



香港城市設計學會  
Hong Kong Institute of Urban Design

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12 April 2024

By email: enquiry@ttss.gov.hk

12/F, South Tower, West Kowloon Government Offices,  
11 Hoi Ting Road, Yau Ma Tei, Kowloon  
Strategic Studies Division

Transport Department

Dear Sir,

**Re: HKIUD recommendations on Traffic and Transport Strategy Study**

On behalf of the Hong Kong Institute of Urban Design, we would like to submit, on the attached file for your consideration our recommendations on Traffic and Transport Strategy Study.

We are also pleased to meet relevant officers to further explain the contents therein if necessary.

Should further information be required, please kindly contact me or Ms. Cherry Lau, our Senior Administrative Officer at 2235 9057. Yours sincerely,

A handwritten signature in black ink, appearing to read 'Barry Wilson', is written over a light grey rectangular background.

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(Barry WILSON)  
President, HKIUD  
Hong Kong Institute of Urban Design

cc: Ms. Doris Ho, JP Permanent Secretary for Development (Planning and Lands),  
Development Bureau

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**Transport Department Traffic and Transport Strategy Study (TTSS) – Briefing to Professional Institutes, City Hall, 31<sup>st</sup> January 2024.**

**Presenters:** Leung Sai Ho, Asst Commissioner/Strategic Studies of Transport Department, Wilfred Lau and Carmen Chu of Arup.

**Website:** <https://www.ttss.gov.hk/en/traffic-and-transport-strategy-study/about/>

## **1.0 Preamble**

1.1 Prior to the commissioning and commencement of the TTSS Transport Department engaged with the HKIUD to solicit its views of the proposed study. Members provided a range of comments to Transport Department included amongst which was that Urban Design should be included as one major element of the TTSS in assessing the ramifications of its proposals. It transpired during the course of the Transport Department (TD) presentation that no cognisance of urban design had been made during in preparing the TTST proposals. Conversely, the major driver of proposals was the facilitation of vehicle movement and an increase in the vehicle fleet.

1.2 The TTST Study commenced in 2021 and is programmed to be completed in 2025.

## **2.0 Strategies Presented at the Briefing**

2.2 Several discrete transportation strategies were presented at the briefing over two sessions: The strategies principally consisted of the following:

- **Enjoyable Journeys:** A major intention of the TTSS was to promote enjoyable journeys through a variety of modes. The TTST study states that it will .....“I adopt a people-centred approach in formulating strategies to improve the passenger experience of public transport services, and to strengthen the connection between Hong Kong and other cities in the Greater Bay Area to develop a liveable and high-density city to support sustainable development in Hong Kong”.
- **Building a New Generation of Transportation Interchange Hubs (TIH’s):** A new generation of transport hubs are to be built. To be known as “Transport Interchange Hubs” (in essence multi layered multi modal Public Transport Interchanges PTI’s) where the intention is to bring together a range of public transport modes to enhance their access and use. This initiative would also be at the core of creating more sustainable neighbourhoods by better integration of transport and land use planning.
- **Exploring the Introduction of “On-demand Public Transport Mode”:** Technologies are being investigated to provide for efficient and convenient access to public transport on an as-required basis via mobile phones.

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- **Making Continuous Improvements to Cross-boundary Public Transport Services for Better Connectivity with Other Cities in the Greater Bay Area (GBA):** This will be afforded by 10 new connections to the GBA 6 of which will be road based.
- **Continuing to Shape Hong Kong into a Walkable City:** The TTSS includes proposals to promote walkability in Hong Kong. Initial initiatives are only to be made in New Development Areas (NDA's) in appropriate locations. This may require the replanning of NDA's prior to their implementation in forthcoming years to shift emphasis away from vehicular transportation.
- **Application of Smart Motorway Management:** New technologies and measures are to be employed to enhance traffic movement and capacity on Motorways. Part of the strategy will involve use of the hard shoulder for vehicular use. A pilot scheme is to be trialled on the Tin Kau Bridge southbound carriageway. The system is to be integrated with smart motorway management within the. Full surveillance on roads will be implemented. Provisions for the strategy have been incorporated in the design of new motorways.
- **Promoting Cycling and Supporting the Use of Electric Mobility Devices in New Development Areas and New Towns:** The strategy advocates provision cycling within the New Territories on paths dedicated to cycling. The uses of cycling as a means of commuting in the New Towns and NDA's will be facilitated. The strategy does not examine the means through which cycling might be facilitated in the existing established urban areas. Cycle Parking will be provided at proposed TIH's. The strategy will also facilitate the use of Electronic Mobility Devices (EMD's) in New Towns and NDA's. Regulatory measures will be drafted to facilitate the use of EMD's in these areas. Further study will also be undertaken to examine how EMD use might be facilitated.
- **Promoting the Development of Autonomous Vehicles (AV's):** TD intends to promote the use of AV's. A series of pilot schemes to be implemented in Airport City, the WKCD, and Discovery Bay.

### 3.0 Public Affairs Committee (PAC) Position on the TTSS:

#### 3.1 General

Far from comprehensively addressing transport and transportation throughout the entire Hong Kong Special Administrative Region (HKSAR) the strategy seems to be confined to implementing initiatives in the New Towns and New Development Areas rather than addressing pressing needs in the older urban areas. Under the TTSS's own admission this is because measures are "easier" to implement in the former

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rather than the latter. Whilst the strategy asserts that it aims to promote “green and sustainable” transit there is enormous emphasis in increasing road capacity and facilitating growth in the vehicle through highway management and expansion proposals. In this respect the TTSS is more redolent of historic road transport planning than it is of a modern visionary transportation strategy.

### 3.2 Specific

Specifically the HKIUD’s position on the TTSS is as follows:

- a. **Unacceptable Vehicle Numbers:** The existing situation with the number amount of vehicles on the road is unacceptable. The TTSS does not outline strategies to reduce vehicle journeys/registrations. Conversely the TTSS should be devising urgent strategies to decrease the numbers of vehicles on our roads setting out a clear timeline by which this should be achieved.
- b. **Limited Breadth:** There is an apparent paucity of ‘transport’ and ‘strategy’ in the ‘TTSS’. Whilst HK’s world-beating 90% public transport mode share is rightly mentioned, the attention of the TTSS appears to be about increasing road capacity, rather than to maintain or improve Hong Kong’s lead in public transport use.
- c. **Vehicle Ownership:** Whilst the TTSS claims to have undertaken international studies it does not appear to have taken note of what is being done elsewhere in the world with an aim to reduce vehicle ownership and vehicle miles travelled, as well as reducing provision for vehicles e.g. alternation of parking standards. This is not a matter that is to be left to the Planning Department’. It is a matter that should be addressed by a comprehensive traffic and transportation study.
- d. **Impact of Increased Cross Boundary Movement:** Roads and parking induce journeys. If cross boundary vehicle trips are being encouraged with new generations of highways (6 new routes are being proposed) the TTSS is silent on the way in strategy how the HKSAR is to cope with what is likely to be a significant increase in cross boundary traffic, and moreover, the likely extent of parking that will be required. No thought to the provision of park and ride provision seems to have been discussed. As a matter of principle, however, cross boundary trips should principally be confined to public transport. In addition there is an absence of discussion on cross border, automated air corridors and hubs.
- e. **Vehicles and Deaths:** First world cities are targeting zero road deaths as a desirable transport objective. This goes hand in hand with the increasing rates of pedestrian and cycling casualties as against a reduction in vehicle casualties. This needs a radical overhaul of approach to using space - the words mean nothing without a clear set of strategies of converting urban roads (movement) back to urban streets (places).

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- f. Promoting Integration:** The TTSS should be concerned with devising a proactive strategy with specific emphasis on promoting an efficient, integrated transport network, with bus, rail (and ferries) working collaboratively and not competing. Bus routes need to be completely rethought and overhauled. Road strategies need to be adapted to make specific provision for buses and to promote their use over other vehicles.
- g. Walkability in all Urban Areas:** Under the TTSS walkability initiatives are relegated to New Towns and New Development Areas. No interventions are advocated within the older established urban areas because, presumably, these are harder to implement than would be the case in newer areas. It is precisely because they are hard to address that they should be addressed. Many of the measures may be counterintuitive to Transport Department whose major concern is facilitate the free movement of traffic. Hong Kong envisages itself as a world class city. It should, therefore, provide world class walkability in new and old urban areas. Not addressing walkability in our older urban areas will have serious implications on tourism, investment, liveability and the economy.
- h. Adequate EV Charging:** The TTSS appears to be silent on how EV charging can be effectively integrated into the public domain for taxis, light vans and logistics vehicles. New and innovative strategies being employed overseas should be studied to investigate their possible adaption for use in Hong Kong.
- i. Local Deliveries:** No last mile discussion on the possible use of- AV / EV / low carbon / small scale delivery logistics strategies that would contrite to ameliorating the impact of traffic at local level.
- j. Need for a Multi-Disciplinary Approach to Address the Environment and Public Health:** The TTSS appears to have largely limited itself to traffic and transportation and is absent of consideration of the environment and public health. There is for example no joined up consideration of health; safety; air-quality; carbon neutrality; energy consumption and social equity. The TTSS should be considerably more multi-dimensional in addressing future transportation needs and how these should be addressed. Take for example the environment and specifically air pollution. The average combustion engine vehicle produces **4.6 metric tonnes of CO<sub>2</sub> each year**. As of 2021, the total number of vehicles registered in Hong Kong reached **926,238**, about **13,000** more than the previous year. There approximately **76 395 electronic vehicles (EV's)** on the Hong Kong roads representing about 8.3% of the total vehicle fleet. If EV's are deducted the balance amounts to **849,843 vehicles**. This means that at its current size the non-EV fleet is generating **3,909,278 metric tonnes of CO<sub>2</sub> each year**. Thus, unless the vehicle fleet total remains static in number the volume of generated each year will grow markedly. The

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accommodation of greater volumes of traffic facilitated by TD proposals will significantly worsen the environment until all the vehicle fleet is electric.

- k. Appropriateness of Technology and Spatial Ramifications:** The TTSS gives major emphasis on “on-demand” service and autonomous vehicles seems to be driven by a desire for “innovation”, rather than any inherent good or diligent study on the applicability of such technologies in the Hong Kong context. From an urban design perspective no discussion or consideration appears to have been included with the spatial requirements that would be likely to occur in relation to autonomous vehicles. Parking and layby provision is not addressed. There is a real danger that there could be real impacts on the pedestrian realm and the provision of safe walkable environments. The TTSS has also not addressed the impact of an “on demand” service on operators, fleet structure, business models, etc. The devil of all these concepts is precisely in those “details”. If such matters are not addressed the TTSS is, otherwise, little more than sleekly-packaged science fiction.
- l. Need for On Demand Services:** The idea of on-demand services appears as a novelty. It would have been preferable to see consideration of strategies to improve the overall public transport network, how to improve the bus network with its various local and express services and their implications for streets and stops etc., and of course the public realm more widely.
- m. Meaningful Paradigm Shift:** The mention of a ‘paradigm shift’ at the end, towards active modes and primary consideration of pedestrians, was not reinforced by the 75% of the presentation that had come before. As a recommendation, the TTSS could begin with fleshing out that paradigm shift as the vision at the beginning of the document, to set the scene for future efforts.
- n. Experimenting in the NDA’s:** The panel at the TTSS briefing argued that the NDA’s are the focus as a way of experimenting with new approaches so as to show residents of the existing city what can be done. It could be noted that existing cities around the world have successfully made changes without experimenting first in urban extensions; and in any case, the issues and solutions will be rather and significantly different in NDAs as compared with the existing built-up areas.

## 4.0 Overview

Without doubt mobility strategies will have a strong influence on the overall betterment of the city. The urban design implications are significant in the long term. In its present form the TTSS is likely to have serious ramifications on the ability of the HKSAR, as it aspires, to attract attracting talent, investment, and, moreover, to compete with other cities over the next decades.

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It is of regret, that contrary to Transport Department's promise, made prior to the commencement of the TTSS, that no apparent consideration has been given to urban design. Had serious concern been given to the built environment and its betterment it is likely that the TTSS would not be advocating many of the strategies that are presently proposed. A more expansive multi-dimensional, multi-disciplinary approach is called for to generate a strategy that is truly inclusive, visionary and inclusive.

**HKIUD Public Affairs Committee  
April 2024**

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