



Paper No. WD 9/2005

For discussion on

12 April 2005

Page 1 of 7

Date: 16 March 2005
From: Clear the Air
To: Secretary of Town Planning Board
Fax: 2877 0245

Subject: Wanchai Development Phase II reclamation (WDII) (Ref: CTA001)

Dear Secretary,

Clear the Air submitted a request for rezoning or two OZPs about two weeks ago. On the request, the number of one of the Outline Zoning Plans we asked to be changes was incorrectly stated. Attached is a corrected version showing the correct plan number which is S/H25/1.

We apologize for any inconvenience caused and would like to know the best way to correct this error.

Thank you,

Best Regards,

Annelise Connell
Vice-Chairman
Clear the Air

Email: cleartheairhk@aol.com



Date: 16 March 2005
From: Clear the Air
To: Town Planning Board
Subject: Wanchai Development Phase II reclamation (WDII) (Ref: CTA001)

Dear Members of the Town Planning Board,

Clear the Air requests that the attached S/H24/6 and **S/H25/1** Outline Zoning Plans be amended such that all the reclamation shown as “Wanchai Development Phase II” on the attached map be removed and the plans redrawn to show only the current existing shoreline.

We note that funds for the reclamation shown as part of WDII on S/H24/6 - OZP labeled “Approved Central District (Extention)” have not yet been approved by the Legislative Council. Also, the OZP - S/H25/1 has been struck down by a court ruling.

We make this request based on the Harbour Protection Ordinance that states that there must be a presumption against reclamation if there is a reasonable alternative to solving any demonstrated present, overriding public need.

Electronic Road Pricing (ERP) is a reasonable alternative to address the issue of traffic congestion that has been presented by the Government as the only overriding public need justifying the current reclamation on the OZP for WDII.

In order to obtain cogent and convincing evidence to confirm that no reclamation is necessary, the ERP feasibility study originally completed in 2001 must be updated by an independent consultant with international experience with ERP and presented to the Town Planning Board so that you may properly evaluate this submission in light of the court rulings based on the Harbour Protection Ordinance.

Details are in the attached submission. Thank you.

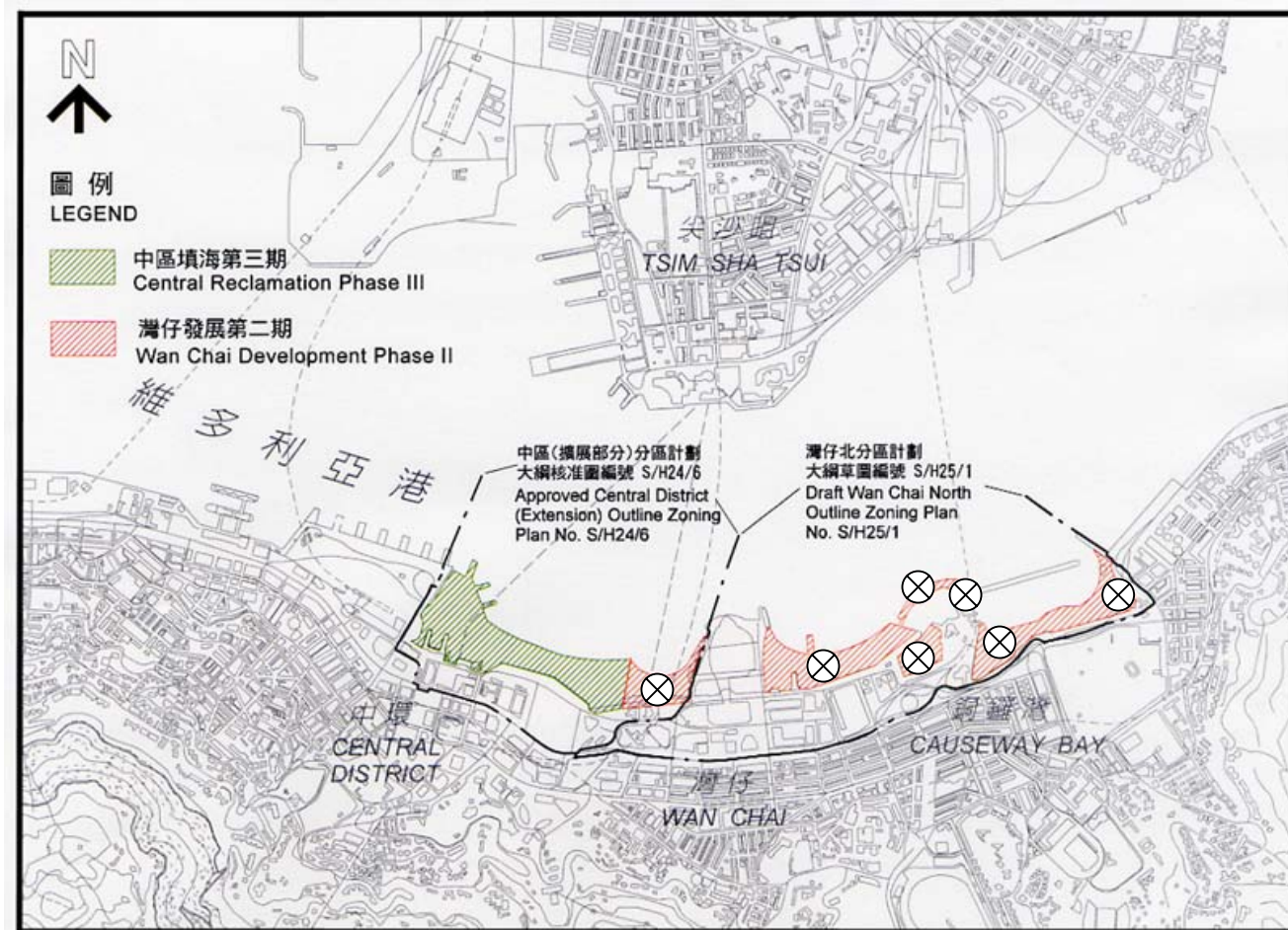
Best Regards,

Annelise Connell
Vice-Chairman
Clear the Air

Attachments: Submission
Map of proposed change to Outline Zoning Plan



(Ref: CTA001) Clear the Air requests that the Town Planning Board amend OZP - S/H24/6 and **S/H25/1** such that all the reclamation labeled “Wan Chai Development Phase II” on the map below is removed.





Submission to the Town Planning Board

Subject: Wanchai Development Phase II reclamation (WDII) (Ref: CTA001)

The Government gave the following justification for not implementing Electronic Road Pricing (ERP) in April 2001.

LegCo Panel on Environmental Affairs and Panel on Planning, Lands and Works
Monday, 8 December 2003, at 4:30 pm

“The Secretary for the Environment, Transport and Works said that repeated **ERP** studies had been carried out in Hong Kong. People in Hong Kong were wary about the system, particularly with regard to the privacy issue. According to the **Feasibility Study on ERP (the Study)** which was completed in April 2001 in parallel with other traffic management plans, it was concluded that drastic restraint measures such as **ERP** were not warranted on traffic management grounds before 2006 as the traffic could still be maintained at 20 kilometres/hour. The use of **ERP** would not be effective in the absence of CWB which was needed to divert the traffic load and reduce the traffic entering the central business district. She nevertheless assured members that the Administration would be looking at **ERP** again when the concern about privacy had been alleviated and having regard to the London experience.”

In summary, there were three things preventing the implementation of Electronic Road Pricing in the Central to Causeway Bay traffic corridor.

1. The overriding public need did not begin until 2006
2. There were privacy concerns regarding payments
3. ERP would not be effective without a Central Wanchai Bypass.

All these barriers have now been removed

1. It is almost 2006
2. The issues about privacy have been solved
3. The CWB is not the only option for through traffic, and more recent actual ERP experience has shown that it is not necessary.

To elaborate on the third issue of an “alternative”:

It has been stated that there “needs” to be a no-cost alternative for through traffic, and that the alternative must be the six lane, below ground Central-Wanchai bypass. This assumption is not accurate.

In Hong Kong the individual traveler already has the alternative of an excellent public transport system in the MTR, KCR, minibuses and buses etc. Under ERP



individuals could still travel during peak times in their own vehicles – they would just required to pay a fee to do so.

Other road users, such as tour buses and delivery vehicles, also have the option of NOT traveling through the zone during peak times. Their customers also have the same option as individual travelers to pay the fee or shift the time of travel away from rush hour. With ERP business traffic will flow faster, saving money.

This creates a level playing field and lets the market determine the true value of using the roads during peak times.

Nevertheless, since ERP is estimated suppress traffic by 24%, when traffic congestion is reduced to an acceptable level, drivers on Connaught Road Central, Harcourt Road, Gloucester Road, Victoria Park Road and the Aberdeen Tunnel flyover could be given a significant discount on the ERP charge if they do not stop or turn off these roads while traveling through the ERP zone.

Once ERP is implemented - Connaught Road Central, Harcourt Road, Gloucester Road, Victoria Park Road and the Aberdeen Tunnel flyover become the Central-Wanchai Bypass.

Points regarding the April 2001 study.

We note the following regarding the original study and the value of ERP over the proposed Central – Wanchai Bypass and the additional proposed surface road network.

- 1) *The Government has no basis of determining to what degree the public was in 2001, or is currently in favor ERP. The 2001 Study did not include a public consultation when evaluating ERP. To date, statements made by the Government on the acceptability of ERP to the public have no basis except the personal opinions of the officials making the statements.*
- 2) *Given the requirements of the Harbour Protection Ordinance the 2001 Study must be updated, including a public consultation by an independent consultant with international experience implementing ERP. The Public must also be given the choice between ERP, including concessions on existing traffic congestion measures such as the First Registration Tax and Annual Registration Fees and the alternative of destroying our Harbour in contravention of the HPO to build the proposed new underground “bypass”.*
- 3) The study should be updated to take into account the recent experience of London, Stockholm, Edinburgh and eight Italian cities in addition to Tel Aviv, Auckland and others who are looking at ERP as a traveller demand management tool to suppress traffic and promote public transport.
- 4) Building a new set of roads to bypass the existing set of roads or supplement them does not solve any problems. ERP *does* address the suppression of trips and therefore there is significant savings to society in *not* building the new



reclamation or road network. The costs - no matter what they are stated to be - are all additional costs to the public. ERP on the other hand, no matter what the start-up costs - pays for the entire system in 2-3 years and generates a positive cash flow after that period for the future. Out of this cash fund, future road maintenance, pedestrianization, new roads and facilities could be built. Further out would be the subsidizing of public transport and lowering of public transport trips for all or certain section of the population - like subsidies for elderly, handicapped and disabled persons on public transport that the government does not now subsidize.

- 5) **“Unnatural” growth of traffic.** Building the Central - Wan Chai by-pass would only produce a short-term reduction of traffic. Soon after we build the road the new trips generated from the sale of the land and construction of new buildings - public or private – will increase the number of jobs and therefore work related trips into the Central Business Area of Central and Wan Chai. Every new office building will increase the number of delivery trucks, service vehicles and other secondary trips related to business into the newly reclaimed land. Landfill and new road patterns will only temporarily reduce traffic but would actually, over time increase traffic along the new waterfront. ERP, on the other hand, would suppress personal trips in cars and promote public transport.
- 6) In London, Congestion Charging increased bus ridership 14% to 18% while suppressing car trips by 33%. Overall trips - after considering increases of taxi's, buses, and push bikes - decreased by 16%-18%. ERP promotes public transport.
- 7) In Hong Kong 88-89% of us take public transport. Almost 90% of the people should not be delayed on their trips due to traffic related problems caused by less than 6-7% of the population driving cars in the same road space. The solution must be to suppress the trips made by the richest 5% of society - those who own cars - who can either pay for the privilege of using the road network at rush hour or joining the rest of society on mass transit. If public transport is good for the 88-89% of the trips, why shouldn't the remaining 5-6% in cars and 5% in Taxi be asked to use the trams, the MTR, the Buses and the Mini-buses that work so well in Hong Kong? Our minority of car drivers should play their part to reduce traffic and save our Harbour.
- 8) A very large percentage of the private cars clogging the road space in the Central to Causeway Bay corridor are driven by government public servants. *The total number of public servants in private cars using the Central to Causeway Bay corridor during rush hour and their contribution to traffic congestion should be listed on the updated report.* Our public transport might work better, faster and more efficiently if the public servants who administer the "public transport" sector receive "first hand" knowledge and experience of public transport issues by riding the same public transport as the people of Hong Kong on a daily basis - rather than driving cars and being provided car parks and vehicles at the public expense.



- 9) The Harbourfront tram must be built on the existing waterfront to handle all the traffic that is currently in single or double occupancy vehicles or crammed into the existing trams. Many people use the Tram at \$2.00 rather than the more expensive buses – a much better value for money for the people of Hong Kong – especially those who have the lowest income. The Harbourfront tram would also provide a charming tourist attraction with brilliant views.

Details about the charging zone – Clear the Air’s best guess.

Notwithstanding the Government’s responsibility and ability to provide to the Town Planning Board all the information contained in the 2001 unpublished ERP feasibility study, not just the Executive Summary, Clear the Air has provided a list of streets that we believe to be the boundary of the ERP zone in the Central to Causeway Bay corridor. Crossing or driving on the streets on the zone boundary would be subject to the congestion charge during peak times.

(**Note:** We would have preferred to use the actual map drawn up by the consultant for the 2001 Study, but that information has not been released to the public. This list of streets is only what we believe to be on the 2001 study and not the data from the study itself. **The Sheung Wan and Tin Hau MTR stations are outside the ERP zone**)

Zone starts - near the Macau Ferry pier, and travels generally:

South: *Harbourfront* - Man Wa Lane - Hillier Street - Ladder Street

East: Caine Rd - Upper Albert Rd - Kennedy Rd

East: Queen's Road East - Morrison Hill Rd – Leighton Rd. - Causeway Rd

North: Hing Fat Street - *Harbourfront*

Zone ends

Summary

We ask the TPB to rezone the two OZP as requested in our cover letter. We request the TPB ask the Government to update the ERP feasibility report of 2001 and outline an implementation plan that will meet the overriding public need to reduce traffic congestion in the Central to Causeway Bay corridor by 2006.

ERP is a reasonable alternative to reclamation to serve the overriding, present public need to reduce traffic congestion because it is

1. **Better** – no reclamation, complies with the Harbour Protection Ordinance
2. **Faster** – can be completed in two years and
3. **Cheaper** – ERP actually makes money

End of Submission