



Hong Kong, 11 April 2013

**Chairman and Members
Panel on Transport**

Clerk to Panel on Transport
Legislative Council Secretariat
2nd floor, Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong
panel_t@legco.gov.hk

Re: Measures to improve traffic distribution among the road harbour crossings

Dear Sirs,

Designing Hong Kong Limited supports managing the distribution of traffic through toll adjustments.
Further comments are as follows:

1. Adjusting harbour tunnel tolls to manage traffic distribution is a first step towards a territory wide intelligent traffic management system whereby road tolls are used to manage the distribution of traffic between routes, vehicular access and use of districts, vehicle usage over the time of the day, roadside air pollution control, and to promote the use of public transport over private vehicles. The management of tunnel tolls could be seen as a first step in building community support for electronic road pricing and the intelligent management of traffic throughout the territory.
2. We urge for a holistic approach in deciding on tunnel tolls to minimize societal costs and to fairly distribute net benefits to stake holders. From this perspective the toll adjustment options proposed differ little as a starting point. Most important is that the Administration obtains and then retains flexibility in setting and changing tolls according changing circumstances continuously.
3. Given the need to control traffic in core urban areas there will be a need to increase rather than to lower the cost of using roads and tunnels around and under the harbour for all traffic including goods vehicles.
4. However, it may not be beneficial for the community to seek equal tolls and equal congestion for each harbour tunnel. People may prefer having a choice between paying more tolls for a tunnel with less traffic flow when they are in a rush, and waiting in line and paying less fees when they have time. The societal benefits of having this choice must be taken into account.
5. Decisions on the tolls charged for the use by public transport of the different tunnel and road sections must be driven by both public transport management objectives, such as bus route development, as well as traffic management objectives. The resultant changes in tolls for public transport may therefore be quite different from those for private passenger and goods vehicles.
6. We urge the Administration to see the re-introduction of tunnel congestion charging as an opportunity to develop and implement a territory wide intelligent traffic management system. This is also an opportunity to reconsider the vehicle identification technology used. The development of a standard technology for electronic license plates mandated for all vehicles using Hong Kong's roads will help reduce congestion, eliminate the need for toll plazas, and provide the platform for intelligent traffic management.

Yours sincerely

Paul Zimmerman
CEO, Designing Hong Kong Limited