

Appendix III
Departmental Comments Received
during the Pre-submission Stage

1. PURPOSE OF SUBMISSION

In response to the requirements of Private Columbaria Ordinance (PCO) enacted on 30.6.2017, Ka Fuk Services Limited (the Applicant) had submitted a private columbarium licensing (PCL) application to the Private Columbaria Licensing Board (PCLB) on 6.3.2018 to apply for a Licence for Koon Yam Tong. The Applicant had fulfilled a series of specified requirements and obtained the Approval-in-principle (AIP) Temporary Suspension of Liability (TSOL) on 11.11.2021, and further obtained a 3 years extension for the TSOL on 8.11.2024. During the validity period of TSOL until 10.11.2027, the Applicant has to comply with a series of licensing requirements, including but not limited to town planning, land lease and building safety, in order to obtain the full Licence.

In order to partly comply with the licensing requirements under the PCO and partly to satisfy the town planning requirements, the Applicant will need to submit a planning application under section 12A of the Town Planning Ordinance (s.12A application). In order to support the s.12A application, a **pre-submission** with a copy of the Planning Statement with technical assessments were submitted to the Planning Department (PlanD) on 3.7.2025. After the first pre-submission, relevant departmental comments were received between 4.8.2025 and 27.8.2025, including:-

- Agriculture, Fisheries and Conservation Department (AFCD)
- Buildings Department (BD)
- Drainage Services Department (DSD)
- Environmental Protection Department (EPD)
- Fire Service Department (FSD)
- Food and Environmental Hygiene Department (FEHD)
- Lands Department (LandsD)
- Home Affairs Department (HAD)
- Hong Kong Police Force (HKPF)
- Landscape Unit (LU) and Urban Design Unit (UD) of PlanD
- Transport Department (TD)

PlanD also advised that the following departments have no objection/ no adverse comment on the pre-submission:

- Chief Engineer/Land Works (CE/LW), Geotechnical Engineering Office (GEO), and Project Manager (West) (PMW) of Civil Engineering and Development Department (CEDD)
- Electrical and Mechanical Services Department (EMSD)
- Leisure and Cultural Services Department (LCSD)
- Water Supplies Department (WSD)

The consultant team appreciates the departmental comments received, and have revised the Planning Statement accordingly. The responses to the comments received from the abovementioned departments are provided in **Section 2** below.

The Applicant understands that the planning application process has been streamlined to avoid delay in processing the application, and the Town Planning Board (TPB) cannot accept further information submitted not falling within the specified periods, as mentioned in paragraph 2.2 in the TPB Guidelines No. 32B. Therefore, a **second Pre-submission** with a copy of the revised Planning Statement with technical assessments was submitted to PlanD on 15.10.2025. Since majority of the relevant Government departments have no major comment on/ objection to the first Pre-submission, core recommendations as proposed in the previous Planning Statement have been fully adopted in the revised Planning Statement. As supported by the findings of the latest Traffic Impact Assessment, additional improvement measures have been proposed to further minimise potential traffic concerns in the surrounding area, i.e. a large reduction of columbarium niches in Koon Yam Tong from 3,162 to 999.

After the second pre-submission, comments from Electrical and Mechanical Services Department (EMSD) and further comments from AFCD, BD, DSD, EPD, FSD, FEHD, HAD, HKPF, LandsD, TD, UD of PlanD and WSD were received between 24.11.2025 and 15.12.2025. PlanD also advised that Antiquities and Monuments Office (AMO) of Development Bureau (DevB), CE/LW, GEO and PMW of CEDD, LCSD, LU of PlanD and WSD have no objection/ no adverse comment on the second pre-submission.

After discussions, the Applicant has agreed with AFCD's suggestion to restrict the visiting time to 9am – 4pm throughout the year, and to 7am – 5pm only for 4 weeks before and after the Ching Ming Festival and Chung Yeung Festival during the operation phase (see **Annex IV of Appendix III**). The proposed opening days as previously suggested in the pre-submission remain unchanged (i.e. closed on Saturdays, Sundays and Public Holidays), and the newly proposed operation hours are:

- (a) 9am – 4pm only apply to Monday to Friday (excluding public holidays) outside Festival Periods; and
- (b) 7am – 5pm only apply to Monday to Friday (excluding public holidays) 4 weeks before and after Ching Ming and Chung Yeung Festival Days.

On 15.12.2025, the Applicant was informed by PlanD via email that FEHD offered no comment on the revised operation hours (see **Annex IV of Appendix III**). In order to implement the new operation hours, the columbarium niches in Koon Yam Tong have been further reduced from 999 to 967.

The responses to the latest comments received from the abovementioned departments are provided in **Section 2** below. Some previous responses to the departmental comments in the Appendix III of the Planning Statement in the Applicant's second pre-submission have been updated (highlighted in grey) to tally with the latest proposal.

2. RESPONSES TO DEPARTMENTAL COMMENTS

2.1 Responses to Comments from Agriculture, Fisheries and Conservation Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on <u>First Pre-submission</u> Received on 27.8.2025</i>		
AFCD (A1)	In the current pre-submission, the applicant has provided information to demonstrate that the proposed development would not cause significant adverse ecological impacts to the surrounding ecological sensitive areas including a management plan on how to restrict the number of visitors and the opening hours. We have no adverse comments on the proposed columbarium use under the current development parameter and management plan. Please note that the comments above are based on the assumptions in the management plan of the pre-submission dated 3.7.2025. Should there be any changes from the current scheme and management plan, our comments may need to be revised accordingly.	Noted.
<i>Comments on <u>Second Pre-submission</u> Received on 21.11.2025</i>		
AFCD (B1)	As compared with the previous submission, it is noted that there are changes in the proposed management plan as compared with that submitted in July 2025. For a total of 4 months in a year (i.e. within 4 weeks before and after the Ching Ming Festival and Chung Yeung Festival, the opening hours will be extended from 9am-4pm to 7am-7pm and the maximum daily visitors will be increased from 56 to 96. Such changes will bring increased disturbances to the surrounding rural area especially during early morning and at dusk as compared with the previous management plan. We have reservation on the proposed changes in the management plan.	<p>Your concern on the proposed opening hours of Koon Yam Tong is well noted. After discussions, the Applicant has agreed with your suggestion to restrict the visiting time to 9am – 4pm throughout the year, and to 7am – 5pm only for 4 weeks before and after the Ching Ming Festival and Chung Yeung Festival during the operation phase (see Annex IV of Appendix III). Besides, the Applicant proposes to reduce the lighting inside the building, and to provide one-way window glass film in order to minimise disturbances.</p> <p>It is hope that the above improvement measures have adequately addressed your comments.</p> <p>.</p>

2.2 Responses to Comments from Buildings Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on First Pre-submission Received on 29.8.2025</i>		
BD (A1)	<p>Comments from the licensing point of view under the Buildings Ordinance ("BO") on the proposal are as follow:</p> <ul style="list-style-type: none"> (i) there is no in-principle objection under the BO to the proposed use on the application site; (ii) there is no record of approval by the Building Authority for the structures existing at the application site; (iii) the subject premises are subject to an application for Specified Instruments ("SI") under the Private Columbaria Ordinance (Cap 630) ("PCO"); (iv) the applicant's Authorized Person advised in his letter dated 18 August 2025 that the pre-submission proposal involves access restriction to 1/F and 2/F and there is a decrease on occupancy capacity. As compared with that in the Fire Engineering Report accepted by the Fire Safety Committee. Detailed building safety requirements will be provided separately upon receiving the relevant documents under the Licence application; and (v) a private columbarium eligible to apply for a SI under the PCO can be (a) a building or building works which complies with the requirements for approval and consent to the commencement of building works under section 14 of the BO; (b) a Certifiable Building ('CB'); or (c) a part or the whole of Structures Certifiable for Pre-cut-off Columbarium ("SCPC"). When the SCPC are covered by a SI or the application of such, they are not subject to the BD's enforcement under section 24(1) or 24C(1) of the BO on the ground of contravening section 14(1) of the BO. However, should they become dangerous or likely to cause danger, they will have to be removed under 	Noted.

Items	Departmental Comments	The Applicant's Responses
	the relevant provisions of the BO.	
BD (A2)	<p>The applicant's attention is drawn to the following points:</p> <ul style="list-style-type: none"> (i) except for SCPC and CB, no part of a private columbarium shall be located under or over any structures built without the approval and consent of the BD; (ii) SCPC are UBWs and so are the building works to improve or strengthen such. Where building works for improvement is indispensable, the qualified professionals appointed by the applicant should prepare the improvement/strengthening proposal for acceptance by the PCLB or the BD under the licensing regime; (iii) If any building improvement works result in extending the size of the SCPC, such extensions might NOT be qualified as SCPC but UBWs actionable under the BO albeit covered by the application of an SI; (iv) If alteration of a NTSB resulting in size exceeding the exemption criteria under Cap. 121, e.g. addition of an external staircase or making openings between party walls of NTSBs combining two or more NTSBs, it will be ultra vires for the BD to process such alteration proposals under the PCO or the BO unless the relevant CoE is still valid; (v) After issuance of an SI, if unauthorised alteration works be identified without prior acceptance by the PCLB or the BD, such works will be regarded as UBWs but not covered by the SI. The BD would raise objection to the PCLB upon application for renewal of the SI, and such UBWs will be subject to enforcement under the BO for removal; and (vi) The applicant should provide certification issued by qualified professionals certifying that the requirements specified by PCLB 	Noted.

Items	Departmental Comments	The Applicant's Responses
	and the BD are complied with. Annexes 4 and 5 of the "Application Guide for Private Columbarium Licence and Other Specified Instruments" are relevant.	
Comments on <u>Second Pre-submission</u> Received on 1.12.2025		
BD (B1)	<p>Please be advised that comments under the Buildings Ordinance (B.O.) from the licensing point of view are as follow:</p> <p>(i) the applicant's Authorized Person ("AP") submitted an explanatory letter, undertaking letter and email clarifications dated 4 November 2025, 14 October 2025 and 21 October 2025 respectively (all attached in Appendix I (see Annex III of Appendix III) regarding the proposed amendments to the bounding conditions stated in paragraphs 2.2 and 2.6 of Appendix IV (Fire Safety Management Plan) of the Fire Safety Assessment Report ("FSAR") accepted by the Fire Safety Committee on 6 March 2024 as well as refinement on wordings to pre-submission proposal in order to tally with the accepted FSAR. There is no objection in principle to the proposed amendments provided that the FSAR should be revised accordingly with the endorsement by the AP and the fire engineering consultant for BD's acceptance under the licensing regime. Currently there is no such application has been received by this office; and</p>	Noted.
BD (B2)	<p>(ii) our previous comments conveyed in paragraphs 2(i) to 2(iii), 2(v) and 3 of the email dated 29 August 2025 under f(55) in B.C. TP(NT) 8/36 PT.II are still applicable. Copies of which are attached in Appendix II (see Annex III of Appendix III) for your information.</p>	Noted.
BD (B3)	For further enquiry, please contact our Connie Wong, Building Surveyor/New Territories West 5, at 2626 1440.	Noted.

2.3 Responses to Comments from Drainage Services Department

Items	Departmental Comments	The Applicant's Responses
Comments Received on 4.8.2025		
DSD (A1)	<p>Please find my comment on the drainage proposal:</p> <p>(a) The existing channel, to which the applicant proposed to discharge the stormwater from the subject site was not maintained by this office. The applicant should identify the owner of the existing drainage facilities and obtain consent from the owner prior to commencement of the proposed works. In the case that it is a local village drains, DO/YL should be consulted.</p> <p>(b) Further to (a) above, since there is no record of the said discharge path, please provide site photos to demonstrate its presence and existing condition.</p> <p>(c) The cover levels and invert levels of the proposed u-channels, catchpits/sand traps should be shown on the drainage plan.</p> <p>(d) Sand trap or provision alike should be provided before the collected runoff is discharged to the public drainage facilities.</p> <p>(e) Where walls or hoarding are erected are laid along the site boundary, adequate opening should be provided to intercept the existing overland flow passing through the site.</p> <p>(f) The development should neither obstruct overland flow nor adversely affect existing natural streams, village drains, ditches and the adjacent areas, etc.</p>	<p>Noted. The owner of the existing drainage facilities will be sought in due course and consent from the owner prior to commencement of the proposed works will be obtained.</p> <p>Please refer to the Drainage Photo Record and Plan attached in Annex V of Appendix III.</p> <p>Please refer to the updated proposed drainage drawing SK-02 Rev. B.</p> <p>Noted, a storm water terminal manhole (SWTM) has already been proposed and shown on the drawings.</p> <p>Noted.</p> <p>Noted.</p>
DSD (A2)	<p>Please remind the applicant's A.P. of the following general comments/ requirements on the drainage works.</p> <p>(a) The proposed drainage works, whether</p>	<p>Noted.</p>

Items	Departmental Comments	The Applicant's Responses
	<p>within or outside the lot boundary, should be constructed and maintained by the lot owner at his expense.</p> <p>(b) The existing drainage system proposed for discharge of the runoff from the subject site is not maintained by DSD. Consent from the owner/maintenance party, users of this drainage system and DO/YL should be sought for the proposed drainage connection. Moreover, the applicant should ensure that this drainage system and the existing downstream drains/channels have adequate capacity to convey the additional runoff from the subject site. In addition, regular maintenance should be carried out by the lot owner/developer to avoid blockage of drain.</p> <p>(c) The applicant/owner that their drainage facilities shall be properly designed, constructed and maintained in good condition without causing adverse drainage impact to the adjacent area at all times, and the applicant is required to rectify/modify the drainage systems if they are found to be inadequate or ineffective to accommodate the additional runoff arisen from the application. The applicant/owner shall also be liable for and shall indemnify claims and demands arising out of damage or nuisance caused by failure or ineffectiveness of the drainage systems caused by their application.</p> <p>(d) For works to be undertaken outside the lot boundary, prior consent and agreement from DLO/YL, DO/YL and/or relevant private lot owners should be sought.</p> <p>(e) The applicant/owner should take all precautionary measures to prevent any disturbance, damage and pollution from the development to any parts of the existing drainage facilities in the vicinity of the lot. In the event of any damage to the</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Items	Departmental Comments	The Applicant's Responses
	<p>existing drainage facilities, the lot owner/developer would be held responsible for the cost of all necessary repair works, compensation and any other consequences arising therefrom.</p> <p>(f) A minimum soil cover of 450mm and 900mm should be provided for the connection pipe constructed under footpath and carriageway respectively.</p> <p>(g) The lot owner/developer should also be advised that the limited desk-top checking by Government on the drainage proposal covers only the fundamental aspects of the drainage design which will by no means relieve his obligations to ensure that:</p> <p>(i) the proposed drainage works will not cause any adverse drainage or environmental impacts in the vicinity; and</p> <p>(ii) the proposed drainage works and the downstream drainage systems have the adequate capacity and are in good conditions to receive the flows collected from his lot.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
DSD (A3)	<p>Nevertheless, I have no objection in principle to the proposed application from a drainage point of view. For any change of existing ground level and associated works proposed by the applicant that could affect adjacent land and cause other impacts and/or other issues to public, please consider to require the applicant to submit technical assessment(s) in other aspect(s) and seek comment from relevant departments as necessary. Should the Town Planning Board consider that the application is acceptable from the planning point of view, I would suggest that a condition should be stipulated in the approval letter requiring the applicant to submit a revised drainage proposal, to implement and maintain.</p>	<p>Noted.</p>

Items	Departmental Comments	The Applicant's Responses
<i>Comments on <u>Second Pre-submission</u> Received on 1.12.2025</i>		
DSD (B1)	<p>Please find my comment on the drainage proposal:</p> <p>(a) Referring the R to C item (b) to DSD in Appendix III, the applicant could not demonstrate the existing downstream drains/channels have adequate condition to convey the additional runoff from the subject site.</p>	As per paragraphs 6.2 and 6.4 of the Drainage Proposal V2, improvement and restoration works are proposed to carry out should be drainage proposal be accepted. Adequate condition of the existing downstream drains/channels will be achieved after the works.
DSD (B2)	(b) In Drawing No. SK-02, the invert level of component A is higher than the cover level. Please review.	Noted. Please find the revised drawing SK-02 Rev C in the latest Drainage Proposal (see Appendix VI).
DSD (B3)	Please note that our comments (a), (e) (f) in para. 1 and general comments/requirements in para. 2 in previous reply are still valid.	Noted. The comments/requirements will be addresses/followed.

2.4 Responses to Comments from Electrical & Mechanical Services Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on <u>Second Pre-submission</u> Received on 21.11.2025</i>		
EMSD (A1)	Please be advised that we have no particular comment on the document from electricity supply safety aspect. However, in the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organizing and supervising any activity near the underground cable or overhead line under the mentioned document should approach the electricity supplier (i.e. CLP Power) for the requisition of cable plans (and overhead line alignment drawings, where applicable) to find out whether there is any underground cable and/or overhead line within and/or in the vicinity of the concerned site. They should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the "Code of Practice on Working near Electricity Supply Lines" established under the Regulation when carrying out works in the vicinity of the electricity supply lines.	Noted.
EMSD (A2)	We have no particular comment on the document as far as electricity supply safety is concerned.	Noted.

2.5 Responses to Comments from Environmental Protection Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on First Pre-submission Received on 4.8.2025</i>		
EPD (A1)	I refer to your memo under reference. The subject is a pre-submission for rezoning application. The applicant seeks planning permission for amendment to the OZP to rezone the application Site from "CPA" to "G/IC" on the approved Sheung Pat Nai and Ha Pak Nai OZP. We note from the proposed schedule of OZP amendment (Table 3.1 of Planning Statement), only "Columbarium (not exceed 3,162 no. of niches)" is specified in Column 1, and no other proposed use under Column 2 of the G/IC zones.	<p>Correct. The following amendments are being adopted in the revised Traffic Impact Assessment (TIA) to further minimise the potential traffic impact, as well as to alleviate AFCD's latest comments:</p> <ol style="list-style-type: none"> 1) The number of niches is reduced from 3,162 to not more than 967. 2) With no operation on weekends and public holidays including Ching Ming and Chung Yeung Festivals, the opening hours will be from 9:00am to 4:00pm from Monday to Friday, and only from 7:00am to 5:00pm from Monday to Friday within 4 weeks before and after Ching Ming and Chung Yeung Festival Days. 3) Pre-booking system will be adopted and the columbarium limits to 5 occupants (4 visitors and 1 staff) per floor at any given time. No parking space will be provided. <p>The above changes in the TIA are minor but are for enhancement purpose. Relevant pages in the Planning Statement have been amended accordingly.</p>
EPD (A2)	According to the application, the proposed use of columbarium (Koon Yam Tong) is a current use of the application site, and is located at an existing 3-storey NTEH. Same as Y/YL-PN/10 and Y/YL-PN/11, the columbarium would provide 3,162 niches. Operation hours would be from 9am and 4pm daily from Mondays to Fridays, with no operation on weekends and public holidays including Ching Ming and Chung Yeung Festivals. A maximum of 70 visitors will visit the columbarium. Pre-booking system will be adopted and the columbarium limits to 5 occupants (4 visitors and 1 staff) per floor at any given time. No parking space will be provided.	
EPD (A3)	In addition, Joss-stick/candle burning is not allowed and there is no incineration process. One smoke-free incense stick per niche owner is not allowed to be lit. No extensive fixed noise sources or any public announcement system will be used. The two existing toilets connected to septic tank will be dismantled and a portable toilet with a size of 400L sewage capacity within the Site. The sewage and waste from the portable toilet will be collected by licensed collectors.	Under the latest arrangement, burning of joss stick, joss papers, incense and candles is prohibited within the site. No extensive fixed noise sources or any public announcement system will be used. The two existing toilets connected to septic tank will be dismantled and a portable toilet with a size of 400L sewage capacity within the site. The sewage and waste from the portable toilet will be regularly collected by licensed collectors. Relevant pages in the Planning Statement have been amended accordingly.
EPD (A4)	From environmental planning perspective, we have no objection to the pre-submission of rezoning application. Nevertheless, please	Noted.

Items	Departmental Comments	The Applicant's Responses
	address the information in the planning supporting document as provided an Annex . Should the application approved by the TPB, the applicant is reminded to comply with relevant environment protection and pollution control ordinances, including APCO, NCO and WPCO.	
EPD (A5)	We noted that you are seeking advice from AFCD from nature and conservation perspective. Please take into account any comments from AFCD.	Noted.
EPD (A6)	<p><u>Annex: Comment to the Planning Statement</u></p> <p><u>Air Quality</u></p> <ol style="list-style-type: none"> 1. Table 5.3 – The meaning of "N/A" in the last Column is unclear. Please clearly confirm whether the HKPSG buffer distance requirement is fulfilled for the two concerned roads. 2. Section 5.8 – It is noted that sewage and waste from the portable toilet will be collected by licensed collectors. The Site will provide general cleaning and housekeeping to maintain a safe and hygienic environmental. Nevertheless, the applicant shall supplement with recommendation of relevant measures for implementation to ensure no adverse odour impact shall be imposed on any nearby ASRs from the proposed portable toilet, such as increasing frequency, proper maintenance, etc. 	<p>Typo. The HKPSG buffer distance requirement is fulfilled for the two concerned roads. Relevant page in the Planning Statement has been amended accordingly.</p> <p>Thank you for the suggestions. Additional measures, such as increasing frequency and proper maintenance, have been added to ensure no adverse odour impact arising from the portable toilet. Relevant page has been amended accordingly.</p>
<u>Comments on Second Pre-submission Received on 21.11.2025</u>		
EPD (B1)	<ol style="list-style-type: none"> 2. According to the updated development scheme in this circulation, the number of niches is reduced from 3,162 to not more than 999. Revised opening hours for special operations (within 4 weeks before and after Ching Ming and Chung Yeung Festival Days) will be from 7:00am to 7:00pm Monday to Friday. A portable toilet with a size of 400L sewage capacity is proposed to cater a maximum of 96 visitors 	<p>Correct. The following amendments are being adopted in the revised TIA to further minimise the potential traffic impact, as well as to alleviate AFCD's latest comments:</p> <ol style="list-style-type: none"> 1) The number of niches is reduced from 3,162 to not more than 967. 2) With no operation on weekends and public holidays including Ching Ming and Chung

Items	Departmental Comments	The Applicant's Responses
	<p>and 2 staff (instead of 70 visitors). Other environmental aspect remains unchanged, including no burning of joss stick, joss papers, incense and candles, no funeral service at the Site, no extensive fixed noise sources or any public announcement system.</p>	<p>Yeung Festivals, the opening hours will be from 9:00am to 4:00pm from Monday to Friday, and only from 7:00am to 5:00pm from Monday to Friday within 4 weeks before and after Ching Ming and Chung Yeung Festival Days.</p> <p>3) Pre-booking system will be adopted and the columbarium limits to 5 occupants (4 visitors and 1 staff) per floor at any given time. No parking space will be provided.</p> <p>The above changes in the TIA are minor but are for enhancement purpose. Relevant pages in the Planning Statement have been amended accordingly.</p>
EPD (B2)	<p>4. We note that the applicant has addressed minor textual suggestions in the planning supporting document per our last advice. Considering the updated development scheme with proposed mitigation measures in place, we maintain our stance of no objection to the pre-submission of rezoning application from environmental planning perspective. Should the application approved by the TPB, the applicant is reminded to comply with relevant environmental protection and pollution control ordinances, including APCO, NCO and WPCO.</p>	<p>Noted. The Applicant is reminded to comply with relevant environmental protection and pollution control ordinances, including APCO, NCO and WPCO.</p>

2.6 Responses to Comments from Fire Service Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on <u>First Pre-submission</u> Received on 12.8.2025</i>		
FSD (A1)	Please be informed that I have no specific comments on the captioned submission subject to water supplies for firefighting being provided to the satisfaction of Director of Fire Services. Detailed Fire Services requirements will be formulated upon receipt of formal submission of general building plans or referral from relevant Licensing authority.	Noted.
<i>Comments on <u>Second Pre-submission</u> Received on 21.11.2025</i>		
FSD (B1)	Please be informed that I have no specific comments on the captioned submission and my previous comments are still valid.	Noted.

2.7 Responses to Comments from Food and Environmental Hygiene Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on First Pre-submission Received on 4.8.2025</i>		
FEHD (A1)	Under the Private Columbaria Ordinance (the PCO), only private columbaria that have obtained a licence may sell or newly let out niches. Any private columbarium which applies for a licence must comply with the Town Planning Ordinance (Cap. 131) and other requirements prescribed in the PCO or specified by the Private Columbaria Licensing Board (the PCLB), including land-related, building-related, right to use the columbarium premises, deed of mutual covenant (if applicable), fire safety, etc. Section 18(2) of the PCO stipulates that the PCLB may grant a licence only if a management plan submitted by the applicant has been approved by the PCLB. The management plan submitted to the PCLB should cover matters including traffic and public transport arrangement or management, crowd management, manpower deployment on peak grave sweeping days or periods and other days or periods, etc. For cases in which planning permission has been given by the Town Planning Board (TPB), the management plan should include the crowd and traffic management measures accepted (and the conditions imposed) by the relevant departments and the TPB when the TPB approved the planning application. In considering the management plan submitted by a licence applicant, the PCLB will take into account comments provided by concerned departments including Transport Department, the Police, Fire Services Department and the Planning Department. In case that the Management Plan and the associated licence application are approved by the Licensing Board, then the PCAO will undertake the monitoring of implementation of the Management Plan within the site boundary covered by the licence.	Noted.
FEHD (A2)	According to our record, the private columbarium (PC) named "Koon Yam Tong" (觀音堂) at No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (Lot No.	Noted.

Items	Departmental Comments	The Applicant's Responses
	118 in DD 135), a set of application for specified instruments (SI) viz. a licence and temporary suspension of liability in respect of a pre-cut-off columbarium have been received by the Licensing Board and the application is being processed by the Private Columbaria Affairs Office (PCAO) according to the prevailing procedure. The applicant is Ka Fuk Services Limited (嘉福服務有限公司). The TSOL application of the above PC has been approved in principle with a validity period of 3 years from 11 November 2021 to 10 November 2024. The applicant was further informed of an extension of the validity period for another 3 years till 10 November 2027.	
FEHD (A3)	Based on the latest proposed plans and niche information submitted by the applicant in support of this SI application, it was preliminary noted that the total number of niches proposed for the SI applications, i.e. 3,162, apparently tallies with that proposed for this pre-submission. However, discrepancies were detected in the number of sold and unsold niches with its ash interment figures as elaborated in paragraph below. Having said that, we are still in the course of detailed checking of the niche information to verify its accuracy. PCAO will notify Plan D of the verification result once vetting of niche information is completed.	Noted. The Planning Statement has been revised accordingly.
FEHD (A3)	<p>The following discrepancies were found in this pre-submission as compared with that in our PCAO's record, clarification with the applicant is required:-</p> <p><i>(Remarks: for comment's details, please refer to Annex I of this Appendix III)</i></p> <p>(i) Name of Applicant</p> <p>(ii) Submission date of application</p>	<p>Please find our clarifications below for your attention. Relevant pages in the Planning Statement have been revised accordingly.</p> <p>Typo. The name of Applicant (i.e. Ka Fuk Services Limited) in the PCAO's record is correct. Relevant pages in the Planning Statement have been amended accordingly.</p> <p>Typo. The submission of PCL application has</p>

Items	Departmental Comments	The Applicant's Responses
	<p>(iii) Site area & GFA</p> <p>(iv) Proposed plans</p> <p>(v) Niche information</p> <p>(vi) Management Plan</p>	<p>been revised to 6.3.2018.</p> <p>The site boundary under the subject planning application is the same as the site boundary under the PCL application. According to the lot boundary survey conducted by the Land Surveyor – Ted Chan & Associates Limited in August 2021, the site area which covers the entire Lot 118 in D.D. 135 is 92.9m². Hence, the Application Summary under the PCL application has been updated and submitted to the PCLB on 14.10.2025.</p> <p>Noted. The proposed plans under Annex 13 of the PCL application have been updated and submitted to the PCLB on 14.10.2025. Plan E in the Planning Statement has also been updated accordingly.</p> <p>Table 2.1 of the Planning Statement has been amended accordingly.</p> <p>Noted. The latest Management Plan under this planning application has been submitted to the PCLB on 14.10.2025.</p>
FEHD (A3)	<p>Since the applicant has opted Alternative Approach (AA) for fulfilment of the BD's requirements, a copy of revised comment from BD re. AA, which was issued on 24.4.2024, was attached herewith for easy reference. In BD's comment, it clearly stated that applicant should require to implementation all those bounding conditions as mentioned in the Appendix IV of fire safety report.</p> <p>Referring the Planning Statement and its appendices, some items therein were deviated from the bounding conditions as stated in the fire safety report in BD's revised comments on AA. Further clarification with the applicant on the following aspects is required:-</p> <p><i>(Remarks: for comment's details, please refer to Annex I of this Appendix III)</i></p>	<p>In order to minimise potential traffic impact, a series of improvement measures have been proposed under this s.12A application and they have been incorporated in the latest Management Plan (see Appendix V). As explained in the Authorised Person's Undertaking Letter recently submitted to BD (see Annex III of Appendix III), the latest Management Plan has been prepared with full reference to the Fire Safety Assessment (FSA) Report. The recommendations and fire safety strategies outlined in the report form the basis of the operational and safety measures proposed in the Management Plan. The Management Plan incorporates a number of operational controls that align with the FSA Report. These measures – including adjustments to occupancy limits, visitor access protocols and transport arrangements – were primarily formulated in response to traffic-related considerations identified in the TIA, but they are contribute</p>

Items	Departmental Comments	The Applicant's Responses
		<p>positively to fire safety and overall operational management. All other core recommendations from the FSA Report have been fully adopted.</p> <p>The FSA Report provides a comprehensive and sufficient foundation for the fire safety provisions, and the changes in the updated Management Plan are minor but for enhancement purpose. By all means, the safety level as worked out in the FSA Report would not be lowered due to the changes, and the operator remains committed to implementing the measures in full accordance with the report's guidance.</p> <p>There are minor changes in the opening hours of Koon Yam Tong, i.e. the opening hours will be changed from 9:00am to 4:00pm from Monday to Friday (excluding public holidays), and extended only from 7:00am to 5:00pm from Monday to Friday (excluding public holidays) within 4 weeks before and after Ching Ming and Chung Yeung Festival Days. Relevant pages in the Planning Statement and the Management Plan have been updated accordingly.</p> <p>There are changes to the proposed arrangement that all floors will be available for visit-by-appointment and internet memorial service. Please refer to item (3) of the updated Management Plan.</p> <p>Under the latest traffic arrangement, no free shuttle services will be provided.</p> <p>Limiting the visiting capacity at 4 visitors per (30-minute) session is in line with the FSA Report that the maximum number of persons on each floor will be controlled not to exceed 10 persons.</p> <p>Under the latest arrangement, burning of joss stick, joss papers, incense and candles is prohibited within the site. Relevant pages in the Planning Statement have been amended accordingly.</p>
	(a) Opening hours of PC	
	(b) Mode of Grave Sweeping	
	(c) Transportation	
	(d) Visiting Capacity	
	(e) Fire Safety Management	

Items	Departmental Comments	The Applicant's Responses
FEHD (A4)	<p>Apart from the above, the applicant is also required to clarify and provide the details on the following issues:-</p> <p>(Remarks: for comment's details, please refer to Annex I of this Appendix III)</p> <p>(a) Application premises</p> <p>(b) Internet memorial worshipping services</p> <p>(c) On-site in-person visit</p> <p>(d) Provision of Portable Toilet</p> <p>(e) Lodging of complaints from public</p>	<p>For consistency in wording, the naming of floors of the application premises in Chinese and English are now: G/F (地下), 1/F (一樓) and 2/F (二樓). Niche Information under Annex 13 of the PCL application has been updated and submitted to the PCLB on 14.10.2025.</p> <p>There are changes to the proposed arrangement that all floors will be available for visit-by-appointment and internet memorial service. Please refer to item (3) of the updated Management Plan in Appendix V.</p> <p>There are changes to the proposed arrangement. An all-year-round-visit-by-appointment-and-management-system will be implemented, and all visitors are required to pre-book with the Applicant and strongly advised and recommended to use green mini-bus route No. 33. All appointments must be made at least 2 days in advance, and Koon Yam Tong opens only if there is confirmed visiting appointment, otherwise it remains closed with no staff on duty.</p> <p>There will be 14 on-site visit sessions daily from Monday to Friday (excluding public holidays), and 20 on-site visit sessions daily from Monday to Friday (excluding public holidays) within 4 weeks before and after Ching Ming and Chung Yeung Festival Days.</p> <p>Please refer to the revised Plan D of the Planning Statement.</p> <p>Please refer to item (11) of the updated management plan.</p>

Items	Departmental Comments	The Applicant's Responses
FEHD (A5)	<p>In addition, comment of Management Plan from PCAO was provided herewith for follow-up action by the applicant:-</p> <p><u>Item (1) Basic information of the columbarium</u></p> <ol style="list-style-type: none"> The address of the columbarium is not tally with the PCAO record. Please clarify or submit a revised version. The applicant should state the year of tenancy. 	<ol style="list-style-type: none"> Please refer to Item (1) of the updated Management Plan in Appendix V. Ditto.
FEHD (A6)	<p><u>Item (2) Site information and building management</u></p> <ol style="list-style-type: none"> The site area is not tally with the Application Summary submitted. Please clarify or submit a revised version. If portable toilet(s) is/are used, the applicant should state the cleansing frequency. [Remarks : As stated in page 11 of the "Planning Statement" that "<i>Applicant is planned to dismantle the existing toilet facilities within the NTEH and a portable toilet will be provided within the site</i>".] "Other buildings which are facilities necessary for or ancillary to the operation of the columbarium" and "Other facilities necessary for or ancillary to the operation of the columbarium" are not tally with the Application Summary submitted. Please clarify or submit a revised version. 	<ol style="list-style-type: none"> The Application Summary under Annex 20 of the PCL application has been updated to reflect the parameters of the subject planning application. Please refer to Item (2) of the updated Management Plan in Appendix V. The Application Summary under Annex 20 of the PCL application has been updated and submitted to the PCLB on 14.10.2025.
	<p><u>Item (3) Visitor Holding Capacity and Admission Control</u></p> <ol style="list-style-type: none"> The applicant should provide the information as stated in page 13 of the "Planning Statement" that "<i>Visiting capacity will be limited at 4 visitors per session, and the length of each session is 30 minutes, i.e. 8 visitors per hour.</i>" The applicant should provide a time table to show visiting sessions of a day. 	<ol style="list-style-type: none"> Please refer to Item (3) of the updated Management Plan in Appendix V. Please refer to Appendix A of the updated Management Plan in Appendix V.

Items	Departmental Comments	The Applicant's Responses
	<p>3. The applicant should exhibit the opening hours of the columbarium at the entrances and exits.</p> <p>4. The applicant should provide the details on provision of internet memorial worshipping services for 1/F and 2/F of the columbarium. [Remarks : As stated in page 3 of the "Planning Statement" that "...while the 1/F and 2/F will only offer internet memorial worshipping service".]</p>	<p>3. Please refer to the item (3) of the updated Management Plan in Appendix V.</p> <p>4. There are changes to the proposed arrangement that all floors will be available for visit-by-appointment and internet memorial service. Please refer to item (3) of the updated Management Plan in Appendix V.</p>
FEHD (A7)	<p><u>Item (6) Security Management</u></p> <p>1. The applicant should clearly state the duty of the trained staff member for security and emergency management in the content of staff concerned in item 7.1 "Staffing". Otherwise, the information in item 6.1 is not tally with the information in item 7.1.</p>	<p>1. Please refer to item (6) of the updated Management Plan in Appendix V.</p>
FEHD (A8)	<p><u>Item (7) Manpower Deployment</u></p> <p>1. The applicant states at item 7.1 "Staffing" that the columbarium operates with one permanent staff and two part-time staff, but item 7.3 "Organization Chart" shows that the columbarium operates with one permanent staff and three part-time staff. The applicant should confirm and revise the number of staff employed at the columbarium in the above regard and amend accordingly.</p> <p>2. The applicant should provide appropriate information having regard to the actual circumstances of the private columbarium on the following:</p> <ul style="list-style-type: none"> The top management personnel (e.g.: general manager, chief executive officer, etc.), including their names, positions, contact telephone numbers, years of service, experience, duties and professional qualifications (if any); The years of service, experience, duties and professional qualifications of other managerial personnel (if any); 	<p>1. Please refer to item (7) of the updated Management Plan in Appendix V.</p> <p>2. Ditto.</p>

Items	Departmental Comments	The Applicant's Responses
	<ul style="list-style-type: none"> Training such as first aid, etc. <p>Equipment for the staff including first aid box, etc.</p>	
FEHD (A9)	<p><u>Item (8) Contingency plans for emergencies</u></p> <ol style="list-style-type: none"> The applicant should provide the name, position and contact telephone number of the person-in-charge of the emergency cases. The applicant should provide staff training and professional qualifications such as first aid etc. The applicant should provide a clear escape route map showing escape routes and safe assembly points as well as give the escape route map a name. 	<ol style="list-style-type: none"> Please refer to item (8) of the updated Management Plan in Appendix V. Ditto. Ditto.
FEHD (A10)	<p><u>Item (11) Complaint Handling</u></p> <ol style="list-style-type: none"> The applicant should exhibit at conspicuous locations of the columbarium notices which provide to the public the job titles and telephone numbers of staff who can immediately handle enquiries and complaints. 	<ol style="list-style-type: none"> Please refer to item (11) of the updated management plan.
FEHD (A11)	<p><u>Item (12) Financial Plan</u></p> <ol style="list-style-type: none"> The applicant should clearly state the size and duty of the finance team in the content of staff concerned in item 7.1 "Staffing". Otherwise, the information in item 12.4 is not tally with the information in item 7.1. 	<ol style="list-style-type: none"> Please refer to item (12) of the updated management plan.
FEHD (A12)	<p>Addition Information Items should be provided in the Management Plan:</p> <p><u>Item (a) Measures to ensure compliance with licensing conditions, guidelines and codes of practice stipulated or issued by the Private Columbaria Licensing Board (PCLB)</u></p> <ol style="list-style-type: none"> <i>The applicants should state what measures will be taken to ensure that the columbarium is in compliance with the licensing conditions, guidelines and codes of practice stipulated or issued by the</i> 	<ol style="list-style-type: none"> Please refer to item (13) of the updated Management Plan in Appendix V.

Items	Departmental Comments	The Applicant's Responses
	<i>PCLB, including measures to ensure that the managerial and frontline staff are acquainted with such conditions, guidelines and codes of practice and relevant monitoring, recording and reporting arrangements to ensure compliance.</i>	
FEHD (A13)	<p><u>Item (b) Persons responsible for the implementation and approval of management plan</u></p> <p>1. <i>The applicant should provide the following information :</i></p> <ul style="list-style-type: none"> <i>The particulars of the person responsible for the implementation of the management plan (such as name, position, contact telephone number and email address);</i> <i>The particulars of the person responsible for approving the management plan (such as name, position, contact telephone number and email address).</i> 	<p>1. Please refer to item (14) of the updated Management Plan in Appendix V.</p>
FEHD (A14)	<p><u>Item (c) Statement of Purpose (Made under the Personal Data (Privacy) Ordinance)</u></p> <p>1. <i>The applicant should include the Statement of Purpose (Made under the Personal Data (Privacy) Ordinance) in the management plan.</i></p>	<p>1. Please refer to the Statement of Purpose of the updated Management Plan in Appendix V.</p>
Comments on <u>Second Pre-submission</u> Received on 21.11.2025		
FEHD (B1)	<p>The comments from PCAO/FEHD on the second round of pre-submission for Koon Yam Tong Columbarium are provided as below.</p> <p>On Table 4.2 of the Planning Statement, a typo on single-urn unsold niche is noted.</p> <p>(Remarks: for comment's details, please refer to Annex II of this Appendix III)</p>	<p>Noted.</p> <p>Table 4.2 of the Planning Statement has been amended accordingly.</p>
FEHD (B2)	On Item A3 of Item 2.5 RtoC from FEHD of Appendix III, the applicant has opted	Noted.

Items	Departmental Comments	The Applicant's Responses
	<p>Alternative Approach for fulfilment of the Building Department's (BD) requirements with comments stipulated on 24.4.2024 [(See attached file: 觀音堂_Comment from BD re. Alternative Approach.pdf)] to the applicant for compliance. It was noted that some measures proposed in the planning statement of this pre-submission are not completely conform with the bounding conditions outlined in the Appendix IV of fire safety report. Since the applicant has recently submitted an undertaking to BD direct on 14.10.2025 [(See attached file: 觀音堂 Amend FSAR to BD 20251014.pdf)] claiming that their adjustments in term of occupancy control, visitor admission, transport arrangement and fire service installation are to ensure compliance with relevant fire safety standard and docs not compromise the integrity of the fire safety provision in the fire safety report, PCAO/FEHD offers no specific comment in this aspect subject to the further views from BD.</p>	
FEHD (B3)	<p>In addition, the following discrepancies were found in this pre-submission as compared with that in PCAO's record, clarification with the applicant is required.</p> <p><i>(Remarks: for comment's details, please refer to Annex II of this Appendix III)</i></p> <p><u>Issue concerned</u></p> <p>(i) Name of Applicant</p> <p>(ii) Address of application premises</p>	<p>Please find our clarifications below for your attention. Relevant pages in the Planning Statement have been revised accordingly.</p> <p>Typo. The name of Applicant (i.e. Ka Fuk Services Limited) in the PCAO's record is correct. Relevant pages in the Planning Statement have been amended accordingly.</p> <p>To be further line with the address of application premises, the title name of the Planning Statement has been amended to "Section 12A Application from "Coastal Protection Area" to "Government, Institution or Community" for Regularisation of a Pre-cut-off Columbarium for Koon Yam Tong, Lot No. 118 in D.D. 135, No.13</p>

Items	Departmental Comments	The Applicant's Responses
	(iii) Proposed plans	<p>Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories".</p> <p>The latest proposed plans, which are in parallel with the planning submission, have been submitted to the PCLB on 17.12.2025.</p>
FEHD (B2)	<p>Regarding the revised management plan of Appendix V, it is considered acceptable and with no outstanding items. The applicant was required to clarify the following minor deviations/contradictions for our consideration:-</p> <p><i>(Remarks: for comment's details, please refer to Annex II of this Appendix III)</i></p> <p><u>Issue concerned</u></p> <p>(i) Name of Applicant</p> <p>(ii) Address of application premises</p> <p>(iii) Provision of shuttle service</p> <p>(iv) Burning of joss stick</p>	<p>Typo. The name of Applicant (i.e. Ka Fuk Services Limited) in the Management Plan is correct. Relevant pages in the Planning Statement have been amended accordingly.</p> <p>The address is amended to align with the application record.</p> <p>No shuttle service will be provided. Relevant paragraph of the Management Plan is updated for submission.</p> <p>Burning of joss stick will be prohibited. Relevant paragraph of the Management Plan is updated for submission.</p>

2.8 Responses to Comments from Home Affairs Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on <u>First Pre-submission</u> Received on 4.8.2025</i>		
HAD (A1)	As the documents concern technical matters over which we have no expertise, we are not in a position to comment.	Noted.
HAD (A2)	The application involves a total of 3,162 niches, relevant stakeholders including but not limited to DCs, RCs, chambers of commerce, residents' associations, owners' corporations etc may have comments or views regarding it. Therefore, it is recommended for the applicant and/or Planning Department to seek their views on the subject matter, and this office stands ready to provide assistance upon request.	Noted.
<i>Comments on <u>Second Pre-submission</u> Received on 21.11.2025</i>		
HAD (B1)	As the documents concern technical matters over which we have no expertise, we are not in a position to comment.	Noted.

2.9 Responses to Comments from Hong Kong Police Force

Items	Departmental Comments	The Applicant's Responses
<u>Comments on First Pre-submission Received on 4.8.2025</u>		
HKPF (A1)	The Police have no objection in principle, but wish to highlight that any significant increase of traffic flow along Nim Wan Road, which is a single lane dual carriageway that the residents, the emergency services and the Hong Kong Garrison of the Liberation Army rely on.	<p>Noted. The following amendments, and special traffic and pedestrian arrangements are proposed by the Applicant to minimise the traffic impact:</p> <ul style="list-style-type: none"> i) The number of niches is reduced to no more than 967 from 3,162, a reduction of 69%, and ii) The Proposed Columbarium will open by appointment only, and the visiting capacity is limited to 4 visitors per 30-minute session, thus the number of visitors is controlled at all time. <p>The Applicant will remind niche owners the year-round visit-by-appointment arrangements, and strongly advise and encourage all visitors to access by public transport service, i.e. Green Minibus No. 33, and discourage the to use private cars and taxi, hence, no additional traffic is anticipated.</p>
HKPF (A2)	As such, consideration for widening of Nim Wan Road to mitigate any potential impact to the community should be considered.	<p>It is noted widening of Nim Wan Road and Deep Bay Road are currently being planned by the Government.</p> <p>Nevertheless, the Traffic Impact Assessment concluded the Proposed Columbarium with the special traffic and pedestrian arrangement imposed will not result in traffic impact.</p>
<u>Comments on Second Pre-submission Received on 21.11.2025</u>		
HKPF (B1)	Comprehensive traffic assessment shall be required to ensure the planning aligns with traffic patterns and public transport integration including analysis of potential impacts on local public transport networks regarding the greater number of potential visitors during the Festive Period due to the revised opening hours.	A Traffic Impact Assessment is prepared and submitted as part of the application for review by Transport Department and others (see Appendix IV). The TIA concluded the proposed columbarium with the traffic and crowd management implemented will not have adverse traffic and pedestrian impact.
HKPF (B2)	While the captioned proposal is still subject to change at detailed design stage, this office has no objection in principle.	Noted.

2.10 Responses to Comments from Lands Department

Items	Departmental Comments	The Applicant's Responses
<u>Comments on First Pre-submission Received on 4.8.2025</u>		
LandsD (A1)	<p>The application site comprises Lot No.118 in D.D.135 ("the Lot") held under New Grand No. 2757 which contains, Inter alia, the following restrictions:-</p> <ul style="list-style-type: none"> (i) The Lot and any building erected thereon or any part of such building shall not be used for any purpose other than non-industrial purposes; (ii) no structure shall be erected on the Lot other than one building which shall not contain more than three storeys nor exceed a height of 7.6m; (iii) the maximum built-over area of the Lot shall not exceed 65.04m² and (iv) no grave shall be made on the Lot, nor shall any human remains whether in earthenware jars or otherwise be interred therein or deposited thereon. 	Noted.
LandsD (A2)	<p>I must point out that the following irregularities covered by the subject pre-submission have been detected by this office:</p> <p><u>Unauthorised columbarium use within the applicant site under the Pre-submission</u></p> <p>There is unauthorized columbarium use ("觀音堂") in the existing building on the Lot. The lot owner should immediately rectify/regularize the lease breaches and this office reserves the rights to take necessary lease enforcement action against the breaches without further notice.</p>	<p>In order to regularise the Pre-cut-off Columbarium in Koon Yam Tong, the Applicant had submitted a PCL application to the PCLB on 6.3.2018 to apply for a Licence and TSOL. The Applicant had fulfilled a series of specified requirements and obtained the AIP TSOL on 11.11.2021, and further obtained a 3 years extension for the TSOL on 8.11.2024. Under the PCO, the TSOL would enable the columbarium and its associated facilities to continue operating and providing services before a Licence is granted. If this s.12A application is accepted by the Board, and further planning application under section 16 of the Town Planning Ordinance (s.16 application) to the</p>

Items	Departmental Comments	The Applicant's Responses
		Board is not required, the land owner will submit request for a permanent lease modification application under streamlined processing or a temporary Short Term Waiver to Lands Department, where appropriate to permit the columbarium use, after an AIP Licence for Koon Yam Tong is obtained from the PCLB.
LandsD (A3)	In the event the subject application under s.12A of the Town Planning Ordinance (TPO) is accepted by the Town Planning Board (TPB) with a set of clear development parameters (including but not limited to the proposed user, gross floor area, building height and car parking provisions, as appropriate) defined / firmed up and further submission to the TPB (including application(s) for permission under s.16 of the TPO after the corresponding amendment to the Outline Zoning Plan (OZP) has been made) is not required, the land owner may submit request for a permanent lease modification application under streamlined processing or a temporary Short Term Waiver (STW) where appropriate to permit the columbarium use. Depending on the circumstances of each case, Lands Department (LandsD) at its sole and absolute discretion may, upon receipt of such valid request and subject to payment of the administrative fee(s) by the land owner, commence the streamlined processing of the lease modification application on a without prejudice and non-committal basis or the processing of the STW while Planning Department (PlanD) is taking forward the relevant OZP amendment.	Noted.
LandsD (A5)	The land owner is reminded that once the accepted or partially accepted proposal is reflected in the OZP and approved under s.9 of the TPO, a formal application for lease modification by land owner to LandsD is still required. Every lease modification or STW application submitted to LandsD will be considered on its own merits by LandsD at its absolute discretion acting in its capacity as a landlord and there is no guarantee that the lease modification or STW application will eventually	Noted.

Items	Departmental Comments	The Applicant's Responses
	be approved by LandsD. If the application for lease modification or STW is approved by LandsD, it will be subject to such terms and conditions as may be imposed by LandsD at its absolute discretion, including payment of premium or waiver fee, and administrative fee(s).	
LandsD (A6)	In addition, LandsD reserves the right to take enforcement action against the lot owner for any breach of the lease conditions, including the breaches already in existence or to be detected at any point of time in future.	Noted.
LandsD (A7)	Please notify the applicant of our comments/requirements as stated above.	Noted.
Comments on <u>Second Pre-submission</u> Received on 12.11.2025		
LandsD (B1)	<p>Please tick as appropriate:</p> <p><input checked="" type="checkbox"/> No objection / No adverse comment*</p> <p><input type="checkbox"/> No comment</p> <p><input type="checkbox"/> Objection / Have adverse comment*</p>	Noted.
LandsD (B2)	<p>The application site comprises Lot No.118 in D.D.135 ("the Lot") held under New Grant No. 2757 which contains, inter alia, the following restrictions:-</p> <p>(i) The Lot and any building erected thereon or any part of such building shall not be used for any purpose other than non-industrial purposes;</p> <p>(ii) no structure shall be erected on the Lot other than one building which shall not contain more than three storeys nor exceed a height of 7.6m;</p> <p>(iii) the maximum built-over area of the Lot shall not exceed 65.04m²; and</p> <p>(iv) no grave shall be made on the Lot, nor shall any human remains whether in earthenware jars or otherwise be interred therein or deposited thereon.</p>	Noted.

Items	Departmental Comments	The Applicant's Responses
LandsD (B3)	<p>I must point out that the following irregularities covered by the subject application have been detected by this office:</p> <p><u>Unauthorised columbarium use within the applicant site under the Pre-submission</u></p> <p>There is unauthorized columbarium use ("觀音堂") in the existing building on the Lot. The lot owner should immediately rectify/regularize the lease breaches and this office reserves the rights to take necessary lease enforcement action against the breaches without further notice.</p>	<p>In order to regularise the Pre-cut-off Columbarium in Koon Yam Tong, the Applicant had submitted a PCL application to the PCLB on 6.3.2018 to apply for a Licence and TSOL. The Applicant had fulfilled a series of specified requirements and obtained the AIP TSOL on 11.11.2021, and further obtained a 3 years extension for the TSOL on 8.11.2024. Under the PCO, the TSOL would enable the columbarium and its associated facilities to continue operating and providing services before a Licence is granted. If this s.12A application is accepted by the Board, and further planning application under section 16 of the Town Planning Ordinance (s.16 application) to the Board is not required, the land owner will submit request for a permanent lease modification application under streamlined processing or a temporary Short Term Waiver to Lands Department, where appropriate to permit the columbarium use, after an AIP Licence for Koon Yam Tong is obtained from the PCLB.</p>
LandsD (B4)	<p>In the event the subject application under s.12A of the Town Planning Ordinance (TPO) is accepted or partially accepted by the Town Planning Board (TPB) with a set of clear development parameters (including but not limited to the proposed user, gross floor area, building height and car parking provisions, as appropriate) defined / firmed up and further submission to the TPB (including application(s) for permission under s.16 of the TPO after the corresponding amendment to the Outline Zoning Plan (OZP) has been made) is not required, the land owner may submit request for a permanent lease modification application under streamlined processing or a temporary Short Term Waiver (STW) where appropriate to permit the columbarium use. Depending on the circumstances of each case, Lands Department</p>	<p>Noted.</p>

Items	Departmental Comments	The Applicant's Responses
	(LandsD) at its sole and absolute discretion may, upon receipt of such valid request and subject to payment of the administrative fee(s) by the land owner, commence the streamlined processing of the lease modification application on a without prejudice and non-committal basis or the processing of the STW while Planning Department (PlanD) is taking forward the relevant OZP amendment.	
LandsD (B5)	The land owner is reminded that once the accepted or partially accepted proposal is reflected in the OZP and approved under s.9 of the TPO, a formal application for lease modification by land owner to LandsD is still required. Every lease modification or STW application submitted to LandsD will be considered on its own merits by LandsD at its absolute discretion acting in its capacity as a landlord and there is no guarantee that the lease modification or STW application will eventually be approved by LandsD. If the application for lease modification or STW is approved by LandsD, it will be subject to such terms and conditions as may be imposed by LandsD at its absolute discretion, including payment of premium or waiver fee, and administrative fee(s).	Noted.
LandsD (B6)	In addition, LandsD reserves the right to take enforcement action against the lot owner for any breach of the lease conditions, including the breaches already in existence or to be detected at any point of time in future.	Noted.
LandsD (B7)	Please notify the applicant of our comments/requirements as stated above.	Noted.

2.11 Responses to Comments from Landscape Unit, Planning Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on <u>First Pre-submission</u> Received on 12.8.2025</i>		
LU (A1)	Please also note that CTP/UD&L (Landscape Unit) has no comment on the presubmission from landscape planning perspective.	Noted.

2.12 Responses to Comments from Transport Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on First Pre-submission Received on 26.8.2025</i>		
TD (A1)	The assessment of the Applicant is based on the proposed "visit by appointment system" and "Internet memorial service". TD has reservation to the aforesaid proposals and opines that such system would not be strictly followed by all visitors. Some visitors may perform ritual activities outside the premise of the columbarium during the visiting days of Ching Ming and Chung Yeung Festivals, and the applicant could not control. In this regard a certain percentage of visitors shall be assumed to visit the columbarium during the days of Ching Ming and Chung Yeung Festivals. Deep Bay Road is a single track road with limited traffic capacity, the potential traffic impact arising from the aforesaid visitors shall be duly assessed.	<p>The following amendments are being adopted in the revised TIA by the Applicant to minimise the potential traffic impact (see Appendix IV):</p> <ol style="list-style-type: none"> 1) The number of niches is reduced to no more than 967 from 3,162, a reduction of 69%. 2) The Proposed Columbarium is opened by appointment only on weekdays, i.e. closed on Saturday, Sunday, and public holidays, including Ching Ming and Chung Yeung Festival Day. In addition, it remains closed and unstaffed on weekdays if there is no confirmed appointment. 3) Opening hours is 0900 to 1600 hours on normal days, and extended to become 0700 to 1700 hours during the Ching Ming and Chung Yeung Festival Periods, i.e. within 4 weeks before and 4 weeks after Ching Ming and Chung Yeung Festival Day. 4) Visiting capacity is limited to 4 visitors per 30-minute session. 5) Visitors are strongly advised and encouraged to access by existing public transport service and the use of private cars and taxis are strongly discouraged. <p>All of the above (2) to (5) will be stated in the conditions of sale, and emphasised by the Applicant to all niche owners, who will also be reminded before each Ching Ming and Chung Yeung Festival Day.</p> <p>Hence, with the special traffic and pedestrian arrangements imposed, the Proposed Columbarium is not anticipated to generate any additional traffic, but a small additional demand on existing public transport service, thus the Revised TIA concluded it will not result in traffic impact.</p>

Items	Departmental Comments	The Applicant's Responses
TD (A2)	Furthermore, according to the Chinese tradition, visitors typically visit columbariums around or on the days of the Ching Ming and Chung Yeung Festivals. Therefore, the assumption that visitors would spread out over the 244 weekdays of the columbarium open days seems unreasonable and may not reflect the actual situation.	The special traffic and pedestrian arrangements proposed in the Revised TIA includes extended opening hours during the Ching Ming and Chung Yeung Festival Periods, i.e. within 4 weeks before and 4 weeks after Ching Ming and Chung Yeung Festival Day. Hence, the Proposed Columbarium has sufficient capacity to serve the potential festive visiting demand.
TD (A3)	As proposed by the Applicant, the public is not allowed to visit niches at 1/F and 2/F. Only mandatory "internet memorial service" would be provided for niches at 1/F and 2/F. The Applicant shall seek FEHD's advice whether such arrangement is pragmatic and enforceable by FEHD. If the mandatory "internet memorial service" could not be enforced by FEHD, the Applicant shall consider to review the number of niches under the application.	In view the number of niches is reduced to no more than 967, all niches will be allowed to worship in-person by visit-by-appointment. To further reduce the number of visitors, the Applicant will continue to provide "internal memorial service" to all niche owners as an alternative way for worshipping besides visiting in-person.
TD (A4)	Besides, the submitted Traffic Impact Assessment has enclosed a layout of project, Upgrading of Deep Bay Road – Investigation. This project has no solid implementation programme.	Noted. The Revised TIA assessed the scenarios without and with the planned upgrading of Deep Bay Road and Nim Wan Road, and concluded with the special traffic and pedestrian arrangements imposed, the Proposed Columbarium will not result in traffic impact, and is acceptable from traffic engineering viewpoint.
Comments on <u>Second Pre-submission</u> Received on 15.12.2025		
TD (B1)	On the basis that the total applied number of niches has been revised from 3,162 to 999 in total, I have no comment on the pre-submission from traffic engineering point of view.	Noted.

2.13 Responses to Comments from Urban Design Unit, Planning Department

Items	Departmental Comments	The Applicant's Responses
<i>Comments on First Pre-submission Received on 4.8.2025</i>		
UD (A1)	The application site (the Site) is located 150m (about) away from the coast of Deep Bay to its west and near Nim Wan Road to its east. Its rural locality mainly comprises vegetated land with scattering temporary structures and low-rise buildings. According to your memo and the submission, the intended application is to regularise the current columbarium use in an existing New Territories Exempted House (NTEH) at the Site. As stated in paras. 4.1(a) and 5.9(b) of the PS, it does not involve any alterations and additions to the existing NTEH, and no new building has been proposed at the Site. In view of this and given the small scale and low-rise nature of the proposal, there are no particular comments from the urban design and visual perspectives.	Noted.
UD (A2)	Our comments are made based on the existing available information of this pre-submission. Further comments may be provided upon receipt of the formal (and complete) submission.	Noted.
UD (A3)	Comments from the Landscape Unit, if any, will be provided under separate cover.	Noted.
<i>Comments on Second Pre-submission Received on 21.11.2025</i>		
UD (B1)	As the applied use is confined within an existing/as-built New Territories Exempted House and not involving intensification or increase in building heights or building masses, we have no comments on the application.	Noted.
UD (B2)	Comments from the Landscape Unit, if any, will be provided under separate cover.	Noted.

Comments from Food and Environmental Hygiene Department on First Pre-submission

PCAO/FEHD (Contact Officer: Mr. Raymond CHAN, Tel: 3141 1231)

Under the Private Columbaria Ordinance (the PCO), only private columbaria that have obtained a licence may sell or newly let out niches. Any private columbarium which applies for a licence must comply with the Town Planning Ordinance (Cap. 131) and other requirements prescribed in the PCO or specified by the Private Columbaria Licensing Board (the PCLB), including land-related, building-related, right to use the columbarium premises, deed of mutual covenant (if applicable), fire safety, etc. Section 18(2) of the PCO stipulates that the PCLB may grant a licence only if a management plan submitted by the applicant has been approved by the PCLB. The management plan submitted to the PCLB should cover matters including traffic and public transport arrangement or management, crowd management, manpower deployment on peak grave sweeping days or periods and other days or periods, etc. For cases in which planning permission has been given by the Town Planning Board (TPB), the management plan should include the crowd and traffic management measures accepted (and the conditions imposed) by the relevant departments and the TPB when the TPB approved the planning application. In considering the management plan submitted by a licence applicant, the PCLB will take into account comments provided by concerned departments including Transport Department, the Police, Fire Services Department and the Planning Department. In case that the Management Plan and the associated licence application are approved by the Licensing Board, then the PCAO will undertake the monitoring of implementation of the Management Plan within the site boundary covered by the licence.

According to our record, the private columbarium (PC) named "Koon Yam Tong" (觀音堂) at No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in DD 135), a set of application for specified instruments(SI) viz. a licence and temporary suspension of liability in respect of a pre-cut-off columbarium have been received by the Licensing Board and the application is being processed by the Private Columbaria Affairs Office (PCAO) according to the prevailing procedure. The applicant is Ka Fuk Services Limited (嘉福服務有限公司). The TSOL application of the above PC has been approved in principle with a validity period of 3 years from 11 November 2021 to 10 November 2024. The applicant was further informed of an extension of the validity period for another 3 years till 10 November 2027.

Based on the latest proposed plans and niche information submitted by the applicant in support of this SI application, it was preliminary noted that the total number of niches proposed for the SI applications, i.e. 3,162, apparently tallies with that proposed for this pre-submission. However, discrepancies were detected in the number of sold and unsold niches with its ash interment figures as elaborated in paragraph below. Having said that, we are still in the course of detailed checking of the niche information to verify its accuracy. PCAO will notify PlanD of the verification result once vetting of niche information is completed.

The following **discrepancies** were found in this pre-submission as compared with that in our PCAO's record, clarification with the applicant is required:-

Issue concerned	Planning Statement	PCAO's Record
(i) Name of Applicant	Ka Fu Services Ltd.	Ka Fuk Services Limited
(ii) Submission date of application	10.3.2018	6.3.2018
(iii) Site area & GFA	Site area: about 92.9m ² Total GFA: 195.12m ²	As shown in Application Summary dated 3.6.2020, Site area: 85.10m ² Total GFA: 195.12m ²
(iv) Proposed plans	As revealed in Planning Statement, applicant intended to dismantle the male and female toilet at G/F of the application premises. However, the relevant sanitary facilities was still shown on the most updated plans dated 20.6.2025 (Plan E – Plan G).	No updated proposed plans were received by PCAO since 10.9.2021
(v) Niche information	The breakdown of niche information shown in P.5 was not tally with that in PCAO's record.	No updated niche information were received by PCAO since 2018. <u>Discrepancies</u> were illustrated in the Table A of below paragraph.
(vi) Management Plan	As stated in Para. 1.3(d) of P.5, "Applicant had already submitted a Management Plan to the PCLB."	According to our record, a management plan was received lastly on 8.4.2025, but its content was totally different to this one submitted through TPB, in which quite a number of the policies proposed in Planning Statement e.g.: "mandatory visit by GMB", "internet memorial worship service for 1/F and 2/F", etc. were not mentioned in the management plan dated 8.4.2025 submitted to PCAO.

Table A Discrepancies for the niche information breakdown compared between planning statement and PCAO's record

Distribution of the sold and unsold niches at various floors of the application premises														
	Information provided in Planning Statement (P.5)							Existing PACO's record (as at 10.9.2021)						
	Single-urn			Double-urn			Total nos. of niches at respective floor	Single-urn			Double-urn			Total nos. of niches at respective floor
	Sold and occupied	Unsold	Sub-total	Sold and occupied	Unsold	Sub-total		Sold and occupied	Unsold	Sub-total	Sold and occupied	Unsold	Sub-total	
G/F	12	1,041	1,053	0	0	0	1,053	4	593	597	0	456	456	1,053
1/F	0	555	555	0	500	500	1,055	1	785	786	0	269	269	1,055
2/F	0	554	554	0	500	500	1,054	0	778	778	0	276	276	1,054
Total number of niches			2,162			1,000	3,162			2,161			1,001	3,162

Since the applicant has opted Alternative Approach (AA) for fulfilment of the BD's requirements, a copy of revised comment from BD re. AA [See attached file: 觀音堂 BD comment (24.4.2024).pdf], which was issued on 24.4.2024, was attached herewith for easy reference. In BD's comment, it clearly stated that applicant should require to implementation all those bounding conditions as mentioned in the Appendix IV of fire safety report.

See Attachment 1 of Annex I

Referring the Planning Statement and its appendices, some items therein were deviated from the bounding conditions as stated in the fire safety report in BD's revised comments on AA. Further clarification with the applicant on the following aspects is required:-

Issue concerned	Proposal in Planning Statement	Proposal in Fire Safety Report								
(a) Opening hours of PC	<p><u>Planning Statement</u> Para.4.2(a), page 12:</p> <p>Opening Hours Koon Yam Tong will open from 0900 to 1600 hours on weekdays, i.e. Monday to Friday, and be closed on Saturdays, and public holidays, including Ching Ming and Cheung Yeung Festivals Days.</p> <p><u>Management Plan</u> Item 3.1, page 2:</p> <p>3.1 Opening Hours</p> <ul style="list-style-type: none">• Ordinary Days: 9:00 AM to 4:00 PM (Monday to Friday, except Public Holidays)• Closed on: Saturday, Sunday and Public Holidays (including Ching Ming and Chung Yeung Festival Days)	<p><u>Page IV-6&7 of Fire Engineering Study Report</u></p> <p>2.2 The columbarium at G/F to 2/F will be opened to visitors by appointments to ensure proper control on occupant capacity. The opening hours are 9:00 a.m. to 4:00 p.m. for ordinary weekdays, ordinary Sundays and Public Holidays. For Festival Days, the opening hours are 7:30 a.m. to 4:00 p.m. The Festival Days are defined as</p> <p>位於地下至二樓的骨灰安置區域將通過預約的方式向訪客開放，以確保適當的容納人數控制。平日、星期日及公眾假期的開放時間為上午 9:00 至下午 4:00。“節日”開放時間為上午 7:30 至下午 4:00。“節日”定義為</p> <ul style="list-style-type: none">- 4 weekends (Saturday and Sunday) before the Ching Ming and Chung <p>Prepared by Arch & Fire Professional (ntf) Ltd. IV-6</p> <hr/> <p>Fotton ELA Architects Ltd. Fire Engineering Study on Koon Yam Tong</p> <p>Yeung Festival Days, 清明節和重陽節前的 4 個週末（週六和周日）</p> <ul style="list-style-type: none">- 4 weekends (Saturday and Sunday) after the Ching Ming and Chung Yeung Festival Days, and 清明節和重陽節後的 4 個週末（週六和周日），以及- Any public holidays within the 4 weekends before and 4 weekends after the Ching Ming and Chung Yeung Festival Days. 清明節及重陽節前 4 個週末及節後 4 個週末內的任何公眾假期。								
(b) Mode of Grave Sweeping	<p><u>Planning Statement</u> Para.4.2(b), page 12:</p> <p>Grave Sweeping In-person and Internet Memorial Service Only the 1,053 niches located on G/F will be available for on-site in-person grave sweeping and must be with prior appointment made. The Applicant will provide internet memorial service for the remaining 2,109 niches on 2/F and 3/F.</p> <p>Para.4.1(a), page 10:</p> <p>The entrance doors of 1/F and 2/F will be locked up at all time and those levels will only offer internet memorial worshipping service in the future.</p>	<p><u>Page IV-12 of Fire Engineering Study Report</u></p> <ul style="list-style-type: none">• Occupant Control 容納人數控制 <p>The maximum number of persons on each floor will be controlled exceed the following design occupant capacity:</p> <p>每層樓的人數應控制在以下設計可容納人數範圍內：</p> <table><tr><th>Floor 樓層</th><th>Design Occupant Capacity* 設計可容納人數</th></tr><tr><td>G/F 地下</td><td>10 max. 最多 10 人</td></tr><tr><td>1/F 一樓</td><td>10 max. 最多 10 人</td></tr><tr><td>2/F 二樓</td><td>10 max. 最多 10 人</td></tr></table> <p>Remarks: *Staff is included in the design occupant capacity. 備註：*工作人員包含在設計可容納人數中。</p> <p><u>Page IV-6 of Fire Engineering Study Report</u></p> <p>The columbarium at G/F to 2/F will be opened to visitors by appointments to ensure proper control on occupant capacity.</p>	Floor 樓層	Design Occupant Capacity* 設計可容納人數	G/F 地下	10 max. 最多 10 人	1/F 一樓	10 max. 最多 10 人	2/F 二樓	10 max. 最多 10 人
Floor 樓層	Design Occupant Capacity* 設計可容納人數									
G/F 地下	10 max. 最多 10 人									
1/F 一樓	10 max. 最多 10 人									
2/F 二樓	10 max. 最多 10 人									
(c) Transportation	<p><u>Planning Statement</u> Para.4.1(a), page 10:</p> <p>all visitors must pre-book with the Applicant and only go to/leave the NTEH by taking the existing public mini-bus service.</p> <p>The designated staff, i.e. the visitor escort coordinator who holds the NTEH's key, will meet the registered visitors at the GMB terminus at Tai Fung Street, Yuen Long, who will then accompany the visitors on the GMB ride to Koon Yam Tong.</p> <p>Para.4.2(d), page 12:</p> <p>Mandatory Visit by Green Minibus Service The Applicant will mandate all visitors to access Koon Yam Tong by GMB No. 33. The visitor escort coordinator will meet the registered visitors at the GMB terminus at Tai Fung Street, Yuen Long, who will then accompany the visitors on the GMB ride to Koon Yam Tong. The journey time is approximate 45 minutes.</p> <p><u>Management Plan</u> Item 3.2.2, page 2:</p> <p>In alignment with the facility's admission policies and transport strategy, the applicant will mandate that all visitors access the proposed columbarium exclusively via Green Minibus (GMB) Route No. 33. A designated staff member—holding the key to the premises—will meet registered visitors at the GMB terminus located at Tai Fung Street, Yuen Long (元朗, 泰豐街), and accompany them on the approximately 45-minute ride to the site. This escorted access system reinforces crowd control, enhances fire safety compliance, and ensures that the locked premises remain secure at all times.</p> <p>Item 4.1.1, page 3:</p> <p>To maintain order and minimize traffic congestion along Nim Wan Road, access is limited exclusively to Green Minibus No. 33, with no shuttle bus service arranged by the columbarium.</p>	<p><u>Page IV-13 of Fire Engineering Study Report</u></p> <ul style="list-style-type: none">- Free shuttle services will be provided during Festival Days between the columbarium building site and the MTR Tin Shui Wai Station. All grave sweepers are required to access the columbarium building site by shuttle service at MTR Tin Shui Wai Station, as it is the closest railway station from the columbarium building site and it is convenient to railway, bus, green minibus and light rail passengers. Visitors arriving by other modes of transport will be denied from entering the columbarium building site. <p>“節日”期間骨灰安置所與港鐵天水圍站之間將提供免費穿梭巴士服務。由於天水圍站是距骨灰安置所最近的港鐵站，方便港鐵、巴士、專線小巴及輕鐵乘客前往，所有祭拜人員須於港鐵天水圍站乘搭穿梭巴士前往骨灰安置所。乘坐其他交通工具抵達的到訪人員將被禁止進入骨灰安置所。</p>								

	<p><u>Item 4.1.2, page 3:</u></p> <p>Visitor access to the columbarium will be limited exclusively to Green Minibus No. 33, with no private vehicle entry or parking facilities provided. A designated staff member will escort visitors from the first GMB stop at Tai Fung Street in Yuen Long (元朗 泰豐街), traveling together to the columbarium in approximately 45 minutes.</p>									
(d) Visiting Capacity	<p><u>Planning Statement</u> <u>Para.4.2(f), page 13:</u></p> <p><u>Visiting Capacity</u></p> <p>Visiting capacity will be limited at 4 visitors per session, and the length of each session is 30 minutes, i.e. 8 visitors per hour.</p> <p>According to the "Fire Safety Management Plan" (FSMP) prepared for Koon Yam Tong, the maximum occupancy for G/F is 10 people at any one time.</p> <p>Hence, limiting the visiting capacity at 4 visitors per session is considered necessary to ensure no more than 10 people would occupy the G/F at any one time, of which shall include a departing group of 4 visitors and 1 staff, and an arriving group of 4 visitors and 1 staff at the time of turnover in between 2 sessions.</p>	<p>Page IV-12 of Fire Engineering Study Report</p> <p>• Occupant Control 容納人數控制</p> <p>The maximum number of persons on each floor will be controlled not to exceed the following design occupant capacity:</p> <p>每層樓的人數應控制在以下設計可容納人數範圍內:</p> <table border="1"> <thead> <tr> <th>Floor 樓層</th><th>Design Occupant Capacity* 設計可容納人數</th></tr> </thead> <tbody> <tr> <td>G/F 地下</td><td>10 max. 最多 10 人</td></tr> <tr> <td>1/F 一樓</td><td>10 max. 最多 10 人</td></tr> <tr> <td>2/F 二樓</td><td>10 max. 最多 10 人</td></tr> </tbody> </table> <p>Remarks: *Staff is included in the design occupant capacity. 備註: *工作人員包含在設計可容納人數中。</p> <p>Min. one staff (included in the maximum 10 persons per floor) will be deployed on each floor for population control. Visitors entering the building will be required to register their names, contacts, the arrival and leaving time on each floor. By this method, staff can control the number of visitors. In addition, these staff will also monitor the situation of the respective floor. In case of fire, these trained staff will take actions to direct occupants to evacuate according to the established fire evacuation strategies and provide timely assistance.</p>	Floor 樓層	Design Occupant Capacity* 設計可容納人數	G/F 地下	10 max. 最多 10 人	1/F 一樓	10 max. 最多 10 人	2/F 二樓	10 max. 最多 10 人
Floor 樓層	Design Occupant Capacity* 設計可容納人數									
G/F 地下	10 max. 最多 10 人									
1/F 一樓	10 max. 最多 10 人									
2/F 二樓	10 max. 最多 10 人									
(e) Fire Safety Management	<p><u>Planning Statement</u> <u>Para.4.3, page 14</u></p> <p>Burning of joss papers and candles is strictly prohibited within the application site. Only one smoke-free incense stick per niche owner is allowed to be lit within the building.</p>	<p>Page IV-12 of Fire Engineering Study Report</p> <p>- No smoking or naked flame is allowed. Burning of joss stick, joss paper, incense and candle is prohibited in the building.</p> <p>建築內禁止吸煙或使用明火。禁止在建築內燒香、燒紙、點燃熏香和蠟燭。</p>								

Apart from the above, the applicant is also required to clarify and provide the details on the following issues:-

Concerns	Items to be clarified
(a) Application premises	<ul style="list-style-type: none"> Advise the naming of floors of the application premises in Chinese and English, that is, G/F (地下), 1/F (一樓), 2/F (二樓) or G/F (地下), 1/F (二樓), 2/F (三樓) since such information in this current planning application is found different with the niches information dated 8.8.2018 submitted to PCAO;
(b) Internet memorial worshipping services	<ul style="list-style-type: none"> Clarify the floors at which only internet memorial worshipping services is allowed as the floors mentioned throughout the planning statement was inconsistent; Advise any terms and conditions will be specified in the sale agreement sample restricting those purchasers where the niches at upper floors that only the internet memorial worshipping services could be used. Please illustrate in detail how to get the service be implemented strictly;
(c) On-site in-person visit	<ul style="list-style-type: none"> Advise the total number of on-site visit sessions daily; Advise whether the visitor escort coordinator will accompany those visitors to leave the PC; if not affirmative, how to ensure all the visitors leave PC by taking the existing public mini-bus service;
(d) Provision of Portable Toilet	<ul style="list-style-type: none"> Since the applicant proposed to dismantle the existing male and female toilet and a portable toilet with 400 litre sewage capacity will be provided at the site, please advise the location of the portable toilet will be placed;
(e) Lodging of complaints from public	<ul style="list-style-type: none"> Since the management office will be changed to F.S. pump room and no staff will be stationed in the application premises, please advise how the public to lodge complaint to the staff direct (In-Person submission) as mentioned in page 14 of Appendix IV- Management Plan.

In addition, **comment** of Management Plan from PCAO was provided herewith for follow-up action by the applicant:-

[attachment "Comment on Management Plan of Koon Yam Tong (觀音堂)_PCAO.docx" deleted by Wilfred Ka Hing CHU/PLAND][attachment "觀音堂 BD comment (24.4.2024).pdf" deleted by Wilfred Ka Hing CHU/PLAND]

See Attachment 2 of Annex I ←

Attachment 1

(BD's Comments (24.4.2024))

MEMO

From Chief Building Surveyor/NTE1&L
Buildings Department
Ref. (86) in BD 1515/9024/17
Tel. No. 3842 3283
Fax. No. 3184 7960
E-mail rttkoo@bd.gov.hk
Date 14 April 2024

To Director of
Food and Environmental Hygiene
(Attn.: Head, Private Columbaria Affairs Office)
Your (14),(35) in FEHD PC 72-40/62/2018/034 Pt. 4 (Licence)
Ref.
dated 5.12.2022, 14.12.2023 Fax No. 2827 2908
e-mail. yunw@fehd.gov.hk
No. vwyau@fehd.gov.hk
Total (68),(70),(73),(75),(77),(80),(81),(83),(85)
Pages

**Application for Licence / ~~Exemption~~ / Temporary Suspension of Liability (TSOL)*
in respect of a Columbarium / Pre-cut-off Columbarium*
under the Private Columbaria Ordinance (PCO) (Cap. 630)**

(For niches sold before 30 June 2017 / For niches unsold as at before 30 June 2017)*

Name of Columbarium: 觀音堂
Name of Applicant: 嘉福服務有限公司
Address of Columbarium: No. 13 Nim Wan Road, Ha Pak Nai,
Lau Fau Shan, Yuen Long, New Territories
(Lot No. 118 in DD 135)

I refer to your MURs circulating the captioned application (including the fire safety assessment report and the supplementary documents submitted by the applicant in connection with the application).

2. Please refer to the enclosed Annex I and Appendices I, II and III (whenever applicable) for our comments on the Licence / ~~Exemption~~ / TSOL application for your consideration.
3. Please be advised that this memo supersedes all my previous memos under the same series. For enquiries concerning the above, please contact our Building Surveyor, SZETO Wai-pong, Toby at email address twpszeto@bd.gov.hk or at telephone number 3842 3301.

(KOO Wen-tien, Rosena)
for Chief Building Surveyor/NTE1&L
Buildings Department

c.c. FHB (Attn. PAS for Food & Health (Food)2) (Fax: 2136 3282)
DPO/TM&YLW (Fax: 2489 9711)
DLO/YL (Fax: 2473 3134)
D of FS (Fax: 2302 9023)
D of EP (Fax: 2838 3111)
C of P (Fax: 2856 2922)
C for T (Fax: 2381 3799)

BD 1515/9024/17 (TSOL)

* Delete where inapplicable.

ts - 263238, 280657

屋宇署對根據《私營骨灰安置所條例》(《條例》)(第630章)
就骨灰安置所 / 截算前骨灰安置所*提交的牌照申請的意見

(適用於2017年6月30日前已售出的龕位 /
適用於在2017年6月30日未售出的龕位)*

骨灰安置所名稱： 觀音堂
申請人姓名： 嘉福服務有限公司
骨灰安置所地址： No. 13 Nim Wan Road, Ha Pak Nai,
Lau Fau Shan, Yuen Long, New Territories
(Lot No. 118 in DD 135)

檔號： (14),(35) in FEHD PC 72-40/62/2018/034 Pt. 4 (Licence)

本署對題述申請(包括申請人就申請提交的建議圖則)的意見如下：

1. 是否有《條例》第 17 條所述的指明執法行動針對有關骨灰安置所？

[請在以下其中一個方格內加上✓號。]

- ☒ 沒有《條例》第 17 條所述按《建築物條例》採取的指明執法行動
針對有關骨灰安置所。
- ☐ 有《條例》第 17 條所述按《建築物條例》採取的指明執法行動針對
有關骨灰安置所，詳情載於附錄 3。

II. 牌照申請是否符合《條例》附表2訂明的關乎建築物的要求：

[請在以下其中一個方格內加上✓號。]

- ☐ 牌照申請符合《條例》內關乎建築物的要求。
- ☐ 牌照申請不符合《條例》內關乎建築物的要求，理由如下：

- ☒ 申請人須提供進一步資料，以便本署審核申請是否符合《條例》內
關乎建築物的要求。申請人須提供的資料載列於附錄 1(見第 IV 部)。

III. 對申請人就牌照申請提交的建議圖則的意見

[尤其請按《條例》附表 2 就建築物 / 構築物的分類提供意見。]

[請在以下其中一個方格內加上✓號。]

☐ 本署對上述牌照申請的建議圖則並無意見。

☒ 本署對上述牌照申請的建議圖則有以下意見：

申請人需向“骨灰所辦”提交修改圖則，以顯示附錄1(見第IV部)
的相關修訂，以供本署接納。

IV. 對將列入“須符合的的要求的通知書”內的要求的意見

[請在以下其中一個方格內加上✓號。]

☐ 就牌照的申請，本署對將列入“須符合的的要求的通知書”內的要求並無意見。

☒ 本署建議把附錄 1所載的要求列入發給申請人的“須符合的的要求的通知書”。

~~[註：如已根據《建築物條例》第 27A(1)條發出危險斜坡修葺令，但該命令未獲遵從，屋宇署可考慮是否應把這項命令納入附錄 1 或附錄 2。]~~

V. 建議對將發出的牌照(如批准)施加的條件

如私營骨灰安置所發牌委員會決定批准這宗申請，

[請在以下其中一個方格內加上✓號。]

☐ 本署建議對牌照施加附錄 2所載的條件。

☐ 本署對施加於牌照的條件並無任何建議。

☒ 本署會待牌照申請人報告已符合“須符合的的要求的通知書”內關乎建築物的要求後，才提出建議(見附錄1)。

VI. 訴訟程序

[請在以下其中一個方格內加上✓號。]

- ☒ 本署與上述申請指明文書的私營骨灰安置所或申請人現時沒有進行訴訟程序。
- ☐ 本署與上述申請指明文書的私營骨灰安置所或申請人現正進行訴訟程序，詳情如下：
-

VII. 其他意見

1. 上述意見只限於所提交的建議布局圖(圖則編號 002-005, 日期：2020 年 6 月 3 日)內有圖例標示的建築物(部份)，當中並不包括不屬於骨灰安置所牌照申請範圍部份。
2. 本署已於 2021 年 9 月 1 日就申請人／認可人士於 2020 年 10 月 12 日及 2020 年 10 月 20 日(2020 年 11 月 4 日轉交)提交的信件作出回覆(見附件)。
3. 本署於 2023 年 12 月 5 日經電郵收到申請人的認可人士代表就有關符合關乎建築物的規定提出採用替代方案。
4. 基於替代方案，本署可在不影響樓宇安全的前提下制定適當的補償及／或管理措施。本署已就相關安排於項目 4 提及的會議向申請人代表解釋，申請人代表於會議表示同意及了解。
5. 本署或會因應就樓宇結構安全方面的文件(附錄 1 (見第 IV 部))而修訂關乎建築物的要求。
6. 如就項目 5 的要求有任何疑問，請致電與本署結構工程師吳景雄先生(電話：3842 4975) 聯絡。
7. 申請人委任的認可人士提交的消防安全評估報告於 2024 年 3 月 6 日經消防安全委員會討論，有關認可人士及其代表亦有出席該會議，其後於 2024 年 4 月 3 日獲委員原則上不反對有關消防安全評估報告的建議。
8. 申請人須確保項目 7 所述的消防安全評估報告內附錄 IV – 消防安全管理計劃中第 2 部分提及的所有約束條件(見附頁)得以完整執行，

本署會待申請人報告已符合“須符合的要求的通知書”內關乎建築物的要求後，相應地建議發牌委員會於發出指明文書時施加有關條件。

9. 申請人或其認可人士於現場進行項目 7 有關的消防安全改善工程前須得到相關部門的批准/同意，並確保遵從所有相關法例要求。
10. 申請人／認可人士／註冊結構工程師須於符合關乎建築物的規定後，向發牌委員會提交符合規定證明書（詳情請參閱申請指引附件 4 附錄 III），再由發牌委員會送交屋宇署，以供抽樣審核。
11. 申請人須確保所提交的圖則中顯示的資料(如 豁免書申請範圍)與其他相關文件(如 豁免書申請摘要)的資料一致，須就當中不一致之處修改及提交以供私營骨灰安置所事務辦事處接納。本署或會就樓宇結構及安全方面相應地修訂關乎建築物的要求。如就項目 11 的要求有任何樓宇結構及安全疑問，請致電與本署屋宇測量師司徒煒邦先生(電話：3842 3301) 聯絡。

屋宇署向私營骨灰安置所事務辦事處提出上述意見的日期： 2024年4月24日

*刪去不適用者

1 Background 背景

- 1.1 Koon Yam Tong is developed as private columbarium building to meet the needs of local villagers and the general public.

觀音堂是一個為滿足當地村民及市民的需要而建立的私營骨灰安置所。

- 1.2 The building is served by only one staircase with winders, which cannot comply with relevant statutory requirements.

該建築只有一道帶斜踏的樓梯，不符合相關的法定要求。

- 1.3 By using fire engineering approach, alternative design solutions with enhanced fire safety measures are proposed to maintain the fire safety level of the building.

該建築設計使用消防工程學方法，採用替代設計方案及消防安全加強措施，以保持建築的消防安全水平。

- 1.4 As supporting document of the fire engineering study, the primary purpose of this FSMP is to ensure the enhanced fire safety measures proposed for the building can be effectively maintained, and to ensure the fire arrangements and procedures as mentioned in this FSMP can be fully implemented.

作為消防工程研究的支持文件，本計劃的主要目的是確保為該建築物提出的消防安全加強措施能够有效維持，並確保本計劃中提到的防火安排及程序能够得到充分實施。

2 Bounding Conditions 約束條件

只供識別之用
For the purpose of identification only

- 2.1 Any alteration will invalidate the fire engineering design results, and re-assessment on the fire safety level should be conducted.

任何變更都將使消防工程設計結果無效，應重新評估建築的消防安全等級。

- 2.2 The columbarium at G/F to 2/F will be opened to visitors by appointments to ensure proper control on occupant capacity. The opening hours are 9:00 a.m. to 4:00 p.m. for ordinary weekdays, ordinary Sundays and Public Holidays. For Festival Days, the opening hours are 7:30 a.m. to 4:00 p.m. The Festival Days are defined as

位於地下至二樓的骨灰安置區域將通過預約方式向訪客開放，以確保適當的容納人數控制。平日、星期日及公眾假期的開放時間為上午 9:00 至下午 4:00。“節日”開放時間為上午 7:30 至下午 4:00。“節日”定義為

- 4 weekends (Saturday and Sunday) before the Ching Ming and Chung

Yeung Festival Days,

清明節和重陽節前的 4 個週末（週六和周日）

- 4 weekends (Saturday and Sunday) after the Ching Ming and Chung Yeung Festival Days, and

清明節和重陽節後的 4 個週末（週六和周日），以及

- Any public holidays within the 4 weekends before and 4 weekends after the Ching Ming and Chung Yeung Festival Days.

清明節及重陽節前 4 個週末及節後 4 個週末內的任何公眾假期。

The maximum number of persons on each floor will be controlled not to exceed the following design occupant capacity:

每層樓的人數應控制在以下設計可容納人數範圍內：

Floor 樓層	Use 用途	Design Occupant Capacity* 設計可容納人數
G/F 地下	Columbarium, male toilet, female toilet, plant room 骨灰安置區域，男廁，女廁，機房	10 max. 最多 10 人
1/F 一樓	Columbarium 骨灰安置區域	10 max. 最多 10 人
2/F 二樓	Columbarium 骨灰安置區域	10 max. 最多 10 人

Remarks: *Staff is included in the design occupant capacity.

備註：*工作人員包含在設計可容納人數中。

- 2.3 Existing Fire Service Installations (FSI) provided for the building including fire extinguishers, exit signs and directional signs in accordance with the Codes of Practice for Minimum Fire Service Installations and Equipment and Inspection, Testing and Maintenance of Installations and Equipment (FSI CoP) [2] should be maintained.

建築內現有消防裝置，包括滅火筒、出口指示牌及方向指示牌，應予以維持。這些消防裝置符合《最低限度之消防裝置及設備與裝置及設備之檢查、測試及保養守則》[2] 的要求。

- 2.4 Apart from the existing FSI provided for the building including fire extinguishers, exit signs and directional signs, the following FSI should also be provided based on the minimum provision requirements on FSI in FSI CoP [2] for Institutional Low Rise Buildings:

除了現有消防裝置（包括滅火筒、出口指示牌及方向指示牌）外，還應根據《最低限度之消防裝置及設備與裝置及設備之檢查、測試及保養守則》[2] 低層社團建築物最低限度消防裝置要求提供以下消防裝置：

- **Emergency lighting 應急照明系統**

Emergency lighting will be provided throughout the entire building and all exit routes leading to ground level.

將于整個建築和通往地面的所有出口路線上提供應急照明。

- **Fire Alarm System 火警警報系統**

One actuating point and one audio warning device will be provided at each hose reel point. The manual fire alarm system will be incorporated in the hose reel system.

每個喉轆放置地點均須裝有啟動按鈕和聲響警報裝置各 1 個。人手操作火警警報系統將包含在喉轆系統內。

- **Visual Fire Alarm System 視像火警警報系統**

Visual Fire Alarm System will be provided in the common areas.

公用區域將提供視像火警警報系統。

- **Fire hydrant/hose reel system 消防栓／喉轆系統**

A hose reel sufficient to reach every part of the building by a length of not more than 30m of fire service hose reel tubing will be provided at each floor. 500 liters water tank serving the hose reel will be provided.

建築物每層每一部分均有喉轆膠喉可達，而且喉轆膠喉的長度不會超過 30 米。將為喉轆系統提供 500 公升水缸。

2.5 Fire Services and Safety Measures Enhancement 消防和安全加強措施

2.5.1 Sprinkler system and fire detection system 花灑系統和火警偵測系統

- **Improvised Direct Feed Sprinkler System with Fast-response Sprinkler Heads 使用快速感應型花灑頭的折衷式直接供水花灑系統**

Sprinkler system can effectively control fire spread within the building at its early development stage and prevent the occurrence of flashover. According to site conditions, improvised direct feed sprinkler system of the design hazard group 1 for the institutional low rise building will be provided to cover the whole building except FS pump room. Fast-response sprinkler heads will be used to shorten the actuation time. The sprinkler system will be fed by single end directly from town main. (Refer to Figure 5 to Figure 8 in Sec 4.2 of Fire Safety Assessment Report)

花灑系統可以在火災發展初期有效控制火災在建築物內的蔓延，並且防止閃燃的發生。根據場地條件，將參照低層社團建築物提供設計危險程度第一組的折衷式直接供水花灑系統，覆蓋除消防泵房外的整個建築。將使用快速感應型花灑頭來縮短啟動時間。花灑系統將通過單端直接從

街喉供水。（參見《消防安全評估報告》第 4.2 節圖 5 至圖 8）

- **Fire Detection System 火警偵測系統**

Fire detection system will be provided to cover the whole building for early warning of fire occurrence such that occupants will start evacuation promptly.

火警偵測系統將覆蓋整個建築，用於火災發生的早期預警，以便建築內的人員迅速啟動疏散。

Smoke detectors will be provided at the columbarium areas on G/F to 2/F. The max. horizontal distance between any point in a protected area and the detector nearest to that point will be reduced to 4.5m as enhancement, less than the required max. 7.5m coverage radius in BS 5839-1:2017 [5]. (Refer to Figure 9 to Figure 11 in Sec 4.2 of Fire Safety Assessment Report)

將在 G/F 至 2/F 的骨灰安置區域安裝煙霧探測器。作為增強措施，區域內任何一點與最靠近該點的探測器之間的最大水平距離將減少至 4.5m，小於 BS 5839-1:2017 [5] 中要求的最大 7.5m 的覆蓋半徑。（參見《消防安全評估報告》第 4.2 節圖 9 至圖 11）

Heat detectors will be provided at pump room.

泵房將配備熱力偵測器。

Fire detection signals including smoke detectors, heat detectors, sprinkler flow switches and break glass units will be linked to the Fire Services Communication Centre via direct link through the main Fire Alarm Control Panel.

火警訊號包括煙霧偵測器、熱力偵測器、花灑流水掣和火警鐘掣玻璃，將通過主火警控制板經直線電話傳送至消防處消防通訊中心。

2.5.2 Enhancement to the required staircase 逃生樓梯加強措施

The following enhancement to the required staircase will be carried out:

針對逃生樓梯將採取以下加強措施：

(i) handrails of height not less than 850mm and not more than 1100mm with projection not more than 90mm at each side of the staircase; (ii) tread surface will be firm and slip-resistant; (iii) adequate warning signs will be posted at the entrance to the staircase to alert occupants on the winders of the staircase; and (iv) the existing tread of not less than 225mm wide along a straight flight will be kept.

(i) 樓梯每一邊設置高度不小於 850mm 且不大於 1100mm 的扶手，扶手突出部分不應令樓梯的淨闊度減少多於 90mm；(ii) 樓梯級面應牢固且防滑；(iii) 樓梯入口處會張貼足夠的警告標誌，提醒使用樓梯的人員小心樓梯斜踏；以及 (iv) 將保持樓梯直段現有樓梯級面的闊度不小於 225mm。

2.5.3 Change of the exit Location of required staircase on G/F 更改逃生樓梯出口位置

The final discharge of the required staircase on G/F will be modified according to Figure 12 in Sec 4.2 of Fire Safety Assessment Report.

逃生樓梯的出口位置將根據《消防安全評估報告》第 4.2 節中的圖 12 進行改造。

2.5.4 Upgrading of separation walls and ceiling for F.S. pump room 消防泵房隔牆和天花板的陞級改造

The fire resisting construction of F.S. pump room will be upgraded to (-/120/120) F.R.R.

消防泵房的耐火結構將陞級至 (-/120/120) 耐火時效。

2.5.5 Upgrading of fire doors at required staircase 逃生樓梯防火門的陞級改造

All doors leading to required staircase will be upgraded to (-/60/60) F.R.R.

通往逃生樓梯的所有防火門將陞級至 (-/60/60) 耐火時效。

2.6 Management Enhancement 加強管理措施

Management measures such as good housekeeping, control of fire load, control of the number of occupants, regular fire drills and inspections, efficient action plan in case of fire, etc. can also be adopted to maintain a low fire risk.

可採取管理措施以維持較低的火災風險，包括良好的內務管理、控制燃燒負荷量、控制建築內人員人數、定期進行火警演習和巡查、制訂有效的火警行動計劃等。

- **Fire Load Control 燃燒負荷量控制**

- The building was constructed by concrete. At the columbarium area of each floor, there are only wall niches and offering tables.

本項目的建築使用混凝土建造。每層的骨灰安置區域內，只有骨灰龕位牆和供桌。

- Wall niches made of non-combustible materials including metal and stone panels.

骨灰龕位牆由不燃材料製成，包括金屬和石板。

- Offering tables made of non-combustible materials such as stainless steel.

供桌由不銹鋼等不燃材料製成。

- All decorations on site made of non-combustible materials.

骨灰安置區域內所有裝飾均由不燃材料製成。

- No combustibles or obstacles are allowed at the circulation area as illustrated from Figure 14 to Figure 16 in Sec 6.1.1 of Fire Safety Assessment Report as well as veranda, staircases and doorways, to keep escape routes clear and ensure smooth evacuation.

如《消防安全評估報告》第 6.1.1 節圖 14 至圖 16 所示，通道地方以及外廊、樓梯和門道不允許有任何可燃物或障礙物，以保持逃生路線暢通，確保疏散順暢進行。

- For the offering table placed in the premises, combustible items should not be accumulated to minimise the risk of direct blockage of exit by fire. Worshipping materials including flowers, food and their packaging material etc., could only be placed during worship. Management staff shall stay at the area and ensure worshippers to clear their worshipping materials before leaving the premises.

對於放置在骨灰安置區域內的供桌，不應堆積可燃物品，以最大限度降低火災直接堵塞出口的風險。祭拜物品包括鮮花、食物及其包裝材料等，只能在祭拜期間放置。管理人員應留在該區域內進行看顧，並確保祭拜者在離開前清理所有祭拜物品。

- As shown from Figure 14 to Figure 16 in Sec 6.1.1 of Fire Safety Assessment Report, no offering table would be placed near the exits. The nearest offering table is arranged to be placed about 5m away from the exit on G/F, and about 4.6m away from the exits on 1/F and 2/F. The offering tables are separated from each other by min. distance of 1m.

如《消防安全評估報告》第 6.1.1 節圖 14 至圖 16 所示，供桌不應擺放在出口附近。地下層距離出口最近的供桌佈置在距出口約 5 米處，一、二層距離出口最近的供桌佈置在距出口約 4.6 米處。供桌之間相

隔至少 1 米的距離。

- No smoking or naked flame is allowed. Burning of joss stick, joss paper, incense and candle is prohibited in the building.

建築內禁止吸烟或使用明火。禁止在建築內燒香、燒紙、點燃熏香和蠟燭。

- Custody services will be provided at open space outside the building for bulk belongings brought by visitors.

將在大樓外的空地為到訪人員提供大件物品保管服務。

- Rubbish bin will be placed outside the building and regularly being cleared to prevent waste accumulation.

垃圾桶將放置在建築外，並定期清理，以防止垃圾堆積。

● Occupant Control 容納人數控制

The maximum number of persons on each floor will be controlled not to exceed the following design occupant capacity:

每層樓的人數應控制在以下設計可容納人數範圍內：

Floor 樓層	Design Occupant Capacity* 設計可容納人數
G/F 地下	10 max. 最多 10 人
1/F 一樓	10 max. 最多 10 人
2/F 二樓	10 max. 最多 10 人

Remarks: *Staff is included in the design occupant capacity.
備註：*工作人員包含在設計可容納人數中。

Min. one staff (included in the maximum 10 persons per floor) will be deployed on each floor for population control. Visitors entering the building will be required to register their names, contacts, the arrival and leaving time on each floor. By this method, staff can control the number of visitors. In addition, these staff will also monitor the situation of the respective floor. In case of fire, these trained staff will take actions to direct occupants to evacuate according to the established fire evacuation strategies and provide timely assistance.

每層樓將至少部署一名工作人員進行人數控制（工作人員的數量包含在每層樓的設計可容納人數 10 人內）。進入大樓的人員需要在每層樓登記姓名、連絡人、到達和離開時間。通過這種方式，工作人員可以控制到訪人員的數量。此外，這些工作人員還將監察各自樓層的情況。一旦發

生火災，這些受過培訓的工作人員將採取行動，按照既定的火災疏散策略，指導人員進行疏散，並及時提供幫助。

For the Festival Days as defined in Sec 2.2 of this FSMP, more visitors than usual are expected. Special arrangement as follows will be adopted for occupant control:

本計劃第 2.2 節中定義的“節日”期間，預計會有比平時更多的到訪人員。將採用如下特殊安排進行人數控制：

- Mandatory visit-by-appointment policy will be implemented during Festival Days. Grave sweepers must register in advance by providing the date, time of visit and group size.

“節日”期間將實施強制預約政策。祭拜人員必須提前登記，並提供到訪日期、時間和團隊人數。

- Free shuttle services will be provided during Festival Days between the columbarium building site and the MTR Tin Shui Wai Station. All grave sweepers are required to access the columbarium building site by shuttle service at MTR Tin Shui Wai Station, as it is the closest railway station from the columbarium building site and it is convenient to railway, bus, green minibus and light rail passengers. Visitors arriving by other modes of transport will be denied from entering the columbarium building site.

“節日”期間骨灰安置所與港鐵天水圍站之間將提供免費穿梭巴士服務。由於天水圍站是距骨灰安置所最近的港鐵站，方便港鐵、巴士、專線小巴及輕鐵乘客前往，所有祭拜人員須於港鐵天水圍站乘搭穿梭巴士前往骨灰安置所。乘坐其他交通工具抵達的到訪人員將被禁止進入骨灰安置所。

- **Fire Prevention Measures 防火措施**

In order to reduce the chances of fire and blockage of escape routes, good housekeeping and precautionary measures should be maintained (see Sec 6 of this FSMP). Staff will be trained to regularly carry out inspections on escape route, access for firefighting and rescue, ignition source, safely use of electrical appliances, etc.

為減低火災發生和逃生路線被堵塞的風險，應保持良好的內務管理和火警預防措施（見本計劃第 6 節）。工作人員將接受培訓，定期對逃生路線、消防救援通道、火源、電器使用安全等進行巡查。

- **Inspection and Maintenance of FSI 消防裝置的檢查和保養**

The building management staff shall arrange routine inspection and maintenance of the FSI by Registered Fire Service Installation Contractors in accordance with the statutory requirements to maintain the fire safety provisions in good working conditions. (see Sec 5 of this FSMP)

管理人員應安排註冊消防裝置承辦商按照法定規定對消防裝置進行例行檢查和保養，以確保消防安全設施處於良好的運作狀態。（見本計劃第 5 節）

- **Fire Evacuation Strategy 消防疏散策略**

Fire evacuation strategy is established in Sec 4 of this FSMP, including the details of actions to alert the occupants and strategies to control the flow of the evacuees to assure safe evacuation in the event of fire.

本計劃第 4 節制訂了疏散策略，包括向建築內人員發出警報的行動細節和控制疏散人員流動的策略，以確保火災發生時的安全疏散。

- **Fire Drill and Staff Training 火警演習和員工培訓**

Each staff will be assigned with specific duties in the execution to implement the proposed management measures. Regular staff training should be conducted to ensure all staff have knowledge on their roles and responsibilities. (see Sec 4.4 of this FSMP)

在實施管理措施的過程中，每位員工都將被分配特定的職責。應定期對員工進行培訓，以確保所有員工都瞭解自己的角色和職責。（見本計劃第 4.4 節）

Fire drill shall be regularly arranged at half year intervals to enable staff to be familiar with the escape routes and the fire action plan. (see Sec 4.4 of this FSMP)

至少每半年安排一次定期火警演習，使工作人員熟悉逃生路線和火警行動計劃。（見本計劃第 4.4 節）

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3 **FSMP Objectives 消防安全管理計劃目標**

The FSMP aims at attaining the following objectives:

本消防安全管理計劃旨在實現以下目標：

- To ensure the fire safety provisions readily available and in good working conditions;

確保消防安全設施隨時可使用並處於良好的工作狀態；

- To assist the evacuation of building occupants to reach the ultimate place

根據《私營骨灰安置所條例》(第630章)
屋宇署建議列入“須符合的要求的通知書”內的關乎建築物的要求

就~~骨灰安置所~~ / 截算前骨灰安置所*申請牌照

(適用於2017年6月30日前已售出的龕位 /
適用於在2017年6月30日未售出的龕位)*~~-~~

骨灰安置所名稱： 觀音堂
申請人姓名： 嘉福服務有限公司
骨灰安置所地址： No. 13 Nim Wan Road, Ha Pak Nai,
Lau Fau Shan, Yuen Long, New Territories
(Lot No. 118 in DD 135)

Ref. (14),(35) in FEHD PC 72-40/62/2018/034 Pt.4 (Licence)

項目	申請人須符合的要求
1.	針對截算前骨灰安置所的替代方案 ¹ ，須由認可人士 / 註冊結構工程師提交補充結構安全核證 (參見附頁 - Supplementary Structural Certification)，以支持其替代評估方法。
2	針對截算前骨灰安置所的替代方案 ¹ ，須由申請人提交書面承諾 (參見附頁 - Undertaking for the Application)。
3	根據申請人的認可人士於2024年4月8日經電郵向本署提交的消防安全評估報告 (Fire Safety Assessment Report - Issue 5)進行包括消防安全及樓宇等改善工程。

屋宇署向私營骨灰安置所事務辦事處提出上述意見的日期：2024年4月²⁴日

*刪去不適用者

¹ 本署可在不影響樓宇安全的前提下制定適當的補償及／或管理措施，相應地建議發牌委員會於發出指明文書時施加條件 (例如 設定更頻密的檢核周期)。

☐ Urgent ☐ Return Receipt Requested ☐ Sign ☐ Encrypt ☐ Mark Subject Restricted ☐ Expand personal&public g



Re: Koon Yam Tong - Fire Safety Assessment Report

08/04/2024 12:05 PM

From: Info FotTON ELA <info@fottonela.com>
To: twpszeto@bd.gov.hk
Cc: HC Huang <huanghc@afp.com.hk>, Polly Cen <polly@afp.com.hk>, Yang Dan <yangdan@afp.com.hk>, kclam@fehd.gov.hk

1 個附件檔



Koon Yam Tong_FE report_20240328.pdf

Dear Mr. Szeto,

Please find the attached revised FSAR for your perusal and comments.

Regards,
Noel Perlado

On Mon, Mar 25, 2024 at 3:07 PM <twpszeto@bd.gov.hk> wrote:

Dear all,

Attached please kindly find the captioned FSAR with FSC comments for your review and amendment. Please feel free to discuss if necessary.

Thanks.

Regards,
SZETO Wai-pong, Toby
BS/Lic17
Tel: 3842 3301

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--

FotTON ELA Architects Limited

Tel.: 2651 3880

Fax: 2651 9999

Address: Address: Unit B1, 11/F, Cheung Kong Factory Building, 5 Cheung Shun Street
and 6 Cheung Yee Street, Cheung Sha Wan, Kowloon

**Supplementary Structural Safety Certification
for the Application for a *Licence / an Exemption
under the Private Columbaria Ordinance (Cap. 630)**

Name of Columbarium: _____

Address and Lot Description: _____

In accordance with the provisions of the Private Columbaria Ordinance (Cap. 630) (PCO), the Application Guide for Private Columbarium Licence and Other Specified Instruments issued by the Private Columbaria Licensing Board (the Guide) and Annexes 4 and 5 of the Guide (the Guidelines), I _____ (full name in English[#])
_____ (name in Chinese[#]), *Authorized Person^(Note 1) / *Registered Structural Engineer^(Note 2), *submitted a Form PCLU-1 on _____ (date) (if applicable) in respect of the above-named Pre-cut-off Columbarium (Pre-C) ^(Note 3). *In support of the Form PCLU-1 (if applicable), I hereby certify and declare as follows:

- ☐ The ground floor of the Pre-C is *a slab-on-grade / *subject to the minimum imposed loads of _____ kPa (i.e., 1 person per _____ m²) other than niches areas / *inaccessible to the public or visitors except for management personnel and niches storage.
- ☐ The 1/F and 2/F floor slabs of the Pre-C and associated buildings^(Note 5) are capable of withstanding the minimum imposed loads of _____ kPa (i.e., 1 person per _____ m²) other than niches areas, and the superimposed loads induced by niches storage^(Note 4), non-structural screeding on slabs to raise floor levels and heavy equipment / plants / sculptures, brick / solid walls, etc.

2. I confirm that the above information is true and correct and understand that all matters and information covered by this certification and all the supporting documents / information may be subject to further examination, auditing and verification by the Private Columbaria Licensing Board and the Buildings Department. If I provide information that is false or misleading in a material particular or furnish the Director of Food and Environmental Hygiene, an authorized officer or a public officer with information knowing that it is false or misleading in a material particular in this certification, I shall render myself liable to disciplinary action under section 7 of the Buildings Ordinance (Cap. 123) (BO) and/or other legal^(Note 6) penalties.

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Date

Signature[#] and full name of *Authorized Person /
*Registered Structural Engineer

Certificate of registration no. # : _____

Date of expiry of
registration# : _____

Correspondence address:

Contact telephone no.: _____

Contact fax no.: _____

Contact email address: _____

: In accordance with the registration record

* : Delete where inappropriate

☐ : Tick where applicable

Notes:

1. *Authorized Persons are those registered under section 3 of the BO.*
2. *Registered Structural Engineers are those registered under section 3 of the BO.*
3. *Pre-C means a columbarium that was in operation, and in which ashes were interred in niches, immediately before the cut-off time (i.e. 8 a.m. on 18 June 2014)*
4. *The height of all niches in the Pre-C is not greater than 3.3 m and the weight of niche material is not greater than 3.3 kN/m for each metre height. All niches are located immediately adjacent to the supports of reinforced concrete slabs.*
5. *If the Certifiable Building (CB)/Structure Certifiable for a Pre-cut-off Columbarium (SCPC) Areas only partly occupy CB / Non-compliant Structures (NCS), the associated buildings refer to those portions of the CB and NCS which have not been included in the application for licence / exemption as well as the structurally connected adjoining buildings and structures. The adjoining building or structures not forming part of the CB/SCPC Areas but with the Means of Escape of the CB/SCPC extended into should also be structurally assessed as associated buildings.*
6. *Relevant legislation includes but not limited to section 99 of the PCO.*

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**Undertaking for the Application for a *Licence / an Exemption
under the Private Columbaria Ordinance (Cap. 630)**

Name of Columbarium: _____

Address and Lot Description: _____

In accordance with the provisions of the Private Columbaria Ordinance (Cap. 630) (PCO) and the Application Guide for Private Columbarium Licence and Other Specified Instruments issued by the Private Columbaria Licensing Board (PCLB), I _____ (full name in English#)
_____ (name in Chinese#), submitted an application for *a Licence and/or * an Exemption on _____ (date) in respect of the above-named Pre-cut-off Columbarium^(Note). In support of my application, I hereby undertake to implement the following measures throughout the validity of the Licence and/or Exemption, if issued by the PCLB:

- ☐ Effective management to control the population of the floor/premises would not exceed the maximum allowable capacity as specified in the conditions imposed for the *Licence and/or Exemption.

Applicant's Signature: _____
Applicant's Name: _____
Applicant's Post: _____
Date of Signature: _____

Applicant's Chop#: _____

Note: Pre-cut-off Columbarium means a columbarium that was in operation, and in which ashes were interred in niches, immediately before the cut-off time (i.e. 8 a.m. on 18 June 2014)

* Delete where inappropriate

If the applicant is a body corporate

☐: Tick the box where applicable

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Attachment 2

(Comments on Management Plan)

PCAO's comments on the management plan of “Koon Yam Tong”:

Item (1) <u>Basic information of the columbarium</u>	
1	The address of the columbarium is not tally with the PCAO record. Please clarify or submit a revised version.
2	The applicant should state the year of tenancy.
Item (2) <u>Site information and building management</u>	
1	The site area is not tally with the Application Summary submitted. Please clarify or submit a revised version.
2	If portable toilet(s) is/are used, the applicant should state the cleansing frequency. [Remarks : As stated in page 11 of the “Planning Statement” that “ <i>Applicant is planned to dismantle the existing toilet facilities within the NTEH and a portable toilet will be provided within the site</i> ”.]
3	“Other buildings which are facilities necessary for or ancillary to the operation of the columbarium” and “Other facilities necessary for or ancillary to the operation of the columbarium” are not tally with the Application Summary submitted. Please clarify or submit a revised version.
Item (3) <u>Visitor Holding Capacity and Admission Control</u>	
1	The applicant should provide the information as stated in page 13 of the “Planning Statement” that “ <i>Visiting capacity will be limited at 4 visitors per session, and the length of each session is 30 minutes, i.e. 8 visitors per hour.</i> ”
2	The applicant should provide a time table to show visiting sessions of a day.
3	The applicant should exhibit the opening hours of the columbarium at the entrances and exits.
4	The applicant should provide the details on provision of internet memorial worshipping services for 1/F and 2/F of the columbarium. [Remarks : As stated in page 3 of the “Planning

	Statement” that “...while the 1/F and 2/F will only offer internet memorial worshipping service”.]
Item (6) Security Management	
1.	The applicant should clearly state the duty of the trained staff member for security and emergency management in the content of staff concerned in item 7.1 “Staffing”. Otherwise, the information in item 6.1 is not tally with the information in item 7.1.
Item (7) <u>Manpower Deployment</u>	
1	The applicant states at item 7.1 “Staffing” that the columbarium operates with one permanent staff and two part-time staff, but item 7.3 “Organization Chart” shows that the columbarium operates with one permanent staff and three part-time staff. The applicant should confirm and revise the number of staff employed at the columbarium in the above regard and amend accordingly.
2	<p>The applicant should provide appropriate information having regard to the actual circumstances of the private columbarium on the following:</p> <ul style="list-style-type: none"> ● The top management personnel (e.g.: general manager, chief executive officer, etc.), including their names, positions, contact telephone numbers, years of service, experience, duties and professional qualifications (if any); ● The years of service, experience, duties and professional qualifications of other managerial personnel (if any); ● Training such as first aid, etc. Equipment for the staff including first aid box, etc.
Item (8) <u>Contingency plans for emergencies</u>	
1	The applicant should provide the name, position and contact telephone number of the person-in-charge of the emergency cases.
2	The applicant should provide staff training and professional

	qualifications such as first aid etc .
3	The applicant should provide a clear escape route map showing escape routes and safe assembly points as well as give the escape route map a name.
Item (11) <u>Complaint Handling</u>	
1	The applicant should exhibit at conspicuous locations of the columbarium notices which provide to the public the job titles and telephone numbers of staff who can immediately handle enquiries and complaints.
Item (12) <u>Financial Plan</u>	
1	The applicant should clearly state the size and duty of the finance team in the content of staff concerned in item 7.1 “Staffing”. Otherwise, the information in item 12.4 is not tally with the information in item 7.1.
<i>Addition Information Items should be provided in the Management Plan :</i>	
<i>Item (a) <u>Measures to ensure compliance with licensing conditions, guidelines and codes of practice stipulated or issued by the Private Columbaria Licensing Board (PCLB)</u></i>	
1	<i>The applicants should state what measures will be taken to ensure that the columbarium is in compliance with the licensing conditions, guidelines and codes of practice stipulated or issued by the PCLB, including measures to ensure that the managerial and frontline staff are acquainted with such conditions, guidelines and codes of practice and relevant monitoring, recording and reporting arrangements to ensure compliance.</i>
<i>Item (b) <u>Persons responsible for the implementation and approval of management plan</u></i>	

1	<p><i>The applicant should provide the following information :</i></p> <ul style="list-style-type: none"> ● <i>The particulars of the person responsible for the implementation of the management plan (such as name, position, contact telephone number and email address);</i> ● <i>The particulars of the person responsible for approving the management plan (such as name, position, contact telephone number and email address).</i>
<p><i>Item (c) <u>Statement of Purpose (Made under the Personal Data (Privacy) Ordinance)</u></i></p>	
1	<p><i>The applicant should include the Statement of Purpose (Made under the Personal Data (Privacy) Ordinance) in the management plan.</i></p>

Comments from Food and Environmental Hygiene Department on Second Pre-submission



Fw: [Departmental Comments] Pre-submission for S12A application for Koon Yam Tong Columbarium at Ha Pak Nai

寄件者 Wilfred Ka Hing CHU/PLAND <wkhchu@pland.gov.hk>
日期 週五 2025-11-21 10:20
收件者 tocoplanning <tocoplanning@hotmail.com>
副本 Janet Hiu Nga FUNG/PLAND <jhnfung@pland.gov.hk>; Tracy Wing Sum LAW/PLAND <twslaw@pland.gov.hk>; Belva Yuen King TONG/PLAND <byktong@pland.gov.hk>

2 個附件 (7 MB)
觀音堂_Comment from BD re. Alternative Approach.pdf; 觀音堂 Amend FSAR to BD 20251014.pdf;

[Our Ref: PDYL 1/0/114]

Dear Sir/Madam,

Re your pre-submission dated 15.10.2025, please find the following comments from PCAO/FEHD for your information please.

PCAO/FEHD (Contact Officer: Mr. Raymond CHAN, Tel: 3141 1231)

2. The comments from PCAO/FEHD on the second round of pre-submission for Koon Yam Tong Columbarium are provided as below:

On Table 4.2 of the Planning Statement, a typo on single-urn unsold niche is noted:

Category	Size	G/F	1/F	2/F	Total
Occupied niches	Single-urn	4	0	0	4
	Double-urn	0	0	0	0
Sold niches but not yet occupied	Single-urn	0	0	0	0
	Double-urn	0	0	0	0
Niches available for sale	Single-urn	329	277	277	884 (typo, should be 883)
	Double-urn	112	0	0	112
Total		445	277	277	999

See Attachment 1 of Annex I

On Item A3 of Item 2.5 RtoC from FEHD of Appendix III, the applicant has opted Alternative Approach for fulfilment of the Building Department's (BD) requirements with comments stipulated on 24.4.2024 [(See attached file: 觀音堂_Comment from BD re. Alternative Approach.pdf)] to the applicant for compliance. It was noted that some measures proposed in the planning statement of this pre-submission are not completely conform with the bounding conditions outlined in the Appendix IV of fire safety report. Since the applicant has recently submitted an undertaking to BD direct on 14.10.2025 [(See attached file: 觀音堂 Amend FSAR to BD 20251014.pdf)] claiming that their adjustments in term of occupancy control, visitor admission, transport arrangement and fire service installation are to ensure compliance with relevant fire safety standard and does not compromise the integrity of the fire safety provision in the fire safety report, PCAO/FEHD offers no specific comment in this aspect subject to the further views from BD.

See Attachment 1 of Annex II

In addition, the following discrepancies were found in this pre-submission as compared with that in PCAO's record, clarification with the applicant is required:-

Issue concerned	Planning Statement	PCAO's Record
(i) Name of Applicant	Ka Fu Services Limited	Ka Fuk Services Limited
(ii) Address of application premises	No. 13 Nim Wan Road, Ha Pak Nai, Yuen Long	No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in DD 135)
(iii) Proposed plans	<ul style="list-style-type: none">As stated in Para. 4.1(a) of P.11, applicant intended to move the F.S. pump facilities to the roof level of the NTEH and the management office will remain on G/F.As shown in Plan E, the annotation of "Office" was marked at floor plan of G/F	<ul style="list-style-type: none">According to the latest revised plans submitted on 22.10.2025, the annotation of "FS Pump Room" was marked at floor plan of G/F (Plan No. 003)

Regarding the revised management plan of Appendix V, it considered acceptable and with no outstanding items. The applicant was required to clarify the following minor deviations/contradictions for our consideration:-

Issue concerned	Planning Statement	Management Plan
Name of Operator	Executive Summary: Ka Fu Services Limited (the Applicant), ... Para.1.1, page 1 Services Limited (the Applicant), ... Ka Fu	Item 1, page 1 Name of operator: Ka Fuk Services Limited Action required <ul style="list-style-type: none">Please clarify the name of operator
Address of application premises	---	Item 1, page 1 Address of the columbarium: No. 13 Nim Wan Road, Ha Pak Nai, Yuen Long, New Territories (Lot No. 118 in D.D. 135) (Remarks: as in PCAO's record, the application address should be No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in DD 135) Action required <ul style="list-style-type: none">Please clarify the address of application premises
Provision of shuttle service	Para.4.2, page 13 Internal transport facilities are not provided at present within the application site, and cannot be provided in future.	Item 12.2, page 23 <ul style="list-style-type: none">Sale or lease of interment rights, which include:<ul style="list-style-type: none">Management Fees: Cover routine maintenance, shuttle services, and operational needs. Action required <ul style="list-style-type: none">Please clarify if the shuttle services will be provided.
Burning of joss stick	Para.4.3, page 15 4.3 Environmental Proposal Burning of joss stick, joss papers, incense and candles are prohibited within the site. Koon Yam Tong will not involve burning of joss paper and offerings within or outside the NTEH.	Item 12.3, page 24 <ul style="list-style-type: none">Worship-Related Services:<ul style="list-style-type: none">Provide items such as flowers and joss sticks. Action required <ul style="list-style-type: none">It was given to know that burning of joss stick would be prohibited on site, please review whether joss sticks would be provided for the worship-related services.

Attachment 1

(Undertaking Letter to BD on 14.10.2025)



Your Ref. BD 1515/9024/17
Our Ref. 08/19067146
Date 14 Oct 2025

Buildings Department

Buildings Department Headquarters, North Tower,
West Kowloon Government Offices,
11 Hoi Ting Road, Yau Ma Tei, Kowloon
Attn: Mr. SZETO Wai Pong, Toby

Dear Mr. SZETO,

Re : S.12A Planning Application for Columbarium of Koon Yam Tong, No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in DD 135) - Undertaking on Management Plan Fire Safety Approach

I refer to the pre-submission of S.12A submitted by TOCO Planning Consultants Limited to the Planning Department dated 3 July 2025 for the captioned columbarium. I would like to confirm that the Management Plan as enclosed in the submission has been prepared with full reference to the Fire Engineering Report (Issue 5), which has been accepted by your department in year 2024. The recommendations and fire safety strategies outlined in the report form the basis of the operational and safety measures proposed in the Management Plan.

As demonstrated in the comparison table below, the Management Plan incorporates a number of operational controls that align with the Fire Engineering Report. These measures — including adjustments to occupancy limits, visitor access protocols, and transport arrangements — were primarily formulated in response to traffic-related considerations identified in the Traffic Impact Assessment (TIA), but they also contribute positively to fire safety and overall operational management. All other core recommendations from the Fire Engineering Report have been fully adopted.

In addition, as stated in the Planning Statement and supported by the findings of the TIA, the proposed arrangements have been formulated to better suit the planning intention of the relevant zoning of the site, with a view to minimizing traffic concerns in the surrounding area. These arrangements include:

- Implementing a mandatory year-round visit-by-appointment system, under which each group of up to 4 visitors per 30-minute time slot must hold a confirmed booking.
- Provision of internet worshipping services to all niche owners to reduce the number of site-visit appointments.



Your Ref. BD 1515/9024/17
Our Ref. 08/19067146
Date 14 Oct 2025

- Strong advised and recommended using Green Minibus Route No. 33.

- Changing the opening days to Monday through Friday only — from 7:00 am to 7:00 pm during the Ching Ming and Chung Yeung Festival periods (defined as the 4 weeks before and 4 weeks after each festival day), and from 9:00 am to 4:00 pm on all other weekdays outside these periods — with the site remaining closed on Saturdays, Sundays, and all public holidays.

- No car parking is available on-site or in the vicinity

These measures have been designed in response to the conclusions of the TIA, which confirms that, with such arrangements in place, the proposed development would not result in adverse traffic or pedestrian impacts and is acceptable from a traffic engineering perspective.

Furthermore, please note that the originally proposed Fire Services (FS) pump room will now be retained for office use. All FS installations, including the pumps and water tank, will be relocated to the rooftop of the building. This adjustment has been reviewed to ensure compliance with relevant fire safety standards and does not compromise the integrity of the fire safety provisions outlined in the Fire Engineering Report.

We trust that the Fire Engineering Report provides a comprehensive and sufficient foundation for the fire safety provisions, the changes in the Management Plan are minor but are for enhancement purpose. By all means, the safety level as worked out in the Fire Engineering Report would not be lowered due to the changes, and the operator remains committed to implementing these measures in full accordance with the report's guidance.

Yours faithfully,
Fotton ELA Architects Ltd.

Lee Siu Man Ervin
Authorized Person – List 1
Registered Architect

c.c. Toco Planning Consultants Limited



Your Ref. BD 1515/9024/17
Our Ref. 08/19067146
Date 14 Oct 2025

Key differences between
Fire Engineering Report (Issue 5) and Management Plan

	Aspect	FE Report Recommendation	Management Plan Proposal	Status
Occupancy Control	Max Occupants per Floor	Limit to 10 per floor (including staff to be stationed on each floor)	Limit to 4 Visitors per session (1 staff will be stationed in the building)	Modified
	Access Restriction	All floors accessible with a limit of 10 occupants per floor	All floors accessible but only one floor is allowed per session with a limit of 4 visitors	Modified
Visitor Admission	Appointment System	Recommend appointment-based access	Mandatory appointment system year-round	Fully Adopted
	Opening days and hours	On ordinary weekdays, Sundays, and public holidays. 9:00 a.m. to 4:00 p.m. On Festival Days — defined as the 4 weekends (Saturday and Sunday) before and after the Ching Ming and Chung Yeung Festival Days, as well as any public holidays within those 4-week periods—the hours are 7:30 a.m. to 4:00 p.m.	Monday through Friday only — from 7:00 am to 7:00 pm during the Ching Ming and Chung Yeung Festival periods (defined as the 4 weeks before and 4 weeks after each festival day), and from 9:00 am to 4:00 pm on all other weekdays outside these periods — with the site remaining closed on Saturdays, Sundays, and all public holidays.	Modified
Transport Arrangement	Private Vehicle Access	Not mentioned	Private Vehicle Access is discouraged. Access by public transport such as GMB No. 33 is encouraged	New Addition
	Transport Mode	Shuttle service during festivals	Encourage and advised via public transport	Modified
Fire Services Installation	FS Pump Room Location	FS pump room on G/F converted from existing office	FS pump room retained as office; FS pumps and water tank relocated to rooftop	Modified

Pre-submission
To rezoning a site from "Coastal Protection Area" to
"Government, Institution or Community"
at Lot 118 in D.D. 135, Ha Pak Nai, Yuen Long, New Territories

2. Please be advised that comments under the Buildings Ordinance (B.O.) from the licensing point of view are as follow:

- (i) the applicant's Authorized Person ("AP") submitted an explanatory letter, undertaking letter and email clarifications dated 4 November 2025, 14 October 2025 and 21 October 2025 respectively (all attached in Appendix I) regarding the proposed amendments to the bounding conditions stated in paragraphs 2.2 and 2.6 of Appendix IV (Fire Safety Management Plan) of the Fire Safety Assessment Report ("FSAR") accepted by the Fire Safety Committee on 6 March 2024 as well as refinement on wordings to pre-submission proposal in order to tally with the accepted FSAR. There is no objection in-principle to the proposed amendments provided that the FSAR should be revised accordingly with the endorsement by the AP and the fire engineering consultant for BD's acceptance under the licensing regime. Currently there is no such application has been received by this office; and
- (ii) our previous comments conveyed in paragraphs 2(i) to 2(iii), 2(v) and 3 of the email dated 29 August 2025 under f(55) in B.C. TP(NT) 8/36 PT.II are still applicable. Copies of which are attached in Appendix II for your information.

3. For further enquiry, please contact our Connie Wong, Building Surveyor/New Territories West 5, at 2626 1440.



FOTTON ELA ARCHITECTS LTD.
李兆民建築師有限公司

Appendix I
 (Total 14 pages)

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Your Ref. BD 1515/9024/17
 Our Ref. 09/19067146
 Date 4 Nov 2025

Buildings Department
 Buildings Department Headquarters, North Tower,
 West Kowloon Government Offices,
 11 Hoi Ting Road, Yau Ma Tei, Kowloon
 Attn: Mr. SZETO Wai Pong, Toby

Dear Mr. SZETO,

Re : S.12A Planning Application for Columbarium of Koon Yam Tong, No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in DD 135) - Undertaking on Management Plan Fire Safety Approach

I refer to the pre-submission of the S.12A Planning Application submitted by TOCO Planning Consultants Limited to the Planning Department, dated 3 July 2025 and 15 October 2025, for the captioned columbarium.

According to the email sent from you to Ms. Chan of PCAO on 24 October 2025, the Buildings Department (BD) has, in principle, no objection to the proposed amendments outlined in the undertaking letter and the subsequent clarifications submitted to BD on 14 October 2025 and 21 October 2025, respectively, by myself as the Authorized Person (AP) for this project.

I would like to further clarify that the following sections of the Management Plan submitted together with the abovementioned pre-submission dated 15 October 2025 shall be amended as follows:

Section 5.1 – Monitoring Capacity

Original Text:

"To ensure a controlled and safe environment, access is permitted across all three floors ... maintaining safety and comfort for all. And the maximum number of occupants will be limited to 10 per floor."

Amended Text:

"To ensure a controlled and safe environment, access is permitted across all three floors ... maintaining safety and comfort for all."

Section 9.2.2 – Staircase and Evacuation Enhancements

Original Text:

- *Handrails on Both Sides of the Staircase: To prevent accidents during evacuation.*

1 | Page



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Your Ref. BD 1515/9024/17

Our Ref. 08/19067146

Date 4 Nov 2025

- *Compensatory Measures for Staircase with Winder Steps:*
 - *Handrails (850–1100mm) with minimal projection*
 - *Slip-resistant tread surfaces and warning signs for winders*
 - *Retain tread width of at least 225mm for straight flights*
- *Exit Relocation on G/F (地下): Replacing an existing door with a new wall opening to improve evacuation flow*
- *Upgrade of Fire Doors: Doors leading to the required staircase upgraded to (-/60/60) F.R.R.*

Amended Text:

- *Handrails on Both Sides of the Staircase: To prevent accidents during evacuation.*
- *Compensatory Measures for Staircase and Mid Landing with Winder Steps:*
 - *Handrails will be installed at a height of not less than 850mm and not more than 1100mm, with a projection not exceeding 90mm on each side of the staircase.*
 - *The tread surface will be firm and slip-resistant.*
 - *Adequate warning signs will be posted at the entrance to the staircase to alert occupants about the presence of winders.*
 - *The existing tread width of not less than 225mm along the straight flight will be maintained.*
- *Exit Relocation on G/F (地下): Replacing an existing door with a new wall opening to improve evacuation flow.*
- *Upgrade of Fire Doors: Doors leading to the required staircase upgraded to (-/60/60) F.R.R.*

Moreover, since the location of the proposed FS pump room on G/F will remain unchanged - contrary to the undertaking letter sent to you with reference 08/19067146 dated 14 October 2025 - the table of key differences between the Fire Engineering Report (Issue 5) and the Management Plan shall be amended as attached.

We trust that this letter will serve as a thorough supplementary clarification.

Yours faithfully,
Fotton ELA Architects Ltd.

Lee Siu Man Ervin
Authorized Person – List 1
Registered Architect

c.c. Toco Planning Consultants Limited



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Your Ref. BD.1515/9024/17

Our Ref. 08/19067146

Date 4 Nov 2025

Key differences between

Fire Engineering Report (Issue 5) and Management Plan

	Aspect	FE Report Recommendation	Management Plan Proposal	Status
Occupancy Control	Max Occupants per Floor	Limit to 10 per floor (including staff to be stationed on each floor)	Limit to 4 Visitors per session (1 staff will be stationed in the building)	Modified
	Access Restriction	All floors accessible with a limit of 10 occupants per floor	All floors accessible but only one floor is allowed per session with a limit of 4 visitors	Modified
Visitor Admission	Appointment System	Recommend appointment-based access	Mandatory appointment system year-round	Fully Adopted
	Opening days and hours	On ordinary weekdays, Sundays, and public holidays, 9:00 a.m. to 4:00 p.m. On Festival Days — defined as the 4 weekends (Saturday and Sunday) before and after the Ching Ming and Chung Yeung Festival Days, as well as any public holidays within those 4-week periods — the hours are 7:30 a.m. to 4:00 p.m.	Monday through Friday only — from 7:00 am to 7:00 pm during the Ching Ming and Chung Yeung Festival periods (defined as the 4 weeks before and 4 weeks after each festival day), and from 9:00 am to 4:00 pm on all other weekdays outside these periods — with the site remaining closed on Saturdays, Sundays, and all public holidays.	Modified
Transport Arrangement	Private Vehicle Access	Not mentioned	Private Vehicle Access is discouraged. Access by public transport such as GMB No. 33 is encouraged	New Addition
	Transport Mode	Shuttle service during festivals	Encourage and advised via public transport	Modified



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Your Ref. BD 1515/9024/17
 Our Ref. 08/19067146
 Date 14 Oct 2025

Buildings Department

Buildings Department Headquarters, North Tower,
 West Kowloon Government Offices,
 11 Hoi Ting Road, Yau Ma Tei, Kowloon
 Attn: Mr. SZETO Wai Pong, Toby

Dear Mr. SZETO,

Re: S.12A Planning Application for Columbarium of Koon Yam Tong, No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in DD 135) - Undertaking on Management Plan Fire Safety Approach

I refer to the pre-submission of S.12A submitted by TOCO Planning Consultants Limited to the Planning Department dated 3 July 2025 for the captioned columbarium. I would like to confirm that the Management Plan as enclosed in the submission has been prepared with full reference to the Fire Engineering Report (Issue 5), which has been accepted by your department in year 2024. The recommendations and fire safety strategies outlined in the report form the basis of the operational and safety measures proposed in the Management Plan.

As demonstrated in the comparison table below, the Management Plan incorporates a number of operational controls that align with the Fire Engineering Report. These measures — including adjustments to occupancy limits, visitor access protocols, and transport arrangements — were primarily formulated in response to traffic-related considerations identified in the Traffic Impact Assessment (TIA), but they also contribute positively to fire safety and overall operational management. All other core recommendations from the Fire Engineering Report have been fully adopted.

In addition, as stated in the Planning Statement and supported by the findings of the TIA, the proposed arrangements have been formulated to better suit the planning intention of the relevant zoning of the site, with a view to minimizing traffic concerns in the surrounding area. These arrangements include:

- Implementing a mandatory year-round visit-by-appointment system, under which each group of up to 4 visitors per 30-minute time slot must hold a confirmed booking.
- Provision of internet worshipping services to all niche owners to reduce the number of site-visit appointments.



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ARCHITECTS-INTERIOR DESIGNERS-ENGINEERS-TOWN PLANNERS-DEVELOPMENT CONSULTANTS 建築及室內設計·城市規劃·物業發展顧問

Your Ref. BD 1515/9024/17
Our Ref. 08/19067146
Date 14 Oct 2025

- Strong advised and recommended using Green Minibus Route No. 33.

- Changing the opening days to Monday through Friday only — from 7:00 am to 7:00 pm during the Ching Ming and Chung Yeung Festival periods (defined as the 4 weeks before and 4 weeks after each festival day), and from 9:00 am to 4:00 pm on all other weekdays outside these periods — with the site remaining closed on Saturdays, Sundays, and all public holidays.

- No car parking is available on-site or in the vicinity

These measures have been designed in response to the conclusions of the TIA, which confirms that, with such arrangements in place, the proposed development would not result in adverse traffic or pedestrian impacts and is acceptable from a traffic engineering perspective.

Furthermore, please note that the originally proposed Fire Services (FS) pump room will now be retained for office use. All FS installations, including the pumps and water tank, will be relocated to the rooftop of the building. This adjustment has been reviewed to ensure compliance with relevant fire safety standards and does not compromise the integrity of the fire safety provisions outlined in the Fire Engineering Report.

We trust that the Fire Engineering Report provides a comprehensive and sufficient foundation for the fire safety provisions, the changes in the Management Plan are minor but are for enhancement purpose. By all means, the safety level as worked out in the Fire Engineering Report would not be lowered due to the changes, and the operator remains committed to implementing these measures in full accordance with the report's guidance.

Yours faithfully,
Fotton ELA Architects Ltd.

Lee Siu Man Ervin
Authorized Person — List 1
Registered Architect

c.c. Toco Planning Consultants Limited



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Your Ref. BD 1515/9024/17
Our Ref. 08/19067146
Date 14 Oct 2025

Key differences between Fire Engineering Report (Issue 5) and Management Plan

	Aspect	FE Report Recommendation	Management Plan Proposal	Status
Occupancy Control	Max Occupants per Floor	Limit to 10 per floor (including staff to be stationed on each floor)	Limit to 4 Visitors per session (1 staff will be stationed in the building)	Modified
	Access Restriction	All floors accessible with a limit of 10 occupants per floor	All floors accessible but only one floor is allowed per session with a limit of 4 visitors	Modified
Visitor Admission	Appointment System	Recommend appointment-based access	Mandatory appointment system year-round	Fully Adopted
	Opening days and hours	On ordinary weekdays, Sundays, and public holidays. 9:00 a.m. to 4:00 p.m. On Festival Days — defined as the 4 weekends (Saturday and Sunday) before and after the Ching Ming and Chung Yeung Festival Days, as well as any public holidays within those 4-week periods — the hours are 7:30 a.m. to 4:00 p.m.	Monday through Friday only — from 7:00 am to 7:00 pm during the Ching Ming and Chung Yeung Festival periods (defined as the 4 weeks before and 4 weeks after each festival day), and from 9:00 am to 4:00 pm on all other weekdays outside these periods — with the site remaining closed on Saturdays, Sundays, and all public holidays.	Modified
Transport Arrangement	Private Vehicle Access	Not mentioned	Private Vehicle Access is discouraged. Access by public transport such as GMB No. 33 is encouraged	New Addition
	Transport Mode	Shuttle service during festivals	Encourage and advised via public transport	Modified
Fire Services Installation	FS Pump Room Location	FS pump room on G/F converted from existing office	FS pump room retained as office; FS pumps and water tank relocated to rooftop	Modified

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy ☐Confidential

Toby WP SZETO/BD

寄件者: Info Fotton Ela <info@fottonela.com>
寄件日期: Tuesday, 21 October 2025 4:00 PM
收件者: Toby WP SZETO/BD
主旨: Re: Koon Yam Tong, No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories
附件: plans.pdf
類別: Internet Email

Dear Mr. Szeto,

This supersedes my earlier email today.

Referring to my email dated 14 October 2025, I am pleased to confirm that the layout of the subject columbarium as adopted in the Fire Engineering Assessment Report being accepted by the Building Authority will remain unchanged.

There will be no change for the location of the FS pump room being converted from the existing office.

A set of revised plans on which the number of urns to be reduced to 999 (the rest of the urns are to be blocked up) is enclosed for your perusal.

Should you have comments or require further information, please feel free to let me know at your convenience.

I apologise for any inconvenience caused.

Best Regards,
Ervin Lee

w/encl

On Tue, Oct 21, 2025 at 3:13 PM Toby WP SZETO/BD <twpszeto@bd.gov.hk> wrote:

Dear Mr Lee,

Knowing that you're out of office this afternoon, please kindly follow up the 2 items below:

1. Please specify in email if there is still any change for the location of the FS pump room (if it would remain on G/F by converting the existing office)

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2. Noted that there is a set of revised plan in your preceding email but seems there was no related attachment. Pls kindly confirm.

Feel free to discuss, thanks!

Regards,

SZETO Wai-pong, Toby

BS/Lic17

Tel: 3842 3301

From: Info Fotton Ela <info@fottonela.com>

Sent: Tuesday, October 21, 2025 12:30 PM

To: Toby WP SZETO/BD <twpszeto@bd.gov.hk>; tocoplanning <tocoplanning@hotmail.com>

Subject: Re: Koon Yam Tong, No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories

Dear Mr. Szeto,

Referring to my email dated 14 October 2025, I am pleased to confirm that the layout of the subject columbarium as adopted in the Fire Engineering Assessment Report being accepted by the Building Authority will remain unchanged.

A set of revised plans on which the number of urns to be reduced to 999 (the rest of the urns are to be blocked up) is enclosed for your perusal.

Should you have comments or require further information, please feel free to let me know at your convenience.

Best Regards,

Ervin Lee

On Tue, Oct 14, 2025 at 5:19 PM Info Fotton Ela <info@fottonela.com> wrote:

Dear Mr. Szeto,

Following my email sent to you on 18 August 2025, I am pleased to enclose a revised copy of the undertaking letter relating to the amendments made to the Fire Engineering Assessment, which was accepted by BD in 2024. For your advance information, a set of plans submitted to the PCAO of FEHD today is also attached.

As previously discussed, a revised Fire Engineering Assessment will be submitted following TPB's acceptance of the S12A submission for the subject columbarium. In the meantime, I would be most grateful if BD could confirm its

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acceptance of the aforementioned amendments to the Fire Engineering Assessment and indicate no objection to both the content of the amendments and the proposed arrangement for future submission.

Best regards,

Ervin LEE

On Mon, Aug 18, 2025 at 12:18 PM Info Fotton Ela <info@fottonela.com> wrote:

Dear Mr. Szeto,

Please find our revised letter dated 18 August, 2025 being self-explanatory.

Best Regards,
Ervin Lee

On Fri, Aug 15, 2025 at 2:59 PM Info Fotton Ela <info@fottonela.com> wrote:

Dear Mr. Szeto,

Please find my letter regarding changes in the Management Plan.

Best Regards,

Ervin Lee

Fotton ELA Architects Limited

Tel.: 2651 3880 Fax: 2651 9999

Address: Address: Unit B1, 11/F, Cheung Kong Factory Building, 5 Cheung Shun Street and 6 Cheung Yee Street, Cheung Sha Wan, Kowloon

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Fotton ELA Architects Limited

Tel.: 2651 3880 Fax: 2651 9999

Address: Address: Unit B1, 11/F, Cheung Kong Factory Building, 5 Cheung Shun Street and 6 Cheung Yee Street, Cheung Sha Wan, Kowloon

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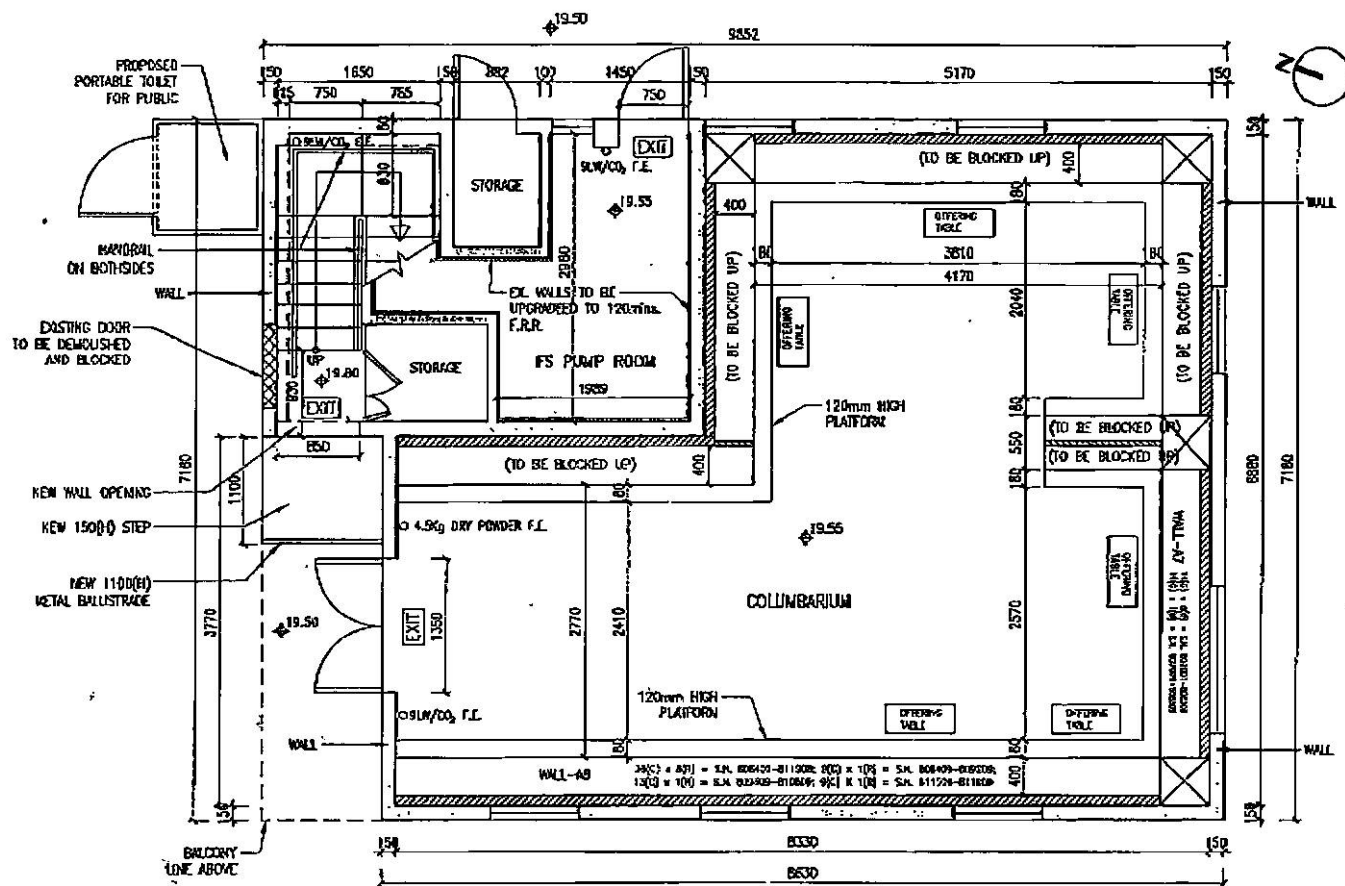
Address: Address: Unit B1, 11/F, Cheung Kong Factory Building, 5 Cheung Shun Street and 6 Cheung Yee Street, Cheung Sha Wan, Kowloon

Fotton ELA Architects Limited

Tel.: 2651 3880 Fax: 2651 9999

Address: Address: Unit B1, 11/F, Cheung Kong Factory Building, 5 Cheung Shun Street and 6 Cheung Yee Street, Cheung Sha Wan, Kowloon

Proposed Floor Plan
Application for Licence in Respect of Pre-cut-off Columbarium



TANG FU SING

Date (dd/mm/yyyy) Name and Signature of Applicant (if the applicant is a natural person) / Authorized Person (Authorized Partner)

C 245718 (S)

Hong Kong Identity Card Number / Travel Document Number

Chief of Body Corporate / Representative (if applicable)

* Must conform to the register under section 3 of the Buildings Ordinance (Cap. 123)

* Delete if inapplicable

Proposed Floor Plan of G/F (Plan No. 003)

Scale 1:50

Name of Columbarium: KOON YAM TONG (觀音堂)
Address: NO. 13 NIM WAN ROAD, LAU FAU SHAN, YUEN LONG, NEW TERRITORIES
(LOT NO. 118 IN DO 135)

LEE SIU MAN, ERWIN

Date (dd/mm/yyyy) Signature and Name of Authorized Person (Registered Structural Engineer) (Authorized Person / Registered Structural Engineer means a person registered under section 3 of the Building Ordinance (Cap. 123))

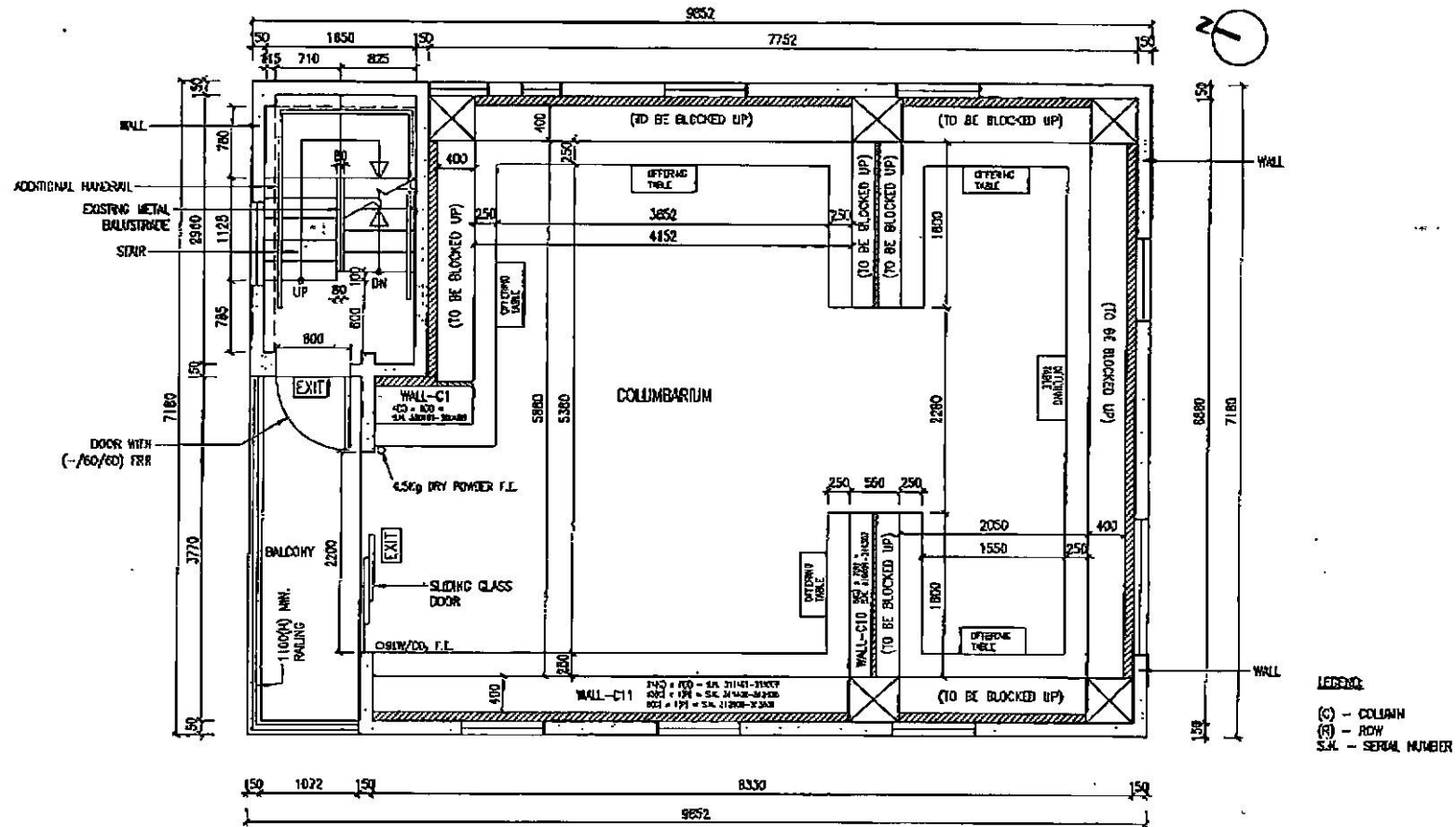
Registration Number: AP (A) 81/84

Date of Expiry of Registration: 31-12-2030

P-017

Date of Expiry of Registration: 31-12-2030

Proposed Floor Plan
Application for Licence in Respect of Pre-cut-off Columbarium



TANG FU SING

Date (dd/mm/yyyy) Name and Signature of Applicant (If the applicant is a natural person) / Authorized Person / Authorized Person

C 245718 (9)

Hong Kong Identity Card Number / Travel Document Number

Chop of Body Corporate / Partnership (if applicable)

a Must conform to the register under section 3 of the Buildings Ordinance (Cap. 123)
Delete if inapplicable

Proposed Floor Plan of 2/F (Plan No. 005)

Scale 1:50

Name of Columbarium: KOON YAM TONG (觀音堂)

Address: NO. 13 NIM YAN ROAD, LAU FAU SHAN, YUEN LONG, NEW TERRITORIES
(LOT NO. 11B IN OD 135)

LEE SIU MAN, ERVIN

Date (dd/mm/yyyy) Signature and Name of Authorized Person / Registered Structural Engineer (Authorized Person / Registered Structural Engineer means a person registered under section 3 of the Building Ordinance (Cap. 123))

Registration Number: AP (A) 81/84

Date of Expiry of Registration: 31-12-2030

			Columbarium Building A	Columbarium Building B	Columbarium Building C	Columbarium Building D	Columbarium Building E	Columbarium Building F	Total
(A) Ash interment capacity ⁽¹⁾	(i) To be permitted under licence	No. of niches	999						
		No. of sets of ashes that may be interred in the niches	1111						
	(ii) Situation as at COT ⁽²⁾	No. of niches	3162						
		No. of sets of ashes that may be interred in the niches	4163						
	(iii) Site situation as at the time of submitting application	No. of niches	3162						
		No. of sets of ashes that may be interred in the niches	4163						
(B) Ash interment right(s) sold as at the beginning of the enactment date ⁽³⁾		No. of niches	4						
		No. of sets of ashes interred in the niches	4						

Information on interment of at least 1 set of ashes in a niche immediately before the COT.	Serial no. of the niche	808809
	Date of interment of ashes	28 Feb 2013

Notes: (1) If ashes have been/will be interred otherwise than in niches in any area in the columbarium, please provide the related information separately.

(2) "Cut-off time" (COT) means 8 a.m. on 18 June 2014.

(3) Enactment date means 30 June 2017.

I TANG FU SING (name in English) confirm that all of the above niche information provided for this application is true and complete.

Date (dd/mm/yyyy) _____ Name and Signature of Applicant (if the applicant is a natural person)/
Authorized Person/Authorized Partner *

C245718(9)

Hong Kong Identity Card Number/Travel Document Number *

Chop of Body Corporate/Partnership* (if applicable)

* Must conform to the register under section 3 of the Buildings Ordinance (Cap.123)

* Delete if inapplicable

I LEE SIU MAN, ERVIN (name in English), being an authorized person/structural engineer* registered under section 3 of the Buildings Ordinance (Cap. 123), hereby certify that the following items in respect of the niche information provided in the above table are true and complete:

Item(A)(i) – The ash interment capacity "To be permitted under licence" conforms to the niche information accompanying the proposed Rear plan; and

Item(A)(iii) – The ash interment capacity as at the time of submitting application conforms to the current site situation.

Date (dd/mm/yyyy) _____ Signature and Name of Authorized Person/Registered Structural Engineer*

Registration Number: AP(A)81/84 Date of Expiry of Registration: 31 Dec 2030

Appendix II

寄件者: Connie CK WONG/BD
收件者: Wilfred Ka Hing CHU/PLAND; Toby WP SZETO/BD
副本: Yuen Man LQ/FEHD
主旨: Re: [Request for Comments from PLAND] Pre-submission for Koon Yam Tong Columbarium - Application for rezoning from "CPA" to "G/IC" at Lot 118 in D.D. 135, Ha Pak Nai, Yuen Long, New Territories
日期: Friday, 29 August 2025 4:26:00 PM
附件: [image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)

Dear Wilfred CHU,

Your email dated 12 August 2025 refers.

2. Comments from the licensing point of view under the Buildings Ordinance ("BO") on the proposal are as follow:

- (i) there is no in-principle objection under the BO to the proposed use on the application site;
- (ii) there is no record of approval by the Building Authority for the structures existing at the application site;
- (iii) the subject premises are subject to an application for Specified Instruments ("SI")¹ under the Private Columbaria Ordinance (Cap 630) ("PCO");
- (iv) the applicant's Authorized Person advised in his letter dated 18 August 2025 that the pre-submission proposal involves access restriction to 1/F and 2/F and there is a decrease on occupancy capacity, as compared with that in the Fire Engineering Report accepted by the Fire Safety Committee. Detailed building safety requirements will be provided separately upon receiving the relevant documents under the Licence application; and
- (v) a private columbarium eligible to apply for a SI under the PCO can be (a) a building or building works which complies with the requirements for approval and consent to the commencement of building works under section 14 of the BO; (b) a Certifiable Building ("CB")²; or (c) a part or the whole of Structures Certifiable for Pre-cut-off Columbarium ("SCPC")³. When the SCPC are covered by a SI or the application of such, they are not subject to the BD's enforcement under section 24(1) or 24C(1) of the BO on the ground of contravening section 14(1) of the BO. However, should they become dangerous or likely to cause danger, they will have to be removed under the relevant provisions of the BO.

3. The applicant's attention is drawn to the following points:

- (i) except for SCPC and CB, no part of a private columbarium shall be located under or over any structures built without the approval and consent of the BD;

- (ii) SCPC are UBWs and so are the building works to improve or strengthen such. Where building works for improvement is indispensable, the qualified professionals appointed by the applicant should prepare the improvement/strengthening proposal for acceptance by the PCLB or the BD under the licensing regime;
- (iii) If any building improvement works result in extending the size of the SCPC, such extensions might NOT be qualified as SCPC but UBWs actionable under the BO albeit covered by the application of an SI;
- (iv) If alteration of a NTSB resulting in size exceeding the exemption criteria under Cap. 121, e.g. addition of an external staircase or making openings between party walls of NTSBs combining two or more NTSBs, it will be ultra vires for the BD to process such alteration proposals under the PCO or the BO unless the relevant CoE is still valid;
- (v) After issuance of an SI, if unauthorised alteration works be identified without prior acceptance by the PCLB or the BD, such works will be regarded as UBWs but not covered by the SI. The BD would raise objection to the PCLB upon application for renewal of the SI, and such UBWs will be subject to enforcement under the BO for removal; and
- (vi) The applicant should provide certification issued by qualified professionals certifying that the requirements specified by PCLB and the BD are complied with. Annexes 4 and 5 of the "Application Guide for Private Columbarium Licence and Other Specified Instruments" are relevant.

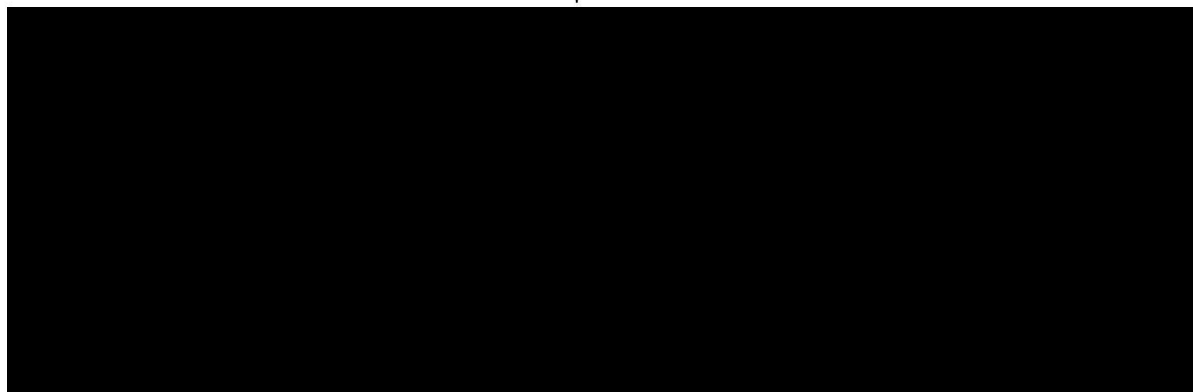
Foot notes

¹ As defined under section 2 of the PCO, which may be a Temporary Suspension of liability, an Exemption or a Licence.

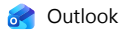
² As defined in section 3(3) of Schedule 2 to the PCO.

³ As defined in section 4 of Schedule 2 to the PCO which includes the ground storey of UBWs, or a New Territories Small Building ("NTSB") that came into existence on or after 16 October 1987 but not issued with Certificate of Exemption ("CoE") operating before the cut-off time and with ashes interred in niches.

Regards,
Connie WONG
Building Surveyor/NTW5
Building Department
Tel: 2626 1440



Discussions with Planning Department and Agriculture, Fisheries and Conservation Department



Re: [Departmental Comments] Pre-submission for S12A application for Koon Yam Tong Columbarium at Ha Pak Nai

寄件者 Wilfred Ka Hing CHU/PLAND <wkhchu@pland.gov.hk>

日期 週一 2025-12-15 12:03

收件者 tocoplanning <tocoplanning@hotmail.com>

副本 Janet Hiu Nga FUNG/PLAND <jhnfung@pland.gov.hk>; Belva Yuen King TONG/PLAND <byktong@pland.gov.hk>

[Our Ref: PDYL 1/0/114]

Dear Mr. Chan,

Please find the comments from FEHD and TD for your information please.

[FEHD \(Contact Officer: Mr. Raymond Chan – Tel: 3141 1231\)](#)

Please be informed that Private Columbaria Affairs Office (PCAO)/FEHD offered no comment on the revised operation hours proposed by the applicant.

[TD \(Contact Officer: Mr. Forrest NG – Tel: 2399 2422\)](#)

On the basis that the total applied number of niches has been revised from 3,162 to 999 in total, I have no comment on the pre-submission from traffic engineering point of view.

Thanks and Regards,
Wilfred CHU
TP/YLW4, TMYLW DPO, PlanD
Tel: 2158 6290



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From: Toco Planning Consultants Ltd TOCO <tocoplanning@hotmail.com>

Sent: Monday, December 8, 2025 2:47 PM

To: Wilfred Ka Hing CHU/PLAND <wkhchu@pland.gov.hk>

Subject: 回覆: [Departmental Comments] Pre-submission for S12A application for Koon Yam Tong Columbarium at Ha Pak Nai

Dear Wilfred,

Thank you for your email.

Correct. The proposed opening days as previously suggested in the pre-submissions remain unchanged (i.e. closed on Saturdays, Sundays and Public Holidays), and the newly proposed operation hours are:

- (a) 9am-4pm only apply to Monday to Friday (excluding public holidays) outside Festival Periods; and
- (b) 7am-5pm only apply to Monday to Friday (excluding public holidays) 4 weeks before and after Ching Ming and Chung Yeung Festival Days.

Regards,

Ted Chan
Toco Planning Consultants Ltd.

寄件者: Wilfred Ka Hing CHU/PLAND <wkhchu@pland.gov.hk>

寄件日期: 2025年12月8日 14:32

收件者: tocoplanning <tocoplanning@hotmail.com>

主旨: Re: [Departmental Comments] Pre-submission for S12A application for Koon Yam Tong Columbarium at Ha Pak Nai

Dear Mr. Chan,

While we note that the proposed operation hours have been revised, grateful if you would clarify on whether the opening days remain unchanged (i.e. the columbarium would be closed on Saturdays, Sundays and Public Holidays) and that the new operation hours:

- (a) 9am-4pm only apply to Monday to Friday (excluding public holidays) outside Festival Periods; and
- (b) 7am-5pm only apply to Monday to Friday (excluding public holidays) 4 weeks before and after Ching Ming and Chung Yeung Festival Days.

Thanks and Regards,
Wilfred CHU
TP/YLW4, TMYLW DPO, PlanD
Tel: 2158 6290



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回覆: [Departmental Comments] Pre-submission for S12A application for Koon Yam Tong Columbarium at Ha Pak Nai

寄件者 Toco Planning Consultants Ltd TOCO <tocoplanning@hotmail.com>
日期 週三 2025-12-03 14:37
收件者 azaria_ky_wong@afcd.gov.hk <azaria_ky_wong@afcd.gov.hk>
副本 Wilfred Ka Hing CHU/PLAND <wkhchu@pland.gov.hk>

Dear Dr. Wong,

Thank you for your email for your suggestion.

We have discussed with our Client and he agreed to the suggested operation hours. Hence we will revise the Planning Statement accordingly.

Regards,

Ted Chan

寄件者: azaria_ky_wong@afcd.gov.hk <azaria_ky_wong@afcd.gov.hk>
寄件日期: 2025年12月3日 09:18
收件者: Toco Planning Consultants Ltd TOCO <tocoplanning@hotmail.com>
副本: Wilfred Ka Hing CHU/PLAND <wkhchu@pland.gov.hk>
主旨: Re: [Departmental Comments] Pre-submission for S12A application for Koon Yam Tong Columbarium at Ha Pak Nai

Dear Mr. Chan,

I refer to your email of 26/11/2025.

Given that the surrounding area of the application site is rural and largely undisturbed, in additional to the proposed measures about lighting and "one-way window glass film" to minimize disturbances, please consider to restrict the visiting time to 9am-4pm throughout the year, and to 7am-5pm only for 4 weeks before and after the Ching Ming Festival and Chung Yeung Festival during the operation phase.

Regards,
Dr. Azaria K.Y. WONG
Nature Conservation Officer (Yuen Long)
Agriculture, Fisheries and Conservation Department
Tel: 2150 6932

From: "Toco Planning Consultants Ltd TOCO" <tocoplanning@hotmail.com>
To: "azaria_ky_wong@afcd.gov.hk" <azaria_ky_wong@afcd.gov.hk>
Cc: "Wilfred Ka Hing CHU/PLAND" <wkhchu@pland.gov.hk>
Date: 26/11/2025 17:53
Subject: [Departmental Comments] Pre-submission for S12A application for Koon Yam Tong Columbarium at Ha Pak Nai

Dear Dr. Wong,

We refer to your comments on our second planning pre-submission received via Planning Department's email on 21.11.2025 regarding the captioned.

Further to our phone conversation today, your concern on the proposed extended opening hours from 9am-4pm to 7am-7pm which will bring increase disturbances to the surrounding rural area especially during early morning and at dusk is well noted. Therefore, we propose to reduce the opening hours from 7am-7pm to 9am-7pm. The maximum daily visitors will be decreased from 96 to 80. In addition, we propose to reduce the lighting inside the building, and to provide one-way window glass film on each window in order to minimise disturbances to the surrounding area.

Should the above suggestion be acceptable from your office, we will revise the Planning Statement and submit the formal planning application in due course. Thank you for your attention and we look forward to your early favourable reply.

Yours faithfully,

Ted Chan
Toco Planning Consultants Ltd.

Existing Drainage Components Photos



Photo 1 – Existing gully and manhole



Photo 2 – existing underground pipe and U-channel covered in heavy vegetation

Existing Drainage Components Photos



Photo 3 – Existing U-channel

Existing Drainage Components Photos



Photo 4 – Existing U-channel covered in heavy vegetation

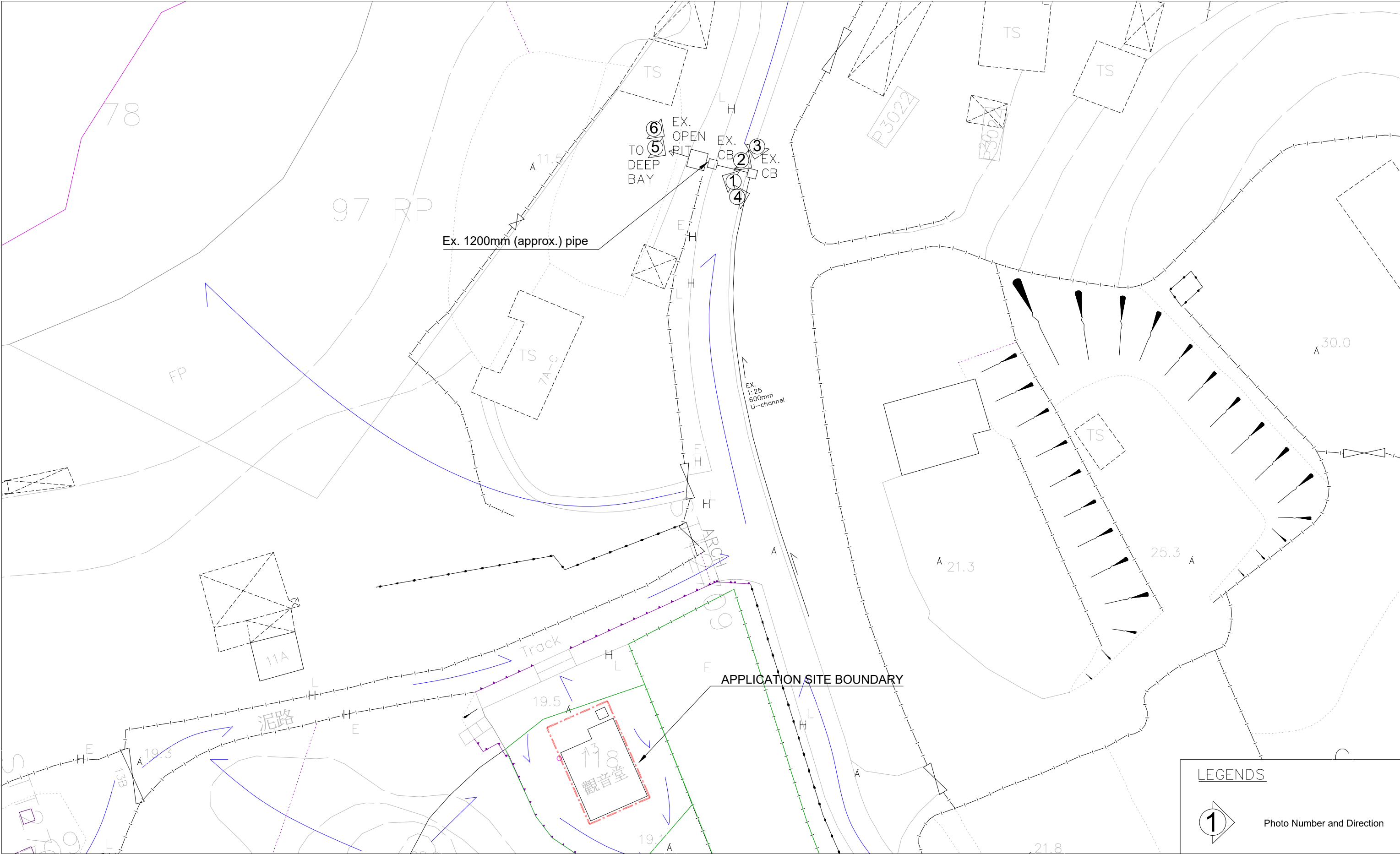


Photo 5 – Existing 1200mm (approx.) underground pipe and open drainage pit

Existing Drainage Components Photos



Photo 6 – Existing gully, manhole, 1200mm (approx.) underground pipe, and open drainage pit



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PROJECT

DRAINAGE PROPOSAL FOR TEMPORARY S.12A PLANNING APPLICATION
FOR KOON YAM TONG, NO. 13 NIM WAN ROAD HA PAK NAI, LAU FAU
SHAN, YUEN LONG, N.T. (LOT NO.118 IN DD135)

DRAWING TITLE

Photographic Record Index Plan

DRAWING NO.

SK-05

SCALE

1:400

PROJECT REF.

CAD REF.

Rev.	Date	Description	Drawn by	Checked by	Approved by
-	10SEP2025	SUBMISSION			

Z:\Fotton ELA Project\Fotton Project\New Territories\19067146 白泥觀音堂 Longlife\2025 Drainage Proposal\Drainage Proposal - U Channel Approach\combined topo maps u channel.dwg

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