

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00001  
Date : 14/12/2015  
Time : 14:43:52  
Source : \* ~~Telephone call~~ /

\* Please delete as appropriate.

Name of Opinion Provider : \* Mr / Ms CHAN  
Contact Number (if any) :  
Email Address (if any) :

Name of Officer handled : Post:

**Opinions and Suggestions received :**

投訴人要求在灣仔天樂里,菲林明道及軒尼詩道往波斯富街近銅鑼灣廣場一期實施電子道路收費  
先導計劃,並要把紅色小巴,的士,私家車及旅遊巴納入需收費的車種,特別是旅遊巴需收取較高的費  
用,與隧道的收費同價,而專營巴士及綠色小巴則可獲豁免

Receipt of Public Opinion (Telephone / ICC 1823 only)

Reference Number : T- 00002

Date : 15 DEC 2015Time : 12:05 pmSource : \* Telephone call /  
\* ICC (case no.: \_\_\_\_\_)

\* Please delete as appropriate.

Name of Opinion Provider : \* Mr / Ms Jonathan Wong

Contact Number (if any) :

Email Address (if any) :

Name and Post of Officer handled :

Opinions and Suggestions received :

黃先生認為電子道路收費不應該再諮詢和研宄，應該立即推行。

黃先生在本年8月22日及9月7日曾經兩發電郵給運輸及房屋局，建議運輸署閱讀這兩封電郵，如有需要，可以再致電給他討論。

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00003  
\_\_\_\_\_

Date : 20/12/2015  
\_\_\_\_\_

Time : 9:05:31  
\_\_\_\_\_

Source : \* ~~Telephone call~~ /  
\* ICC (case no.: \_\_\_\_\_ )

\* Please delete as appropriate.

Name of Opinion Provider : \* ~~Mr / Ms~~ Not Provided  
\_\_\_\_\_

Contact Number (if any) : Not Provided  
\_\_\_\_\_

Email Address (if any) :  
\_\_\_\_\_

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

**Opinions and Suggestions received :**

建議道路收費加快推行, 警車, 的士, 救護車括免收費

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00004  
 \_\_\_\_\_  
 Date : 28/12/2015  
 \_\_\_\_\_  
 Time : 15:50:41  
 \_\_\_\_\_  
 Source : \* ~~Telephone call~~/

\* Please delete as appropriate.

Name of Opinion Provider : \* ~~Mr~~ / Ms Not Provided  
 \_\_\_\_\_  
 Contact Number (if any) : Not Provided  
 \_\_\_\_\_  
 Email Address (if any) :  
 \_\_\_\_\_

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

**Opinions and Suggestions received :**

電子道路收費  
 支持牌照限制的人多以防止的士、小巴及非專營巴士之間及各自內部的「惡性競爭」之名行反競爭之實。而另一個常被引用的理由則為處理交通擠塞問題。然而，只要當局沒有限制私家車及其他車輛的數量，這問題就不會有改善。  
 真正有效能舒緩交通擠塞的解決方法乃為透過電子道路收費提升使用道路的成本，從而降低部分道路在特定時間點的過份需求。而政府終於在今年12月11日就此展開公眾諮詢。我們支持落實這項措施，並會就此撰寫更多文章。下圖為1985年香港年報的其中一段，顯示30年前已有人提出這個議題：  
 既然的士佔用的道路空間和普通車輛相若，電子道路收費系統就應一視同仁。系統應採取彈性收費，在非繁忙時段降低收費或取消收費，反之亦然。政策亦應禁止車輛於繁忙時段上落貨物，以免造成嚴重擠塞。而的士及巴士收費則應如隧道收費一樣將電子道路收費計算在內。  
 又，系統應向佔用雙倍道路空間的標準長度的巴士及重型貨車收取雙倍費用，而中型貨車、小巴、消防車、救護車及警車則可獲豁免，除此之外一律收費。在這情況下，巴士及小巴的人均收費仍會遠低於私家車。如果交通界能如我們鼓吹般自由，載客量增加應能鼓勵人們轉乘公共交通工具。  
 而系統的另一個間接好處，就是能打破隧道公司在汽車自動繳費業務上的壟斷。新的系統可以應用於停車計時器，以防止司機混水摸魚，亦不用事先預計泊車時間，自然不會再有超時泊車的問題。

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00005  
 \_\_\_\_\_  
 Date : 4/1/2016  
 \_\_\_\_\_  
 Time : 21:30:00  
 \_\_\_\_\_  
 Source : \* ~~Telephone call~~ / Email to ICC

\* Please delete as appropriate.

Name of Opinion Provider : \* ~~Mr~~ / Ms Louis Li  
 \_\_\_\_\_  
 Contact Number (if any) : Not Provided  
 \_\_\_\_\_  
 Email Address (if any) :  
 \_\_\_\_\_

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

Opinions and Suggestions received :

I am writing to object Electronic Road Pricing (ERP).

I currently work in Central / Sheung Wan area. Based on my own observation, the traffic congestion problem is mainly caused by:

1. Illegally parking of Trucks / Vans: Everyday I observe a lot of trucks / vans occupying both sides of Queen's Road Cenral, Des Voeux Road Central, Connaught Road Central, Stanley Street, Wellington Street, etc for parking, unnecessary prolonged goods delivery, lunch eating and even sleeping. However, it is seldom found penalty tickets are issued to these trucks / vans. Sometimes even after Police Officers ask them to leave, these drivers take action slowly so they continue to illegally occupy our road after the officers left;
2. Illegally stopping of Taxis: A very good example is the part of Queen's Road Central in front of The Center. Although that's a restricted area for stopping, every time when I pass that area I can find a few taxis stopped. Combined with the effect of illegally parking of trucks on the other side of Queen's Road Central, only one lane out of three lanes is left of pass-through traffic. In such case, how can traffic not be congested?
3. Poor services and Monitoring of Public Transport: Currently I live in Pokfulam. However, Transport Department fails to monitor Citybus to provide reliable bus services for route 37A, 37B and 37X and GMB route 22, which are the only bus routes I can rely on to travel between office and my home. Although countless complains have been raised regarding the serious chaos in headway / frequency and Transport Department also promised to monitor the concerned operators, nil improvement is found. In case I have to go home punctually, I find that I cannot rely on the bus and GMB services provided as my colleagues do.

So if ERP has to be implemented, Transport Department has to do the following before:

1. Arrange fixed penalty tickets be issued to both trucks, vans, and taxis illegally use our road as parking ground;
2. Replace GMB services by franchised bus services. A GMB can only carry 16 passengers but two GMBs will occupy the same amount of road surfaces as a bus that can carry more than 100 passengers. So if all GMB services serving Central can be replaced by franchised bus services, a lot of road surface can be freed immediately.
3. Impose a fine system for both bus and GMB operators as same system has already implemented for MTR. In case of services delay, a heavy fine should be imposed to the operators so they will provide services as promised. For example, HKD 100,000 should be imposed of a one-minute delay for

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00006  
Date : 6/1/2015  
Time : 15:25:21  
Source : \* ~~Telephone call~~ /

\* Please delete as appropriate.

Name of Opinion Provider : \* ~~Mr~~ / Ms Lau  
Contact Number (if any) :  
Email Address (if any) :

Name of Officer handled : Post:

**Opinions and Suggestions received :**

查詢人查詢有關電子道路收費計劃中，中環地區所涉及的街道及範圍。查詢人表示已參閱公眾參與文件中的資料，唯第四章(第35頁)所提供圖4.1只有列出街名，現查詢是否有電子道路收費計劃在各街道的開始及結束的詳細地點，並查詢電子道路收費計劃是否只限於圖4.1中所述的街道，希望部門回覆。

查詢人表示同意姓名及意見在公眾參與活動完結後被刊載，供公眾人士查閱，及政府在與其他人士討論時引用查詢人所遞交的意見。

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00007  
Date : 18/1/2016  
Time : 12:20:00  
Source : \* Telephone call /  
\* ICC (case no.: \_\_\_\_\_)

\* Please delete as appropriate.

Name of Opinion Provider : 黃漢強  
Contact Number (if any) :  
Email Address (if any) :

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

Opinions and Suggestions received :  
黃先生表示他的意見主要有三點：  
1. 電子道路收費不應再拖延下去，應儘快建設有關硬件工具以實行。  
2. 電子道路收費應採用雲端科技。  
3. 運輸署沒有能力實行電子道路收費，此收費計劃應交由OGCIO(政府資訊科技總監辦公室)處理。



**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00008  
Date : 17/2/2016  
Time : 18:16:15  
Source : \* ~~Telephone call~~ /

\* Please delete as appropriate.

Name of Opinion Provider : \* Mr / Ms 卓  
Contact Number (if any) :  
Email Address (if any) :

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

**Opinions and Suggestions received :**

建議人就中環及其鄰近地區電子道路收費先導計劃發表建議，已告知建議人可於網上專設的網頁上提供建議，建議人表示該計劃治標不治本，建議有二：第一，加強檢控違例泊車，減少道路阻塞；第二，讓所有私家車、旅遊巴、貨車可以使用隧道自動繳費「快易通」，節省駕駛者等候時間。

==  
已提供相關回應口徑，建議人表示同意公開其姓名及全部意見。

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00009  
 \_\_\_\_\_

Date : 3/3/2016  
 \_\_\_\_\_

Time : 21:54:16  
 \_\_\_\_\_

Source : \* ~~Telephone call~~/Email

\* Please delete as appropriate.

Name of Opinion Provider : \* Mr / ~~Ms~~-Peter A Crush  
 \_\_\_\_\_

Contact Number (if any) :  
 \_\_\_\_\_

Email Address (if any) :  
 \_\_\_\_\_

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

**Opinions and Suggestions received :**

- 1.You have made your questionnaire too complicated and this will discourage many people from responding
2. The survey should have been basically a simple "Yes" or "No" to the concept of using congestion charges to reduce traffic in busy down-town areas.
3. I am IN FAVOUR of congestion charges being applied around the clock in all west Kowloon and north Hong Kong Island streets.
- 4.The privacy issue should be disregarded because the recording of a vehicle's presence in any location is not legal proof that any particular person is driving it.
- 5.If an offence has been committed by the driver of a motor vehicle, the police have the power to demand the identity of the driver from the owner of the vehicle but this would only occur for a very specific set of circumstances relating to the commission of offences and when public interest justifies that the owner of a vehicle should supply details of the driver. This is not an unjustified invasion of privacy.

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00010  
Date : 8/3/2016  
Time : 21:46:00  
Source : \* Telephone call /Email

\* Please delete as appropriate.

Name of Opinion Provider : \* Mr / Ms 李  
Contact Number (if any) :  
Email Address (if any) :

Name of Officer handled : Post:

**Opinions and Suggestions received :**  
投訴人要求應用電子道路收費系統於電單車上，方便駕駛電單車的人士能更有效快捷地通過隧道。投訴人表示現時駛經紅磡海底隧道時，經常都因為電單車繳付隧道費時要繳付現金及要找續，阻礙其他車輛，令交通擠塞。因此要求運輸署研究電單車電子道路收費系統。

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00012  
\_\_\_\_\_  
Date : 18/3/2016  
\_\_\_\_\_  
Time : 12:33:23  
\_\_\_\_\_  
Source : \* ~~Telephone call~~ /Email

\* Please delete as appropriate.

Name of Opinion Provider : \* Mr / ~~Ms~~ Tse Wai Chuen  
\_\_\_\_\_  
Contact Number (if any) :  
\_\_\_\_\_  
Email Address (if any) :  
\_\_\_\_\_

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

Opinions and Suggestions received :  
Attachment refers



香港特別行政區立法會  
LEGISLATIVE COUNCIL  
OF THE HONG KONG SPECIAL ADMINISTRATIVE REGION

立法會 謝偉銓議員辦事處  
OFFICE OF THE HON. TONY TSE

# 2016 年《中區電子道路收費先導計劃》 意見書

立法會議員謝偉銓  
(建築、測量及都市規劃)  
2016 年 3 月 18 日



## 立法會議員謝偉銓

### 對 2016 年《中區電子道路收費先導計劃》的意見

#### 引言

為紓緩交通道路擠塞情況，政府早前提出《中區電子道路收費先導計劃》公眾諮詢文件徵詢市民意見。本人的議員辦事處亦於今年 3 月上旬，與建築、測量、園境及都市規劃專業界別舉辦「中區電子道路收費先導計劃」研討會，就諮詢文件相互表達意見。

#### 建議

道路暢通，最終受益的是道路使用者，這亦包括了行人。雖然，本人與出席研討會的業界朋友原則上不反對實施電子道路收費，然而在決定實施時的規劃設計、需要的設施和實施的空間、地點等必須事前取得社會各界大多數的認同。

就諮詢文件，本人有以下一些初步意見：

#### I. 選取實施先導計劃的地區

政府建議在中環及其鄰近地區推行電子道路收費先導計劃，原因是該區乃香港的商業中心區，交通擠塞。綜合諮詢文件中，海外實施電子道路收費的例子，不少亦選取商業中心區進行。

而香港除了中環，還有不少商業區，如灣仔、銅鑼灣、旺角等，又或觀塘這類工業區，同樣面對道路常年擠塞的情況，因此如要實施「電子道路收費計劃」，其覆蓋的地區應有客觀標準，如行車速度每小時低於一定里數等，而非只針對中環一帶。



立法會 謝偉銓議員辦事處  
OFFICE OF THE HON. TONY TSE

據資料顯示，香港的私家車數目在過去十年每年平均增幅約 4%，而 2015 年增幅更達 5.4%，但全港道路網絡過去十年的擴展速度，只有每年約 0.8%。因此，「電子道路收費計劃」在中環地區實施後，會否把中區疏導了的車輛轉到鄰近地區，造成有關地區更為擠塞？

另一方面，政府將以東九龍作為發展「聰明城市」的試點，而智慧城市可由交通做起，若可同時引進這個電子道路收費計劃，配合智慧城市的科技發展，並作為「先導計劃」，「相輔相成」，亦可加快實現「智慧城市」。

## II. 收費計算方法及水平

### 1. 以行車速度、佔用道路路面時間作基準

收費方法方面，建議以行車速度作考慮，做法是，收費以路面行車速度計算，若車流量少、行車速度愈快，收費將愈低。此收費方法更符合用者自付的公平原則，亦可鼓勵駕駛者善用路面。然而我們亦要考慮以下因素：首先，行車速度受路面面積、車流量及行人流量而影響。若行車路面擴闊了，行人路面相對會收窄，有機會加劇人車爭路的情況，阻礙行車流量及速度。又如該區路面若太多過路設施，如斑馬線等，亦會減慢該區的行車速度，

另一方面，收費亦應以車輛佔用路面的時間作計算基準，這時間包括了車輛逗留路面的時間及停留時段。佔用路面時間愈長、及於繁忙時段(即行車速度緩慢時段)使用該區路面，收費相應較高。若車輛駛入收費區後停泊停車場內，則不納入收費計算範圍。政府亦應把握這機會善用及結合現代科技，以現今的科技水平去拓展電子道路收費發展，例如用於計算車輛使用停車場的前後、佔用路面的時間。



立法會 謝偉銓議員辦事處  
OFFICE OF THE HON. TONY TSE

### III. 科技

香港大廈林立，建議採用自動化的短距離微波通訊技術，配合自動拍攝違例車輛。車輛可以預繳卡繳費方式付款，減少涉及私隱的爭議。

### 總結

自 1980 年代至今，政府已 3 次就電子道路收費作出研究，交通擠塞不但影響城市的宜居性，亦影響經濟活動，我們必須正視、解決。鑑於是否採用電子道路收費辦法，由研究至興建相關設施及系統需時，政府有必要加快作出決定。同時，當局亦應多管齊下改善交通擠塞，包括做好路面管制，處理非法佔用路面的車輛，加強執法，使路面暢通，這對改善空氣質素亦有幫助，最終駕駛者和行人也能受惠。



**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00013  
Date : 18/3/2016  
Time : 14:14:12  
Source : \* ~~Telephone call~~ /Email

\* Please delete as appropriate.

Name of Opinion Provider : \* ~~Mr/Ms~~ 香港貨車商會  
Contact Number (if any) :  
Email Address (if any) :

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

Opinions and Suggestions received :  
Attachment refers

致 運輸署

香港貨車商會對於政府運輸署就電子道路收費徵詢意見是十分重視的。

但我會表示反對這項計劃實施，原因如下：

- 1) 強烈反對商用車輛需要付費進入道路。
- 2) 強烈反對道路交通需要用付費改善流量。
- 3) 政府應該用長遠城市規劃設計來控制流量。
- 4) 根本上電子道路收費是絕對不可能解決車輛的擠塞問題。

香港貨車商會

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00014  
Date : 18/3/2016  
Time : 15:07:31  
Source : \* ~~Telephone call~~ /Email

\* Please delete as appropriate.

Name of Opinion Provider : \* ~~Mr / Ms~~ ITS-HK  
Contact Number (if any) :  
Email Address (if any) :

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

Opinions and Suggestions received :  
Attachment refers



香港智能交通運輸系統協會  
Intelligent Transportation Systems, Hong Kong Limited

**By Fax (Fax No.: \_\_\_\_\_) and Email (info@erphk.hk)**

Transport Department Headquarters  
Room 3926, 39/F, Immigration Tower  
7 Gloucester Road  
Wan Chai  
Hong Kong

18 March 2016

Dear Sir / Madam

**Electronic Road Pricing Pilot Scheme in Central and its Adjacent Areas  
- Public Engagement**

ITS Hong Kong is a non-profit making learned society and its membership comprises organisations and individuals involved in the implementation of Intelligent Transport Systems (ITS). We engage regionally with our peer groups, from the public and private sector to satisfy a range of objectives including the promotion of benefits of ITS and to encourage the exchange of information on applications areas within the field of ITS. For this reason, we offer our comments below in response to the above-mentioned document issued to seek feedback on the potential for Electronic Road Pricing in Hong Kong. Several of our members have been, and are currently involved in, the design and implementation of ERP schemes elsewhere, including delivery of programme management services, the design (and execution) of stakeholder consultation programmes and the evaluation of achieved performance against promised benefits. For the reasons given above, we believe that ITS Hong Kong is eminently well-placed to respond objectively to the consultation.

In general our views are supportive towards ERP. Implemented well, an ERP scheme can deliver many benefits, including reduced congestion for all road users (including public bus users), improved journey time reliability and can assist with demand rebalancing amongst all modes of travel. The effects of ERP can be far-reaching since the impact of behaviour change would extend beyond the charged area on arterial routes.

However, as a policy tool it cannot be used in isolation and other complementary measures would be needed. In particular, the Transport Advisory Committee (TAC) identified 13 recommendations, all of which have been accepted by Government. We propose that Government does not regard the recommendations as separate or independent tools but as components of a larger 'mobility package' which has ERP at its core. In particular, we identify improved parking enforcement as a primary complementary measure and would add improved



signalisation timing, extensive marketing to targeted stakeholder groups, the application of a rational (but limited) range of exemptions and an increase in the allocation of exclusive road space to public bus services, as being other potential measures that could be considered.

Our response is provided under six headings below:

#### 1. Scope of Consultation

Stakeholder engagement programmes conducted globally have found that the level of support for the pricing of road use depends on a range of factors, including the use to which revenues are put. For example, public opinion surveys conducted in New York (scheme planning aborted) and Gothenburg (scheme implemented) considered transport 'packages' that reflected a range of benefits and costs, including the provision for road pricing. To often the debate focuses on the level of charges for road use which invariably results in a negative opinion expressed by stakeholders. For this reason, we would advise that several packages are described and selected variations are also trialled at the same time as any pilot.

For example, Stockholm City hosted a 9-month trial of a transport package. By comparison Transport for London delivered some of the promised benefits early, such as additional bus routed, revised / improved signal timing on adjacent routes so that users could witness such improvements. The Government may wish to associate the opening of the Central-Wanchai Bypass with the simultaneous commencement of the ERP pilot to provide motorists with a viable alternative.

#### 2. Technology Availability

We agree that there are readily available and mature technologies to implement mechanisms for charging and enforcement of an ERP scheme in Hong Kong. For example, the solution may be hybrid of Automatic Number Plate Recognition and Dedicated Short-Range Radio Communication for charging and enforcement. Alternatively, the use of GPS/BeiDou-2<sup>1</sup> or other positioning method could be applicable – noting that both groups were subject to trials for a potential Beijing scheme.

The availability of deliverable, proven technologies mean that the ERP pilot could be carried out as soon as possible. We recommend that any technology adopted for a pilot should provided in a form that is easy for road users to understand to reduce confusion and unintentional misuse that may result in unintended results such as violations caused by improperly installed

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<sup>1</sup> 北斗衛星導航系統





equipment.

Also, we regard that privacy can be protected through a range of technical and organisational solutions. For example, end-to-end encryption to prevent tampering of charge records, Any images of exception events (such as non-payment) can include images of the vehicle without showing the faces of any of the occupants. Also, the charging services provider need not be the same organisation employed for billing. Since the most recent trial in Hong Kong in the late 1990's data protection has evolved considerably and this should be recognised in the requirement specifications that Government develops for the pilot scheme.

### 3. Scope of Pilot

We would recommend 'before' and 'after' study(s) to inform the public of the improvement to road network performance from the implementation of the pilot scheme. A reduction of traffic demand within and in zones that are adjacent to the zone could also improve road safety and reduce harmful emissions – all of which benefit both road users and non-road users, including pedestrians and residents. Therefore, the any Study(s) should cover various aspects include traffic flow (i.e. the quantity of vehicles entering a leaving the priced area), congestion delays time (ration of peak travel time to non-peak travel time), environmental, health, economic and social impacts.

Robust enforcement during the pilot period will be necessary in order to ensure drivers comply with the relevant road traffic regulations including the provisions against illegal loading & unloading, double parking and vehicles attended by professional drivers waiting for their clients. Improved enforcement should be regarded as the development of a deterrent to non-compliant behaviour that impacts road capacity rather than enforcing non-compliant behaviour itself.

### 4. Hypothecation or 'ring-fencing' of revenues

Using of the revenue of ERP from the public, the revenue should either be ploughed back into improvements to the traffic or transport related matters of Hong Kong or alternatively an equal amount to the revenue collected should be seen to be reinvested to benefit all road users, including those that continue to drive.

### 5. Stakeholder Communication

Hong Kong continues to invest in improving the visibility of road network performance and making a subset of data collected available to 3<sup>rd</sup> party application developers or Transport Department apps such as eTransport. We recommend that Government treat the mobility



package as a further opportunity to capture traffic data – to demonstrate improvements in road network performance within and adjacent to the pilot area. This evidence help to reassure the public that benefits are being delivered as promised. Traffic data that is collected should be ready to disseminate back to public through existing channels such as data.gov.hk and all media channel, particularly during the first few months of the pilot. Of course real-time traffic information should also be made available to all drivers to enable each to make an informed decision on changing the mode of travel, traveling during a different time of the day, varying the route or other feasible behaviour changes.

#### 6. Policy Scalability

Finally, we recommend that the ERP scheme should be sustainable and scalable so that succeeding phases of the ERP, as part of the mobility package, may be implemented smoothly and with minimal risk. This should also apply to the charges – simply setting charges without having a mechanism to vary the charges over time to maintain reduced levels of congestion would erode the impact of changes on behaviour change. Although not perfect, the method used by Singapore is based on varying charges monthly to maintain average traffic speeds. By comparison the Mayor of London employs mini-consultations to vary changes, add new discounts or new emission-related exemption (such as low emission vehicles).

As a baseline, we recommend that any charging mechanism employed should reflect different congestion levels or time periods.

We trust that our comments are helpful to help shape an acceptable, sustainable, efficient mobility package that includes pricing alongside complementary transport measures. Please do not hesitate to contact me to discuss any of the points raised in more detail and if requested, we would welcome the opportunity to meet to discuss further.

**Yours faithfully**

**Ir. Charles So**  
**President**  
**Intelligent Transportation Systems, Hong Kong**

**Receipt of Public Opinion (Telephone / ICC 1823 only)**

Reference Number : T-00015  
Date : 18/3/2016  
Time : 17:52:15  
Source : \* ~~Telephone call~~ /Email

\* Please delete as appropriate.

Name of Opinion Provider : \* ~~Mr / Ms~~ Liberal Party  
Contact Number (if any) :  
Email Address (if any) :

Name of Officer handled : \_\_\_\_\_ Post: \_\_\_\_\_

Opinions and Suggestions received :  
Attachment refers





## 自由黨回應「中區電子道路收費先導計劃」諮詢文件

### 前言

1. 政府基於近年道路擠塞問題日益惡化，因此而考慮交通諮詢委員會的建議和海外經驗，提出籌劃在中環及其鄰近地區推行電子道路收費先導計劃，並就此進行公眾諮詢。

### 推電子道路收費須先符合三條件

2. 自由黨支持政府以三管齊下的方式，即透過改善交通基建、擴展及改善公共交通系統、以及優化道路管理和使用的方法，以處理道路交通擠塞的問題。但最終是否落實「中區電子道路收費先導計劃」，自由黨認為必須符合三個先決條件。
  - A. 提供替代道路：中環灣仔繞道將於 2017/18 落成，倘若在中環灣仔繞道未開通前在中環推行「中區電子道路收費先導計劃」，除因沒有選擇而有迫使駕駛人士必須繳費之嫌外，相信同時會將堵塞問題禍延至鄰近地區。

根據諮詢文件，劃設「中區電子道路收費先導計劃」的收費區需安裝門架/柱杆作偵測進出收費區和在收費區行駛的車輛，由於空間的要求，三條主要幹道包括干諾道中、德輔道中及皇后大道中設置為收費區，如沒有新替代道路，原取道上述三條幹道的車輛，為避免進入繳費區，會因此而轉移到中環外圍及半山區地段，令該等地段的車流大幅增加，進一步加劇區內道路使用壓力。

- B. 加強道路管理及改善使用情況：現時促成中環嚴重塞車的主要原因之一是違例泊車情況非常嚴重，而違例泊車的主因是區內的泊車車位嚴重不足。現時違例泊車主要是一些公司車或所謂的「老闆」車，因此在政府未有完善泊車配套及有效的道路管理(對違例泊車加強執法)前，而只利用收費以壓抑交通需求，作為改善道路擠塞問題的手段，最終只是讓有錢人的車可以進入中環，對其他駕駛者做成不公，特別是中產階層必須額外負擔更大的養車成本。
- C. 優化三條海隧分流：政府將於今年 8 月收回東區海底隧道，運輸及

房屋局局長曾多次表示，屆時會考慮透過收費調整以改善三條過海隧道的分流。當局必須合理地疏導紅隧的承載能力及充份利用西隧和東隧的分流作用，以紓緩中環和周邊地區的交通擠塞問題。

3. 雖然海外有實施電子道路收費計劃的例子，但正如政府在諮詢文件中指出，電子道路收費計劃涉及相當的複雜性，既要花費一筆為數不少的公帑設置有關配套外，還需配合相關法理依據，最終電子道路收費計劃是否能達致其計劃中的成效，還要視乎其收費水平。倘若中環灣仔繞道於2017/18 通車、政府又成功透過收費調整改善三條過海隧道的分流及推行有效的道路管理措施以減少違例泊車問題；與此同時，鐵路網絡亦已進一步擴充，因而減少道路交通需求，中環及附近區域的道路擠塞問題定必有所改善，政府便不需要大費周章推行「中區電子道路收費先導計劃」。反之，若然屆時問題仍未見改善，自由黨自然同意推行「中區電子道路收費先導計劃」。

### 計劃的具體建議

4. 如最終必須落實「中區電子道路收費先導計劃」，自由黨認為當局須考慮採納以下措施：
  - a. 收費計劃應該參考新加坡模式以「周界為本」，即車輛於收費時段每次駛經收費點時，便需要繳費。此舉可免除以「區域為本」作收費模式所產生的弊病，即部份駕駛者可能會在繳付一天的收費後，便可在區內作長時間逗留或兜圈，更可以不斷進出收費區域，難以達到減少收費區內車輛數量的目的。
  - b. 收費水平方面，自由黨認為應因應不同時間及擠塞程度作出調整。電子道路收費計劃是否可有效地減低駕車人士進入繁忙區域的意欲，除收費水平外，還須配合公共交通服務。既然政府整體意願是鼓勵市民利用公共交通工具往返繁忙區域，以減少區內的車輛流量，故當局應該考慮給予所有公共交通工具(包括的士)收費豁免。

另外，由於部份貨車亦必須進入區內完成上落貨程序，為免影響區內商戶，當局亦可考慮增加區內的上落貨地點或車位，以減少造成擠塞的時間。
  - c. 自由黨建議採納新加坡選用的系統，規定所有車輛必須安裝短距離微波通訊科技的裝置，車輛通過馬上徵費，而不是倚賴自動車牌識別系統於核實後才徵費，費時失事。
  - d. 最後，自由黨建議「中區電子道路收費先導計劃」的收費收益不應歸入庫房，而應將其用於改善交通運輸設施方面之特定用途(專款專用)。