



**THE HONG KONG
INSTITUTE OF
PLANNERS**

香港
規劃
師學
會

21 October 2004

Environment, Transport and Works Bureau
10/F Citibank Tower
3 Garden Road
Central
Hong Kong

Dear Sir/Madam,

Response to Consultation Document for the Harbour Area Treatment Scheme Stage 2

Victoria Harbour is the natural asset and the pride of all the Hong Kong people. It is therefore of utmost importance and the obligation of to ensure the water quality of the harbour.

It is worrying to know that despite HATS Stage 1, some 25% of the population in the HATS catchment (over 1.1 million people) still do not have their sewage properly treated before discharge into Victoria Harbour. How can this match up with a World Class City? It is also unfair to the residents in New Territories West that the Tsuen Wan beaches become unfit for swimming after HATS Stage 1, under the impacts of the large volume of treated effluent (without disinfection) discharged from Stonecutters Island Sewage Treatment Works.

HKIP therefore supports implementation of HATS Stage 2A as soon as possible.

In order to implement HATS Stage 2A as soon as possible, Option A (centralization at Stonecutters Islands) is the most appropriate as the other 3 options would likely attract a lot of public objections which would severely delay implementation.

Option B involves building a surface treatment plant at a disused quarry zoned for "Undetermined Use" at the Lamma Island. While the planning application procedure is not complicated, it is expected that the local residents would strongly object to it;

tourists who come to Lamma Island to enjoy the rural landscape would not welcome it; and the green groups would likely be concerned about the impact of the effluent on the water quality for the Sea Turtles and Finless Porpoise in the vicinity.

Option C proposes to build a treatment plant at Sandy Bay to partly share the remaining 25% load with Stonecutters Island. It is suggested that the plant be built in a cavern up on the slopes zoned "GB" to the north of Cyberport. The site is surrounded by up class residential areas. Objections from the neighbouring residents and Cyberport would likely be strong.

Option D proposes to build a treatment plant in a cavern on Braemar Hill in addition to the one at Sandy Bay. The site is also zoned "GB" and is richly vegetated. Although the site is at the end of Braemar Hill Road, the residents and the many schools along the road will very likely object to the possible traffic and environmental impacts generated from the construction and operation of the plant.

On the other hand, centralization at Stonecutters Island has a number of advantages. Stage 2A works can be handled at the existing treatment plant with some upgrading works. Since it is an existing use, public objection is expected to be minimal. Even for the future implementation of Stage 2B, the Port Rail Terminal Site near the existing plant is segregated from residential areas by district open space and Tsing Kwai Highway. The proposed underground plant would not only allow better land utilization but also provide the opportunity for further expansion.

HKIP supports a phased approach because HATS Stage 2A should be implemented as soon as possible and CEPT is available already at Stonecutters. With the added disinfection process, the water quality can be improved to the extent that Tsuen Wan beaches can be re-opened for swimming. Furthermore, population growth in Hong Kong has slowed down significantly in the past few years. According to the projection of C & S D in 2004, the population in Hong Kong in 2033 will only be 8.4 million. It would be highly unlikely that the population in HATS catchment areas alone would amount to 6.2 million.

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HKIP urges the government to closely monitor the marine habitat and the population growth and distribution after commissioning of Stage 2A and agrees that the preparation works for Stage 2B should be carried out in parallel.

HKIP has the following Visions for HATS:

1. To re-open Tsuen Wan beaches as soon as possible
2. To revitalize the Victoria Harbour
 - for more diverse marine life
 - for greater public enjoyment at the harbourfront
 - for more secondary contact water recreation
 - for an annual cross harbour swimming gala which can be an international event like dragon boat race

To realize the above visions, HKIP supports "Polluter Pays Principle".

Yours sincerely,

Iris Tam
Chairman
Public Affairs Committee, HKIP
