
**Response by the Business Policy Unit of British Chamber of Commerce
to Government’s Public Consultation on Strategic Studies on
Railways and Major Roads beyond 2030**

We would like to make an overall observation on the document, before providing specific feedback on the seven specific groups of questions highlighted on pages 53 & 54 of the consultation document.

1. General Comments

- The Chamber strongly supports the long-term planning approach adopted in the Strategic Rail and Roads Studies to take us beyond 2030. This long-term planning approach must be linked to the opportunities for economic growth and business development that such infrastructure-led projects can bring but must also be based on sound projections of potential. In this respect, we are not certain that developing the transport plan based on a forecast local population of 8.86m before 2050 would be the preferred approach. Experience has shown that actual resident population numbers have lagged CSD’s high population estimates for many years. However, we do believe that the basis of planning may need to change and journeys should be included for those living in Shenzhen and working in Hong Kong and vice versa as integration in the GBA speeds up.
- We strongly support a “rail first” or “rail as a backbone” approach to public transport planning, which has served Hong Kong well in the past and is a key ingredient essential for a sustainable transport network. We also appreciate the need for new roads to underpin new development areas in particular, but also suggest that measures to constrain the high growth in private cars are necessary to avoid a cycle in which new roads reduce traffic congestion, which in turn leads to more cars on the roads. The Chamber has in the past urged government to expedite implementation of Electronic Road Pricing (ERP), free flow tolling and other such developments to help constrain such growth and facilitate more sophisticated charging for road use, especially as EVs become more prevalent.
- We note that the Major Transport Infrastructure Development Blueprint up to and beyond 2046 will be formulated in the study. Longer term strategic development planning, over 20- or 25-year lead times, has worked well for our city in the past. On page 17, three objectives are highlighted (“Drive Development”; “Strengthen Connection”; and “Improve Efficiency”). Whilst the Chamber supports these three, we would also add a fourth, that we should aim to deliver these strategies in the Blueprint taking into account Hong Kong’s environmental needs in achieving carbon neutrality by 2050 and in a way to support our development as a Smart City¹,

¹ [Hong Kong Smart City Blueprint 2.0](#) – Ibid, pages 6 & 7

in particular with intelligent transport system and traffic management and achieving environmental friendliness in transport, for example through the promotion of electric vehicles and rail to facilitate a net zero ambition.

- The lack of innovation and technology introduction is a major impediment to improved mobility and improving the urban environment. Progress on road-pricing, congestion charging, pedestrianisation (such as in Central) and in the reform of taxis and taxi regulation has been slower than the Chamber would like to see.
- Following on from the point above, we recommend having early consideration of the eventual decarbonisation of road transport. This has implications for traffic planning as with an increase in volumes of e-vehicles, there will be greater demand for electric charging stations. New highways connecting key centres should consider how charging needs for electric buses, passenger cars, taxis, vans and trucks could be accommodated on-route or expanded at the road destination points.
- Better and more holistic planning for integrated mobility solutions is essential to encourage seamless modal shifts in transport between road and rail, with the development of convenient and efficient Public Transport Interchanges (PTIs) and these must be built into the plan, upfront. The integration between modes needs greater attention, including last-mile connectivity between railways/ major roads and local areas with last mile ease of use for local public transportation and other alternative services. Establishing Transport Interchange Hubs will enhance local connectivity - note the recent URA redevelopment in Kwun Tong. The document notes that rail currently reaches more than 70% of the population, but with the creation of better cycling and walking routes and the new lines being planned, government should target an increase to over 80%. This way road vehicle transport may be needed on less and less journeys. Where feasible, cycling should be considered as a mobility mode, rather than simply a form of leisure.
- We offer three more specific comments on transport strategy: (i) we do not make enough of water-borne transport in the way that other cities do – for example Sydney and London; (ii) several new tourist destinations are poorly served by regular, integrated, local public transport services – for example the Palace Museum and M+ in West Kowloon, where the development of public pier facilities has lagged behind the completion of these projects; adversely impacting sustainability; and (iii) planning ahead for new technology can minimise redundancy – for example, the future use of autonomous vehicles.

2. Specific responses to questions posed in the consultation document

- 2.1. **Effectiveness in rail/ road alignment.** Our view is that roads may be built for different reasons, even in a small jurisdiction like Hong Kong. We have **highways, major urban thoroughfares** and **local distributor roads**, as well as **residential streets**.

The three new major roads proposed are either highways, bypasses or new road tunnels – all are designed to ease congestion on key trunk routes. For rail, however, it may be different, as apart from the XRL and Airport Express, routes are primarily designed to serve the needs of communities, commuters and local residents, so the alignment must address all these needs. For the HSKQ route, we therefore support the addition of intermediate stations. The other two projects (a “cross-rail” link and a simple extension of the TKO line) both make sense as they are. For environmental reasons, as well as the need to preserve above ground land resources, it is suggested to continue to look at underground “heavy rail” for the East Kowloon line, especially if this can be funded by the successful Rail plus Property Model.

Additionally, while the rail system can operate efficiently as one integrated system, oversight of rail planning and operations should be enhanced to better control the risks typically facing one operator. Interface with other operators or systems (for example the Western Rail Link) must ensure neither design nor operating standards are compromised.

- 2.2. **Diversion effects.** Whilst the document notes some benefits in diverting traffic from existing to new routes, we still want to see development to increase the reach of rail to more of the population and also enhanced PTI provision, as noted above.

- 2.3. **Intermediate rail stations along routes.** They can be beneficial to increase access by more of the population, especially if property development above stations can cover the costs of the basic rail line development. Adding 1 or 2 station(s) to the proposals presented would not significantly increase transit times.

- 2.4. **Road interchanges/ exits/ entrances.** We have no specific comment, except to reflect our points above on the need to manage the environmental aspects of road building and to take account of the nature of the road development itself. As noted above, the three additional roads proposed are either highways, bypasses or tunnels, so entrance/ exits are likely to be limited.

- 2.5. **The Chamber is supportive of Hong Kong’s key economic development being infrastructure-led.** As noted above, integrated land planning to optimise travel across transport modes and a greater focus on rail access for more of the population should help to reduce land pressures from such development. Extension of the Rail plus Property Model to the new lines will also defray development costs.



2.6. **Land resumption/ temporary traffic diversion.** Our response to this question is similar to that for the points above. Development needs to be carefully planned in an integrated mobility fashion, to minimise diversions/ delays in using existing links, as the new road developments are constructed.

2.7. **Railway Projects – financing.** As noted above, we strongly suggest the very successful Rail plus Property Model is applied to project developments to help offset the development costs. In other areas, for roads, bridges and tunnels, for example, there should be a greater use of private sector finance applied in PPP models.

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