



香港地貌岩石保育協會
Association for Geoconservation, Hong Kong

2 August, 2026

Director of Highways
Highways Department
5th Floor, Ho Man Tin Government Offices
88 Chung Hau Street
Ho Man Tin, Kowloon

Attention: Mr YAU Kwok Ting Tony JP (Email: tonyyau@hyd.gov.hk)

Copy:

Major Works Project Management Office, HyD: pmmw.mw@hyd.gov.hk
AMMJV: samuel.kwan@arup.com

Dear Mr Yau,

Route 11 Tsing Lung Bridge Concerns for impacts on Nature, Geodiversity, and Landscape

The Association for Geoconservation, Hong Kong (AGHK) was founded in 2007 as a conservation NGO with the primary objectives of conserving the valuable geological heritage and landscape of Hong Kong; to disseminate scientific information of our earth; to promote sustainable geotourism and eco-tourism as well as to make Hong Kong a better place to live.

OVERVIEW

We would like to encourage Government to deliver new highways to the highest standard of nature conservation, landscaping, and aesthetics while concurrently meeting the objectives of traffic capacity, operation, safety, economics, and programme.

MANAGEMENT CENTRE AT LANTAU SIDE- LANDTAKE AND DAMAGES

We are unconvinced of the major land formation at the southern landfall of Tsing Lung Bridge to accommodate the Route 11 management building. The rationale is:

- The proposed earthworks include tall cuttings adjacent to the hilltop of Ng Kwu Leng in angular form which is incompatible with the natural terrain.
- Such major cuttings are also undesirable for the aesthetics of Tsing Lung Bridge as a landmark.
- Current conversion of the Lantau Link toll plaza to free-flow tolling already released enormous area of levelled land ready for use.
- Modern control facilities based on advanced technology do not require siting of the control room directly overlooking Tsing Lung Bridge.
- Similar management facilities at other existing tunnels in Hong Kong often occupy excessive land with outdoor parking and access roads. This is considered not a sustainable practice as more highways and tunnels are built.



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We would like to give the following recommendations:

- The management facilities are shared/partly shared with those for Lantau Link.
- Reduce the land take, and in turn, the need for large earthworks.
- Provide multiple platforms to avoid excessively tall cut slopes.

MANAGEMENT CENTRE AT LANTAU- INTEGRATION WITH NATURE PARK AND VIEWING PLATFORM

We recommend that the Ng Kwu Leng area to be designated a public park with the following facilities:

- Public parking area with access through the interchange already for the management centre
- Viewing platform
- Amenities- picnic sites, toilets, coffee shop, etc.
- Walking paths and connections
- Connections with the nearby bus-bus interchange

TUNNEL PORTALS

We understand that attention will be given to the compatibility of the tunnel portal buildings with the surrounding landscape. In this respect, we suggest that this issue is further explored given the generally enormous size of ventilation buildings at tunnel portals in Hong Kong.

In brief, the following approach should be followed:

- Subtle architectural form in harmony with the rugged granite landscapes at Tsing Lung Tau.
- Extensive use of natural rocks of irregular shapes excavated from the tunnels for architectural and landscaping design.

RECLAMATION AT TSING LUNG TAU

We understand that a reclamation is planned at Tsing Lung Tau. On this issue, we would like to recommend the following:

- Utilise the land as a resting place/viewpoint for the planned Tsuen Wan to Tuen Mun cycle track.
- Create a local geological park of naturalistic design using excavated rocks from Tai Lam Chung Tunnel and other tunnels of Route 11, and from cut slopes.
- Promote geodiversity education with open stockpiles of rocks citing the origin from the various tunnels or cut slopes of Route 11 with suitable illustrations.

MATERIALS FROM TUNNELS AND EXCAVATIONS

In our understanding, vast quantities of excavated materials from tunnels have to be disposed of. We have been advocating the beneficial use of in-situ rock materials for naturalistic landscaping and architectural design of infrastructure projects. We hope this project will showcase how such approach can be adopted.



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In fact, tunnel excavation will generate rock materials of special values in landscaping and geological education. We hope that in Route 11 the whole process will be integrated with landscape design and earth science education.

We would like to reiterate that fake rocks and imported rocks should not be adopted for architectural and landscape purpose. This will need special attention and special provisions at the design stage.

SLOPE WORKS AND ROADSIDES

We would like to recommend the followings for all slope works:

- Blending into the natural terrain.
- Smoothened corners at edges of cut slopes.
- Suitably exposing natural rock formations as part of the landscaping strategy.
- Avoiding indiscriminate application of shotcrete over slopes.
- Attention to details and positioning of catch pits and channels.
- Attention to aesthetics of any boundary fencings.

We look forward to your reply on the above points and would be pleased to continue our dialogue with the responsible offices for these projects.

Best regards,

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