

**Responses from The Professional Commons on
the “Hong Kong International Airport Master Plan 2030”**

1. The Professional Commons (hereafter The ProCommons) acknowledges the importance for the further development of the Hong Kong International Airport (hereafter the HKIA) for the maintenance of the competitiveness of the HKIA as the premier aviation hub in the Asia-Pacific Region. However, there are some significant unresolved issues in the “Hong Kong International Airport Master Plan 2030” (hereafter the Master Plan) prepared by the Hong Kong Airport Authority (hereafter the HKAA), which has prevented us from lending support to any of the proposed options.
2. Firstly, we hold the view that a Strategic Environmental Impact Assessment (hereafter the SEIA) should be conducted before any decision is made concerning the way forward for the development of the HKIA, including the construction of the third runway, as it would be unfair and illogical to ask the public to support the proposals before the environmental implications are fully identified and considered by the public. As exemplified in paragraph 9.2.2 of the “Preliminary Economic Impact Study” as prepared by Enright, Scott and Associates as part of the nine preliminary consultancy studies appeared in the Technical Report of the Master Plan (hereafter referred as “consultancy studies”), it is suggested that a detailed environmental impact assessment “would have to be performed before permission to proceed with such a project could be obtained”.
3. Secondly, we are in the view that any options for the development of the way forward for the HKIA, must take into account for its impacts on the air quality of Hong Kong, as well as on the implementation of measures on the tackling of the worsening air quality. As in Table 5.3 of the “Air Quality Review for Hong Kong International Airport Final Report” prepared by Ove Arup as part of the consultancy studies has suggested that, in order to reach the standards in the proposed new Air Quality Objectives of the HKSAR Government in Tung Chung, it is estimated that 59% of the capacity of the Landings and Take-offs of the HKIA will have to be reduced. While in Table 5.4 of the Report suggested that based upon preliminary assessments, 40% of the potential emission mitigation potential of nitrogen oxide lies on the responsibility of the HKSAR Government’s emission

measures (Phase I + Phase II + Phase III measures), which constituted the biggest proportion among all responsible parties in terms of mitigation potential.

4. Thirdly, we are in the view that the actual costs of the third runway would not be simply spending on the construction costs alone. Although in Chart 41 of the “HKIA Airport Master Plan 2030 Financial Feasibility Assessment: Financial Advisor Final Report” as prepared by the Hong Kong and Shanghai Banking Corporation has estimates the cost for the construction of the third runway as HK\$86.2 billion (in 2010 prices), the HKAA has failed to take into account of other costs involving the facilitation of the construction of the associated and supporting infrastructure, as well as the costs incurred due to the environmental damages and other externalities or other irreversible costs incurred from the third runway option.
5. These costs include, but not confined to, the following costs: Cost on additional healthcare expenditure and other areas incur from additional air pollution and additional noise pollution, cost of associated roads (the Hong Kong Zhuhai and Macau Bridge, Tuen Mun-Chek Lap Kok Link and Tuen Mun Western Bypass, etc., the costs of associated rail (Hong Kong Shenzhen Airport Link), cost of reclamation and infrastructure for land for logistics centres planned in Lantau Island. Without taking account on all the necessary costs regarding the construction of the third runway, it would be difficult to conduct an accurate and comprehensive assessment of the real costs for the third runway option.
6. Fourthly, we would raise our concerns over the deterioration of the noise pollution and the means of calculation of the noise pollution of the third runway option. Although in para. 3.1.1 of the “Noise Contour Report: Noise Contour Analysis for Third Runway Alternatives” as presented by the URS Corporation has claimed that Integrated Noise Model as adopted by the Federation Aviation Authority in the United States of America is “a state-of-the-art and internationally accepted method for the prediction of airport-related noise levels”. The ProCommons suggested that in additional to the adoption of the “Integrated Noise Model”, the HKAA or the HKSAR Government should also adopt or taking references from the relevant directives from the European Union, known as “European Noise Directives”

which requiring “competent authorities in Member States to draw up “strategic noise maps” for major roads, railways, airports and agglomerations, using harmonised noise indicators L_{den} (day-evening-night equivalent level) and L_{night} (night equivalent level) should also be adopted as a precautionary means to measure the likely impacts on the noise levels of the residential areas along the flight path”, arisen from the construction of the third runway (For details: see <http://ec.europa.eu/environment/noise/directive.htm>). These maps could be used to assess and projects the number of people annoyed and sleep-disturbed along the flight paths once the third runway is in operation. We believe that the HKAA should adopt the approach of the European Union in terms of the prediction of the noise levels.

7. The noise levels of the affected areas are directly correlated with the age and “quality” of the aircraft itself. We have previously enquired with the HKAA in terms of the current age range and “quality” of the aircraft taking and landing in the HKIA, but the HKAA stated they do not have the details of the requested information in hand. The ProCommons believes that the HKAA should put in place more stringent standards for the approval of the types of aircraft taking off and landing in the HKIA, especially the take-off and landings during late hours.
8. Lastly and most importantly, The ProCommons takes the view that the information that should be provided by the HKIA in the Master Plan for the detailed discussions is either absent or incomplete. As the detailed studies and assessments have neither been conducted in the first place, nor incorporated in the consultation documentations as soon as the consultation has begun, an informed discussion and decision-making regarding the construction for the third runway cannot be concluded even after this consultation exercise has been completed. For example, there were lack of any studies or detailed information regarding the mitigation measures on the environmental damages, as well as the sources of funding for the third runway option in the Master Plan, its technical reports and its consultancy studies. Without the provision of such information, the stakeholders, as well as the general public, would not be able to make an informed decision.

9. Hence, in order to facilitate the decision-making process in the various options for the further development of the HKIA, including the construction of the third runway, we call for a follow-up stage consultation on the way forward for the development of the HKIA to be conducted.
10. As for the question of the responsible party which steers such follow-up stage of consultation, given that some issues concerning the further development of the HKIA, such as the coordination of flight area control issues with the relevant authorities in the Mainland of China, would be beyond the authority of the HKAA, and would require the coordination and decision-making at the governmental level.
11. Rather than spearheaded by the HKAA, we call for the HKSAR Government, under the Transport and Housing Bureau and the Development Bureau, the Planning Department and the Civil Aviation Department, to take the lead in conducting the full scale and well-rounded consultation regarding the further options for the way forward of the HKIA that we have proposed. The follow-up stage of consultation should only be conducted after the full-scale and detailed assessments on competitiveness, costs and benefits, economic, environmental issues, flight area controls and paths have been conducted by the respectful authorities. We are also in the view that, apart from the two options listed out in the Master Plan, the “smart-growth” options aiming at the sustainable growth of the airport shall also be included in the follow-up stage of consultation. We believe that only a genuine consultation with different options presented for public interest would then an informed assessment and decision-making process for the way forward of the development of the HKIA could be made.

The Professional Commons

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