

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/TW/549

- Applicant** : Water Supplies Department (WSD), New Works Branch, Consultants Management Division represented by Binnies Hong Kong Limited
- Site** : Tsuen Wan Water Treatment Works, Tsuen Wan
- Site Area** : About 2,392m²
- Land Status** : Government Land (GL)
- Plan** : Draft Tsuen Wan Outline Zoning Plan (OZP) No. S/TW/40
- Zoning** : “Government, Institution or Community” (“G/IC”)
(a) maximum building height (BH) of 2 storeys, or the height of the existing building, whichever is the greater
(b) in determining the relevant maximum number of storeys, any basement floor(s) may be disregarded
- Application** : Proposed Minor Relaxation of Building Height Restriction (BHR) for Permitted Government Use (Water Treatment Works)

1. The Proposal

- 1.1 The applicant seeks planning permission for proposed minor relaxation of BHR from two storeys to four storeys (excluding one level of basement) (i.e. +2 storeys or +100%) for two sludge treatment plants (STPs) at the application site (the Site) (**Plan A-1**). The proposed STPs are ancillary to the adjacent Tsuen Wan Water Treatment Works (TWWTW) within the same “G/IC” zone. In terms of land use, water treatment works (and the subject ancillary STPs), which is a kind of ‘Government Use (not elsewhere specified)’, is under Column 1 of the Notes of the OZP for the “G/IC” zone and is always permitted. However, as the two STPs, each with building height (BH) of four storeys, exceed the BHR as stipulated on the OZP, planning permission for minor relaxation of BHR from the Town Planning Board (the Board) is required.
- 1.2 TWWTW was commissioned in 1957¹. In order to uprate the raw and freshwater facilities and enhance the reliability of freshwater supply in the area, an investigation, design and construction study for in-situ reprovisioning and upgrading of TWWTW (the Study) is being conducted by WSD. As sludge is created during the water

¹ TWWTW treats raw water from Shing Mun Reservoir and Tai Lam Chung Reservoir for supply to the Kwai Chung area and parts of Tsuen Wan.

treatment process (such as from washing the filters of the raw water), the purpose of the STPs is to remove excessive water content from the sludge for off-site disposal. As such, the proposed STPs are integral to the reprovisioning and upgrading of TWWTW under the Study². The Site, as well as the TWWTW as a whole, is accessible from Shing Mun Road via an access road (**Drawing A-2**).

- 1.3 According to the applicant, construction of the two STPs will synchronise with the phased upgrading works of TWWTW. After the sludge treatment process, excessive water content will be recirculated for water treatment, while the dry sludge cakes will be disposed of off-site. Compared with the existing TWWTW, which utilises a simple sedimentation process for sludge treatment, the new STPs can enhance the water recovery rate and reduce discharge to public sewers. Layout plans, floor plans, sections and photomontages submitted by the applicant are at **Drawings A-1 to A-16**. The major development parameters of the proposed development are summarised below:

Major Development Parameters	Proposed Development (Application No. A/TW/549)
Site Area (about)	2,392m ²
Gross Floor Area (about)	4,136m ²
Plot Ratio (PR) (about)	1.73
Number of Storeys ^[1]	4 (excluding one basement floor)
Maximum BH ^[1] (about)	138.1mPD ^[2]
Number of Blocks	2
Schematic Floor Uses and Floor-to-floor Heights (FTFH) ^[2]	
B/F (8m) <i>(not counted towards the BHR)</i>	Polymer Room and Sludge Balancing Tank
G/F (7m)	Transformer Room, Switch Room, Polymer Room and Loading/unloading (L/UL) Area
1/F (13m)	Filter Press Hall
2/F (6m)	Motor Control Centre Hall, Thickened Sludge Holding Tank and Polymer Storage Tank
R/F (6.5m)	Sludge Thickener Storage Tanks
L/UL Bays for Heavy Goods Vehicle	2
Anticipated Year of Completion ^[3]	Not earlier than 2033 (Phase 1 works)

Note:

^[1] The proposed roof-top structures exceed 10% of the BH of the proposed STPs, hence they are counted towards the BH in accordance with Joint Practice Note No. 5.

^[2] Subject to change at detailed design stage.

^[3] The proposed STPs will be developed in phases (**Drawing A-1**). Phase 1 works is expected to be completed not earlier than 2033, while Phase 2 works will commence after the completion of Phase 1 works.

- 1.4 According to the applicant, the proposed STPs are essential to meeting the operational needs of modern-day water treatment facilities. The FTFH of the G/F (7m) is to allow direct loading of sludge onto collection vehicles, while the FTFH of the 1/F (13m) is to accommodate the 5m-high filter presses, 2.5m-high moving crane

² Other facilities proposed under the Study include the main water treatment plant (east wing and west wing), administration building, and chemical storage buildings, etc. (**Drawing A-1**). As the BHs of these facilities are within the BHRs as stipulated on the OZP, no planning permission is required.

installation and 5.5m-high sludge conveyor belt system. The 2/F (FTFH of 6m) is to accommodate the necessary machineries with sufficient headroom, as well as the sludge holding tank and polymer storage tank prior to treatment. The R/F will hold the 6.5m-high sludge thickener storage tanks, which is a standard installation in STPs for sludge concentration before treatment. The proposed STPs adopt a vertical setup for cost efficiency. Similar installations and equipment dimensions are also found in Siu Ho Wan Water Treatment Works.

1.5 A Preliminary Environment Review (PER) has been carried out as part of the Study, which confirms that the proposed development will not generate significant adverse impact on the surrounding area. According to the Visual Appraisal (VA), various façade design measures, including muted external colours, textured vertical articulation, painted fins and soften edge treatments, will be adopted to promote visual compatibility with the surrounding area and to reduce the perceived building bulk (**Drawing A-16**). With implementation of the aforesaid measures, the VA concludes that the proposed development will not generate adverse visual impacts on the surrounding area.

1.6 In support of the application, the applicant has submitted the following documents:

- | | |
|--|----------------------|
| (a) Application Form received on 9.4.2026 | (Appendix I) |
| (b) Supporting Planning Statement (SPS) received on 9.4.2026 | (Appendix Ia) |
| (c) Further Information (FI) received on 28.5.2026* | (Appendix Ib) |
- * accepted and exempted from publication and recounting requirement*

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are set out in the SPS and FI at **Appendices Ia** and **Ib** respectively, which are summarised as follows:

In-situ Reprovisioning to Enhance Operational Efficiency and Sustainability

- (a) the proposed STPs are an integral and essential part of the TWWTW upgrading works. It will enhance the water recovery rate of the facility, thereby reducing sewage discharge to public sewers. The proposed STPs will improve operational resilience and support long-term sustainability of the regional water supply network;

Optimised BH in Commensurate with Site Constraints and Design Requirements

- (b) the proposed BH has carefully balanced the need to optimise the building footprint, while taking into account the following requirements and site constraints:
- (i) the existing TWWTW utilises a simple sedimentation process for sludge treatment. As the sludge after sedimentation treatment is still bulky with high water content, it does not achieve the minimum solid content of 30% required by the Environmental Protection Department for landfill disposal, and hence is discharged to public sewers. In contrast, the proposed STPs will adopt advanced sludge treatment processes, which would reduce sludge volume and achieve the required minimum solid content of 30% for disposal to landfills, thereby improving the sustainability credentials of the project;

- (ii) compared with the existing rudimentary setup which only requires at-grade open-air sedimentation pits, the proposed STPs entail additional equipment, including gravity thickeners, filter presses, pumps and other machineries, which necessitates a multi-storey configuration amidst the constrained site;
- (iii) while land to the east of the Site currently has a BHR of four storeys, it will be fully utilised for the development of the upgraded water treatment plant. The presence of access road also constrains expansion horizontally and renders the need for two STP blocks;

No Adverse Impacts

- (c) the proposed development is expected to generate about two vehicle trips per day. According to the air ventilation appraisal (AVA), no adverse impact is anticipated given the scale of the proposed STPs and their distance from sensitive receivers. The PER also concludes that the proposed works would not cause long-term adverse environmental impacts. The associated slope improvement works, if any, will also be subject to agreement with the Geotechnical Engineering Office (GEO) of the Civil Engineering and Development Department (CEDD) at a later stage. Overall, the proposed development will not generate adverse traffic, visual, air ventilation, environmental, drainage, sewerage and geotechnical impacts on the surrounding area.

3. Compliance with the “Owner’s Consent/Notification” Requirements

As the Site involves GL only, the “owner’s concern/notification” requirements as set out in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31B) are not applicable to the application.

4. Previous Application

There is no previous application covering the Site.

5. Similar Application

There is no similar application for minor relaxation of BHR for ‘Government Use’ within the “G/IC” zone on the OZP.

6. The Site and Its Surrounding Areas (Plans A-1 to A-5)

6.1 The Site is:

- (a) located within the existing TWWTW at Sheung Kwai Chung on a hill platform with site formation level of about +105mPD; and
- (b) currently occupied by water treatment facilities and internal roads of TWWTW.

6.2 The surrounding areas have the following characteristics:

- (a) to the immediate east and west of the Site within the same “G/IC” zone are other low-rise water treatment facilities, including TWWTW and the Tsuen Wan Fresh Water Service Reservoir respectively;
- (b) to the north and northwest are landscaped slopes, Shing Mun Valley Sports Ground and Shing Mun Valley Park on land zoned “Open Space”; and
- (c) to the further south are resite villages on land zoned “Village Type Development” (“V”), such as Hoi Pa San Tsuen and Ham Tin Tsuen.

7. Planning Intention

7.1 The planning intention of the “G/IC” zone is primarily for the provision of government, institution and community (GIC) facilities serving the needs of the local residents and/or a wider district, region or the territory. It is also intended to provide land for uses directly related to or in support of the work of the Government, organisations providing social services to meet community needs, and other institutional establishments.

7.2 As stated in paragraph 7.6 of the Explanatory Statement of the OZP, a minor relaxation clause in respect of BHRs is incorporated into the Notes of the OZP to provide incentive for developments/redevelopments with design merits/planning gains. Each application for minor relaxation of BHR will be considered on its own merits and the relevant criteria for consideration of such application are as follows:

- (a) amalgamating smaller sites for achieving better urban design and local area improvements;
- (b) accommodating the bonus PR granted under the Buildings Ordinance in relation to surrender/dedication of land/area for use as a public passage/street widening;
- (c) providing better streetscape/good quality street level public urban space;
- (d) providing separation between buildings to enhance air and visual permeability;
- (e) accommodating building design to address specific site constraints in achieving the permissible PR under the OZP; and
- (f) other factors such as site constraints, need for tree preservation, innovative building design and planning merits that would bring about improvements to townscape and amenity of the locality and would not cause adverse landscape and visual impacts.

8. Comments from Relevant Government Departments

8.1 The following Government departments have been consulted and their views on the application are summarised as follows:

Land Administration

- 8.1.1 Comments of the District Lands Officer/Tsuen Wan and Kwai Tsing, Lands Department (DLO/TW&KT, LandsD):

as the Site is currently under the management and maintenance of WSD, she has no comment on the application from land administration point of view.

Traffic

- 8.1.2 Comments of the Commissioner for Transport (C for T):

as the proposed development will not induce significant traffic impact (only about two vehicles per day), she has no comment on the application from transport operation and traffic engineering perspectives.

Environment

- 8.1.3 Comments of the Director of Environmental Protection (DEP):

- (a) no objection to the application; and
- (b) in accordance with the Environment, Transport and Works Bureau Technical Circular (Works) No. 13/2003, the applicant has carried out a PER which recommends appropriate environmental measures for the TWWTW to meet the relevant environmental planning standard. The applicant shall implement the environmental measures as recommended in the PER in accordance with the technical circular procedure.

Fire Safety

- 8.1.4 Comments of the Director of Fire Services:

no comment on the application subject to fire service installations and water supplies for firefighting being provided to his satisfaction. His advisory comments are at **Appendix II**.

Urban Design and Landscape

- 8.1.5 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

- (a) no adverse comment on the application from urban design, visual impact, air ventilation and landscape planning perspectives;

Urban Design, Visual Impact and Air Ventilation

- (b) the Site is located on a hill platform with the Shing Mun Valley Sports Ground and Shing Mun Valley Park to its north. There are some villages zoned "V" to the south. Noting that the Site adjoins the central part of the same "G/IC" zone with a BHR of four storeys, the

proposed minor relaxation of BHR from two to four storeys would unlikely induce significant adverse impact on the visual character of the surrounding area;

- (c) according to the VA, while the proposed minor relaxation of BHR may result in slight visual obstructions from two viewpoints, the proposed STPs with façade design measures as stated in paragraph 1.5 above may promote visual interest;
- (d) the AVA conducted by the applicant concluded that the proposed STPs with heights of four storeys would not have significant adverse impact on the surrounding pedestrian wind environment; and

Landscape Planning

- (e) according to the aerial photo, the Site is situated in an area of “Urban Peripheral Village Landscape” predominantly surrounded by vegetation and is currently occupied by the TWWTW. No significant adverse landscape impact arising from the proposed development is anticipated.

8.2 The following Government departments have no objection to/no comment on the application:

- (a) Chief Engineer/Mainland South, Drainage Services Department (CE/MS, DSD);
- (b) Chief Highway Engineer/New Territories West, Highways Department;
- (c) Chief Building Surveyor/New Territories West, Buildings Department;
- (d) Commissioner of Police;
- (e) Project Manager (West), CEDD;
- (f) Head of the GEO, CEDD;
- (g) Director of Electrical and Mechanical Services; and
- (h) District Officer (Tsuen Wan), Home Affairs Department.

9. Public Comment Received During the Statutory Publication Period

During the statutory publication period, one public comment from an individual was received expressing concerns on the extent of minor relaxation in BHR sought, the lack of illustrations on the proposed façade design and the visual impact from potential rusting of steel façade finishes (**Appendix III**).

10. Planning Considerations and Assessments

10.1 The application is for proposed minor relaxation of BHR from two storeys to four storeys (+2 storeys or +100%) (excluding one level of basement) for two blocks of STPs at the Site. Each application for minor relaxation of BHR will be considered by the Board on the individual merits of the development proposal.

Planning Intention and Land Use Compatibility

- 10.2 The proposed development, forming part of the in-situ re-provisioning and upgrading works for TWWTW, is in line with the planning intention of the “G/IC” zone, which is primarily for the provision of GIC facilities serving the needs of the local residents and/or a wider district, region or the territory. The proposed STPs are also compatible with the cluster of water treatment related-uses within the TWWTW in the immediate vicinity of the Site.

Minor Relaxation of BHR and Visual Compatibility

- 10.3 The proposal comprises two new STP blocks each of four storeys in height (excluding one level of basement). As discussed in paragraphs 1.4 and 2 above, the proposed BH of four storeys is formulated having regard to various operational needs (such as the height of various equipment/machinery within a vertical setup for cost efficiency) and site constraints (i.e. the adjoining land with BHR of four storeys will be fully utilised for the upgrading of the main water treatment facility). These factors necessitate the need to minor relax the BHR from two storeys to four storeys, so that the water treatment facilities at TWWTW can undergo upgrading works without interruption to the supply network.
- 10.4 The Site is located on a hill platform within the existing TWWTW at Sheung Kwai Chung surrounded by landscaped slopes, with low-rise village houses and open spaces further afield. Judging from the photomontages in the VA (**Drawings A-13 to A-16**), CTP/UD&L, PlanD considers that the proposed development would unlikely induce significant adverse visual impacts on the surrounding area with the implementation of various design measures as mentioned in paragraph 1.5 above.

Other Technical Aspects

- 10.5 Concerned departments, including C for T, DEP and CE/MS, DSD, have no objection to/no adverse comments on the application. Significant adverse traffic, environmental, drainage and sewerage impacts on the surrounding area are not anticipated. Overall, the proposal generally meets the relevant criteria for consideration of minor relaxation of BHR as stated in paragraph 7.2 above in that the proposal is to provide an essential infrastructure to serve the public while addressing various operational and site constraints.

Public Comment

- 10.6 Regarding the concern on the extent of minor relaxation in BHR sought and the associated visual impact, each application for minor relaxation of BHR will be considered by the Board on a case-by-case basis subject to the individual planning circumstances and merits of the proposals. In this connection, the planning assessments in paragraph 10 above are relevant. As for the appearance of the proposed development, while the applicant has supplemented that materials with higher resistance to corrosion will be adopted at the detailed design stage (**Appendix Ib**), they will also be reminded, by way of an advisory clause, to properly maintain the external appearance of the proposed development at all times.

11. Planning Department's Views

- 11.1 Based on the assessments made in paragraph 10 and having taken into account the public comment mentioned in paragraph 9, the Planning Department has no objection to the application.
- 11.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until 5.6.2030, and after the said date, the permission shall cease to have effect unless before the said date, the development permitted is commenced or the permission is renewed. The recommended advisory clauses are attached at **Appendix II**.
- 11.3 There is no strong reason to recommend rejection of the application.

12. Decision Sought

- 12.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 12.2 Should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the date when the validity of the permission should expire.
- 12.3 Alternatively, should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.

13. Attachments

Appendix I	Application Form received on 9.4.2026
Appendix Ia	SPS received on 9.4.2026
Appendix Ib	FI received on 28.5.2026
Appendix II	Recommended Advisory Clauses
Appendix III	Public Comment
Drawing A-1	Layout Plan
Drawing A-2	Site Access Plan
Drawings A-3 to A-10	Floor Plans
Drawings A-11 and A-12	Sections
Drawings A-13 to A-16	Photomontages (extracted)
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4 and A-5	Site Photos