



## Section 16 Town Planning Application Supplementary Planning Statement

**Proposed Religious Institution (Church)  
at Shop 193 on 1/F, Union Plaza,  
9 Wo Muk Road, Fanling, New Territories**

**December 2025**

**Town Planning  
Consultant:**



DeSPACE (International) Limited

**Client:**



**Wah Ming Christian  
Faith Hope Love Church**

**Architect:**



THEO TEXTURE Total design solution



## **EXECUTIVE SUMMARY**

This planning application is submitted on behalf of Wah Ming Christian Faith Hope Love Church ("the Applicant") in support of a proposed Religious Institution (Church) ("the Proposed Development") at Shop 193 on 1/F, Union Plaza, 9 Wo Muk Road, Fanling, New Territories ("the Subject Premises"). The application seeks the Town Planning Board's ("TPB") approval under Section 16 of the Town Planning Ordinance.

The Subject Premises falls within an area zoned "Residential (Group A)" on the Approved Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/28 ("the OZP"). According to the Notes of the OZP, the use of "Religious Institution" is a Column 2 use that requires planning permission from the TPB.

The Subject Premises of about 305 sq. m., which is currently vacant, form part of Union Plaza – a commercial podium underpinning 3 residential towers in a composite development. The Applicant proposes to establish a multi-functional assembly hall with a capacity of up to 200 people, designed to facilitate worship, fellowship, and community services. Multi-function rooms, a nursery/counselling room and a pantry are proposed as ancillary uses to support the church operation.

The proposal is justified mainly on the following reasons:

- The Proposed Development (as a Religious Institution (Church)) is compatible with the land uses in the subject development (Union Plaza) and the surroundings, which are predominantly non-domestic uses at the lowest three floors;
- There is a similar approved application for "Religious Institution" within the "R(A)" Zone, demonstrating that it is not incompatible with the surrounding land use and is unlikely to cause adverse impacts;
- The size, layout and location of the Subject Premises are suitable for expanding the Applicant's services and aligning with the Applicant's ongoing mission to provide social welfare and promote Christianity that can bring a positive impact to the existing facilities and the local community; and
- The Proposed Development would not result in insurmountable traffic, fire safety and noise impacts on the surroundings.

In view of the above justifications, the Applicant sincerely seeks the TPB to give favourable consideration and approve this Planning Application.

## 行政摘要

此規劃綱領謹代表華明基督徒信望愛堂（申請人）為位處新界粉嶺和睦路 9 號海聯廣場 1 樓 193 舖（申請處所）用作擬議宗教機構（教堂）（該擬議發展）的規劃申請而擬備，並希望根據《城市規劃條例》第 16 條得到城市規劃委員會（城規會）的規劃許可。

申請處所位於粉嶺／上水分區計劃大綱草圖編號 S/FSS/28（該大綱核准圖）上的「住宅（甲類）」地帶。根據該大綱核准圖的《註釋》所述，「宗教機構」用途屬於第二欄用途，須先向城規會申請。

申請處所現時空置，面積大約 305 平方米，位於海聯廣場基座非住宅部分內，其上設有 3 座住宅樓宇，該綜合發展項目統稱為海聯廣場。在該擬議發展中，申請處所主要有一個最多可容納 200 人的禮堂，另設有多用途房間、輔導房間及茶水間作為附屬用途。

該規劃申請的主要理據如下：

- 擬議的「宗教機構（教堂）」用途與該商場內的商業用途及毗鄰的土地用途相容，其最低三層一般用作非住宅用途；
- 過往有位於「住宅（甲類）」地帶的「宗教機構」用途申請獲批准，這表示該擬議發展與周圍的土地用途並非不兼容；
- 該處所無論在面積、間隔和位置方面均符合申請人擴展其基督教服務的需要，亦滿足到申請人一直秉承社會福利服務和推廣基督教的使命，其服務相信能有助裨益當地社區；以及
- 該擬議發展在交通、消防安全及噪音方面都不會對周圍環境造成不良影響。

有鑑於以上理據，敬希城規會支持本次的規劃申請。

*（內容如與英文版本有任何差異，概以英文版本為準）*

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## SECTION ONE – INTRODUCTION

- 1.1. DeSPACE (International) Limited acts on behalf of the Applicant, namely, Wah Ming Christian Faith Hope Love Church, to submit this Section 16 Town Planning Application to the Town Planning Board (“TPB”). This application seeks approval for developing a Religious Institution (Church) (“the Proposed Development”) at Shop 193 on 1/F, Union Plaza, 9 Wo Muk Road, Fanling, New Territories (“the Subject Premises”). The location of the Subject Premises is shown on **Figure 1**.
- 1.2. The Subject Premises falls within the area zoned “Residential (Group A)” (“R(A)”) on the Approved Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/28 (“the OZP”). According to the Notes of the OZP, the use of “Religious Institution” is a Column 2 use that requires planning permission from the TPB.
- 1.3. The Subject Premises is located on the first floor of Union Plaza, which serves as a commercial podium below three residential towers. With a total GFA of about 305 square meters, it is currently vacant, and the Applicant proposes to establish an assembly hall that accommodates up to 200 people for worship, community gatherings, and other related activities. In addition, the Proposed Development also includes multi-function rooms, office spaces and a pantry that support the church’s operations.
- 1.4. The Applicant is a member of The Christian Faith, Hope, and Love Church, which was established in the 1960s and now has over 10 churches in Hong Kong. The Applicant began its evangelistic work in the Fanling area in 1992 by establishing a kindergarten at Wah Ming Estate, Fanling. The vision of The Christian Faith, Hope, and Love Church is to spread the Gospel of Jesus Christ, nurture believers to become disciples of Christ, and demonstrate Christ’s love through community care. Therefore, this application is submitted with the aim of expanding its community services and building a harmonious society.

## **SECTION TWO – SITE CONTEXT AND HISTORY**

### **2.1. Site Context and Surrounding Land Uses**

- 2.1.1. The Subject Premises, of about 305 square meters, occupies a portion of the first floor (around 6.5%) in the two-storey Union Plaza, which serves as the commercial base for Union Plaza with 3 residential towers above (“the Composite Development”). Union Plaza primarily accommodates a variety of commercial uses, including retail shops, tutorial schools, learning centres, and a religious institution (i.e., Fanling Hoi Luen Tsung Tsin Church). Currently, the Subject Premises remains vacant.
- 2.1.2. The surrounding areas have the following characteristics, including: **(Figure 1)**
- a) to the north, an open space (i.e. Fan Leng Lau Road Playground);
  - b) to the northeast, an open space (i.e. Wo Muk Road Playground);
  - c) to the southeast, private housing blocks (i.e. 17-39 Wo Tai Street & 41-53 Wo Tai Street) with shops and services on the ground floor; and
  - d) to the southwest, an open space (i.e. Luen Hing Street Sitting-out Area) and a commercial/residential development (i.e. Mount One) comprising 1 residential block atop a 6-storey podium with shops and services, an eating place and parking facilities;
- 2.1.3. It is observed that the surrounding environment has a harmonious mix of residential development with non-domestic uses on the lower floors to serve the needs of the neighbourhood, along with various open spaces.

### **2.2. Land Status**

- 2.2.1. Union Plaza is held under Fanling Sheung Shui Town Lot No. 128. The Applicant is not a “current land owner”. An Agreement for Sale and Purchase was signed by the Applicant as the purchaser and was registered in the Land Registry. Yet, the change in ownership is pending to be reflected in the Land Registry.
- 2.2.2. Nevertheless, the Applicant has fully complied with the Town Planning Board Guidelines TPB PG-No. 31B regarding the owner’s notification requirement under Section 16 of the Town Planning Ordinance. Reasonable steps have been taken to notify the “current land owner.”

### **2.3. Accessibility**

- 2.3.1. The Subject Premises is well served by various modes of public transport, including buses and minibuses, within 10 minutes' walking distance. Visitors can easily access the Subject Premises from the bus terminus (i.e., Luen Wo Hui Public Transport Terminus), the minibus terminus (i.e., Wo Mun Street Public Light Bus Terminus), or various bus and minibus stops outside the Subject Premises on Wo Muk Road or Wo Tai Street (refer to **Figure 1**).
- 2.3.2. The closest MTR station is Fanling Station of the East Rail Line, which is approximately a 20-minute walk from the Subject Premises, and visitors can connect to the MTR Station by minibus services (refer to **Figure 2**).
- 2.3.3. Union Plaza offers car parking and loading/unloading facilities on the basement floor of the Plaza, available to residents and users of the Composite Development. Visitors arriving by private vehicles can reach the Subject Premises via lifts connecting the first floor and the basement floor. Additional car parks or parking meters, such as those on Fan Leng Lau Road or Luen Shing Street, are available within 10 minutes' walking distance. Please refer to **Figure 2** for detailed locations of car parks and parking meters.
- 2.3.4. Although the Subject Premises is situated within a predominantly residential development, it can be directly and separately accessed from the entrances of the non-domestic portion on Wo Muk Road, Wo Muk Road Playground, and in the service lane near Wo Tai Street in the southeast by staircases, escalators, and lifts. It does not require entry through the residential portion of the building (refer to **Figures 3&4**); thus, it will not cause nuisance to the residents of the Composite Development.



## SECTION THREE – PLANNING CONTEXT

### 3.1. Statutory Planning Context

- 3.1.1. The Subject Premises falls within the zoning of “R(A)” on the Approved Fanling/Sheung Shui Outline Plan No. S/FSS/28 (“OZP”). This zone is intended primarily for high-density residential development. According to the Notes for the “R(A)” zone, “Religious Institution” use is a Column 2 use which requires planning permission from the Town Planning Board.

### 3.2. Planning History

- 3.2.1. The Subject Premises does not involve any previous planning applications nor records of illegal and/or unauthorized development.

### 3.3. Similar Planning Applications

- 3.3.1. There are precedent cases for the Proposed Development as a “Religious Institution” within the “R(A)” zone in similar mixed commercial-residential developments (refer to **Table 1**). One of the applications (i.e., A/FSS/302) is in a nearby location on the same OZP freshly approved on 21/11/2025.
- 3.3.2. In general, all precedent cases demonstrate the key consideration of the proposed development as a Religious Institution based on its compatibility with the surrounding areas, having separate access from the residential portion that reduces nuisance to residents, and being situated on the lower floors of the composite development. **Table 1** summarizes the similar approved applications and key considerations provided by the Planning Department.

**Table 1:** Similar Approved Planning Applications in “R(A)” Zone

	Case No. (Approval Date)	Name of Religious Institution (Address)	Planning Department's View on the Application(s)
<b>1</b>	A/FSS/302 (21/11/2025)	Evangelical Free Church of China Yan Fook Church Limited  (Shop G1B, Dawning Views Shopping Plaza, No. 23 Yat Ming Road, Fanling, N.T.) <b><u>*On the Same OZP</u></b>	<ul style="list-style-type: none"> <li>• <u>The proposed use is also considered not incompatible with the surrounding areas</u>, which are mainly high-rise residential developments with commercial uses on the lower floors, and intermixed with schools</li> <li>• The Premises are accessible directly from G/F of the subject development <u>separated from the accesses to the residential portion</u>. It is envisaged that the proposed use will not cause nuisance to the residents of the subject development.</li> </ul>
<b>2</b>	A/K5/876 (10/10/2025)	Evangelical Free Church of China – Spring Church Limited  (Shops L and R5, 1/F, Bondlane 2, 268 Hai Tan Street, Cheung Sha Wan, Kowloon)	<ul style="list-style-type: none"> <li>• As the shopping mall is served by <u>independent accesses at Hai Tan Street separated from the residential development</u> through staircase, escalator and lift, it is envisaged that the proposed use will not cause nuisance or inconvenience to the residents of the subject building.</li> <li>• The proposed use is also considered <u>not incompatible with other uses in the surrounding areas</u> which are predominantly residential developments with commercial uses including shops and eating places on the lower floors, asnd intermixed with G/IC uses.</li> <li>• While no parking space and L/UL Bay is available at the subject building, there are <u>car parking provisions including on-street parking spaces in the vicinity</u>.</li> </ul>

**Table 1**(cont'd)

	Case No. (Approval Date)	Name of Religious Institution (Address)	Planning Department's View on the Application(s)
<b>3</b>	A/TKO/130 (08/11/2024)	Christian & Missionary Alliance Sun Kei Alliance Church  (Shops 15 and 15A, Level 1, Bauhinia Garden Commercial Complex, 11 Tong Chun Street, Tseung Kwan O)	<ul style="list-style-type: none"> <li>It is considered <u>not incompatible for the proposed church to coexist with other existing uses</u> in the subject building, which mainly comprise commercial and institutional facilities, as well as with the surrounding developments that are predominantly residential with commercial uses on the lower floors.</li> </ul>
<b>4</b>	A/YL/320 (02/08/2024)	Assemblies of God Holy Light Church  (1/F (Part), Ho Sun Lee Building, 9 Fung Yau Street South, Yuen Long, N.T.)	<ul style="list-style-type: none"> <li>It is <u>not incompatible with other uses on the non-domestic floors</u>, which comprise shop and services, eating places and tutorial school.</li> <li>As the Premises is located on the 1/F of the commercial podium and has a <u>separated entrance from the residential portion</u> of the subject development at Fung Yau Street South, it is envisaged that the Church will not cause nuisance to the residents of the subject development</li> </ul>
<b>5</b>	A/H8/440 (05/04/2024)	Shinnyo-En Hong Kong  (2/F Commercial Podium of 2-4 Tin Hau Temple Road and 180 Tung Lo Wan Road, Tin Hau, Hong Kong)	<ul style="list-style-type: none"> <li>The Premises occupying the entire 2/F of the dedicated commercial portion is provided with a direct access to Tin Hau Temple Road via an escalator within the commercial podium.</li> <li>As the residential/commercial floors above <u>are served by separate entrances and lifts/escalators</u>, the Premises is well-served by various modes of public transport, it is envisaged that the proposed use will not cause nuisance or inconvenience to the residents of the subject buildings.</li> </ul>

## SECTION FOUR – THE PROPOSED DEVELOPMENT

- 4.1. The Subject Premises, which is currently vacant and has a total GFA of about 305 square meters, is now proposed to be developed as a Religious Institution (Church). Main facilities in the church include an assembly hall accommodating around 200 people, with partitions to allow flexible arrangements for worship, setting up group meetings, and providing community services.
- 4.2. Further to the main assembly hall, the Proposed Development also incorporates several ancillary uses to support the future expansion of the church service, including multi-function rooms to nurture children to become disciples of Christ, a nursery/counselling room to provide family support in the community, ancillary office spaces to facilitate administrative and pastoral work, and an ancillary pantry designed for light refreshments to encourage fellowship and relationships. These ancillary uses align with the existing land use, strengthen the channel of support within the community, and achieve higher cohesiveness and resilience in the community.
- 4.3. The church operates primarily between 8 am and 10 pm during weekends, with one major worship session for around 150 people between 11:30 am and 1 pm and other group activities to serve different groups. On weekdays, the church operates between 8 am and 9 pm for after-school tutorials for students from nearby schools, counselling work, community workshops serving children and the elderly, fellowship activities and administrative work, etc., with the number of attendees varying from 20 to 80 people in general.
- 4.4. To access the Subject Premises, two major entrances in the northern (facing Wo Muk Road) and the southern (facing the service lane and Wo Tai Street) portions of the commercial portion provide direct access from the street through one escalator, one lift, and two staircases. As per the approved General Building Plan dated 09/03/1994, this access is separate from the residential portions of the Composite Development (refer to **Figures 3&4**) and therefore minimizes nuisance to the residents. For service and logistics needs, a cargo lift is provided to connect the loading/unloading bays on the basement level directly, reducing interference with the walkways in both the residential and commercial portions.
- 4.5. Fire safety measures will be installed and enhanced in compliance with relevant laws and regulations, upon the requirements from the Fire Services Department.
- 4.6. Please refer to **Appendix 1** for the Layout Plan.

## **SECTION FIVE – PLANNING AND TECHNICAL JUSTIFICATIONS**

### **5.1. Compatible with the Composite Development and the Surrounding Land Uses**

- 5.1.1. The Proposed Development as a Religious Institution (Church) is compatible with the composite development and surrounding land uses. The Composite Development comprises three (3) residential towers atop a commercial podium with shops and services, tutorial schools, educational centres, and an existing religious institution. Furthermore, there are similar uses in the surrounding areas, where commercial uses are found on the lower floors of composite/residential developments, indicating that the Proposed Development aligns with the context of the surrounding area. The Proposed Development will not be incompatible with the surrounding land uses; instead, it will further enhance the coherence of the community through the provision of different social services.
- 5.1.2. One (1) similar application in the vicinity was previously approved by the Town Planning Board, demonstrating that it was considered not incompatible with the surrounding areas to develop a religious institution within the “R(A)” Zone. In addition, as summarized in **Table 1**, there are five (5) similar town planning applications showing that religious institutions are not incompatible within composite developments and their surrounding uses, including shops and services, tutorial schools, and other facilities. Therefore, with a similar nature and scale, it is expected that the Subject Premises for a religious institution (Church) is compatible and a suitable use in the surrounding area.

### **5.2. Well-suited Location for Expanding the Applicant’s Services**

- 5.2.1. The Applicant has established its services for the Fanling community since the 1990s. The Subject Premises offers a suitable location for the church to expand its service to the northern part of Fanling, including Luen Wo Hui and areas along Sha Tau Kok Road (such as Queen’s Hill and the new public housing development), as well as satisfying future needs to welcome residents in the Fanling North New Development Areas. It is conveniently located in the heart of Luen Wo Hui and enjoys great connectivity with public transportation, ensuring accessibility for a broader range of worshippers to attend assemblies and other activities in the Subject Premises.
- 5.2.2. Situated in the commercial portion of the Composite Development, access to the Subject Premises does not require entry from the residential portion of the buildings, reducing nuisance for the residents and maintaining a tranquil living environment in the Composite Development. It can be directly accessed from the commercial portion of the building by escalators, lifts, and staircases

(refer to **Figures 3&4**). In sum, it is unlikely to cause conflicts with the residents or create interfacing issues with the existing uses through the introduction of this Proposed Development.

- 5.2.3. With the provision of barrier-free facilities to access the Subject Premises, it is also an ideal location for the church to encourage community integration through collaboration with other churches and organizations. Currently, the church's services are limited to the daily operation of the kindergarten with limited space available. With the Proposed Development, the Applicant is optimistic about discovering new possibilities for organizing other outreaching activities and/or sharing sessions, building better Christian networks with other NGOs and churches, and providing a high-quality venue for these gatherings to strengthen community resilience. Therefore, the Subject Premises is a strategic location for the Applicant to deliver more high-quality services that respond to the community's needs and promote Christianity.

### **5.3. Diversifying Services for Community Enrichment**

- 5.3.1. The Applicant, Wah Ming Christian Faith Hope Love Church, has over 30 years of experience serving the Fanling community, and the Proposed Development will effectively facilitate the operation of the religious institution by diversifying services in the community and enhancing community bonding through demonstrating Christ's love.
- 5.3.2. The Proposed Development applies careful designs for flexible multi-function rooms and counselling rooms to enable the possibility of different activities at different scales, achieving the objective of the Applicant to diversify its services to family counselling, promote elderly wellness, and support children/youth development. Therefore, the Proposed Development will support the community by assisting people in need to overcome their difficulties, promoting positivity in society, and encouraging genuine fellowship.

### **5.4. No Adverse Traffic Impact**

- 5.4.1. Situated in a well-developed community with a comprehensive transportation network, the Proposed Development is not anticipated to generate adverse traffic impacts on the surrounding areas. Regarding parking demands, the availability of car parking and loading/unloading facilities at Union Plaza (The Composite Development), as well as the sufficient supply of parking meters around the Subject Premises (refer to **Figure 2**), will be adequate to meet the operational requirements of the Proposed Development. The applicant



conducted a survey on the number of parking spaces inside Union Plaza. The car park provides a total of 39 public hourly parking spaces on both weekdays and weekends.

5.4.2. It is expected that worshippers will primarily come from the surrounding areas or within the communities of Fanling and Sheung Shui. The Applicant will remind attendees to access the Subject Premises on foot or via public transportation to minimize traffic flow and alleviate parking pressures associated with the Proposed Development.

5.4.3. Additionally, social activities will primarily be held on weekends within a specified timeframe. The Applicant will further arrange for attendees to arrive in smaller groups to ensure smooth circulation and minimize inconvenience to other users.

## **5.5. No Adverse Fire Safety Impact**

5.5.1. Fire safety requirements will be strictly adhered to within the Subject Premises to ensure a safe and secure environment for all worshippers and staff. The Subject Premises is equipped with two entrances, which are connected to two staircases and two exits leading to Wo Muk Road and Wo Tai Street, facilitating fire escape in the event of an emergency. To safeguard all users, appropriate fire safety measures will be implemented. The existing facilities will be reviewed and upgraded to comply with the latest regulations and codes of practice, with provisions made for barrier-free access as per Fire Service Department's advice.

## **5.6. No Adverse Noise Impact/Nuisance to Residents**

5.6.1. All activities at the Subject Premises are primarily passive in nature and take place in the non-domestic portion of the Composite Development. These activities are not expected to generate significant noise impacts for residents, as they are mostly held on weekends. Furthermore, in line with the Applicant's mission of fostering a harmonious society, attendees of the church will always be encouraged to remain considerate of others and avoid potential confrontations.

5.6.2. The Subject Premises is equipped with a central air-conditioning system, eliminating the need for openable windows for ventilation and thereby preventing noise leakage. The Applicant will also implement proactive

measures to minimize disturbances to residents, including, but not limited to, crowd control managed by staff.

## **SECTION SIX – CONCLUSION**

This Planning Statement is submitted to the Town Planning Board in support of the application for a Proposed Religious Institution (Church) at the Subject Premises. This Planning Statement has demonstrated the general background of the Subject Premises, the development proposal and the planning justifications.

The Town Planning Board is cordially invited to give a favourable consideration to approve the current application with the following grounds:

- i) The Proposed Development is compatible with the composite development and the surrounding land uses, together with the establishment of precedent cases for similar uses;
- ii) The Subject Premises enjoys great accessibility with public transportation and pedestrian links, with separate and direct access from streets that reduce the potential nuisance to residents and no interfacing problems are anticipated;
- iii) The scale, layout and location of the Subject Premises is suitable for the expansion of the church's service, so as to provide social welfare services and promote Christianity in the growing local community with new development areas in Fanling and Sheung Shui;
- iv) The Proposed Development has taken thoughtful consideration about the residents of the composite development and the neighbourhood. It is unlikely to pose adverse traffic, fire safety and nuisance impacts to the surrounding areas.