

ERP Policy Consultation

Dear Sir,

The Fixed Penalty parking scheme inaugurated in the 1970's was designed and implemented through HK Police Traffic HQ together with the adaptation of the Transport Department computer data to the scheme. The police officers involved in the contravention scheme's design and implementation were Chief Inspector Neil Hamilton and Senior Inspector James Middleton. The initial \$30 per contravention has grown to only \$320 whereas dropping a tissue can bring a fine of \$1500. The first Pol 525 issued in Hong Kong was to a Mercedes parked illegally outside the Hong Kong Club in Central (by this writer). It seems little has changed some 40 odd years later due to the lack of political will by the Government and the unelected stooges representing transport sectors and vested interests in Legco.

Our online reply to SCMP 21st December 2015 article is shown immediately below:

The Fixed Penalty scheme removed the criminality of parking to become a contravention of civil law. The car owner is liable, not the driver. As in parts of London CCTV should be used to discourage double parking and illicit parking. The only legal on-road parking is in designated parking spaces. One operator in a control room could electronically issue 50 tickets in the time it currently takes a traffic warden to issue one, in between timing vehicles for 3 minutes for engine idling, only to see the driver drive off at ten seconds short of 3 minutes.

The CCTV option can be introduced all over Hong Kong; places like Yuen Long are a nightmare because of illegal and double parking whereas in Saikung local triads Octopus feed (or not) the meters for restaurant patrons, for a look-out fee. The law should be amended to prevent meter re-feeding and to prevent medium goods vehicles using on street metered parking spaces intended for private cars.

Big Stick – suspension of vehicle licence for repeat abusers

The second amendment to the current system should be the removal of the vehicle licence if the vehicle owner is issued with more than a certain amount of parking tickets per month. This will get the owners' attention and obedient compliance, far more than any financial penalty.

A businessman or tycoon meeting a customer at the Mandarin for a \$30m deal is hardly worried about a few parking tickets or a congestion charge, but losing his vehicle for a month at a time would get their attention. The congestion is caused by illegal double parking blocking already congested small roads and illegal parking in areas allocated for dropping down passengers, plus circling chauffeurs exacerbating the traffic congestion for the convenience of the vehicle owners at the detriment of traffic flow. Vehicle road licence suspension for repeat abusers who collect more than a certain number of contraventions per month would solve the problem, without having a congestion ERP charge, and allow the police to get back to preventing crime.

Indeed the whole system should be contracted out to a private contractor (as in London - Indigo) as are other Govt services here, like HK ID card processing.

The advantages of this contracting are that the efficiency of ticketing using a CCTV control centre operation would benefit both the Government, the parking problem and the private contractor whilst freeing police manpower to more important matters (crime prevention and detection) freeing traffic wardens to police other areas. This system could be extended to areas beyond the initial Central test zone to force compliance elsewhere and make Hong Kong a true E-City.

Many traffic highway etc surveillance cameras already exist as do Gatso Speed radar cameras, so privacy should not be a viable complaint that can be raised – indeed there will be a benefit to crime prevention when thugs know an area is under active surveillance, wanted vehicles can be flagged by the number plate recognition system, taxis can still go about their business and the main offenders, private limousines and 7 seaters will be targeted and removed by the **Big Stick** option. Years back the taxi companies used to cheat by having three vehicles in operation – one in HKG, Kowloon and NT each at the same time using the same registration number, so the number plate recognition scheme has further benefits.

Consideration needs to be given for roadworks to take place overnight, delivery points for couriers, and goods vehicles should be allowed only at certain times.

WARNING – PASSENGER ALIGHTING ONLY
THIS AREA IS A NO PARKING ZONE UNDER 24/7 CCTV SURVEILLANCE
REMOTE ELECTRONIC TICKETING ENFORCEMENT AREA
REPEAT ABUSE WILL RESULT IN VEHICLE LICENCE SUSPENSION

Problem areas can be signposted as an immediate deterrent to show the area is under CCTV surveillance control and that offenders WILL be ticketed electronically for every 5 minutes of illegal parking, with vehicle licence suspension for 1 month if the vehicle receives more than 10-15 (tba) contravention notices per month, and, with vehicle licence cancellation on a 4-strikes-and-you-are-out system for repeat abusers. Law abiding vehicle owners need not fear these measures. They use car parks.

Without double parking and illegal parking the traffic flow will be far more efficient. This option will also be more acceptable than ERP to the vested moaners and groaners in Legco and those representing the vested interests of the transport industry and tygoons. The monied billionaire people who frequent Central business area would not care whatever the congestion charge is per minute, per hour or per day, in return for the convenience of stepping out of the Mandarin or their office building and into their nicely air-conditioned vehicle. If the vehicle was off the road for a month with a suspended licence, then their behaviour would change and traffic would flow freely. Specific drop off areas have to be created with wardens enforcing no stopping in double yellow lined areas.

Indeed the tygoons would welcome ERP as it would keep the plebs out of Central and enhance their comfort even more.

If the ERP scheme does proceed then In-vehicle RFID tags similar to the E-toll tags are the way forward. If a vehicle without a tag enters the gated area like Singapore, the number plate recognition scheme can tag it and issue a contravention notice, again from the CCTV Control centre.

A police liaison officer per shift could be seconded to the control centre to oversee operations and authorise repeat issue of tickets to abusing contraveners or to take action if a wanted vehicle or crime is spotted.

South China Morning Post 南華早報

Hong Kong's new tax on cars in Central: Will people pay to drive through the city?

PUBLISHED : Saturday, 12 December, 2015, 12:00am

UPDATED : Tuesday, 15 December, 2015, 5:20pm

News>Hong Kong>Health & Environment

TRANSPORT

Danny Lee and Tony Cheung

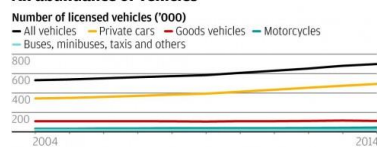
While environmentalists have welcomed a plan to make drivers pay to enter Central, critics doubt it will solve the city's congestion problem. The government faces an uphill battle to convince a mounting number of opponents to back a road congestion charge after receiving a hostile reception following the launch of a consultation to make motorists pay to drive.

While environmentalists hailed it as killing "two birds with one stone", predicting a drop in congestion and pollution, there is a clear divide between road users, motoring representatives, business leaders and lawmakers.

[READ MORE: Government says fee for driving in Central is finally coming \[1\]](#)

"Many people won't like this charge because they are already paying taxes for the roads," said Marshalyn Abay, 41, who has noticed her commute time from Sai Kung to Central getting longer since first making the trip in 1998. "I can feel the difference, and how bad the traffic gets now." A trip that used to take her around 30 minutes, now takes up to an hour and a half. The government's preferred electronic road pricing (ERP) option is a flexible system, like that used in Singapore, based on "user pays" and depending on the time of day, location and travel direction. London adopted a flat fee for all vehicles.

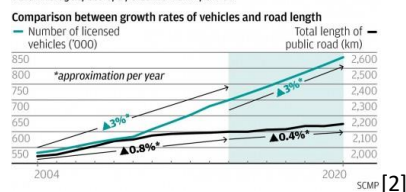
An abundance of vehicles



Car journey speed during morning peak on weekdays (km/hour)

	2009	2010	2011	2012	2013
Hillier Street (from Wing Lok Street to Connaught Road Central)	7.2	5.7	7.8	7.3	5.4
Chater Road (from Pedder Street to Murray Road)	9.2	10.3	8.3	9.3	10.2
Des Voeux Road Central (westbound) (from Jubilee Street to Wing Wo Street)	18.1	17.1	14	17.6	14

Note: Average speed of a person is 4.5km per hour



Irons Sze Wing-wai, an honorary president of the Chinese Manufacturers' Association, warned that ERP would increase the business costs of small and medium enterprises, but acknowledged potential savings from higher productivity. "If it can really solve Hong Kong's traffic problem, we don't mind more cost because our cars will travel faster. I'm just worried that it cannot

solve the problem, because cars will enter Central anyway if they need to," he said. Legco's transport panel chairman, Michael Tien Puk-sun, said ERP was vital to tackle traffic woes. Tien also proposed an alternative based on time spent in a charge zone. **"It is private cars that we are trying to limit,** and it won't affect the business sector. Taxi drivers can ask for an exemption; so can truck drivers, who can also avoid entering the zone when the charge applies," he said. Opponents are urging the government to delay implementation until the Central-Wan Chai bypass opens and the MTR expansion is completed. Transport sector lawmaker Frankie Yick Chi-ming said: "When the Central-Wan Chai bypass is ready for use, the whole traffic situation in Central might change so we have to wait and see what the traffic looks like."

A representative of taxi drivers, To Sun-tong of the Motor Transport Workers General Union, called for cabbies to be exempt from the charge and warned it would turn Central into a "zone for the privileged" who don't mind paying extra money. Polytechnic University transport expert Dr Hung Wing-tat said while it was simpler to charge vehicles at a daily rate, it would be more effective to charge every time they entered the zone. Automobile Association president Wesley Wan Wai-hei dismissed concerns about traffic in Central. "Statistics do show the travelling speed is going down, that's a fact, but I still think the traffic congestion is bearable. Most modern cities in the world must have traffic congestion." Kwong Sum-yin, chief executive of the Clean Air Network, said: "We all know the congestion problem in Hong Kong is serious. We think there should be some kind of policy to make driving more inconvenient. "We're concerned that congestion is aggravating air pollution. It is killing two birds with one stone if we can solve that."

[Raise the tax on petrol to help clean up Hong Kong's air](#) [3]

[Transport Bureau's responsibility is to curb growth in car numbers: Loh](#) [4]

[Hong Kong urged to impose stiffer fees to unclog roads](#) [5]

<http://www.scmp.com/news/hong-kong/health-environment/article/1890119/rocky-road-ahead-hong-kong-looks-start-charging>

Links

[1] <http://www.scmp.com/news/hong-kong/economy/article/1890135/government-says-fee-driving-central-finally-coming#comment-270550>

[2] <https://www.scmp.com/sites/default/files/2015/12/11/39367f54071b24106eb40ece5a0963b1.jpg>

[3] <http://www.scmp.com/comment/insight-opinion/article/1852688/raise-tax-petrol-help-clean-hong-kongs-air>

[4] <http://www.scmp.com/news/hong-kong/health-environment/article/1801871/transport-bureaus-responsibility-curb-growth-car>

[5] <http://www.scmp.com/news/hong-kong/article/1671586/hong-kong-urged-impose-stiffer-fees-unclog-roads>

South China Morning Post 南華早報

Hong Kong's perennial traffic jams can and should be cleared

PUBLISHED : Monday, **21 December, 2015**, 1:00am UPDATED : Monday, 21 December, 2015, 1:26am

Comment › Insight & Opinion

SCMP Editorial

We can either continue to get stuck behind the wheel and resign ourselves to the belief that nothing can and should be done, or we can try out what we believe is right but have lacked the will to do

Traffic congestion in Hong Kong has become so serious that passengers may soon be better off walking. During peak hours, the average vehicle speed in some major roads is as slow as 10km per hour, not much faster than going on foot. Solutions have been thoroughly debated over the past few decades but regrettably little progress has been made. The need for urgent policy intervention is obvious. Launching a three-month public consultation on the controversial electronic road pricing scheme, along with heftier fines for congestion-related traffic offences, Secretary for Transport and Housing Anthony Cheung Bing-leung

rightly said that the question was no longer whether or not we should do something; but how to turn the answers into reality. The minister is to be commended for his courage and determination to push ahead with what has been long overdue.

The merits of a levy for driving into heavily congested districts have been well recognised around the world. In the case of London and Singapore, traffic volume in the toll zones fell by 16 per cent while speeds improved by some 26 per cent. Hongkongers could have benefited similarly decades ago had policymakers at the time been more resolute in tackling the problem. The charging scheme was first tabled as early as the 80s, but was never adopted because of privacy concerns and other technical difficulties. These may have been valid obstacles in the past, but with better safeguards and technology nowadays, there is no further excuse to dodge the levy.

Equally important is the punishment for congestion-related offences. It is absurd that the fine for illegal parking has remained unchanged at HK\$320 for more than two decades. The proposed 50 per cent rise to HK\$480 is only tied to inflation. With more than one million tickets issued each year, the fine is no deterrent. It is disappointing that some transport traders still resist the adjustment and blame the government for insufficient parking spaces instead. The truth is that the number of vehicles has surged by 30 per cent to about 700,000 during the period. While more parking spaces are needed, the penalty should be strong enough to make drivers think twice before leaving their vehicles anywhere they want. Heftier fines should be considered if the new ones, to be enforced by 2017, fail to improve the situation. Our choice is clear. We can either continue to get stuck behind the wheel and resign ourselves to the belief that nothing can and should be done, or we can try out what we believe is right but have lacked the will to do. More on this:

[Beating Hong Kong's traffic jams: university tests new route planner for drivers](#) [1]

Source URL: <http://www.scmp.com/comment/insight-opinion/article/1893600/hong-kongs-perennial-traffic-jams-can-and-should-be-cleared>

Links

[1] <http://www.scmp.com/news/hong-kong/health-environment/article/1888768/ beating-hong-kongs-traffic-jams-university-tests>

Red Zone Areas

The police already has a working number plate recognition system. Certain Red Zone roads could be designated for entry only once during a set period of time to counter chauffeurs circling the area waiting for the call to pick up their bosses - this Red Zone offence could be added to the moving offences scheme list with penalty points against drivers with no exemptions, so couriers and Watsons water, Park n Shop deliveries etc, can use bikes like New York and London or deliver after 1830 hrs. The Govt has to date no political will to tackle the problem. Their own chauffeured vehicles take them to dinners at Central hotels no matter what happens so this needs to be prevented and the offending bigwig passenger punished.

Clean Air Zones

In our opinion the best form of carbon free transportation would be hydrogen powered buses. This of course would require an hydrogen refueling network. The only emissions are - water. The previous HK Govt poo-pooed the use of such and even forbade a test vehicle entry to the Lion Rock tunnel.

What should happen: - New buses entering Hong Kong should be Hybrids. They will have a Euro 6 small engine that is used only to charge the bus power train batteries. The engine does not run when the bus stops at bus stops. This will allow the buses to run aircons and have enough power for Hong Kong's hilly terrain. They do not need recharging downtime and the Wrightbus London bus double deck hybrids would suit Hong Kong terrain. Since Edward Yau took a Greenwash junket trip to Europe and UK and rode the London hybrid Wrightbus perhaps he jotted down some notes on it before travelling on to the whiskey distillery?

Clean Air Zones must be mandated on Nathan Rd, Central main thoroughfares and likewise in Causeway Bay.

All diesel buses now travelling around for 4/5ths of the day as moving advertising billboards, nose to tail on the same culminating unrationalised routes should instead terminate at termini outside these congestion areas, where passengers will transfer to electric hybrid bus shuttles that will run on these current high pollution congested routes at no extra charge if an Octopus card is used on the initial journey.



<http://cleartheair.org.hk>

<http://www.scmp.com/news/hong-kong/health-environment/article/1895082/hong-kongs-first-green-bus-hits-road-government>

These shuttles should not be BYD e-bus types that need coal generated power for recharging over 5 hours- they should be recharged inductively during operation and will have Wiegand technology transponders for charging. Each bus stop stanchion or the roadway under same will have inductive power transmitters, so when the buses are at bus stops their batteries are recharging - the transponders can either be in the road or set into the bus shelter uprights. See relevant attachments.

The current BYD e-bus test vehicles each requires 4 ½ tonnes of polluting coal per month to generate the 60 KWH x 5 hours daily downtime recharging <https://www.eia.gov/tools/faqs/faq.cfm?id=667&t=6>

Solar panels should be built into the inductive coil bus shelter roofs to help power the transponders and reduce reliance on coal power generation. See attachments on inductively charged buses. These vehicles are an operational reality. Hong Kong does not have to spend another \$40 million to the HK Productivity Council for them to create another spontaneously combusting charred stone-age vehicle that needed plug-in charging anyway.

Only Euro4 and above vehicles should be allowed into the Clean Air Zone areas reflected by easily spotted colored road licence plates. Consideration should be given to following Shanghai and Beijing systems where large trucks are only allowed into the downtown area at night. Stores / restaurants should be restocked during the evening or at night.

Pol 525 Penalty

The penalty for illegal parking contravention should be \$1500 per ticket to reflect inflation since the 1970's to date. A CCTV surveillance system should be set up in troublesome areas and the current Pol 525 system amended to allow the issue of tickets electronically using the surveillance cameras control room contractor operatives, based on photographic snapshots with video, time and place shown as evidence and included along with the e-ticket. Vehicle owners who receive more than a certain number of tickets per month should have their vehicle licences suspended which is the **Big Stick** deterrent, and this will work.

Working Examples

<http://www.cityoflondon.gov.uk/services/transport-and-streets/parking/penalty-charge-notice/Pages/cctv-enforcement.aspx>

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Services
Transport and streets
Parking
Parking tickets

- Challenge a ticket (PCN)
- Avoiding parking tickets
- CCTV enforcement**
- Clamped and removed vehicles
- Enforcement and penalty charge notices

CCTV enforcement

CCTV cameras are principally used to enforce moving traffic contraventions but can still be used for some parking contraventions.

Note Before the 1 April 2015 CCTV cameras were used for a wider range of parking contraventions. Penalty Charge Notices (PCNs) issued for these wider parking contraventions before 1 April 2015 are still enforceable and will follow the usual recovery and appeal process.

Moving traffic contraventions include

- banned turns (e.g. no left/right turn)
- no entry
- yellow box junctions
- no entry to pedestrian zone
- illegal U-turns
- blue arrow sign (e.g. keep to the left/right)
- bus lane

CCTV PCNs will be sent by post and are supported by CCTV footage.

Viewing CCTV

Email chair@cleartheair.org.hk

Some recordings of contraventions enforced by CCTV are available to view in accordance with the CCTV code of practice.

There are signs warning motorists of the use of cameras for parking enforcement at every entrance point to the City. These signs comply with the Traffic Signs Regulations and General Directions 2002.

CCTV maintenance


Calibration and maintenance records of the cameras used in CCTV enforcement are not held by the City of London Parking Ticket Office. The CCTV cameras are owned and maintained by the City of London Police. The equipment received certification from the Secretary of State in March 2009 and a copy of the authorisation is held with the [Department for Transport](#).

Advice regarding enforcement and parking

squaremileparking.uk@parkindigo.com
020 7332 3910

Please note that our advisors are not authorised to make decisions on any challenges to Penalty Charge Notices (PCNs) over the phone.

Explore the site



City of London - Enforcement and penalty charge notices



The City of London is responsible for the enforcement of parking and moving traffic regulations in the Square Mile. Enforcement is carried out by Civil Enforcement Officers (CEOs) on street and through the use of CCTV cameras. We also use information provided by the City of London Police. If you wish to report problems with parked vehicles, please contact our enforcement team on 020 7332 3910 or by email to squaremileparking.uk@parkindigo.com

Enforcement methods Civil Enforcement Officers (CEOs)

Our contractor (Indigo) provides uniformed CEOs who carry out our parking enforcement services. Each officer has been trained to a high standard, **and they are equipped with handheld computers and cameras**. CEOs are required to issue a parking ticket when they observe a vehicle committing a contravention. Once they have started issuing a ticket they are not permitted to stop. Our contractor has quality indicators based on the British Parking Association. CEOs adhere to **two Codes of Practice which have been agreed with London Councils for on street parking enforcement and the use of CCTV**. Both are available on London Councils' website.

See a copy of the [London Councils' Civil Enforcement Officers Handbook](#)

Remote enforcement

CCTV enforcement is used for parking and moving traffic contraventions.

Police enforcement

A City of London police officer may observe a moving traffic contravention which they consider should be enforced. The police officer will prepare a witness statement which will be passed to the City of London for enforcement. A parking ticket will then be issued by post to the registered keeper of the vehicle. Photographs of the vehicle committing the contravention will not be available in these circumstances.

Penalty Charge Notices (PCNs)

If your vehicle is illegally parked you may be issued with a parking ticket for £130 or £80, depending on the severity of the contravention.

- for CCTV contraventions, a 50% discount applies if it is paid within 21 days from the date of the penalty charge notice
- for moving traffic contraventions (MTC), a 50% discount applies if it is paid within 14 days from the date of the penalty charge notice
- any other parking tickets, a 50% discount applies if it is paid within 14 days

More information is provided in the document you receive.

You can [pay, challenge or view evidence](#) relating to your parking ticket online.

Do not ignore the PCN. If you do not pay or challenge a parking ticket, the penalty charge will increase.

<http://www.parkindigo.co.uk/our-markets/local-authority/city-of-london>

See our relevant attachments provided herewith.

Yours faithfully,

James Middleton

James Middleton
Chairman