk/hong_kong_statistics/statistical_tables/index.jsp?charsetID=1&subjectID=1&tableID=156

²⁸ 49 minutes MTR time to travel from home to work, Sheung Shui→ Kowloon Tong→ Mong Kok→ Tsim Sha Tsui and 53 minutes from work back home, Admiralty→ Mong Kok→ Kowloon Tong→ Sheung Shui

L. West Kowloon Terminus not meet the Rail Network Expansion Criteria

“XR Termini must be placed in the city centre” is a myth. Having next to West Kowloon Cultural District is an arbitrary and gone-beyond proportionality consideration. Government and experts have a set of relevant criteria defined in formulating rail network expansion. The selection criteria are:

Table 2 Criteria for Formulation of Network Expansion Plans

Sustainability	<ul style="list-style-type: none"> • maximise rail share of travel in the HKSAR and Cross Boundary • minimise the adverse impacts of transport and travel on the physical environment. • minimise the depletion of scarce resources - fuel, land
Development	<ul style="list-style-type: none"> • integration of transport and land use planning • facilitate urban renewal, in particular in <ul style="list-style-type: none"> - Central Kowloon - Western District - Wanchai • facilitate new development areas, in particular in <ul style="list-style-type: none"> - South East Kowloon - NENT - NWNT - Lantau - South Hong Kong Island - Tseung Kwan O Intensification • facilitate the housing programme by enhancing the scope for high density development and redevelopment.
Cross Boundary	<ul style="list-style-type: none"> • facilitate Cross Boundary travel for <ul style="list-style-type: none"> - commuting - leisure - business - freight to adjacent Shenzhen and Pearl River Delta, and further into Mainland.
Integration	<ul style="list-style-type: none"> • form part of an integrated transport system for Hong Kong and Cross Boundary providing: <ul style="list-style-type: none"> - hierarchy of transport links and services - convenient and seamless interchange - user-friendly system
Level of Service	<ul style="list-style-type: none"> • provide appropriate high quality metro, commuter, and inter-city services • provide adequate capacity to meet peak demands • charge affordable fares to the general public in order to offer an attractive choice compared with road-based travel
Economic	<ul style="list-style-type: none"> • provide a cost-effective railway system • generate maximum community benefits • offer affordable fares to avoid social exclusion • affordable investment for the community through Government or private sector
Financial	<ul style="list-style-type: none"> • to be self-financing • provide appropriate return to shareholders • generate sufficient returns to meet replacement and recurrent costs

Administration should use the Rail Network Expansion Criteria to formulate a Decision Matrix (comparison) in selecting various XRL Terminus alternatives.

(V) *Ultra Vires*

1. Has the Administration been acting in excess of her powers under the RAILWAYS ORDINANCE?
2. Has the Administration exercised its lawful powers for a purpose of railway development specifically intended or conferred?
3. Has the Administration made drastic or unexplained change in policy?
4. Has the Administration judged of his or her own cause? Was there appearance of bias in decision making with the party to the dispute or the subject matter of it?
5. Has the Administration abused of her discretion?
6. Has the Administration unreasonably failed to analyze or consider other perspectives?
7. Has the Administration ignored key scientific information?
8. Has the Administration considered irrelevant information in making is decision?
9. Has the Administration made her decision which is reasonable and as been made according to logical principles?
10. Has the Administration been acting arbitrary and capricious in reasoning?
11. Has the Administration partially or arbitrarily exercised her discretion conferred by law in making decision based on policies formulated to guide the exercise of her discretion?
12. Has the Administration's scheme gone beyond the Principle of Proportionality?
13. Has the Administration considered all relevant information or matters?
14. Has the Administration ensured she gained access to all relevant information before making the decision?
15. Has the Administration been tainted by Ex Parte contact?
16. Has the Administration exercised of power by the wrong person?
17. Has the Administration made errors of law in exercising of her discretion?
18. What the Administrative agencies, e.g. its consultant, bureau and departments, actually did, how did they do it, and the internal ethics that both motivate and restrain their behaviour?
19. Has the Administration made errors of fact in exercising of her discretion?
20. Has the Administration's findings of fact been manifestly contrary to the weight of the evidence?
21. Has the Administration denied a fair hearing to allow the disputed parties to put their side of the case?

(VI) Appendix A: Japan's Tokyo Shinkansen Station

This appendix is added to compare West Kowloon Terminus with Japan's Tokyo Shinkansen Station in response to a feedback after West Kowloon Terminus was compared with London's St Pancras XR Terminus in Europe and Tianjin XR Station in China.

The reader's observation was "Tokaido Shinkansen occupies 6 platforms in Tokyo station. ... The Tokyo station of Tokaido Shinkansen serves about 95000 people daily (from website of JR Central) , as this figure is close to the passenger flow of XRL estimated by the government, Tokyo station can be a good reference in designing the terminus of XRL." Here, we will show there is no comparison between West Kowloon Terminus and Tokyo Station because:

1. Tokyo Station has more than ten (10) local rails and metro lines connecting to/from various population, employment and economic activity centers in Tokyo City to the Tokyo Station.

West Kowloon Terminus has no in-station local rail or metro line interchange support.

2. The eight local rails and metro lines bring 35 to 39 million people in the Greater Tokyo Metropolitan Area from various population, employment and economic activity centers to Tokyo Station. The daily 95,000 Shinkansen patronage has a 37-million Tokyo user base.

The 5-km West Kowloon Terminus inner city with a tiny user base is no comparison with Tokyo Station.

3. Narita Airport has a rapid rail directly to Tokyo Station. (For instance, from Hong Kong we flew in Narita and took the rapid rail to Tokyo Station for a convenient in-station Shinkansen interchange to Sendai.)

WKT does not have a convenient interchange to HKIA; it is more convenient and faster from HKIA to KSR XR Terminus in Procommons's proposal or to Lo Ma Chau PTI XR Terminus as we suggested.

4. Tokyo Station is a major Shinkansen XR hub with six Shinkansen lines. All XR travelers from south, west and north Japan XR trains to Tokyo Station for XR interchange to destinations at a further distance. The daily 95,000 XR travelers are not just come from Tokyo City and the Greater Tokyo Area but also from various Japan regions. Tokyo Station is an XR hub, a collecting and distributing point, of XR travelers to make transfer among the six Shinkansen lines.

WKT has just one XRL terminating itself in Hong Kong, dead-ended and isolated at the edge of Victoria Harbor.

Geographically and politically, Hong Kong cannot be the center of a 37-million population metropolitan area. In the greater Pearl River Delta metropolitan area, Guangzhou would be the center and not Hong Kong.



From the network topology point of view, West Kowloon Terminus is no comparison with Tokyo Station.

West Kowloon Terminus is an XR terminal station like Niigata Station in Niigata (新潟), the largest city on the Sea of Japan coast at the end of the Jōetsu Shinkansen.

Tokyo Station is the largest Shinkansen hubs in Japan.

The New Guangzhou Shibi Terminus has an equivalent function of Tokyo Station being a major XR hub of a national Shinkansen or high-speed rail (XR) network.

WKT cannot and should not try to take the place of Shibi Terminus or act like Tokyo Station.

5. The Niigata Station has in-station interchange with three (3) local metro and six (6) Express/Rapid train services connecting XR travelers to/from various population, employment and economic activity centers in the city and surrounding areas.

West Kowloon Terminus does not even have this essential support for XR travelers. All, including the Administration, have agreed a larger majority of Hong Kong population will be exclude form the useful range of West Kowloon Terminus.



With such a tiny 5-km inner city user base, how could West Kowloon Terminus have daily 99,000 XR passengers, more than the 95,000 Shinkansen ridership of Tokyo Station on an over 40-million-user base?

Not only the daily WKT 99,000 XR ridership forecast is unrealistically exaggerated; its growth forecast doubling (>100%) in just 15 years (2031) is also too optimistically high because Tokyo Station could not even achieve the 100% growth but just 14% in the past 15 years²⁹.

Niigata needs only four (4) XR platforms to serve the Jōetsu Shinkansen to Tokyo and the entire Japan Shinkansen network. Why does West Kowloon Station need fifteen (15) XR platforms?

Fifteen (15) XR platforms are more than the sum of all XR platforms in Tokyo Station and that in Niigata Station?

東京高鐵站是一個有 6 條高鐵線和十多條本地鐵路的高鐵交匯站，西九高鐵站祇有單獨一條線的尾站，西九高鐵站為什麼還要 15 個月台多過東京站加新潟站的月台的總和？

²⁹ Passenger Ridership was 151,000,000 in 2008 and 132,000,000 in 1993; <http://english.jr-central.co.jp>