Letterhead of Friends of the Earth

FRIENDS OF THE EARTH'S SUBMISSION TO ENVIRONMENTAL AFFAIRS PANEL OF THE LEGISLATIVE COUNCIL

Sustainable Transport Policy

12 January 1999

1. Friends of the Earth (FoE) concern about Hong Kong's traffic growth and associated environmental and social costs. In 1995, FoE submitted the response to the working party on measures to address traffic congestion "Driving Us Crazy" that contains objectives to achieve a sustainable transport policy highlight as follows:

    (i) To integrate the transport policy with land-use policy so as to minimize transport demand,
    (ii) To enhance mobility by less environmentally damaging modes and improve the quality of life by encouraging such alternatives,
    (iii) To achieve acceptable standards of air quality and noise by reducing vehicular emissions,
    (iv) To halt the loss of lands to transport infrastructures in areas of conservation, cultural, recreational and scenic value.

Population

2. Population growth and distribution patterns are one of the basic causes for increasing territorial and district transport needs: The approach of the Administration is reactionary to fulfill the expanding transport needs that are virtually reflected by the monotonous strategy of road development especially in the New Territories and on lands formed by reclamation. No measures or intentions are paid to lower the transport demand through the integration of a transport policy with land-use policy. FoE urges the Administration to adopt a pro-active approach in order to control the population growth and distribution pattern as well as vehicle growth. These measures certainly require the participation and inputs from various bureaus such as Planning, Environment and

Lands Bureau, Housing Bureau, Territorial Development Department, Town Planning Board and Port Development Board; in conjunction with the Transport Bureau.

Railways

4. FoE supported that railways should be accorded priority in the use of valuable land space in Hong Kong and for their higher carrying and energy efficiency, and lower environmental impacts (see the table below). However, railways were only put in place to meet the demonstrable need of a certain district; such as the Northwestern New Territories and Tseng Kwun O, when traffic was built up to an extent which had usually overloaded the road networks for years. This cost-effective approach towards transport planning must be replaced by a strategic approach to meet the predicted transport need for new developments.

	Road	**Rail**	**Sea**
Air Pollution	***	*	*
Water Pollution	*		**
Soil Pollution	***	**	*
Health & Safety	***	*	

*Small impact; **Significant impact; ***great impact.

Gwilliam, K. M. and Geerlings, H. (1992). *Research and Technology Strategy to Help Overcome the Environmental Problems in Relation to Transport.* Monitor-SAST. EC. Brussels.

5. Although road networks, such as Route 10, linking Lantau Port to urban areas, existing ports and the border had been planned and under investigation, no comprehensive and confirmed port rail line was proposed. While providing additional transport infrastructure for Northwest New Territories, the Administration planned and built Route 3 long before West Rail. These transport planning cases contradict the pledged strategy of the Administration to preferentially develop rail system. FoE urges the Administration to launch the feasibility study and public consultation of port rail system as a priority over highway development.

Freight Traffic

6. Good vehicles and container trucks are major causes of congestion on certain main roads. Goods vehicles which were the second largest vehicle fleet in Hong Kong, accounted for 24% of the number of the licensed vehicles of Hong Kong during 1998. (The largest fleet was private cars, 63.3%) Owing to the economic benefits brought about by freight transport and the use of rail for freight transport,

especially cross-border, should be encouraged as far as possible so as to increase the mobility and thus reduce economic loss due to the delay by traffic congestion. On the other hand, the overloading situation of certain main roads can be relieved.

7. Owing to the improper planning and uncontrolled development of port backup facilities in the New Territories, unnecessary trips between the port in the harbour and the other supporting facilities, such as container storage, are created that impose extra traffic loading on the main roads and congestion in rural roads. These facilities also bring about many other environmental problems such as flooding, land contamination, noise and visual impacts (please see below). Such unnecessary demand on road should be phased out by careful allocation of the port facilities and restructure of the freight traffic therefore diminishing the traffic generated in incompatible areas such as villages and fishponds.

Pedestrianization

8. Attracting more people out of vehicular modes will be feasible only if a pollution-free and nuisance-free alternative is available. More pedestrian-friendly and biker-friendly pathways should be provided during the planning stage of new development areas and renewal areas. Such pathways should be safe, convenient and avoid the nuisances of exhaust gas and noise from roads. FoE regretted that the health impact and well being of the bikers were out of the study in the environmental impact assessment of some road works such as Tolo Highway Widening. Pedestrians and bikers should be given a higher priority for short and medium-distance traffic.

Vehicle Growth Control

9. FoE supports any feasible ways including Electronic Road Pricing and increase in First Registration Tax and Annual License Fee to restrict the use of private vehicles especially on the main roads leading to urban areas during rush hours. Road provision will never be able to catch up with vehicle growth, eventually suffocating city centre. It is also unfair to the public transport users who select a more transport efficient and energy saving travel modes.

Environmental Impacts

10. Environmental impacts of transport system have not been adequately considered in transport planning. The approach of the Administration is to expand the transport system of Hong Kong without any measures to limit the growth of vehicles and extension of infrastructure. More roads will only attract more

vehicles that will in turn bring along air and noise pollution to new areas.

Air Pollution

11. Hong Kong's air quality regularly exceeds statutory health standards, especially particulate and nitrogen oxides (NO.). Contribution of vehicles to particulate emissions increased from 30.5% in 1988 to 51.8% in 1996 and has become the greatest source of particulate emissions. In the same period, vehicular contribution to nitrogen oxides (NO.) emissions increased from 19.3% to 32.9% (EPD, 1998).
12. Territorial Development Strategy Review (TDSR) revealed that *vehicle related air pollution, mainly associated with goods vehicle traffic, is likely to cause exceedance of the statutory Air Quality Objectives (AQOs) in the Harbour and Tuen Mun Air Control Zones, even assuming all proposed pollution control measures are in place.*
13. Based on prevailing levels of RSP in Hong Kong (i.e. 60 microgrammes per cubic metre), FoE estimated that additional 1928 people die unnecessarily every year. FoE estimated that air pollution costs on health were equivalent to HK$12.5 billion.

Noise Pollution

14. EPD estimated that more than 1 million people are affected by traffic noise. (Hong Kong Environment, 1997). TDSR expected that traffic noise in many areas would *exceed the requirements of the Hong Kong Planning Standards and Guidelines and the Noise Control Ordinance. Development proposals for the NWNT are of particular concern because of increased port related activities and the anticipated growth of associated traffic.* (TDSR-Final Executive Report 1998)

Waste and Soil Pollution

15. The rapid growth of the vehicle fleet, especially the goods vehicles, creates a larger quantity of waste tyres. In 1995, possibly about 750 000 tyres were needed to be disposed of but only about 650 000 tyres were dumped at the landfills. Then the remaining 100 000 tyres were most likely disposed of in improper ways such as open burning (leads to high emissions of lead and particulates) and illegal dumping in countryside.

16. Owing to lack of landuse planning for backup facilities for the increasing vehicles and port expansion, many car repair workshops were set up in the New Territories in past two decades. Because of the ineffective control on the waste disposal, serious soil contamination with chemicals such as lubricating oil is expected over

extensive area in the New Territories. EPD has identified about 150 illegal dumping sites in the Northwest New Territories. Beside construction wastes, many illegal dumping sites contain waste tyres, parts of vehicles and chemicals associated with automobiles.

Habitat Loss

17. Transport infrastructure such as highways may occupy and sterilize (due to the air and noise pollution) lands and damage valuable habitats. Some important colonies of rare species such as the pitcher plant have already been lost to Lantau North transport infrastructure development. FoE found that the construction of Route 3 has grave impacts on air quality at Au Tau, water quality of Kam Tin River which leads to Mai Po Nature Reserve and Deep Bay Ramsar Site, and the stream habitat at Sham Tseng. (Please refer to FoE's press release on 24 May 1998, website http://www hk super net/-foehk).

18. The Administration should protect the remaining important habitats such as Tai Ho Stream which is of significant conservation value as half of the Hong Kong freshwater fish species are found in the stream. Tai Ho Stream is the only known site in Hong Kong or Guangdong for rare species the Ayu (*Plecoglossus altivilis*). (A Conservation Strategy For Lantau, Joint Green Groups) However, the stream is vulnerable to damage from the Lantau North-south Road Link between Tai Ho Wan and Mui Wo. (Country Parks Committee Paper: CMPB/CPC/16/98, AFD)

Greenhouse Gas Emission

19. FoE estimated that the vegetation over Hong Kong's territory assimilates about 600 000 tonnes of carbon dioxide annually. However, the carbon dioxide emissions from vehicles is estimated to be about 12 million tonnes each year, which is about one-third of the total carbon dioxide emission for Hong Kong. Again, FoE regretted that the Administration excluded vehicle growth control as a measure to curb the local greenhouse gas emissions. (ACE Paper 47/97)

Public Consultation and Other Transport Modes

20. FoE supports the measures to encourage the use of non-vehicular transport modes such as Park and Ride and Sky Rail. With the lesson learned from the overemphasis on capacity of Light Rail to solve the transport loading in Yuen Long-Tuen Mun District, comprehensive planning and public consultation is needed for any proposed measures or facilities. Ferries have their roles in relieving road traffic and provision alternatives for passengers. However, ferries are not only facing the competition from land-based transportation but also the impact of

reclamation that affect marine safety with the increasing choppiness of harbour, more frequent mechanical damages due to more floating refuse and the consequent maintenance cost.

FoE's Recommendations in brief

22. To archive a sustainable transport policy, FoE urges the Administration

(I) To reduce the need for vehicular traffic growth with better town planning ; such as

(a) decentralized, clustered and multi-use city development that decreases the need for daily commuter travel,

(b) pedestrian access before driver convenience,

(c) freight rail priority over trucking

(II) To improve and expand Government's traffic management measures; such as

(a) give incentives to drivers who share rides;

(b) implement driving bans or pedestrianization schemes. Partial or total bans on cars have been introduced in many cities around the world. It should be noted that pedestrian schemes result in higher turnovers and increased shop rental values as business improves for local retailers.

(c) promote driver education on adverse effects of transportation and increased awareness of links between traffic and air pollution;

(d) provide incentives to take non-motorised trips (cycling and walking), including provision of bike lanes and bike paths, allowing bikes on ferries. It is important that proper consideration is given to pedestrian facilities at outline planning stage of all new developments. If a city is to be liveable in it has to be walkable.

(III) To promote alternatives to fossil fuel dependence such as Fuel Cells, Liquefied Petroleum Gas and Compressed Natural Gas,

(IV) To assess realistic limits to growth for port development.

(V) Systematic protection and re-forestation of existing Country Parks.

Plato K. T. Yip
ACE Member