

**Proposed Regularisation of Existing Columbarium  
Use (for Columbarium Niches Sold before  
30.6.2017 only) at G/F - 6/F (Parts) of  
an Existing Religious Building in  
“Government, Institution or Community” Zone,  
18 Sha Tau Kok Road-Lung Yeuk Tau Section,  
Lung Yeuk Tau, Fanling, New Territories**

Applicant : The Emperor Hall Services Company Limited  
Planning Consultants : Vision Planning Consultants Limited  
Date of Submission : 27 March, 2026

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## **Executive Summary**

This planning application seeks the Town Planning Board’s (“**TPB**”) approval to regularise the existing columbarium use at parts of the Ground to 6<sup>th</sup> Floors (G/F-6/F) (“**Application Premises**”) of The Emperor Hall (“**Hall**”) – a religious building situated at Lot No. 4433 S.17 in D.D. 51 (“**Subject Site**”), 18 Sha Tau Kok Road-Lung Yeuk Tau Section, Lung Yeuk Tau, Fanling, New Territories. This regularisation applies **exclusively to columbarium niches sold before 30 June 2017**, the enactment date of the Private Columbaria Ordinance (“**PCO**”). TPB’s approval of this application is a statutory prerequisite for the Applicant to obtain a Private Columbarium Licence (“**PCL**”) from the Private Columbaria Licensing Board (“**PCLB**”) under the PCO.

This application involves a total of 1,364 sold columbarium niches (783 sold and interred; and 581 sold but un-interred), with the latest count updated and registered with the Private Columbaria Affairs Office (“**PCAO**”) on 14.1.2026.

Upon TPB’s approval, the Applicant will request the PCLB to continue to proceed the PCL application to lawfully operate the above sold columbarium niches at the Application Premises under the PCO. The Subject Site is proven to be a suitable location for the existing private columbarium use: it is compatible with surrounding land uses, fully aligns with the statutory land use planning intent for the site, and addresses the acute local community demand for this essential facility. No significant, unacceptable adverse impact on traffic, the environment, visual amenity, sewerage or drainage systems are anticipated from the regularization of these sold niches. This application represents a sound land use planning proposal on all relevant grounds.

## 內容摘要

本規劃申請旨在獲 城市規劃委員會（下稱「城規會」）批准，對 黃帝祠 地下至六樓部分樓層（下統稱“申請樓層”）內，於 2017 年 6 月 30 日《私營骨灰安置所條例》（下稱《條例》）生效前 已售出的靈灰位，規範其靈灰安置所相關用途。黃帝祠 坐落位於 新界 粉嶺 龍躍頭 沙頭角公路- 龍躍頭段 18 號，對應丈量約份第 51 約地段第 4433 號第 17 分段（下稱“申請地點”），門牌號為 龍躍頭路 18 號。根據《條例》規定，申請人須先取得「城規會」批准，「私營骨灰安置所發牌委員會」（下稱「發牌委員會」）方可繼續處理後續「私營骨灰安置所牌照」的申請事宜。

本規劃申請涉及的已售出靈灰位共計 1,364 個，其中已安放靈灰的 783 個，未安放的 581 個，該數量為申請人於 2026 年 1 月 14 日向「私營骨灰安置所事務辦事處」（下稱「骨灰辦」）更新並確認的數值。上述靈灰位實際均設置於申請樓層的二樓、三樓及五樓，其餘相關樓層範圍與「發牌委員會」早前考量的申請範圍保持一致。「發牌委員會」曾於 2023 年 3 月 6 日和 2026 年 2 月 20 日，分別批准相關暫免法律責任書申請，有效期均為三年，後者為續期審批。本次規劃申請內容與「骨灰辦」最新檔案資料高度一致，涵蓋 已售出靈灰位對應的建築樓面範圍、數量、分佈及經更新的管理方案。

待「城規會」批准本次申請後，申請人將繼續向「發牌委員會」申請「私營骨灰安置所牌照」，確保上述 已售出的靈灰位在《條例》的監管下合法持續運營。經核查，申請地點完全適合用作靈灰安置所，與周邊用地用途相協調，且符合法定規劃導向；同時，該申請能夠及時響應社區對靈灰安置這類民生配套設施的迫切需求。本申請相關建設不會對該區域造成不可接受的交通、環境、視覺景觀、污水處理或雨水排放方面的影響，是一項合理合規的用地規劃申請。

## **1. THE PURPOSE**

- 1.1 This application seeks the Town planning Board’s (“**TPB**”) approval to regularise the existing columbarium use at parts of the Ground to 6<sup>th</sup> Floor (G/F-6/F) of The Emperor Hall (黃帝祠) (hereinafter the “**Application Premises**”), applying solely to columbarium niches sold before use 30 June 2017 - the enactment date of the Private Columbaria Ordinance (“**PCO**”).
- 1.2 The Applicant is The Emperor Hall Services Company Limited (黃帝祠服務有限公司), which is not the registered landowner of The Emperor Hall at Lot No. 4433 S.17 in D.D. 51 (“**Subject Site**”), 18 Sha Tau Kok Road-Lung Yeuk Tau Section, Lung Yeuk Tau, Fanling, New Territories. The location of the Subject Site is shown in **Figure 1** and **Figure 2**.
- 1.3 On 6 March 2023, the Private Columbaria Licencing Board (“**PCLB**”) under the PCO granted the Applicant a three-year “Approval-in-Principle” (“**AIP**”) for its Temporary Suspension of Liability (“**TSOL**”) application (**Appendix 1**).
- 1.4 On 20 February 2026, the PCLB approved the Applicant’s renewal of AIP for the TSOL application, extending the approval for further three years until 5 March 2029 (**Appendix 2**).
- 1.5 On 14 January 2026, the Private Columbaria Team (“**PCT**”) confirmed via email that the total number of sold niches at the Hall is 1,364 (**Appendix 3**). With this official confirmation, the Applicant is submitting this planning application to comply with the statutory requirements under the Town Planning Ordinance (“**TPO**”) and the PCO. The TPB’s approval is a key prerequisite for the PCLB to process the Applicant’s subsequent Private Columbarium Licence (“**PCL**”) application.
- 1.6 Of the 1,364 sold columbarium niches, 783 are sold and interred with human ashes, and 581 are sold but un-interred. The breakdown and floor distribution of these niches have been fully reported and registered in the updated Management Plan (“**MP**”), which was submitted to the Private Columbaria Affairs Office (“**PCAO**”) on 30 January 2026 (**Appendix 4**).

## **2. STATUTORY PLANNING ASPECTS**

- 2.1 The Subject Site falls within an area zoned “Government, Institution or Community” (“**G/IC**”) on the Approved Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/28 (the “**OZP**”) (**Figure 1**). According to the Notes of the OZP,

for “G/IC” zone, ‘Religious Institution’ is a Column 1 use, while ‘Columbarium’ is a Column 2 use (**Appendix 5**). Accordingly, planning approval from the TPB on application under Section 16 of the Town Planning Ordinance (“TPO”) is required to regularise the existing sold columbarium niches at the Application Premises.

- 2.2 It should be noted that the Hall also contains unsold columbarium niches on various floors. A separate planning application will be submitted to the TPB for these unsold niches following their verification by the PCAO.

### **3. BACKGROUND OF THE SUBJECT SITE**

- 3.1 The Hall at the Subject Site is a seven-storey religious building completed in 2005 as a reconstruction project. Prior to this, the Subject Site was occupied by the Hin Yuen Ancestral Temple (“HYAT”) (軒轅祖祠), a single-storey building complex founded in the late 1920s (**Appendix 6**). Due to prolonged disrepair, HYAT was reconstructed into the seven-storey building in 2005 and renamed The Emperor Hall. **Figure 3** shows historical photographs of HYAT taken prior to the reconstruction.

- 3.2 The Hall is listed as a pre-cut-off private columbarium by the Development Bureau<sup>1</sup>. On 26 March 2018, under the PCO, the Applicant submitted two separate applications to the PCLB: one for a PCL and TSOL for niches sold before 30 June 2017 (**Appendix 7**); and another for a PCL and TSOL for the niches unsold as at 30 June 2017 (**Appendix 8**). As noted in paragraph 1.4, the PCLB has renewed the Applicant’s AIP for TSOL application, with approval valid until 5 March 2029 (**Appendix 2**).

- 3.3 Notably, Chapter 18 of the *Application Guide for Private Columbaria Licence and Other Specific Instruments (2018)* - issued by the PCLB and addressing Traffic Impact Assessment Issues for Pre-cut-off Columbaria Applications (**Appendix 9**) – stipulates the following: “*taking into account the overall interests of the community, the Government has decided to use an empirical evidence approach as the basis for assessing traffic impacts when the Government departments process the licence application from a pre-cut-off columbarium whose operation only involves the number of niches sold before June 30, 2017 (the enactment date of the Private Columbarium Ordinance).*”

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<sup>1</sup> Development Bureau (2018). Information on Private Columbaria (Part A and Part B) . Retrieved from [https://www.devb.gov.hk/en/issues\\_in\\_focus/private\\_columbaria/part\\_a\\_and\\_b/index.html](https://www.devb.gov.hk/en/issues_in_focus/private_columbaria/part_a_and_b/index.html)

- 3.4 In light of the above stipulation, the empirical evidence approach for assessing the local traffic impacts (as set out in **Appendix 9**) applies to regularisation of the existing sold columbarium niches under this application. Accordingly, no standalone TIA is included in this submission; instead, a comprehensive set of Traffic and Crowd Management Proposals has been integrated into the MP filed with the PCAO (**Appendix 4**), covering the overall columbarium operations at the Subject Site.
- 3.5 Upon TPB’s approval of this planning application, the Applicant will request the PCLB to proceed with its statutory PCL application for ongoing operation of the sold niches at the Application Premises under the PCO. Should the TPB deem it appropriate, additional planning requirement(s) may be imposed on the aforementioned MP to provide further oversight for the columbarium use during its operational phase under the PCO.

#### **4. SUBJECT SITE AND ITS SURROUNDINGS**

- 4.1 The Subject Site is located at 18 Sha Tau Kok Road-Lung Yeuk Tau Section, On Lok Tsuen, Lung Yeuk Tau, Fanling, New Territories (**Figures 1 and 2**), with a total site area of approximately 936m<sup>2</sup>. It is currently occupied by a seven-storey religious building, The Emperor Hall (**Figure 2**). Vehicle access to the Subject Site is via On Lok Street through a 6m wide service lane, which also serves as the Hall’s Emergency Vehicular Access (“EVA”) (Photo 2, **Figure 4**).
- 4.2 As shown in **Figure 4**, the Subject Site is bounded by Sha Tau Kok Road - Lung Yeuk Tau Section to the northwest; Cardinal Industrial Building (基力工業大廈) to the southeast and northeast; On Lok Tsuen Garden to the southwest (separated by an 6m wide EVA); and Rohm and Haas Electronic Material Asia Technology Centre (羅門哈斯電子材料亞洲科技中心) to the south (also separated by the 6m wide EVA).
- 4.3 As depicted in **Figure 1**, the Subject Site, On Lok Tsuen Garden (安樂村花園) and Pui Ling School (寶血會培靈學校) are all zoned “G/IC”, and are closely surrounded by the On Lok Tsuen Industrial Area (an industrial-zoned precinct). The 27m wide Sha Tau Kok Road-Lung Yeuk Tau Section physically separates the Subject Site from existing residential developments to its north and northwest and southwest (**Figure 4**).
- 4.4 Despite being a seven-storey structure, the Hall is largely obscured from view from Luen Wo Hui Playground by mature, tall roadside trees lining both sides of

- Sha Tau Kok Road-Lung Yeuk Tau Section (Photos 5 to 7, **Figure 4**). Additionally, there is a 1.3m level difference between Luen Wo Hui Playground (聯和墟遊樂場) (at +13.2mPD) and the Subject Site (at +11.9mPD) (**Figure 4**). Combined with the Hall’s 13m setback from Sha Tau Kok Road-Lung Yeuk Tau Section, these factors further screen the building from residential developments to the far west, southwest and northwest of the Subject Site.
- 4.5 The Hall is located approximately 88m (building wall to building wall) from the nearest existing residential developments in the Luen Wo Hui area, and is physically isolated from these residential areas by a cluster of urban developments - including Luen Wo Road, Sha Tau Kok Road – Lung Yeuk Tau Section and the linear Luen Wo Hui Playground (**Figure 4**).
- 4.6 The Subject Site benefits from excellent pedestrian accessibility. Two pedestrian subways run underneath Sha Tau Kok Road-Lung Yeuk Tau Section, connecting the Site to Luen Wo Hui: one is located approximately 70m southwest of the Site, and the other about 110m northeast (**Figure 5**). These subways provide a convenient pedestrian link across both sides of the road for all users.
- 4.7 The Subject Site is also served by a comprehensive public transport network (**Figure 5**). MTR Fanling Station is situated approximately 850m southwest of the Site, with a walking time of just 10 to 15 minutes via the existing pedestrian walkway system (**Figure 5**).
- 4.8 Within a 300m catchment radius of the Subject Site (a 5-minute walk or less), there is access to 32 public routes (261, 270C, 270D, 270E, 270S, 277A, 277X, 278A, 278K, 279A, 279B, 279X, 373, 56A, 673A, 673, 673P, 70K, 73B, 78A, 78B, 78K, 79K, 978A, A43, A43P, N373, N42A, E43, N78, N373 and NA43) and 16 Green-Minibus (“GMB”) routes (52A, 52B, 52K, 54A, 54K, 55K, 56A, 56B, 56C, 56K, 501A, 501C, 501S, 505, 506 and 507).
- 4.9 Most bus and GMB stops are in close proximity to the Subject Site, with a walking time of only 5 to 8 minutes via the local walkway system (**Figure 5**). A GMB terminus is located approximately 190m north of the Site, adjacent to Wo Mun Street between Grand Regentville (御庭軒) and Regentville (帝庭軒). GMB Route 55K operates between MTR Fanling Station and this GMB terminus, providing one of the most convenient transport options for travel to and from the Hall (**Figure 5**).

## 5. PROPOSED (EXISTING) SOLD COLUMBARIUM USE

### *Key Development Parameters*

- 5.1 **Figures 6 to 12** show the locations, extents and photographs of the proposed (existing) sold columbarium niches at the Application Premises – these are identical to the details set out in the MP registered with the PCLO on 30 January 2026 (**Appendix 4**).
- 5.2 **Table 1** summarises the key development parameters of the proposed (existing) columbarium use and breakdown by floor.

**Table 1 Key Existing Development Parameters of the Hall**

1.	Land Area of Subject Site	About 936m <sup>2</sup>	
2.	Total Existing GFA (under approved GBPs)	About 3,001m <sup>2</sup>	
3.	Proposed Existing GFA (under Application)	About 1,950m <sup>2</sup>	
	G/F	Extent of Application Area	140m <sup>2</sup>
	1/F	Extent of Application Area	322m <sup>2</sup>
	2/F	Extent of Application Area (845 sold niches)	413m <sup>2</sup> (or 318m <sup>2</sup> in UFA)* <sup>1</sup>
	3/F	Extent of Application Area (505 sold niches)	354m <sup>2</sup> (or 272m <sup>2</sup> in UFA)* <sup>1</sup>
	4/F	Extent of Application Area (Office)	85m <sup>2</sup>
	5/F	Extent of Application Area (14 sold niches)	348m <sup>2</sup> (or 263m <sup>2</sup> in UFA)* <sup>1</sup>
	6/F	Extent of Application Area	288m <sup>2</sup>
4.	Total No. of Sold Columbarium Niches*	<b>1,364</b>	
	A. Sold and interred with human ashes	783	
	B. Sold but un-interred with human ashes	581	

\* as at 30.6.2017; \*<sup>1</sup> mainly used for assessing the maximum visitors' holding capacity

### *Key Operation (Existing)*

- 5.3 The core operational arrangements for the proposed columbarium use at the Hall are summarised below, with full details stipulated in **Appendix 4 – Management Plan**.
- i. Total Sold Niches: 1,364 (with maximum of 1,756 ashes sets) (**Table 2**);
  - ii. Opening hours: 10:00 to 16:00 daily, seven days a week including public holidays (Section 3(1), **Appendix 4**);
  - iii. Visitor Control: A maximum of 25 registered groups per columbarium floor (with an overall maximum visitor capacity of 120 people) (Section 3(2), **Appendix 4**);
  - iv. Staffing: 7 full-time staff for day-to-day operations, with additional staff deployed on each active columbarium floor during Festival Periods (Sections 5(1) and 7, **Appendix 4**);

**Table 2 Distribution of Sold Columbarium Niches by Type and by Floor**

		Number of Niches				
		Single-Niche ()*	Double-Niche ()*	Family-Niche (4 members) ()*	Family-Niche (5 members) ()*	Sub-total ()*
<b>2/F</b>	Niches sold and interred with human ashes before 30.6.2017	310	184	3	1	498
	Niches sold but un-interred with human ashes before 30.6.2017	251	96	0	0	347
	<b>Sub-total</b>	561	280	3	1	<b>845</b>
<b>3/F</b>	Niches sold and interred with human ashes before 30.6.2017	211	67	0	0	278
	Niches sold but un-interred with human ashes before 30.6.2017	196	31	0	0	227
	<b>Sub-total</b>	407	98	0	0	<b>505</b>
<b>5/F</b>	Niches sold and interred with human ashes before 30.6.2017	7	0	0	0	7
	Niches sold but un-interred with human ashes before 30.6.2017	6	1	0	0	7
	<b>Sub-total</b>	13	1	0	0	<b>14</b>
<b>Total</b>	Niches sold and interred with human ashes before 30.6.2017	528 (528)	251* <sup>1</sup> (502)	3* <sup>2</sup> (12)	1* <sup>3</sup> (5)	783* <sup>4</sup> (1,047)
	Niches sold but un-interred with human ashes before 30.6.2017	453 (453)	128 (256)	0	0	581 (709)
	<b>Total</b>	<b>981 (981)</b>	<b>379 (758)</b>	<b>3 (12)</b>	<b>1 (5)</b>	<b>1,364 (1,756)</b>

()\* Number of sets of ashes may be interred;

\*<sup>1</sup> Comprises 76 niches being sold and fully occupied and 175 niches being sold and partially occupied;

\*<sup>2</sup> Comprises 1 niche being sold and fully occupied and 2 niches being sold and partially occupied;

\*<sup>3</sup> Comprises 1 niche being sold and fully occupied; and

\*<sup>4</sup> Comprises 606 niches being sold and fully occupied 177 niches being sold and partially occupied.

- v. All purchasers of columbarium niches must become a Member of The Emperor Hall Foundation prior to acquisition, as the columbarium operates exclusively for Foundation Members (Section 7(a), **Appendix 4**);
- vi. No religious services may be conducted in any columbarium area without prior permission, to maintain a quiet environment (Sections 3(f)-(g), **Appendix 4**);
- vii. The burning of joss paper is prohibited inside the Hall and within the boundaries of the Subject Site (Sections 3(4)-(5), **Appendix 4**);
- viii. No on-site parking is provided, given the readily availability of a wide range of public transport services in the immediate vicinity of the Hall (Section 3(h). **Appendix 4**);
- ix. Two sets of Crowd Control Arrangements (“CCA”) have been clearly defined: one for normal operational days and one for Festival Periods (Sections 3(b) and 5(2), **Appendix 4**). **Figure 13** shows the festival period CCA, which has been successfully trialled in practice over the past two years;
- x. Key considerations for Traffic and Public Transportation (“TTP”) are outlined in Sections 4(1) and 4(2), **Appendix 4**;
- xi. The maximum visitor holding capacity for the columbarium rooms on the 2/F, 3/F and 5/F of the Hall is 159, 136 and 132 persons per visiting timeslot respectively (with each timeslot set at one hour during Festival Periods) (**Table 3** and Section 5(2), **Appendix 4**). For conservative fire safety purposes, a maximum of only 80 persons will be permitted in each active columbarium room per timeslot during Festival Periods; and

**Table 3 Estimated Visitor Holding Capacity of Columbarium Use by Floor\***

Floor	Approximate Usable Floor Area (“UFA”) (For Columbarium Use Only)	Holding Capacity [UFA/2m <sup>2</sup> ] (person)
2/F	318m <sup>2</sup>	159
3/F	272m <sup>2</sup>	136
5/F	263m <sup>2</sup>	132
<b>TOTAL</b>	<b>853m<sup>2</sup></b>	<b>427</b>

\* Unsold columbarium niches - which form an undivided part of the niche walls – on each floor have been included in the calculations to reflect a worst-case scenario for visitor holding capacity.

- xi. Visitors are required to use the internal staircases (in accordance with the directional signage, **Figure 14**) for vertical movement, except for those with walking difficulties or disabilities who may use the internal lifts.

5.4 It is important to note that the MP at **Appendix 4** is the most up-to-date version

and has been filed with the PCLO. Unless the TPB imposes specific planning conditions requiring amendments to the MP, this document will form an integral part of this planning application and will remain in force for the PCL application under the PCO.

## **6. PLANNING JUSTIFICATIONS**

### ***Full Alignment with Government Policy Objectives***

- 6.1 Since the enactment of the PCO on 30 June 2017, the HKSAR Government has adopted a three-pronged policy approach - increasing public niche supply, regulating private columbaria and promoting green burial - to address the long-term surge in demand for columbarium niches<sup>2</sup>.
- 6.2 As noted in paragraph 1.4 above, the PCLB approved the Applicant’s renewal of AIP for the TSOL application for sold columbarium niches at the Application Premises on 20 February 2026, with validity until 5 March 2029 (**Appendix 2**). This, together with the confirmation of the total number of sold niches (i.e. 1,364) issued by the PCT via email on 14 January 2026, finalizes the key details required for this planning application.
- 6.3 Approval of this planning application would recognise the genuine and ongoing efforts made by the PCLO and the Applicant in recent years to comply with the relevant requirements of the PCLB under the PCO. It is fully aligned with the Government’s policy objective of regulating private columbaria where circumstances permit.

### ***Retention of Full Enforceable Control***

- 6.4 Following approval of this planning application, the Applicant will be required to obtain a statutory PCL under the PCO, which will provide long-term regulatory oversight of the on-site sold columbarium operations. Any planning conditions imposed by the TPB in respect of this application must be fully complied with prior to the approval of the PCL. The PCLB, with input from relevant Government departments, will act as the licensing authority and monitor the future operation of the proposed (existing) sold columbarium use at the Application Premises in accordance with the latest MP accepted by the PCLB.

### ***Meeting Community Demand and Aspirations***

- 6.5 Under the Government prevailing policy, cremation is encouraged in preference

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<sup>2</sup> The Government of the Hong Kong Special Administrative Region (2022). *Press Release - LCQ18: Supply of niches*. Available at: <https://www.info.gov.hk/gia/general/202205/04/P2022050400446.htm>

to conventional burial and has become the mainstream form of interment in Hong Kong, accounting for over 90% of all deaths<sup>2</sup>. Meanwhile, due to Hong Kong’s ageing population, the annual number of deaths is projected to rise from 50,653 (actual figure for 2020) to approximately 75,540 by 2040, with a total of 1.2 million cremations expected over the next two decades<sup>3</sup>.

- 6.6 In anticipation of the projected increase in deaths and cremations, the Government launched the “District-based Columbarium Development Scheme” in 2010, with the aim to identifying suitable sites for columbarium development across Hong Kong’s 18 districts. A total of 24 potential sites were identified in three batches (July 2010, December 2010, and April 2011) for assessment of their suitability for columbarium development<sup>4</sup>.
- 6.7 However, progress under the Scheme has been slow. To date, only 8 of the 24 potential sites, together with the Junk Bay Chinese Permanent Cemetery, have commenced columbarium operations, providing a total of 349,835 niches. A further 3 planned projects, set to provide around 122,000 niches, have obtained support of the relevant District Councils (“DC”) (**Table 4**).
- 6.8 Even if all above projects are completed as planned, there will still be a shortfall of approximately 728,165 niches (i.e., 1,200,000 - 471,835) to meet projected community demand.
- 6.9 In this context, greater efforts are required from both the private and public sectors to increase the supply of columbarium niches. The regularisation of existing private columbaria – where circumstances permit, as in the case of this application – represents the most practical “quick-win” measure to address immediate local demand.
- 6.10 Furthermore, beyond the challenge of identifying new land for columbarium facilities (a land use often subject to “*not-in-my-backyard*” opposition from the public), pre-cut-off existing private columbaria offer a viable alternative to meet community demand for niches, particularly for individuals with specific religious beliefs.

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<sup>3</sup> Food and Health Bureau (2021). Legislative Council Panel on Food Safety and Environmental Hygiene - Public Works Programme Item No. 5841CL - Site Formation and Associated Infrastructural Works for Development of Columbarium at Siu Ho Wan, Lantau Island. [LC Paper No. CB(2)972/20-21(05)]. Available at: <https://www.legco.gov.hk/yr20-21/english/panels/fseh/papers/fseh20210420cb2-972-5-e.pdf>

<sup>4</sup> Legislative Council Secretariat (2017), *Panel on Food Safety and Environmental Hygiene; Background brief prepared by the Legislative Council Secretariat; Issues relating to supply of niches* [LC Paper No. CB(2)1312/16-17(03)]. Available at: <https://www.legco.gov.hk/yr16-17/english/panels/fseh/papers/fseh20170509cb2-1312-3-e.pdf>

**Table 4 Short-term Supply of New Columbarium Niches<sup>5,6,7,8,9,10</sup>**

Projects obtained support from DC	District Council	Completion Year	Columbarium Niches (About)
<i>Completed Projects</i>			
<b>Diamond Hill Crematorium Extension</b>	Wong Tai Sin	2012	1,540
<b>Wong Nai Chung Road Columbarium</b>	Wan Chai	2019	855
<b>Tsang Tsui Columbarium</b>	Tuen Mun	2020	163,000
<b>Wo Hop Shek Cemetery (Phase 1)</b>	North	2020	44,000
<b>Cheung Chau Columbarium Extension</b>	Islands	2020	2,250
<b>Lai Chi Yuen Cemetery Extension</b>	Islands	2020	790
<b>Cape Collison Road</b>	Eastern	2022	25,000
<b>On Hing Lane, Shek Mun</b>	Sha Tin	2025	40,000
<i>Completed Projects<sup>#</sup></i>			
<b>Junk Bay CP Cemetery Extension<sup>#</sup></b>	Sai Kung	2025	72,400
<b>Subtotal</b>			<b>349,835</b>
<i>Projects to be Completed</i>			
<b>Tsuen Wan CP Cemetery Extension<sup>#</sup></b>	Kwai Tsing	2027	20,000
<b>Two sites at Ex-Kwai Chung Incineration Plant</b>	Kwai Tsing	2028	68,500
<b>Two sites at Siu Ho Wan</b>	Tsuen Wan	TBC	33,500
<b>Subtotal</b>			<b>122,000</b>
<b>Grand Total</b>			<b>471,835</b>

<sup>#</sup> Private columbaria (to be) managed by the Board of Management of the Chinese Permanent Cemeteries

6.11 The proposed (existing) sold columbarium use at the Subject Site comprises a total of 1,364 sold niches, representing the aspirations of at least 1,364 families to inter the ashes of their deceased loved ones at the Hall. It also provides a valuable alternative for the local community. Assessments have confirmed that the proposed (existing) sold columbarium use at the Subject Site is compatible with surrounding developments, and that the operation of this much-needed community facility is feasible without causing any significant adverse or unacceptable impacts on the local area in terms of traffic, the environment, sewerage, drainage or visual amenity. The entire development will be subject to close long-term monitoring under the statutory private columbarium licensing regime.

<sup>5</sup> Food and Environmental Hygiene Department (2025), *Supply of Public Niches (from 2019 to 2025)*. Available at: [https://www.fehd.gov.hk/english/cc/notice\\_supply\\_of\\_public\\_niches.html](https://www.fehd.gov.hk/english/cc/notice_supply_of_public_niches.html)

<sup>6</sup> The Government of the Hong Kong Special Administrative Region (2022). *Press Release - LCQ18: Supply of niches*. Available at: <https://www.info.gov.hk/gia/general/202205/04/P2022050400446.htm>

<sup>7</sup> Kwai Ching District Council (2022), *Construction of Columbarium Facilities at the Former Site of the Kwai Chung Incineration Plant on Kwai Yue Street, Kwai Tsing [Paper no. 4/D/2022]*. Available at: [https://www.districtcouncils.gov.hk/kwt/doc/2020\\_2023/en/dc\\_meetings\\_doc/21701/4\\_D\\_2022\\_Revised.pdf](https://www.districtcouncils.gov.hk/kwt/doc/2020_2023/en/dc_meetings_doc/21701/4_D_2022_Revised.pdf)

<sup>8</sup> Food and Health Bureau (2018), *Legislative Council Panel on Food Safety and Environmental Hygiene - New Allocation Arrangement for Public Niches and Green Burial Initiatives [LC Paper No. CB(2)832/17-18(07)]*. Available at: <https://www.legco.gov.hk/yr17-18/english/panels/fseh/papers/fseh20180213cb2-832-7-e.pdf>

<sup>9</sup> The Government of the Hong Kong Special Administrative Region (2021). *Press Release - LCQ9: Supply of niches of public columbaria*. Available at: <https://www.info.gov.hk/gia/general/202106/16/P2021061600496.htm?fontSize=3>

<sup>10</sup> Home and Youth Affairs Bureau (2025), *Legislative Council Panel on Home Affairs, Culture and Sports - Proposal on the Amendments to the Chinese Permanent Cemeteries Rules (Cap. 1112A) [LC Paper No. CB(3)648/2025(03)]*. Available at: <https://www.legco.gov.hk/yr2025/english/panels/ha/papers/ha20250512cb3-648-3-e.pdf>

***Unique Community-based Columbarium Services***

- 6.12 The Subject Site has served the local community since the late 1920’s. While Luen Wo Hui (the local ‘town market’) has since developed into a modern township with surrounding industrial developments, the land use zoning of the Subject Site in the current OZP has been intentionally retained to preserve its community-based function as a traditional culture heritage asset for the local area.
- 6.13 The redevelopment of the HYAT (renamed as The Emperor Hall) has not altered the original purpose of the site – to serve as a place for worship and the storage of ancestral tablets and funeral urns containing human ashes (now referred to as a “columbarium”). Beyond the physical revitalisation of the site, the redevelopment was driven by a commitment to uphold the original mission of optimising the land use to continue providing community-based columbarium services and address the soaring community demand for such facilities.
- 6.14 Based on the above, and taking into account the following factors, the Subject Site is deemed the most suitable location for the proposed (existing) columbarium use and is fully compatible with surrounding developments.
- a. The Subject Site is situated in a secluded location, physically separated from the nearest residential developments in Luen Wo Hui (**Figure 4**);
  - b. Existing urban developments (i.e., the Luen Wo Hui Playground and Sha Tau Kok Road-Lung Yeuk Tau Section) form a natural buffer zone, separating the Hall from the nearest residential clusters in Luen Wo Hui (**Figure 4**);
  - c. Most parts of the 7-storey Hall are screened by mature roadside trees along the Sha Tau Kok Road-Lung Yeuk Tau Section (**Figure 4**);
  - d. The Subject Site is entirely surrounded by industrial developments (**Figure 1**);
  - e. A well-established pedestrian walkway network connects the Subject Site to Luen Wo Hui town centre and to MTR Fanling Station (a 10 to 15-minute walk) (**Figure 5**);
  - f. All visitors are advised to use the existing pedestrian walkway network and public transport to access the Subject Site, with no on-site parking provided for visitors; and
  - g. The burning of joss paper is strictly prohibited at the Subject Site.

- 6.15 The operation of the Hall will be managed and maintained in accordance with the latest MP accepted for the PCL, and will be fully monitored under the statutory licensing regime of the PCO.

***Clean, Quiet and Tidy Operations***

- 6.16 No incineration facilities are provided on the Subject Site, and the burning of joss paper is strictly prohibited inside the Hall and within the Subject Site boundaries. All permitted religious services are conducted within the Hall in a controlled manner. The Applicant is confident that the proposed (existing) sold columbarium use at the Hall will continue to maintain a clean, quiet and well-maintained operational environment in the future.

***No Adverse Sewerage or Drainage Impacts***

- 6.17 The Hall’s sewerage system is already connected to the adjacent public sewer network. As this application does not involve any additional site formation works or land paving, no additional surface runoff will be generated by the proposed development. Accordingly, the proposed columbarium use is not expected to cause any adverse or unacceptable sewerage or drainage impacts on the local area.

***Alignment with Planning Intention of G/IC Zone***

- 6.18 The Subject Site falls within an area zoned “G/IC” on the OZP (**Figure 1**). The Notes of the OZP for G/IC zone state that the zone is “... *primarily for the provision of Government, institution or community facilities serving the needs of local residents and/or a wider district, region or the territory...*”, and ‘columbarium’ is listed as a Column 2 use (**Appendix 5**). This means that columbarium use is considered acceptable within this zoning, subject to prevailing circumstances.
- 6.19 As demonstrated throughout this application, the Subject Site is highly suitable for the proposed (existing) sold columbarium use and is compatible with surrounding land uses. The operation of the proposed (existing) sold columbarium use at the Application Premises will not cause any unacceptable traffic impacts on the local road network - even during Festival Periods – and no environmental, visual amenity, sewerage or drainage impacts will arise from the proposed use.
- 6.20 For the above reasons, the proposed (existing) sold columbarium use under this application is considered entirely suitable for the Subject Site.

## **7. CONCLUSION**

- 7.1 This application seeks the TPB’s permission to regularise the proposed (existing) sold columbarium use (exclusively for niches sold before 30 June 2017) across parts of the Ground to 6<sup>th</sup> Floors (G/F - 6/F) of The Emperor Hall, Lot No. 4433 S.17 in D.D.51, 18 Sha Tau Kok Road-Lung Yeuk Tau Section, Lung Yeuk Tau, Fanling, New Territories.
- 7.2 The approval of this planning application is a prerequisite for the PCL application under the PCO. The PCT’s confirmation of the total number of sold columbarium niches (1,364) in January 2026 is a critical and necessary prerequisite for this planning application.
- 7.3 Assessments have confirmed that the Subject Site is suitable location for columbarium use, and such use is an acceptable Column 2 use under the Notes of the OZP for “G/IC” zone. The proposed columbarium use is not expected to cause any unacceptable traffic, environmental, visual, sewerage or drainage impacts on the local area, and will retain the site as a tidy, clean and community-based facility for the local area.
- 7.4 Following approval of this planning application, the Applicant will request the PCLB to proceed with the assessment of its PCL application under the PCO, with the proposed the proposed columbarium use subject to ongoing monitoring under the statutory licensing regime.
- 7.5 In light of the above, the Applicant respectfully requests that Members of the TPB give a favourable consideration to and approve this planning application, to enable the Applicant to continue serving the needs of the local community.

**VISION PLANNING CONSULTANTS LIMITED**

**27 March, 2026**