

Hong Kong, 30 December 2015

Clerk to the Panel on Transport
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Dear Sirs,

Below please find our views on views on the proposed increase in fixed penalties for congestion-related traffic offences and implementation of Electronic Road Pricing Pilot Scheme in Central and adjacent areas.

Yours sincerely



Paul Zimmerman

Support increase in fixed penalty for congestion-related traffic offences – but more is needed

1. We support the proposed increase in fixed penalties for congestion-related traffic offences.
2. In addition, the root causes of the increase in demand for parking, drop-off/pick-up, (un-)loading in the older parts (south of the Connaught Road corridor) need to be addressed:
 - a. Park ‘n Walk: Parking facilities OUTSIDE the older urban areas and near the through roads should be identified and increased. Shun Tak Centre, Rumsey Carpark; the various parking in the IFC complex, and the Star Ferry and City Hall Parking facilities are full on most working days between 11am and 4pm. Also, consolidated electronic information on available parking bays in these facilities should be provided on-line and for road users.
 - b. Drop-off (pick-up) and Walk: Convenient locations need to be identified for drop-off and pick up from where there are convenient pedestrian connections to destinations throughout Central. These connections need to be improved. Among others, government should review the assessment mechanism for fees and premiums for connecting buildings to the network of elevated footbridges so that this can be expanded.
 - c. (Un-)loading: There are few to no residents in Central. (Un-)loading activities should be allowed only to take place outside office hours. These activities should be banned during peak traffic hours. Moreover, convenient (un-)loading points should be identified and the routes between those and the destinations should be made barrier-free for trolleys. A standard trolley size and design should be identified and promoted for convenient transfer of goods using pedestrian facilities.

Implement the right technology for Electronic Road Pricing in Hong Kong

3. We support the implementation of electronic road charging technology to aid traffic management and road use in Hong Kong. Fees collected should be used to improve public transport and walkability of districts.
4. The increase in GDP and personal wealth, the increase in the number of housing units in the New Territories and the committed increase in cross-border vehicular capacity will continue to drive the increase in the number of vehicles which compete for road space. Any time lost in implementing rail infrastructure as the backbone for our transport (lack of a rail connection to Macau, the deferral of a rail connection between the airport and national (express) rail grid, Northern Island Line, South Island Line (West), etc) will increase the demand for road transport and increase the number of vehicles competing for space on Hong Kong's limited road network, including Hong Kong Island.
5. The decline in car journey speeds is caused by the queuing of vehicles which seek to enter older urban areas with extreme limited road capacity. At the same time, the demand for access grows with the increase in density of developments, residents, employees and economic activities in these areas. Although this queuing time is a disincentive for the use of road transport, the ongoing program of building through roads and highways is improving journey times and mitigates the time lost queuing.
6. The road pricing technology to be considered should consider the above causes of traffic congestion, as well as Hong Kong's topography, urban development model, and road and transport grids. The charging should promote the use of alternative modes of transport. There is little benefit with Hong Kong's short road network to promote the use of alternate routes. In fact, the most economical is for all traffic to follow the shortest route between origin and destination and to minimize distances travelled.
7. At all times, the charging should discourage road transport from entering older urban areas. Traffic which bypasses urban areas can do so without charge. The alternatives to be promoted is first the use of rail over road use; next the use of public transport over private vehicles; and thirdly to park'n walk (park outside older urban areas and walk to destinations). Charging systems should discourage drivers from seeking routes to 'bypass' the system or require changes in road engineering and traffic management.
8. Charging systems should be simple and dynamic taking into account variables such as vehicle engine (environmental performance), vehicle length and weight, vehicle use (public, taxi, emergency, vs private), vehicle origin (local vs visiting), area, time of day, day of week, etc. Importantly, the system should be expandable throughout the territory without having to undertake significant engineering.
9. Therefore, the two ERP technologies Government is considering - namely "Automatic Number Plate Recognition" ("ANPR") and "Dedicated Short-range Radio Communication" ("DSRC") – which both require gates, may not be ideal. Their use is limited to tunnels, and road corridors.
10. We urge for the implementation of Vehicle Positioning based systems using Global Navigation Satellites and satellite based Global Positioning (GPS). No roadside equipment is required at charge points but violation enforcement stations are required at strategic locations. A wireless data communication network is provided between the vehicles and the control centre for transaction data transmissions, database updating and enforcement verification.