



香港建築師學會  
The Hong Kong Institute of Architects

Your Ref. : ETWB(E)55/07/72  
Our Ref. : BLA/E&SD/HATS2/RC/cw/1204

3 December 2004

Environment, Transport and Works Bureau  
Government Secretariat  
10/F Citibank Tower  
3 Garden Road  
Hong Kong  
**Attn : Mr Raistlin Lau**

Dear Mr Lau

**Harbour Area Treatment Scheme (HATS) Stage 2**

Thank you for your letter dated 24 September 2004 informing us the launching of public consultation exercise and inviting us to comment on the subject.

Please find enclosed herewith a paper containing our views regarding HATS Stage 2 for your consideration.

Thank you for your kind attention.

Yours sincerely

Rita Cheung (Mrs)  
Registrar

c.c. Bernard Lim, Chairman, Board of Local Affairs  
M K Leung, Chairman, Environment and Sustainable Development Committee  
Vincent Ng, Chairman, Planning and Lands Committee



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Comments to Harbour Area Treatment Scheme Stage 2

**1. Treatment Scheme**

System resiliency of chosen treatment scheme is very important to the sustainable operation and conversion of the plants. The proposed adoption of large-scale centralized chemical treatment facilities is inherently difficult to transfer to biological treatment or other developing technologies in this field and may turn obsolete with a short system life span.

It is noted that HKSAR has not yet indicated any commitment to Stage 2B which converts the Chemical Treatment to Biological Treatment. If Stage 2A is to be implemented mainly relying on Chemical treatment due to its lower capital investment, we urge the Government to carry out further study and release data on its potential hazards to species and marine habitat as a result of chlorination within the harbour. Such study should be made known to the public before any informed decision could be made on the choice of the treatment scheme.

Treatment at source (household preliminary treatment / biological treatment along pipeline / district treatment) should also be considered rather just focusing on centralized treatment scheme.

**2. Scale of Treatment Facilities**

Calculations of sewage volume are based on the combined volume of waste and foul water. Mandatory use of 2-pipe system could extend the life span of present and future treatment facilities and/or reduce the scale of treatment facilities.

To further reduce the scale of the sewage discharge problem, adoption of limited volume flushing cisterns to all new and renovated buildings in Hong Kong and gradual replacement of existing large-volume water cisterns are recommended.

**3. Population Growth Rate**

The population growth rate taken for the harbour area (from 4.2 millions in 2000 to 6.1 millions in 2021) is very large and needs to be justified. Decentralizing population density could reduce the capacity of the facilities.