Attn: Transport Department info@erphk.hk

From J Robert Gibson

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ERP Consultation response

www.erphk.hk/en/home/index.html

Introduction the points forming the foundation of my response

My general views, to which I refer below when answering your specific questions below.

1. The following benefits will justify a well-designed , well-managed and hence effective ERP system:
    a. Reduced congestion due to:
        i. People switching from private cars and taxis to transport such as buses which make better use of road space and to the MTR and foot which use no road space.
        ii. Less circling of chauffeur driven cars waiting to pick-up their owners[1].

    This reduced congestion will have substantial financial benefit.
    b. Reduced air pollution and carbon emissions - as noted in para 2.3.5 of the consultation document. Note:
        i. The reduction in air pollution should improve health. The Consultation document seems to leave out mention of this health benefit. I hope the final evaluation will include it.
        ii. The carbon emissions have an 'external cost' in the damage they do to the climate. A carbon price should be applied to the reduction in emissions as part calculating the benefit to the pubic of the ERP scheme.
    c. The switch to public transport and reduction in traffic will make it more feasible to (a) avoid building further roads with substantial cost savings; and (b) pedestrianise some roads and allow freer pedestrian crossings in others.
2. Features needed for the ERP system to be well-designed:
    a. **Clear objectives:** The system should be designed and managed around targets to increase the speed of traffic flow by a certain amount on key roads.
    b. **Insulation of the management authority from political pressure**: The system should have a managing authority which is given an area which is larger than the initial scheme and the power, after appropriate consultation, to alter the number and location of cordons within this area and the charges. NB: The Central Cross Harbour Tunnel appears to provide an example of political pressures preventing an increase in charges to reduce congestion.

[1] See attachment for example of congestion caused by chauffeur driven cars.

c. **Flexibility to change the cordons and charging system**: As noted in point b the authority managing the scheme should be able to change cordons and fees. Frequent modest changes should be an acceptable part of optimising the scheme.

Charging area

1. *Do you have any views on how the boundary of the Central District ERP Pilot Scheme should be drawn up, and what are your reasons?*

- As noted above the starting point is to set objectives for traffic flow at certain key points. The authority which manages the ERP should then be given an operating area which is ample for achieving this objective but may initially try using only part of this area.

2. *Do you think some neighbouring areas of Central, say some parts of Admiralty or Sheung Wan, should be covered in the Central District ERP Pilot Scheme? If so, which area(s)?*

- Yes. These should be in the area the authority managing the ERP can put cordons on.

Charging mechanism

3 *Do you prefer an area-based or cordon-based charging mechanism for the Central District ERP Pilot Scheme? Why?*

- I strongly favour cordon-based as I believe that some vehicles enter the District multiple times in a day. A cordon based scheme would provide an incentive to reduce the number of visits.
- One significant cause of congestion is chauffeurs circling in traffic while they wait to pick up their owner[2]. To disincentivise this the authority managing the ERP may need to (a) have cordons across some roads within the area cover by the ERP; (b) have a system for charging higher fees after, say, the first five cordons crossed in a day. Further given the wealth of the people with chauffeurs the fees should probably increase at an exponential rate after the first five cordons crossed in a day.

Charging period

4 *Do you agree that ERP charges for the Central District ERP Pilot Scheme should be imposed throughout the hours in a day when the traffic flow is high in the charging area*

- Yes.

5 *Do you agree that Sundays and public holidays should be excluded from the ERP charges for the Central District ERP Pilot Scheme? Do you have any other views on the charging period?*

- Yes exclude Sundays and public holidays.
- The authority managing the ERP should have the power to vary charges according to the time of day.

[2] See attachment for example of congestion caused by chauffeur driven cars.

Charging level

6 *Which charging approach do you prefer for the Central District ERP Pilot Scheme – a unified charge for all vehicles, differential charges based on vehicle sizes (i.e. larger vehicles to be charged more), or differential charges based on a vehicle's carrying capacity (i.e. vehicles with higher carrying capacities to be charged at lower levels)?*

- The charge should be based on the amount of road space a vehicle takes. This should be calculated as its size plus its share of a safe separation from other vehicles. It should not be based on the carrying capacity of the vehicle.

7 *Do you have any suggestion on the range of ERP charge which you believe could induce motorists to adjust their travel behaviour when (a) ERP charge is levied on a per day basis; or (b) ERP charge is levied on a per pass basis (charging at each and every charging point)?*

- I favour a cordon system with a charge per pass.
- I do not know what level of fee is needed to change behaviour. It is important that the authority managing the scheme has the ability to frequently change fee levels as it seeks to meet traffic flow objectives.

Exemption/concession

8 *Do you support providing exemption / concession to vehicles other than emergency vehicles for the Central District ERP Pilot Scheme? If so, what are the type(s) of vehicles and why do you choose them?*

- No. Even buses should be charged. This may provide an additional incentive for bus companies to try and run buses full.
- Taxies should have DSRC technology enabled to allow them to charge their passengers twice the charges per pass they incur while the meter is running for the passenger.

Technology

9. *DSRC technology requires the installation of an IVU in each vehicle entering the charging area for ERP payment, while ANPR technology captures the license number plate of a vehicle every time when it enters / leaves / circulates in the charging area. On the whole, would you say that ANPR or DSRC is a more preferable technology for the Central District ERP Pilot Scheme?*

- Use DSRC as it probably more reliable in heavy traffic and provides drivers with a more instantaneous message of the ERP cost they are incurring.
- The same DSRC device should work for congestion charging and for tunnels.

Privacy concern

10 *Do you have any concern over the protection of privacy in the Central District ERP Pilot Scheme? What are your concern(s) and how do you think it/they could be addressed?*

- No. If London can solve this then so can Hong Kong.

Effectiveness

11 *What indicators do you think we should use to evaluate the effectiveness of the Central District ERP Pilot Scheme?*

- As mentioned at the start of this reply, objectives should be set for the speed of traffic on key roads. The extent to which this is achieved should be the prime indicator of the success of the scheme.

12. Do you agree that the charging level should be reviewed regularly and adjusted where necessary in order to maintain the effectiveness of the Central District ERP Pilot Scheme?

- Emphatically yes. See introduction.

Complementary measures

13. Do you have any suggestions on measures which could complement the implementation of the Central District ERP Pilot Scheme?

- The Central ERP pilot should be seen as the first step in a wider implementation so (a) consideration should be given regarding charges for tunnel use; (b) other congested areas should be measured with a view to planning additional ERP schemes.
- Consideration should be given to improving non-road vehicle transport. In particular (a) easier access to the MTR for people with luggage and handicaps; (b) pedestrianisation.
- Experiments should be done with 'higher quality' minibuses as a way of substituting for taxis and chauffeured cars.

Consultation response

It would be great if future consultations made it easy to copy the questions into a word document for this sort of response. Alternatively it would be good to be able to complete a 'survey monkey' type response if this is set up in a way which allows one to save the draft response, amend it before submission and make a copy for one's own use.

Personal response from J Robert Gibson
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Attachment

Example of chauffuer driven cars causing congestion.

Above – a full lane of the street occupied by stationary cars waiting to pick up people.

Below – The same row of cars. This time with a row of chauffeur driven cars blocking the second lane of the road.