

4 February, 2014

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Head (Kai Tak Office)
Kai Tak Office
Kowloon Development Office
Civil Engineering and Development Department
7/F, Empire Centre
68 Mody Road
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Kowloon

Dear Sorais,

Stage 2 Public Consultation on Connecting Kowloon East
– Environmentally Friendly Linkage System

The Chamber supports the principle of an environmentally friendly, efficient, cost-effective and sustainable transportation system, connecting the neighbourhoods of Kowloon East with the rest of Hong Kong to enhance the accessibility of the area encompassing Kai Tak, Kowloon Bay and Kwun Tong, and to facilitate the area's redevelopment into another premier CBD catering to the growing needs of commercial, leisure and entertainment purposes. Nevertheless, we have concerns on whether the proposed Environmentally Friendly Linkage System ("EFLS") meets the stated criteria above and whether it will be financially viable, even on an operating basis so that it may need continual annual subsidies from the Government.

2. The overseas experience of employing monorail systems for public transportation in many parts of the world generally tells us that they are an expensive and highly inflexible piece of infrastructure due to their high construction costs, low revenue and difficulty of realignment with roads and other infrastructure facilities once the extensions of systems or redevelopment of adjacent areas are required. The decommissioning of Sydney's monorail in 2013 was one of such examples.

3. In view of the huge capital outlays and low expected operating return of the proposed EFLS, we suggest that the Government should conduct a **comprehensive cost-benefit analysis** of the project with detailed projections of cost breakdown, expected ridership level and revenue so that the general public is informed of the financial viability of the project. The Government should pay particular attention to the flexibility and needs of inter-district extensions of lines and/or route alteration by taking into consideration future urban regeneration or revitalization of the adjacent districts.

4. Financial, social, environmental feasibility cannot be established without quantitative estimates. In the work that has been presented to date, there are no projections of the ridership of the system. It should be borne in mind that studies of other public rail facilities have massively over-estimated the ridership - for example, the Airport Express Line although some may consider the infrastructure a success. The studies for the EFLS do not seem to have estimated ridership and usage. Nor have there been substantive estimates of costs and revenues released during the public consultation process. Besides, there does not seem to have been any comprehensive assessment of social and environmental impacts. Nor have there been any comprehensive and formal analysis of alternatives.

5. We are also concerned that the proposed EFLS with the construction of the new Kwun Tong Transportation Link (“KTTL”) at the southern tip of the old runway will prevent access to the typhoon shelter for high-mast vessels and therefore may sterilise its potential use both now and in the future. The Government should consider eliminating this link and work on alternative solutions. This body of water is highly useful as a typhoon shelter and has excellent potential for marine sports and leisure uses for which there is a huge and demonstrable shortage at the present time. Restricting access to this water body under the current proposal has a very negative and permanent impact on the usefulness of this water body. As with the proposed EFLS, there is no ridership projection to support the financial variability of this KTTTL.

6. Alternatively, the Government may want to consider exploring other options of enhancing the existing infrastructure, applying administrative measures and introducing other transportation modes to increase the

accessibility of the Kai Tak Development Area to the rest of Kowloon East, while maintaining a relatively green environment in a more cost-effective way. The difficulty of connecting the whole area to the existing MTR lines does not appear to have been adequately studied and the excuse of problems with the existing and proposed utilities was unconvincing. The Government should explore more carefully the possibility of having a full-scale underground railway. Another recommendation could be to make use of the secludedness of the ready-to-develop land in Kai Tak from its neighbouring areas to enable the experimenting of more innovative and sustainable planning and traffic arrangements. For example, electric buses on dedicated routes could be deployed to connect Kai Tak with the nearby MTR stations. Access to Kai Tak could be limited to electric vehicles only during daytime, with commercial vehicles being allowed to make delivery and engage in other activities for the rest of the day only. A road charging scheme could also be adopted for vehicles entering Kai Tak. All these initiatives with their implications on the road capacity should be studied and supplemented with cycle tracks, pedestrian footpaths, walkways and footbridges to provide both inter- and intra-district connectivity to support the redevelopment of the entire Kowloon East into a vibrant, dynamic and green district for business, leisure and tourism activities.

Yours sincerely,



Shirley Yuen
CEO