

立法會陸恭蕙議員辦事處的信頭  
Letterhead of OFFICE OF CHRISTINE LOH • LEGISLATIVE COUNCILLOR

**HONG KONG'S UNSUSTAINABLE TRANSPORT STRATEGY**

**Third Comprehensive Transport Study  
Strategic Environmental Impact Assessment**

**WHAT YOU MUST KNOW & ACT UPON NOW**

**Executive Summary**

The *Third Comprehensive Transport Study* (CTS3) is a publicly funded consultancy for the Government to develop a strategic transport framework for up to the year 2016 for a population of 10.1 million.<sup>1</sup> A *Strategic Environmental Impact Assessment* (SEIA) and a Technical Report running to several hundred pages accompany CTS3.

CTS3's stated aims are to integrate land-use, transport and environmental planning in a strategy that maintains mobility in an environmentally acceptable and sustainable way, but it fails to do so.

What the Government released on 26 October 1999 is a summary of CTS3 <http://www.info.gov.hk/td/cts3/index.htm> together with the Transport Bureau's *Hong Kong Moving Ahead: A Transport Strategy for the Future*. <http://www.info.gov.hk/tb/press/index.htm>

These documents omitted much of the key information in the SEIA and Technical Report. Indeed, the strategy presented by the Transport Bureau is so general as to be almost worthless.

Given that much of Hong Kong's air and noise pollution is derived from traffic-related sources, transport planning is a key driver of environmental quality. Despite the Chief Executive's pledges to reduce air pollution in his October 1999 Policy Address, through various technical fixes, without a fundamental change in transport planning, Hong Kong's air quality will not improve, noise pollution will significantly worsen.

**HIGHLIGHTS: SEIA**

*Air Quality*

In 1996, roadside monitoring at 15 urban and suburban sites found that the daily average Air Quality Objective (AQO) for Respirable Suspended Particulates (RSP)<sup>2</sup> was breached 38 times over one month at 10 monitoring sites. The majority of the exceedances occurred in the Yuen Long and Tuen Mun.

According to the SEIA "**pollutant emissions in districts with developing new towns continue to increase mainly due to the provision of new highway infrastructure**".

<sup>1</sup> CTS3 adopted 1997 as a base year to which future conditions in 2001, 2006 and 2016 were compared. GDP growth was used as an indication of the increase expected in vehicle numbers. Three GDP growth scenarios were developed. The forecasts range from an average annual growth of 2.4%, a medium scenario of 4.4% and a high scenario of 4.9%. Different infrastructure scenarios were then considered to predict the likely effects of this growth in traffic.

<sup>2</sup> 180 ug/m<sup>3</sup>

- For all scenarios, air quality will fail the AQO
- High and medium growth scenarios show RSP levels could increase by 89% and 69% respectively relative to 1997
- Air quality in the North West New Territories could deteriorate significantly due to growth in cross boundary traffic and local traffic, as well as the associated provision of new highway infrastructure
- In Tai Po, Sham Shui Po, Tsuen Wan, Sha Tin and Kwun Tong, air quality is predicted to deteriorate under most scenarios due to growth in traffic which offsets benefits of improved emission control technologies.
- RSP level is expected to increase in Mong Kok, Kwun Tong, Tai Po, Tsuen Wan and Yuen Long
- Cross-boundary traffic could **increase by 400%** by 2016, from nearly 30,000 vehicles a day in 1997 to 120,000 by 2016
- When cross-boundary traffic is high, pollutant emissions showed an increase in all districts and most evident in districts with high cross boundary traffic
- Strategies that favour moving goods by road result in significant increases in emissions in some districts eg Yuen Long and North NT.
- The most significant growth (>200%) in emissions of all pollutants is predicted in Yuen Long, Sai Kung and Islands Districts in 2016

The SIA recommends that *“the most effective way to tackle roadside air quality is to eliminate or reduce the emission sources. This can be achieved by “zero emissions” vehicles e.g. electric vehicles, trolley buses or controlling the number of vehicles using the roads. Alternatively, in some instances it may be possible to separate the sources from sensitive receivers by means such as area restrictions, enclosed pedestrian walkways. This will not reduce the overall pollutant emissions but may provide a partial relief in heavily polluted areas.”*

Yet few of these initiatives have been taken up in Transport Bureau’s strategy.

### **Noise**

In 1997, some 49,000 people along roads were affected by excessive road traffic noise.

By 2016, noise performance under all the recommended transport strategies would remain unacceptable. By then, 50% more people in the New Territories will be exposed to excessive traffic noise compared to 1997. Even people in newly developed areas will be affected, with a worsening of both excessive noise levels and exposure duration.

Heavy vehicles are the main culprits. Their relative proportions, out of the total vehicle flow, on certain trunk routes are high (some in excess of 70%) and they have much higher noise emissions on an individual basis than light vehicles. Either the heavy vehicle fleet size should be restrained or its use managed (or a combination) or there will be no real progress in reducing noise.

The SEIA notes that these approaches may have impacts on the transport and economic aspects, and that: *“these issues should be deliberated and addressed in the wider context of injecting environmental considerations in policy and decision making”*, yet there is no real forum or opportunity for debate.

Mitigation measures recommended include rail expansion, putting roads underground, expand pedestrian schemes, tightening vehicle noise standards, require engine encapsulation, promote trolley buses, and dramatically improve traffic management including imposing speed regulation.

Yet again, none of these measures have been officially endorsed.

### **What can you do?**

If you are concerned about the implications of the current transport strategy write to the following to express your concern:

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Your Legislative Council representatives  
Check [www.legco.gov.hk](http://www.legco.gov.hk) for contacts.

Write letters to the newspapers.