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Subject: 3rd runway EIA



公眾意見表格(環境影響評估)

Public Comment Form for Application (Environmental Impact Assessment)

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29/4/2012

意見詳情

Details of Comments

工程項目名稱:

Title of Project : Social Return on Investment report needs to be carried out – see below

文件種類:

Type of Document :

工程項目簡介 Project profile

環評報告 EIA report

意見: (如有需要, 請另加紙張。)

Your Comments : (please continue on another sheet if necessary.)

<http://www.airportwatch.org.uk/?p=3998>

Heathrow Runway 3 will leave UK £5 billion worse off – says new NEF report

19.4.2010 (New Economics Foundation press release)

Runway 3 will produce a negative return for society and is economically and socially inefficient, according to a new independent evaluation.

A new and comprehensive analysis, using Social Return on Investment, published today, Monday 19 April 2010, by independent think-tank nef (the new economics foundation), concludes that a third runway at Heathrow would leave society worse off by £5 billion.

report at [Grounded report by NEF April 2010](#)

Researchers at nef used the same economic modelling program as the Department for Transport (DfT), but updated the input data on economic growth rates, exchange rates, carbon prices, fuel prices and other variables. They also estimated the costs of a new runway to the local community near Heathrow. This included re-visiting the DfT's estimates for noise disturbance and air pollution, and for the first time, calculating the cost of additional surface congestion and community blight.

The resulting report **Grounded: A new approach to evaluating Runway 3** reveals that:

- **A third runway at Heathrow would leave the UK £5 billion worse off. nef's estimate reverses the DfT's prediction of a £5.5 billion net benefit.**
- **The £5 billion cost estimate includes negative impacts on the local community valued at £2.5 billion. The DfT's analysis suggested an equivalent cost of only £0.4 billion.**

nef's report describes problems around establishing the economic benefits of a third runway. This has been recognised by business leaders, as reflected in a letter to the Times on 4 May 2009.

In addition, the report presents the formidable environmental hurdle faced by proponents of a third runway because of the climate change impacts of air travel. Aviation policy clashes with objectives for sustainable development, particularly for tackling climate change. The government's 2050 target for maintaining aviation's emissions of greenhouse gases at 2005 levels, rather than demanding cuts as for other sectors, means that all other uses of fossil fuels – for heating and road transport for example – will have to be reduced much further. As it is the well-off who fly, even on budget airlines, this means the burden of emissions reduction is shifted from the rich to the poor.

;With such high social and environmental costs associated with Runway 3, the burden of proof should lie squarely with those who are in favour of the expansion. It's up to them to demonstrate that Runway 3 is in the public interest. With a rapidly diminishing timeframe in which to tackle climate change it is imperative that we allocate our carbon budget in the most efficient and equitable way, and to schemes that will create the most social value. This must surely be the test for any proposed infrastructure project in the future said Helen Kersley, co-author of the report.

Public input welcome, as long as it favours Airport Authority's plans



LAI SEE

Howard Winn SCMP

May 29, 2012

The Airport Authority issues its project profile today for building the third runway at Chek Lap Kok and triggers the start of a statutory process that gives the public a mere 14 days to send comments to the director of the Environmental Protection Department. These comments are then supposed to be taken into account when the department prepares an environmental impact assessment (EIA) study brief that sets out what the EIA needs to consider.

This is a key stage of the process, because the judge who presided over the judicial review of the Hong Kong-Zhuhau-Macau bridge said that this was the time to object to and comment on the project, rather than after the EIA report was produced.

Fourteen days is the standard period to lodge comments, but given the size and significance of this project, a longer period would have been appropriate, assuming that is, the government is really interested in the public's views. You get the sense that the current administration is only interested so long as the public agrees with its plans. The authority has made much of a survey it commissioned that found 73 per cent of respondents favoured building the third runway. A subsequent survey for the WWF and Greenpeace found more than 73 per cent believe it is important to consider the social and environmental costs when building the runway.

In its press statement yesterday, the authority appeared to be bending over backwards to appear accessible, transparent and so on.

"To facilitate stakeholders' exchange of views, AAHK will set up technical briefing groups and invite environmental experts, green NGOs, industry representatives and relevant government officials ... with a view to addressing the potential environmental impacts arising from HKIA's [Hong Kong International Airport's] expansion to a three-runway system." There's even going to be an electronic newsletter to keep the public informed of the EIA process and studies. This is all very encouraging, but it would take a massive change in the authority's aloof culture for this to be a meaningful exercise.

Despite the authority's apparent conversion to openness and transparency, the one thing it won't be doing is conducting a social return on investment study. This is a study that examines the impact of the project on the community at large. Indeed, the Legislative Council's environmental panel asked the airport to conduct one, together with a carbon audit and a strategic assessment.

When we asked the authority if it intended to comply, we received the lofty reply that there was no generally accepted methodology for these studies and, in any case, it wasn't obliged by law to conduct one. That may be true, but given that the authority has pledged to make Hong Kong's airport the greenest in the world, you'd have expected a more enlightened response.

The EIA report MUST:

Take into the EIA the effect of the three incinerators operational by 2015 in Shenzhen with northerly prevailing winds most of the year.

The effect of the Tsang Tsui sludge incinerator emissions.

The effect of the possible SWC incinerator emissions and knock on effect of having to build mega islands as new ash lagoons.

The effect of all increased pollution in Hong Kong by the start date considering the current and proposed infrastructure projects.

They MUST show proof of additional granted landing slots from the Chinese PLA Air force that controls air space in the PRD and the capability of the air traffic control to handle same (since there were almost two head on air crashes in recent months) – also the fact that Shenzhen airport has opened its second runway and is building a third, Guangzhou will have 5 runways, Beijing South Airport will open in 2017 with 8 commercial and one military runways.

The EIA should take into consideration the proposed sub-sea fast rail link to Shenzhen and its likely effect on taking considerable passengers away from HKIA for Mainland connections.

The EIA should consider the business impact of the movement of large corporations like Foxconn away from the PRD due to increased costs of operation there and its negative effect on airfreight levels through HKIA longterm.

<http://www.sroi-uk.org/home-uk>

<http://www.sroi-uk.org/publications-uk>

<http://www.neweconomics.org/publications/grounded>

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Before the public inspection period expires, please forward this form to the Director of Environment Protection by post or fax to the EIA Ordinance Register Office at the following address: Environmental Protection Department, 27th floor, Southorn Centre, 130 Hennessy Road, Wanchai, Hong Kong. You may also email your comments to : eiaocoment@epd.gov.hk

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