

2025年12月30日

此文件在 2025-12-30 收到。城市規劃委員會
只會在收到所有必要的資料及文件後才正式確認收到
申請的日期。

Form No. S12A
表格第 S12A 號

The document is received on 2025-12-30
The Town Planning Board will formally acknowledge
the date of receipt of the application only upon receipt
of all the required information and documents.

**APPLICATION FOR
AMENDMENT OF PLAN UNDER SECTION 12A OF
THE TOWN PLANNING ORDINANCE
(CAP. 131)**

根據《城市規劃條例》(第131章)
第12A條遞交的修訂圖則申請

Applicant who would like to publish the notice of application in local newspapers to meet one of the Town Planning Board's requirements of taking reasonable steps to obtain consent of or give notification to the current land owner, please refer to the following link regarding publishing the notice in the designated newspapers:
https://www.tpb.gov.hk/en/plan_application/apply.html

申請人如欲在本地報章刊登申請通知，以採取城市規劃委員會就取得現行土地擁有人的同意或通知現行土地擁有人所指定的其中一項合理步驟，請瀏覽以下網址有關在指定的報章刊登通知：
https://www.tpb.gov.hk/tc/plan_application/apply.html

General Note and Annotation for the Form
填寫表格的一般指引及註解

"Current land owner" means any person whose name is registered in the Land Registry as that of an owner of the land to which the application relates, as at 6 weeks before the application is made
「現行土地擁有人」指在提出申請前六星期，其姓名或名稱已在土地註冊處註冊為該申請所關乎的土地的擁有人的人

& Please attach documentary proof 請夾附證明文件

^ Please insert number where appropriate 請在適當地方註明編號

Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

Please use separate sheets if the space provided is insufficient 如所提供的空間不足，請另頁說明

Please insert a 「✓」 at the appropriate box 請在適當的方格內上加上「✓」號

2502932

2025.12.19

By Hand

Form No. S12A 表格第 S12A 號

For Official Use Only 請勿填寫此欄	Application No. 申請編號	Y/TL-PN/12
	Date Received 收到日期	2025-12-30

- The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board (the Board), 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申請人須把填妥的申請表格及其他支持申請的文件 (倘有), 送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會(下稱「委員會」)秘書收。
- Please read the "Guidance Notes" carefully before you fill in this form. The document can be downloaded from the Board's website at <http://www.tpb.gov.hk/>. It can also be obtained from the Secretariat of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong (Tel: 2231 4810 or 2231 4835), and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories).
請先細閱《申請須知》的資料單張, 然後填寫此表格。該份文件可從委員會的網頁下載 (網址: <http://www.tpb.gov.hk/>), 亦可向委員會秘書處 (香港北角渣華道 333 號北角政府合署 15 樓 - 電話: 2231 4810 或 2231 4835) 及規劃署的規劃資料查詢處(熱線: 2231 5000) (香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓)索取。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters. The processing of the application may be refused if the required information or the required copies are incomplete.
此表格可從委員會的網頁下載, 亦可向委員會秘書處及規劃署的規劃資料查詢處索取。申請人須以打印方式或以正楷填寫表格。如果申請人所提交的資料或文件副本不齊全, 委員會可拒絕處理有關申請。

1. Name of Applicant 申請人姓名/名稱

(Mr. 先生 / Mrs. 夫人 / Miss 小姐 / Ms. 女士 / Company 公司 / Organisation 機構)

Ka Fuk Services Limited

嘉福服務有限公司

2. Name of Authorised Agent (if applicable) 獲授權代理人姓名/名稱 (如適用)

(Mr. 先生 / Mrs. 夫人 / Miss 小姐 / Ms. 女士 / Company 公司 / Organisation 機構)

Toco Planning Consultants Limited

達材都市規劃顧問有限公司

3. Application Site 申請地點

(a) Whether the application directly relates to any specific site?
申請是否直接與某地點有關?

Yes 是



No 否



(Please proceed to Part 4 請跳到第 4 部分填寫)

(b) Full address/ location/ demarcation district and lot number (if applicable)
詳細地址/地點/丈量約份及地段號碼 (如適用)

Lot No. 118 in D.D. 135, No.13 Nim Wan Road,
Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories

(c) Site Area 申請地點面積

.....92.9.....sq.m 平方米

About 約

(d) Area of Government land included (if any) 所包括的政府土地面積 (倘有)	----- N/A ----- sq.m 平方米 <input type="checkbox"/> About 約
(e) Current use(s) 現時用途	Columbarium Use (If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)

4. Eligibility of Applicant 申請人資格

The applicant 申請人 –

- (a) is a person whose name is registered in the Land Registry as that of the sole owner or one of the owners of any non-Government land within the application site, when this application is made[&] (if the applicant is the sole owner, there is no need to fill in Part 5).
(a) 是一名人士，其姓名或名稱於提出申請時已在土地註冊處註冊，該註冊顯示申請人為申請地點內任何非政府土地的唯一或其中一名擁有人[&] (如申請人為唯一擁有人，不用填寫第 5 部分)。
- (b) is a person who has obtained consent to this application from at least one owner as defined in (a) above[&].
(b) 是一名人士，已獲得最少一名上述 (a) 所界定的擁有人同意這宗申請[&]。
- (c) is a person who has obtained consent to this application from the Director of Lands in relation to any government land within the application site[&].
(c) 是一名人士，就這宗申請地點內的任何政府土地，已獲得地政總署署長同意這宗申請[&]。
- (d) is a public officer.
(d) 是公職人員。
- (e) is a public body as defined by section 2 of the Prevention of Bribery Ordinance (Cap. 201).
(e) 是《防止賄賂條例》(第 201 章)第 2 條所界定的公共機構。

5. Statement on Consent from/Notification to “Current Land Owner”[#] 就「現行土地擁有人」[#]的同意/通知土地擁有人的陳述

- (a) According to the record(s) of the Land Registry as at (DD/MM/YYYY), this application involves a total of “current land owner(s)”[#].
根據土地註冊處截至 年 月 日的記錄，這宗申請共牽涉 名「現行土地擁有人」[#]。
- (b) The applicant 申請人 –
 has obtained consent(s) of “current land owner(s)”[#].
已取得 名「現行土地擁有人」[#]的同意。

Details of consent of “current land owner(s)” [#] obtained 取得「現行土地擁有人」 [#] 同意的詳情		
No. of ‘Current Land Owner(s)’ 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where consent(s) has/have been obtained 根據土地註冊處記錄已獲得同意的地段號碼/處所地址	Date of consent obtained (DD/MM/YYYY) 取得同意的日期 (日/月/年)

(Please use separate sheets if the space of any box above is insufficient. 如上列任何方格的空間不足，請另頁說明)

- has notified “current land owner(s)”#
已通知 名「現行土地擁有人」#。

Details of the “current land owner(s)”# notified 已獲通知「現行土地擁有人」#的詳細資料		
No. of ‘Current Land Owner(s)’ 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where notification(s) has/have been given 根據土地註冊處記錄已發出通知的地段號碼/處所地址	Date of notification given (DD/MM/YYYY) 通知日期(日/月/年)

(Please use separate sheets if the space of any box above is insufficient. 如上列任何方格的空間不足，請另頁說明)

- has taken reasonable steps to obtain consent of or give notification to “current land owner(s):
已採取合理步驟以取得「現行土地擁有人」的同意或向該人發給通知。詳情如下：

Reasonable Steps to Obtain Consent of “Current Land Owner(s)”# 取得「現行土地擁有人」# 的同意所採取的合理步驟

- sent request for consent to the “current land owner(s)”#& on _____ (DD/MM/YYYY)
於 _____ (日/月/年)向每一名「現行土地擁有人」#郵遞要求同意書&

Reasonable Steps to Give Notification to “Current Land Owner(s)”# 向「現行土地擁有人」# 發出通知所採取的合理步驟

- published notices in local newspapers& on _____ (DD/MM/YYYY)
於 _____ (日/月/年)在指定報章就申請刊登一次通知&

- posted notice in a prominent position on or near application site/premises& on _____ (DD/MM/YYYY)
於 _____ (日/月/年)在申請地點/申請處所或附近的顯明位置貼出關於該申請的通知&

- sent notice to relevant owners’ corporation(s)/owners’ committee(s)/mutual aid committee(s)/management office(s) or rural committee& on _____ (DD/MM/YYYY)
於 _____ (日/月/年)把通知寄往相關的業主立案法團/業主委員會/互助委員會或管理處，或有關係的鄉事委員會&

Others 其他

- others (please specify)
其他(請指明)

Note: May insert more than one 「✓」.

Information should be provided on the basis of each and every lot (if applicable) and premises (if any) in respect of the application.

註: 可在多於一個方格內加上「✓」號

申請人須就申請涉及的每一地段(倘適用)及處所(倘有)分別提供資料

6. Plan Proposed to be Amended 擬議修訂的圖則

(a) Name and number of the related statutory plan(s) 有關法定圖則的名稱及編號	Approved Sheung Pak Nai and Ha Pak Nai Outline Zoning Plan No. S/YL-PN/9
(b) Land use zone(s) involved (if applicable) 涉及的土地用途地帶(如適用)	"Coastal Protection Area"

7. Proposed Amendments 擬議修訂

(a) Propose to rezone the application site to the following zone(s)/use(s)
(May insert more than one 「✓」) (Please illustrate the details on plan)

建議將申請地點的用途地帶改劃作下列地帶 / 用途
(可在多於一個方格內加上「✓」號)(請在圖則顯示詳情)

- | | |
|---|---|
| <input type="checkbox"/> Comprehensive Development Area []
綜合發展區 [] | <input type="checkbox"/> Commercial [] 商業 [] |
| <input type="checkbox"/> Residential (Group <input type="checkbox"/> A/ <input type="checkbox"/> B/ <input type="checkbox"/> C/ <input type="checkbox"/> D/ <input type="checkbox"/> E) []
住宅 (<input type="checkbox"/> 甲類 / <input type="checkbox"/> 乙類 / <input type="checkbox"/> 丙類 / <input type="checkbox"/> 丁類 / <input type="checkbox"/> 戊類) [] | <input type="checkbox"/> Village Type Development []
鄉村式發展 [] |
| <input type="checkbox"/> Agriculture [] 農業 [] | <input type="checkbox"/> Industrial [] 工業 [] |
| <input type="checkbox"/> Industrial (Group D) [] 工業 (丁類) [] | <input type="checkbox"/> Open Storage [] 露天貯物 [] |
| <input checked="" type="checkbox"/> Government, Institution or Community []
政府、機構或社區 [] | <input type="checkbox"/> Open Space [] 休憩用地 [] |
| <input type="checkbox"/> Recreation [] 康樂 [] | <input type="checkbox"/> Green Belt [] 綠化地帶 [] |
| <input type="checkbox"/> Country Park [] 郊野公園 [] | <input type="checkbox"/> Coastal Protection Area []
海岸保護區 [] |
| <input type="checkbox"/> Conservation Area [] 自然保育區 [] | <input type="checkbox"/> Site of Special Scientific Interest []
具特殊科學價值地點 [] |
| <input type="checkbox"/> Other Specified Uses (<input type="checkbox"/> Business/ <input type="checkbox"/> Industrial Estate/ <input type="checkbox"/> Mixed Use/ <input type="checkbox"/> Rural Use/ <input type="checkbox"/> Petrol Filling Station/
<input type="checkbox"/> Others (please specify _____)) []
其他指定用途 (<input type="checkbox"/> 商貿 / <input type="checkbox"/> 工業邨 / <input type="checkbox"/> 混合用途 / <input type="checkbox"/> 鄉郊用途 / <input type="checkbox"/> 加油站 /
<input type="checkbox"/> 其他 (請註明: _____)) [] | |
| <input type="checkbox"/> Road 道路 | <input type="checkbox"/> Others (please specify _____)
其他 (請註明: _____) |

Please insert subzone in [] as appropriate.
請於 [] 內註明支區，如適用。

(b) Propose to amend the Notes of the Plan(s) 建議修訂圖則的《註釋》

Covering Notes 《註釋》說明頁

Notes of the zone applicable to the Site 適用於申請地點土地用途地帶的《註釋》

Details of the proposed amendment(s) to the Notes of the Plan, where appropriate, are as follows:

(Please use separate sheets if the space below is insufficient)

建議修訂圖則的《註釋》的詳情，如適用：

(如下列空間不足，請另頁說明)

Please see attached Planning Statement.....

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Proposed Notes of Schedule of Uses of the zone attached
夾附對《註釋》的擬議修訂

8. Details of Proposed Amendment (if any) 擬議修訂詳情 (倘有)

Particulars of development are included in the Appendix.
附錄包括一個擬議發展的細節。

No specific development proposal is included in this application.
這宗申請並不包括任何指定的擬議發展計劃。

9. Justifications 理由

The applicant is invited to provide justifications in support of the application. Use separate sheets if necessary.
現請申請人提供申請理由及支持其申請的資料。如有需要請另頁說明。

Please see attached Planning Statement.....

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Blank lined area for text entry.

10. Declaration 聲明

I hereby declare that the particulars given in this application are correct and true to the best of my knowledge and belief.
本人謹此聲明，本人就這宗申請提交的資料，據本人所知及所信，均屬真實無誤。

I hereby grant a permission to the Board to copy all the materials submitted in this application and/or to upload such materials to the Board's website for browsing and downloading by the public free-of-charge at the Board's discretion.
本人現准許委員會酌情將本人就此申請所提交的所有資料複製及/或上載至委員會網站，供公眾免費瀏覽或下載。

Signature
簽署



Applicant 申請人 / Authorised Agent 獲授權代理人

CHAN TAT CHOI

Name in Block Letters
姓名（請以正楷填寫）

Managing Director

Position (if applicable)
職位（如適用）

Professional Qualification(s) Member 會員 / Fellow of 資深會員
專業資格

- HKIP 香港規劃師學會 / HKIA 香港建築師學會 /
 HKIS 香港測量師學會 / HKIE 香港工程師學會 /
 HKILA 香港園境師學會 / HKIUD 香港城市規劃師學會

RPP 註冊專業規劃師

Others 其他 ... MPIA



on behalf of
代表

Toco Planning Consultants Limited

Company 公司 / Organisation Name and Chop (if applicable) 機構名稱及蓋章（如適用）

Date 日期

19.12.2025

(DD/MM/YYYY 日/月/年)

Remark 備註

The materials submitted in this application and the Board's decision on the application would be disclosed to the public. Such materials would also be uploaded to the Board's website for browsing and free downloading by the public where the Board considers appropriate.

委員會會向公眾披露申請人所遞交的申請資料和委員會對申請所作的決定。在委員會認為合適的情況下，有關申請資料亦會上載至委員會網頁供公眾免費瀏覽及下載。

Warning 警告

Any person who knowingly or wilfully makes any statement or furnish any information in connection with this application, which is false in any material particular, shall be liable to an offence under the Crimes Ordinance.

任何人在明知或故意的情況下，就這宗申請提出在任何要項上是虛假的陳述或資料，即屬違反《刑事罪行條例》。

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this application will be used by the Secretary of the Board and Government departments for the following purposes:

委員會就這宗申請所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：

- (a) the processing of this application which includes making available the name of the applicant for public inspection when making available this application for public inspection; and
處理這宗申請，包括公布這宗申請供公眾查閱，同時公布申請人的姓名供公眾查閱；以及
- (b) facilitating communication between the applicant and the Secretary of the Board/Government departments.
方便申請人與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the applicant in this application may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

申請人就這宗申請提供的個人資料，或亦會向其他人士披露，以作上述第 1 段提及的用途。

3. An applicant has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.

根據《個人資料(私隱)條例》(第 486 章)的規定，申請人有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道 333 號北角政府合署 15 樓。

APPLICATION FOR AMENDMENT OF PLAN UNDER
SECTION 12A OF THE TOWN PLANNING ORDINANCE (CAP. 131)
根據城市規劃條例(第 131 章)第 12A 條遞交的修訂圖則申請

Development Proposal (only for indicative purpose)
擬議發展的發展計劃 (只作指示用途)

1. Development Proposal 擬議發展計劃

<input checked="" type="checkbox"/>	Proposed Gross floor area (GFA) 擬議總樓面面積195.12..... sq.m. 平方米	<input checked="" type="checkbox"/> About 約
<input checked="" type="checkbox"/>	Proposed plot ratio 擬議地積比率2.1.....	<input checked="" type="checkbox"/> About 約
<input checked="" type="checkbox"/>	Proposed site coverage 擬議上蓋面積70..... %	<input checked="" type="checkbox"/> About 約
<input checked="" type="checkbox"/>	Proposed number of blocks 擬議座數1.....	
<input checked="" type="checkbox"/>	Proposed number of storeys of each block 每座建築物的擬議層數3..... storeys 層	
		<input type="checkbox"/> include 包括.....storeys of basements 層地庫	
		<input type="checkbox"/> exclude 不包括.....storeys of basements 層地庫	
<input checked="" type="checkbox"/>	Proposed building height of each block 每座建築物的擬議高度7.6..... m 米	<input checked="" type="checkbox"/> About 約
	 mPD 米(主水平基準上)	<input type="checkbox"/> About 約
<input type="checkbox"/>	Domestic part 住用部分		
	GFA 總樓面面積 sq.m. 平方米	<input type="checkbox"/> About 約
	number of units 單位數目	
	average unit size 單位平均面積 sq.m. 平方米	<input type="checkbox"/> About 約
	estimated number of residents 估計住客數目	
<input checked="" type="checkbox"/>	Non-domestic part 非住用部分195.12..... sq.m.平方米	<input checked="" type="checkbox"/> About 約
<input type="checkbox"/>	hotel 酒店 sq.m.平方米	<input type="checkbox"/> About 約
		(please specify the number of rooms 請註明房間數目:.....)	
<input type="checkbox"/>	office 辦公室 sq.m.平方米	<input type="checkbox"/> About 約
<input type="checkbox"/>	shop and services/eating place 商店及服務行業/食肆 sq.m.平方米	<input type="checkbox"/> About 約
<input type="checkbox"/>	Government, institution or community facilities 政府、機構或社區設施	(please specify the use(s) and concerned land area(s)/GFA(s) (請註明用途及有關的地面面積/總樓面面積)	
<input checked="" type="checkbox"/>	other(s)其他	(please specify the use(s) and concerned land area(s)/GFA(s) (請註明用途及有關的地面面積/總樓面面積) Columbarium and ancillary uses: 195.12 sq.m.....	
<input type="checkbox"/>	Open space 休憩用地	(please specify land area(s)) (請註明面積)	
<input type="checkbox"/>	private open space 私人休憩用地 sq.m.平方米	<input type="checkbox"/> Not less than 不少於
<input type="checkbox"/>	public open space 公共休憩用地 sq.m.平方米	<input type="checkbox"/> Not less than 不少於

Transport-related facilities 與運輸有關的設施

parking spaces 停車位 (please specify type(s) and number(s))
(請註明種類及數目)

Private Car Parking Spaces 私家車車位

Motorcycle Parking Spaces 電單車車位

Light Goods Vehicle Parking Spaces 輕型貨車泊車位

Medium Goods Vehicle Parking Spaces 中型貨車泊車位

Heavy Goods Vehicle Parking Spaces 重型貨車泊車位

Others (Please Specify) 其他 (請列明)

loading/unloading spaces 上落客貨車位 (please specify type(s) and number(s))
(請註明種類及數目)

Taxi Spaces 的士車位

Coach Spaces 旅遊巴車位

Light Goods Vehicle Spaces 輕型貨車車位

Medium Goods Vehicle Spaces 中型貨車車位

Heavy Goods Vehicle Spaces 重型貨車車位

Others (Please Specify) 其他 (請列明)

other transport-related facilities (please specify type(s) and number(s))
(請註明種類及數目)

其他與運輸有關的設施

Use(s) of different floors (if applicable) 各樓層的用途(如適用)

[Block number] [座數]	[Floor(s)] [層數]	[Proposed use(s)] [擬議用途]
Building 1	G/F	Columbarium, F.S., Pump Room, Store Room, Access
	1/F	Columbarium, Access
	2/F	Columbarium, Access

Proposed use(s) of uncovered area (if any) 露天地方(倘有)的擬議用途

Portable toilet

.....

.....

.....

Any vehicular access to the site? 是否有車路通往地盤?

Yes 是 There is an existing access. (please indicate the street name, where appropriate)
有一條現有車路。(請註明道路名稱(如適用))
Nim Wan Road

There is a proposed access. (please illustrate on plan and specify the width)
有一條擬議車路。(請在圖則顯示，並註明車路的闊度)

No 否

For Development involving columbarium use, please complete the table in the Annex to this Appendix.
如發展涉及靈灰安置用途，請填妥於此附件後附錄的表格。

For Developments involving Columbarium Use, please also complete the following:
如發展涉及靈灰安置所用途，請另外填妥以下資料

Ash interment capacity 骨灰安放容量[@]

Maximum number of sets of ashes that may be interred in the niches 在龕位內最多可安放骨灰的數量	1,079
Maximum number of sets of ashes that may be interred other than in niches 在非龕位的範圍內最多可安放骨灰的數量	0
Total number of niches 龕位總數	967
Total number of single niches 單人龕位總數	855
Number of single niches (sold and occupied) 單人龕位數目 (已售並佔用)	4
Number of single niches (sold but unoccupied) 單人龕位數目 (已售但未佔用)	0
Number of single niches (residual for sale) 單人龕位數目 (待售)	851
Total number of double niches 雙人龕位總數	112
Number of double niches (sold and fully occupied) 雙人龕位數目 (已售並全部佔用)	0
Number of double niches (sold and partially occupied) 雙人龕位數目 (已售並部分佔用)	0
Number of double niches (sold but unoccupied) 雙人龕位數目 (已售但未佔用)	0
Number of double niches (residual for sale) 雙人龕位數目 (待售)	112
Total no. of niches other than single or double niches (please specify type) 除單人及雙人龕位外的其他龕位總數 (請列明類別)	0
Number of niches (sold and fully occupied) 龕位數目 (已售並全部佔用)	0
Number of niches (sold and partially occupied) 龕位數目 (已售並部分佔用)	0
Number of niches (sold but unoccupied) 龕位數目 (已售但未佔用)	0
Number of niches (residual for sale) 龕位數目 (待售)	0

Ordinary Days (outside Ching Ming and Chung Yeung Festive Periods):
Monday to Friday, 09:00 to 16:00

Proposed operating hours 擬議營運時間

Ching Ming and Chung Yeung Festive Periods (within 4 weeks before and after the Festival Days):
Monday to Friday, 07:00 to 17:00

Closed on:
Saturdays, Sundays, and Public Holidays (including Ching Ming and Chung Yeung Festival Days)

[@] Ash interment capacity in relation to a columbarium means –

就靈灰安置所而言，骨灰安放容量指：

- the maximum number of containers of ashes that may be interred in each niche in the columbarium;
每個龕位內可安放的骨灰容器的最高數目；
- the maximum number of sets of ashes that may be interred other than in niches in any area in the columbarium; and
在該靈灰安置所並非龕位的範圍內，總共最多可安放多少份骨灰；以及
- the total number of sets of ashes that may be interred in the columbarium.
在該骨灰安置所內，總共最多可安放多少份骨灰。

Gist of Application 申請摘要					
(Please provide details in both English and Chinese <u>as far as possible</u> . This part will be circulated to relevant consultees, uploaded to the Town Planning Board's Website for browsing and free downloading by the public and available at the Planning Enquiry Counters of the Planning Department for general information.) (請盡量以英文及中文填寫。此部分將會發送予相關諮詢人士、上載至城市規劃委員會網頁供公眾免費瀏覽及下載及於規劃署規劃資料查詢處供一般參閱。)					
Application No. 申請編號	(For Official Use Only) (請勿填寫此欄)				
Location/address 位置/地址	Lot No. 118 in D.D. 135, No.13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories 新界元朗流浮山下白泥稔灣路13號丈量約份第135約地段第118號				
Site area 地盤面積	92.9	sq. m 平方米	<input checked="" type="checkbox"/> About 約		
	(includes Government land of 包括政府土地	sq. m 平方米	<input type="checkbox"/> About 約)		
Plan 圖則	Approved Sheung Pak Nai and Ha Pak Nai Outline Zoning Plan No. S/YL-PN/9 上白泥及下白泥分區計劃大綱核准圖編號 S/YL-PN/9				
Zoning 地帶	"Coastal Protection Area" 「海岸保護區」				
Proposed Amendment(s) 擬議修訂	<input type="checkbox"/> Amend the Covering Notes of the Plan 修訂圖則《註釋》的說明頁 <input checked="" type="checkbox"/> Amend the Notes of the zone applicable to the site 修訂適用於申請地點土地用途地帶的《註釋》 <input checked="" type="checkbox"/> Rezone the application site from <u>"Coastal Protection Area"</u> to <u>"Government, Institution or Community"</u> 把申請地點由「海岸保護區」地帶改劃為「政府、機構或社區」				
Development Parameters (for indicative purpose only) 發展參數(只作指示用途)					
(i) Gross floor area and/or plot ratio 總樓面面積及/或地積比率		sq.m 平方米		Plot Ratio 地積比率	
	Domestic 住用	-	<input type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	-	<input type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
	Non-domestic 非住用	195.12	<input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	2.1	<input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
(ii) No. of block 幢數	Domestic 住用	-			
	Non-domestic 非住用	1			
	Composite 綜合用途	-			

(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	-	m 米 <input type="checkbox"/> (Not more than 不多於)
		-	mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)
		-	Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) (<input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
	Non-domestic 非住用	7.6	m 米 <input checked="" type="checkbox"/> (Not more than 不多於)
		-	mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)
		3	Storeys(s) 層 <input checked="" type="checkbox"/> (Not more than 不多於) (<input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
	Composite 綜合用途	-	m 米 <input type="checkbox"/> (Not more than 不多於)
		-	mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)
		-	Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) (<input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
(iv) Site coverage 上蓋面積	70	% <input checked="" type="checkbox"/> About 約	
(v) No. of units 單位數目	967 靈灰龕位 Columbarium Niches		
(vi) Open space 休憩用地	Private 私人	-	sq.m 平方米 <input type="checkbox"/> Not less than 不少於
	Public 公眾	-	sq.m 平方米 <input type="checkbox"/> Not less than 不少於

(vii) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數 Private Car Parking Spaces 私家車車位 Motorcycle Parking Spaces 電單車車位 Light Goods Vehicle Parking Spaces 輕型貨車泊車位 Medium Goods Vehicle Parking Spaces 中型貨車泊車位 Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 Others (Please Specify) 其他 (請列明) _____	-
	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位/停車處總數 Taxi Spaces 的士車位 Coach Spaces 旅遊巴車位 Light Goods Vehicle Spaces 輕型貨車車位 Medium Goods Vehicle Spaces 中型貨車車位 Heavy Goods Vehicle Spaces 重型貨車車位 Others (Please Specify) 其他 (請列明) _____	-

Submitted Plans, Drawings and Documents 提交的圖則、繪圖及文件		
	<u>Chinese</u> 中文	<u>English</u> 英文
Plans and Drawings 圖則及繪圖		
Master layout plan(s)/Layout plan(s) 總綱發展藍圖/布局設計圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Block plan(s) 樓宇位置圖	<input type="checkbox"/>	<input type="checkbox"/>
Floor plan(s) 樓宇平面圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sectional plan(s) 截視圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Elevation(s) 立視圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Photomontage(s) showing the proposed development 顯示擬議發展的合成照片	<input type="checkbox"/>	<input type="checkbox"/>
Master landscape plan(s)/Landscape plan(s) 園境設計總圖/園境設計圖	<input type="checkbox"/>	<input type="checkbox"/>
Others (please specify) 其他 (請註明)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Location Plan, Site and Land Status Plan, Proposed Amendments to the OZP, Historical Aerial Photo Plans,</u>		
<u>Land Use Compatibility Plan, Buffer Distance for CPA Plan, Assessment on Similar Case Plan</u>		
Reports 報告書		
Planning Statement/Justifications 規劃綱領/理據	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental assessment (noise, air and/or water pollutions) 環境評估 (噪音、空氣及/或水的污染)	<input type="checkbox"/>	<input type="checkbox"/>
Traffic impact assessment (on vehicles) 就車輛的交通影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on pedestrians) 就行人的交通影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Visual impact assessment 視覺影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Landscape impact assessment 景觀影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Tree Survey 樹木調查	<input type="checkbox"/>	<input type="checkbox"/>
Geotechnical impact assessment 土力影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Drainage impact assessment 排水影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Sewerage impact assessment 排污影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Risk Assessment 風險評估	<input type="checkbox"/>	<input type="checkbox"/>
Others (please specify) 其他 (請註明)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Drainage Proposal 排水建議, Management Plan 管理方案</u>		
Note: May insert more than one 「✓」. 註：可在多於一個方格內加上「✓」號		

Note: The information in the Gist of Application above is provided by the applicant for easy reference of the general public. Under no circumstances will the Town Planning Board accept any liabilities for the use of the information nor any inaccuracies or discrepancies of the information provided. In case of doubt, reference should always be made to the submission of the applicant.

註：上述申請摘要的資料是由申請人提供以方便市民大眾參考。對於所載資料在使用上的問題及文義上的歧異，城市規劃委員會概不負責。若有任何疑問，應查閱申請人提交的文件。

Section 12A Application

from “Coastal Protection Area” to “Government, Institution or Community”

for Regularisation of a Pre-cut-off Columbarium for Koon Yam Tong,

No.13 Nim Wan Road, Ha Pak Nai, Yuen Long

PLANNING STATEMENT



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Executive Summary

This planning application under section 12A of the Town Planning Ordinance (s.12A application) is submitted by Toco Planning Consultants Limited on behalf of Ka Fuk Services Limited (the Applicant), which is the operator of Koon Yam Tong in No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories. It is for the agreement of the Town Planning Board to amend the zoning of a site covering Lot No. 118 in D.D. 135 (the application site) from "Coastal Protection Area" ("CPA") to "Government, Institution or Community" ("G/IC") on the Approved Sheung Pak Nai and Ha Pak Nai Outline Zoning Plan (OZP) No. S/YL-PN/9. The proposed "G/IC" zone will facilitate the continual operation of the existing Pre-cut-off Columbarium with 967 niches in Koon Yam Tong.

The existing New Territories Exempted House (NTEH) on the application site was built in 1981 and has not been demolished or re-built. In view of the public demand for columbarium niche spaces in Hong Kong in the past 40 years, as well as the site suitability for columbarium use due to its isolated location, the NTEH has been renovated and operated as a columbarium under the name of Koon Yam Tong since 2010. In response to the requirement of Private Columbaria Ordinance (PCO) in 2017, the Applicant had submitted a private columbarium licensing application to the Private Columbaria Licensing Board 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 Temporary Suspension of Liability (TSOL) on 11.11.2021, and further obtained a 3 years extension for the TSOL on 8.11.2024. This s.12A application is submitted partly to comply with the licensing requirements under the PCO and partly to satisfy the town planning requirements.

Planning and technical assessments have indicated that this s.12A application is well justified. The application site is suitable for columbarium use as it is located at a secluded and tranquil location, and is far away from residential development. It is also visually obstructed by slopes and mature trees. This s.12A application will not propose any new building. The applied use is only confined within the NTEH which is small scale in nature, and is compatible with the surrounding rural character. In order to minimise any possible impact on technical aspects that may arise from the subject development, as well as to avoid any potential unnecessary disturbance to the surrounding area as far as practicable, the Applicant has proposed to largely reduce the number of niches in Koon Yam Tong to no more than 967 from originally 3,162. 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 are advised and encourage to go to and leave the NTEH by taking the existing public mini-bus service. 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 Festival and Chung Yeung Festival. The number of visitors per (30-minute) session will be limited to 4 persons only. 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.

In view of the above, the subject development will not result in any significant adverse impacts on land use, traffic, environmental, drainage, sewerage, landscape, visual and ecological aspects of the locality. Burning of joss papers is strictly prohibited within the site. Due to its secluded location, small scale, new measures and new policy initiatives, this application will not set an undesirable precedent for similar applications in the area. It will help meeting part of the urgent demand for columbarium niche spaces in Hong Kong. The internet memorial service provided by the Applicant can take of the filial descendants who emigrated overseas to pay respects to their ancestors.

行政摘要

(內容如有差異，應以英文版本為準)

嘉福服務有限公司 (申請人) 是新界元朗流浮山下白泥稔灣路 13 號觀音堂的經營者，現透過達材都市規劃顧問有限公司，根據城市規劃條例第 12A 條向城市規劃委員會遞交修訂圖則申請，將位於丈量約份第 135 約地段第 118 號 (申請地點)，由現時在上白泥及下白泥分區計劃大綱核准圖編號 S/YL-PN/9 內之「海岸保護區」改為「政府、機構或社區」，以協助將現時在觀音堂內的截算前骨灰安置所，當中存放的 967 個靈灰位能夠繼續運作。

申請地點內的現存新界豁免管制屋宇 (屋宇) 於 1981 年興建，至今再沒有拆卸或重建。鑒於公眾在過去 40 年來對骨灰位的需求，加上申請地點因位於偏遠地方而很適合作靈灰安置所用途，該屋宇於 2010 年進行翻新並改為現時名為觀音堂的靈灰安置所用途。申請人因應 2017 年私營骨灰安置所條例的要求，已於 2018 年 3 月 6 日就牌照事宜向私營骨灰安置所發牌委員會提交了私營骨灰安置所牌照申請 (牌照申請)，並已經符合了一系列的指定要求，最終在 2021 年 11 月 11 日獲得了原則上同意暫免法律責任書，及於 2024 年 11 月 8 日再獲得暫免法律責任書的三年延期。是次規劃申請是為了符合牌照申請的相關要求，同時亦符合城市規劃要求。

規劃及工程研究指出是次申請理據充分，申請地點寧靜隱蔽，四周被樹木和山坡所包圍，並與住宅發展相隔一段甚遠距離，所以很適合用作靈灰安置所用途。是次申請不會在申請地點加設新的建築物，而申請用途主要位於一座規模細小的新界豁免管制屋宇內，因此在土地利用上與周邊的鄉郊特色互相配合。為了在實際可行的範圍內減少任何就是次發展所產生有關技術方面的影響，以及避免對附近環境造成任何潛在不必要的滋擾，申請人擬將靈灰位數目由原先 3,162 大幅減至不多於 967。觀音堂將會實施全年性訪客預約及管理制，所有訪客必須與申請人預約及建議並鼓勵乘坐現有的公共小巴服務前往／離開屋宇。觀音堂的開放時間將改為星期一至五 (不包括公眾假期) 的早上 9 時至下午 4 時，以及改為只在清明節和重陽節的前後四星期的星期一至五 (不包括公眾假期) 的早上 7 時至下午 5 時，而每 (半小時) 節的訪客人數將限制至不多於 4 人。所有預約必須在最少兩天前進行，而觀音堂只會在有預約的情況下開放，否則會維持關門及沒有工作人員當值。

基於以上安排，本發展不會對本區及附近的土地利用、交通、環境、排水、排污、園景、視覺景觀及生態造成不良影響，申請地點範圍內嚴禁燃燒冥鏹。基於觀音堂隱蔽的位置、小規模、最新的管理改善建議和最新政策措施，本申請不會對同區的類似申請立下不良先例。相反，本申請能滿足公眾人士對骨灰存放位的強烈需求，而擬議網上思念拜祭服務亦能照顧到移居開外的孝子賢孫可以拜祭先人。

PART I- MAIN REPORT



1. INTRODUCTION

1.1 Purpose of Submission

This planning application under section 12A of the Town Planning Ordinance (s.12A application) is submitted by Toco Planning Consultants Limited on behalf of Ka Fuk Services Limited (the Applicant), which is the operator of Koon Yam Tong in No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (NT). It is for the agreement of the Town Planning Board (TPB / the Board) to amend the zoning of a site covering Lot No. 118 in D.D. 135 (the application site) from “Coastal Protection Area” (“CPA”) to “Government, Institution or Community” (“G/IC”) on the Approved Sheung Pak Nai and Ha Pak Nai Outline Zoning Plan (OZP) No. S/YL-PN/9 (see **Plan A**). The proposed “G/IC” zone will facilitate the continual operation of the existing Pre-cut-off Columbarium¹ with 967 niches in Koon Yam Tong.

1.2 The Application’s Background

The existing New Territories Exempted House (NTEH) on the application site was built in 1981 and has not been demolished or re-built. In view of the public demand for columbarium niche spaces in Hong Kong in the past 40 years, as well as the site suitability for columbarium use due to its isolated location, the NTEH has been renovated and operated as a columbarium under the name of Koon Yam Tong since 2010.

On 30.6.2017, the Private Columbaria Ordinance (PCO) came into effect to resolve properly the historic problems which have accumulated over the years regarding consumers who purchased niches from private columbaria. The Government is prepared to adopt a pragmatic and sensitive approach to resolve the Pre-cut-off Columbaria under a licensing scheme and all the private columbarium in Hong Kong must be either covered with a Licence or an Exemption (see **Appendix I**).

In response to the requirement of the PCO, 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 (see **Annex I** of **Appendix III**). 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 (see **Annex II** and **Annex III** of **Appendix III**). 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. Hence, this s.12A application is submitted partly to comply with the licensing requirements under the PCO and partly to satisfy the town planning requirements.

¹ “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 18.6.2014).



Plan A: Zoning and Location Plan

Extract of Approved Sheung Pak Nai & Ha Pak Nai Outline Zoning Plan

No. S/YL-PN/9

(Prepared on 16.6.2025)

1.3 The Improved Scheme in Responses to the TPB's Concerns

The application site and its adjoining Government land is the subject of a previous s.12A application (No. Y/YL-PN/7) for rezoning from "CPA" to "G/IC" for regularisation of columbarium development with 1,000 niches (hereafter refer as "the previous application"). The previous application was rejected by the Board on 3.2.2017 mainly on the grounds in relation to no strong justification for columbarium to be located in "CPA" zone, technical concern (i.e. traffic, landscape and ecological aspects) and precedent effect arising from the development.

Hence, the consultant team has comprehensively studied the previous application and the Applicant has made utmost effort to address the above TPB's concerns by way of a series of improvement measures. Two rounds of pre-submissions were submitted to the Planning Department (PlanD) on 3.7.2025 and 15.10.2025 respectively, and majority Government departments had no major comment on/ objection to the case (see **Appendix III**).

This Planning Statement has been updated accordingly by taking into account the departmental comments received from the PCL application, the previous s.12A application and the aforesaid pre-submissions. The improvement measures as proposed under this s.12A application are summarised as follows:

(a) Fully Comply with the Private Columbaria Ordinance

This s.12A application is intended to fully comply with the PCO's requirements. In order to tally with the requirement of PCL application, the development scheme under this s.12A application, including the proposed layout, the site boundary and the total number of niches, has been prepared entirely based on the latest proposed layout plan for the PCL application for Koon Yam Tong.

(b) Largely Reduce the Total Number of Niches

In order to further minimise any possible impact on traffic, environmental and ecological aspects that may arise from the subject development, the Applicant has decided to largely reduce the total number of niches in Koon Yam Tong from originally 3,162 to 967. Hence, the expected visitor demand per year for Koon Yam Tong will be significantly reduced. The Niche Information under Annex 13 of the PCL application have been updated and submitted to the PCLB on 17.12.2025.

(c) Site Boundary Improvement

The site boundary under this s.12A application has also been largely reduced, and it only covers the subject lot – no Government land has been involved. It is mostly covered by the NTEH, which has been established at the application site for nearly half a century. The present scheme does not involve any change in the overall form of the existing building, and will not propose any new building.

Considering there is no existing landscape resource within the site, significant adverse impact on the landscape resources is not anticipated.

(d) Proper Development Control

In order to regularise the Pre-cut-off Columbarium in Koon Yam Tong, but at the same time to respect some ecological sensitive areas nearby, it is proposed to amend the zoning of the application site to "G/IC" with only "Columbarium" to be placed under Column 1 of the schedule of uses, and no other uses to be put under Column 1 or Column 2 of the schedule of uses. Such proposal will also facilitate the Applicant to obtain the full Licence as soon as practicable by way of a streamline development control process. There will be sufficient control mechanism on details and technical requirements of the columbarium use under the licence regime of PCO.

(e) Traffic and Crowd Management Plan (TCMP)

A Traffic Impact Assessment (TIA) with a workable TCMP has been prepared by a reputable traffic consultant – CKM Asia Ltd. (see **Appendix IV**). In order to minimise traffic impact and to avoid any potential unnecessary disturbance to the surrounding area as far as practicable, an all-year-round-visit-by-appointment-and-management system will be implemented by Koon Yam Tong. All visitors are required to pre-book with the Applicant, and strongly advised and recommended to access the NTEH by the existing public mini-bus service. They will be reminded car parking is not available on site and in the vicinity.

All appointments must be made at least 2 days in advance. The number of visitors per (30-minute) session will be limited to 4 persons only. During the Ching Ming and Chung Yeung Festival Periods (within 4 weeks before and after Ching Ming and Chung Yeung Festival Days (the Festival Periods), the visitation period is from 7:00am to 5:00pm from Monday to Friday (excluding public holidays). Outside the Festival Periods, the visitation period is from 9:00am to 4:00pm on Monday to Friday (excluding public holidays). However, Koon Yam Tong opens only if there is confirmed visiting appointment, otherwise it remains closed with no staff on duty.

In order to be in line with the TIA, the Management Plan has been further updated (see **Appendix IV**), and has also been submitted to the PCLB on 17.12.2025. The Applicant will ensure that the future operation of Koon Yam Tong can be run in a safe, orderly and smooth fashion.

(f) Environmental Friendly Arrangement

According to the latest TCMP, all visitors are advised and encouraged to access the NTEH via the existing public transport, and the number of visitors per day will be minimal. Internet memorial service will be provided by the Applicant for all niche owners as an alternative option to in-person visitation.

Burning of joss stick, joss papers, incense and candles is prohibited within the site. Koon Yam Tong will not involve burning of joss paper and offerings within or outside the NTEH. The existing toilet within the NTEH are planned to be dismantled and a portable toilet will be provided within the site. In order to further minimise disturbances to the surrounding area, the Applicant proposes to reduce the lighting inside the building, and to provide one-way window glass film on each window.

Therefore, the subject development will not cause adverse environmental impacts to the surrounding area. A Drainage Proposal has been prepared to minimise the potential drainage impacts that may arise from the site (see **Appendix VI**).

Planning and technical assessments have indicated that this s.12A application is well justified based on the following reasons:

- (a) the NTEH has been in existence at the site since 1981, before the statutory town plan of the area came into force in 1990, and it has been renovated and operated as a columbarium since 2010;
- (b) this s.12A application is aimed at regularising the columbarium niches as at the cut-off-time (i.e. 8 a.m. on 18.6.2014), which is in line with the spirit of PCO to resolve the Pre-cut-off Columbarium under a pragmatic and sensitive approach;
- (c) it is also in line with the Government's intention to relieve part of the urgent demand for columbarium niche spaces in Hong Kong;
- (d) the internet memorial service provided by the Applicant can take of the filial descendants who emigrated overseas to pay respects to their ancestors;
- (e) the application site is suitable for columbarium use as it is located at a secluded and tranquil location, and is far away from residential development;
- (f) the columbarium is only confined within the NTEH which is small scale in nature, and is compatible with the surrounding rural character;
- (g) the total number of niches in Koon Yam Tong will be largely reduced from 3,162, thus the expected visitor demand per year for Koon Yam Tong will also be significantly reduced;
- (h) the application site, being hard paved and mostly occupied by a NTEH for a long period of time, has never functioned as Coastal Protection Area; it is surrounded by mature trees and located more than 100m from the coastline or at least 80m away from any potential ecological sensitive areas;
- (i) the proposed scheme represents a significant improvement over the previous scheme to address the TPB's concerns;
- (j) the small scale development will not result in any significant adverse impact on land use, traffic, visual, environmental, drainage, sewerage, landscape and ecological aspects of the locality; and
- (k) the proposed "G/IC" zone is tailor-made for Koon Yam Tong and it will not set a bad precedent for similar applications in the area in view of its secluded location, small scale, new measures and new policy initiatives.

The above planning justifications will be further elaborated in **Section 5**.

2. PLANNING BACKGROUND

The location, accessibility, site condition, adjacent land uses, planning history and land status of the application site will be presented in this section.

2.1 Site Location and Accessibility

The application site is located in No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, NT (see **Plan B**). It is situated at a secluded and tranquil area mainly surrounded by mature trees, vacant land, track and orchards, and is hardly visible from outside. A popular local temple, known as Kwun Yam Tin Kau Temple (觀音堂天后廟), is located about 50m west of the application site.

The application site is accessible by an existing footpath on the northern side leading to a track connecting Nim Wan Road, which eventually connects to Deep Bay Road. A green mini-bus (GMB) route No. 33 running along Nim Wan Road connecting Ha Pak Nai and Yuen Long New Town area. A minibus stop is available in Nim Wan Road, which is less 1 minute walking distance from the site.

2.2 Site Condition

The application site has a total site area of about 92.9m². It is mostly covered by a three-storey NTEH with a gross floor area (GFA) of about 195.12m². Since 2010, the existing NTEH at the site has been renovated and operated as a columbarium under the name of Koon Yam Tong (**Photo 1**). The columbarium portions are situated on all three floors (**Photo 2 - Photo 4**), while the management office and toilet facilities are located on G/F (**Photo 5** and **Photo 6**).

Currently, the ash interment capacity of Koon Yam Tong (i.e. 3,162 niches) has been based on that as at the cut-off time (i.e. immediately before 8 a.m. on 18.6.2014). Breakdown of niche information for Koon Yam Tong based on the Private Columbaria Affairs Office (PCAO)'s record dated 10.9.2021 is shown in **Table 2.1**. According to the information provided by the Applicant, an occupied niche on 1/F has been recently removed. Besides, in order to minimise the potential traffic impact, the total number of niches will be reduced and some columbarium walls will be sealed off in future.

Table 2.1: Breakdown of Niches Information for Koon Yam Tong as at 10.9.2021

Category	Size	G/F	1/F	2/F	Total
Occupied niches	Single-urn	4	1	0	5
	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	593	785	778	2,156
	Double-urn	456	269	276	1,001
Total		1,053	1,055	1,054	3,162



Photo 1: Koon Yam Tong.



Photo 2: G/F of NTEH.



Photo 3: 1/F of NTEH.



Photo 4: 2/F of NTEH.

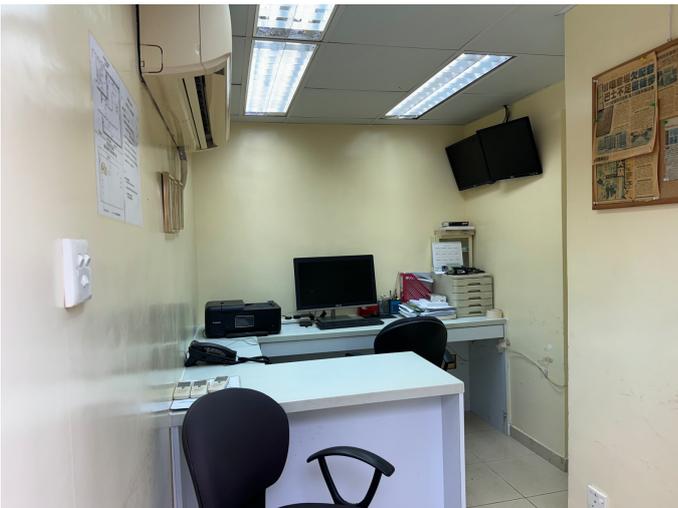


Photo 5: Management office.



Photo 6: Toilet.



Site Photos

(See Plan B for Visual Points)

(Prepared on 16.6.2025)



Photo 7: Existing footpath leading a track.



Photo 8: Track connects to Nim Wan Road.



Photo 9: Nim Wan Road.



Photo 10: Minibus Stop.



Photo 11: Vacant land connecting Nim Wan Road.



Photo 12: Kwun Yam Tin Kau Temple.



Site Photos (2)

(See Plan B for Visual Points)

(Prepared on 16.6.2025)

2.3 Adjacent Land Uses

The surrounding areas have the following characteristics:

- (a) North – An existing footpath (**Photo 7**) is located on the northern side of the site leading to a track (**Photo 8**), which connects to Nim Wan Road (**Photo 9**). Further north of the site across the track are some scattered rural residential dwellings and orchards.
- (b) East – Further east of the site across the orchards is the Nim Wan Road. A minibus stop is located about 20m northeast of the site along Nim Wan Road (**Photo 10**).
- (c) South – To the immediate south of the site is a piece of vacant land (**Photo 11**) connecting Nim Wan Road. To the further south is a latrine and orchards.
- (d) West – A Kwun Yam Tin Kau Temple (**Photo 12**) is located about 50m west of the site across the small knoll with mature trees. It comprises a Tin Hau Temple, a Kwun Yam Temple, a Jade Emperor Hall and a 6-storey pagoda.

2.4 Planning History

The application site falls within the "CPA" zone on the Approved Sheung Pak Nai and Ha Pak Nai OZP No. S/YL-PN/9 (see **Plan A**). According to the Notes of the OZP, the planning intention of this zone is intended to conserve, protect and retain the natural coastlines and the sensitive coastal natural environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological value, with a minimum of built development. It may also cover areas which serve as natural protection areas sheltering nearby developments against the effects of coastal erosion.

Although there is a general presumption against developments in the "CPA" zone, it should be highlighted that the subject NTEH has been long been erected at the application site before the publication of the first Sheung Pak Nai and Ha Pak Nai Interim Development Permission Area (IDPA) Plan No. IDPA/YL-KTN/1 on 14.9.1990. Since then, the NTEH on the site has not been demolished or re-built, and has been renovated for columbarium use in 2010.

In view that 'Columbarium' use is neither under Column 1 nor Column 2 of the current "CPA" zone, a s.12A application (No. Y/YL-PN/7) for rezoning the site and the adjoining Government land from "CPA" to "G/IC" for regularisation of columbarium development with 1,000 niches was submitted by the Applicant on 5.2.2016. It was rejected by the Board on 3.2.2017 mainly on the grounds that there is no strong planning justification for the columbarium development at the site which is located in "CPA" zone which is

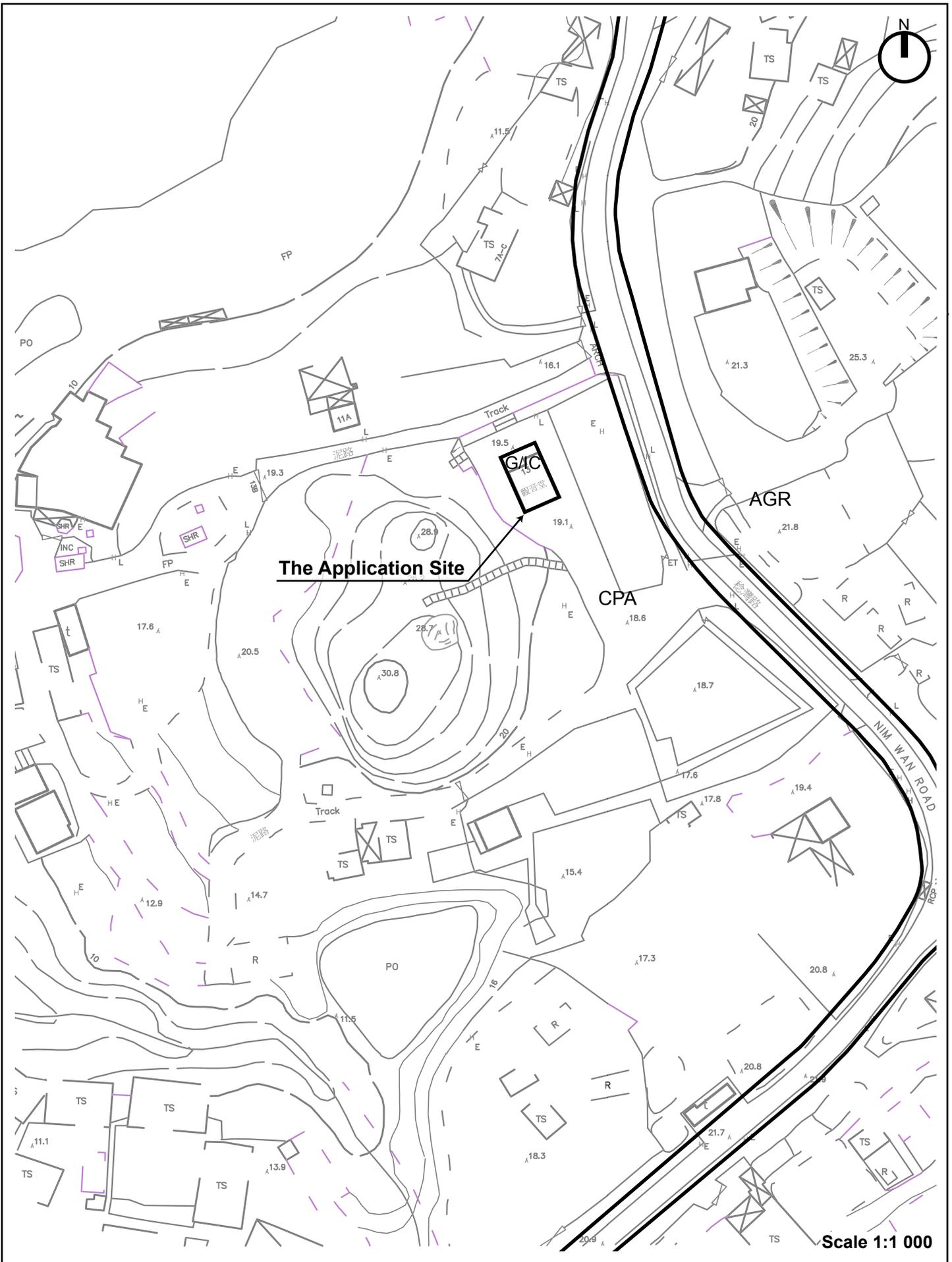
intended to protect the landscape and scenic value of the area; relevant departments shown concern on traffic, landscape and ecological impacts on the surrounding uses; and approval of the application would set an undesirable precedent for similar applications.

In response to the requirement of PCO in 2017, the Applicant had submitted a PCL application to the PCLB on 6.3.2018 to apply for a Licence for Koon Yam Tong. This s.12A application is submitted partly to comply with the licensing requirements under the PCO and partly to satisfy the town planning requirements. In order to address the TPB's concerns on the previous application, the consultant team has studied the previous departmental comments and latest relevant statutory requirements in detail, and has prepared a compromised scheme with detailed technical assessments for Koon Yam Tong for the consideration of the Board.

2.5 Land Status

The application site involves Lot No. 118 in D.D. 135 (see **Plan B**), which is owned by the Applicant. The subject lot is a New Grant Lot covering New Grant No. 2757 which permits the erection of one building not more than 3 storeys nor exceed a height of 7.6 and the maximum built-over-area not exceeding 65.04m² for non-industrial purposes. No grave shall be made on the subject lot nor shall any human remains whether in earthenware jars or otherwise be interred therein or deposited thereon.

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 (STW) to Lands Department, where appropriate to permit the columbarium use, after an AIP Licence for Koon Yam Tong is obtained from the PCLB.



Plan C: Proposed Amendments to the Sheung Pak Nai and Ha Pak Nai Outline Zoning Plan

(Prepared on 16.6.2025)

3. REZONING PROPOSAL

This s.12A application involves the following amendments to the Approved Sheung Pak Nai and Ha Pak Nai OZP No. S/YL-PN/9:-

(i) **Amendment Item 1 – OZP (Plan C)**

It is proposed to rezone the area covering Lot No. 118 in D.D. 135 from "CPA" to "G/IC" in order to regularise the Pre-cut-off Columbarium in Koon Yam Tong.

(ii) **Amendment Item 2 – Schedule of Uses (Table 3.1)**

According to the planning cases in relation the s.12A application for regularising the Pre-cut-off Columbarium, it is noticed that the TPB has recently approved several columbarium cases and recommended 'Columbarium' use to be placed under Column 1 uses (i.e. uses always permitted) of a proposed new zone. This is because the Board considered there will be sufficient control mechanism on details and technical requirements of the columbarium use under the licence regime of PCO and, thus, consideration could be given to streamline the development control process.

In view that the Applicant has submitted a detailed development proposal with supporting technical assessments, 'Columbarium' use is suggested to be placed under Column 1 of the proposed "G/IC" zone so as to allow the Applicant to comply with the town planning requirements and obtain the full Licence within the validity period of TSOL.

In order to address any potential adverse ecological impact to the surrounding area, all uses that are currently fall under Column 1 or Column 2 of the "CPA" zone, such as 'Agricultural Use' and 'Picnic Area' etc., will be excluded to be put under the schedule of uses in the proposed "G/IC" zone. They are not related to the current operation or future improvement plan of Koon Yam Tong.

(iii) **Amendment Item 3 – Planning Intention and Remarks (Table 3.1)**

It is proposed to specify this new zoning is intended for columbarium use. The maximum number of columbarium niches within this zone as a whole shall not exceed 967 niches. A building height restriction of 3 storeys has been imposed in the new zoning.

It should be noted that there is no "G/IC" zone under the current Sheung Pak Nai and Ha Pak Nai OZP. Therefore, the proposed "G/IC" zone is tailor-made zoning to facilitate the continual operation of the existing Pre-cut-off Columbarium with 967 niches in Koon Yam Tong.

Table 3.1 Proposed Schedule of Uses for "G/IC" Zone

GOVERNMENT, INSTITUTION OR COMMUNITY

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Columbarium (specified number of niches in paragraph (a) under Remarks)	

Planning Intention

This zone is intended primarily for columbarium use.

Remarks

- (a) On land designated "Government, Institution or Community", the maximum number of niches for columbarium use shall not exceed 967.
- (b) No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of the maximum building height of 3 storeys or the height of the existing building, whichever is the greater.
- (c) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the number of niches/building height restriction stated in paragraphs (a) and (b) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

4. DEVELOPMENT PROPOSAL

The development proposal in support of this s.12A application will be presented in this section.

4.1 Master Layout Plan and Development Schedule

(a) Master Layout Plan

The existing NTEH on the application site was built in 1981, i.e. well before the publication of the first Sheung Pak Nai and Ha Pak Nai IDPA Plan No. IDPA/YL-KTN/1 on 14.9.1990. Since then, it has not been demolished or re-built, and has been only renovated for columbarium use in 2010. The development scheme in support of this s.12A application is entirely intended to comply with the requirements of PCO for regularising the existing columbarium in Koon Yam Tong. It does not involve any change in the overall form of the existing building, and will not propose any new building. The master layout plan, which was prepared based on the latest proposed layout plan of the PCL application for Koon Yam Tong, is shown at **Plan D**.

The application site is not accessible by vehicles. However, emergency vehicles could reach onto the vacant land south of the site from Nim Wan Road. In order to operate Koon Yam Tong in a safe, orderly and smooth fashion during the grave sweeping occasions, a TCMP has been proposed by the Traffic Consultant. An all-year-round-visit-by-appointment-and-management system will be implemented. All visitors must pre-book with the Applicant, and they are strongly advised and recommended to access the NTEH by taking the existing public mini-bus service. They will be reminded car parking is not available on site and in the vicinity. 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. Internet memorial service will also be provided by the Applicant for all niche owners as an alternative option to in-person visitation. For further details, please refer to the TIA and Management Plan in **Appendix IV** and **Appendix V** respectively.

Two rounds of pre-submission were submitted to the PlanD on 3.7.2025 and 15.10.2025 respectively, and majority Government departments had no major comment on/ objection to the case (see **Appendix III**). In order to further minimise the potential traffic impact and to avoid any potential unnecessary disturbance to the surrounding area as far as practicable, the Applicant has decided to largely reduce the total number of niches in Koon Yam Tong from originally 3,162 to 967. The opening hours of Koon Yam Tong will be from 9:00am to 4:00pm on Monday to Friday (excluding public holidays), and extended only from 7:00am to 5:00pm from Monday to Friday (excluding public holidays) within the Festival Periods.

According to the bounding conditions as stated in the Fire Safety Assessment (FSA) Report for the Applicant's Alternative Approach for fulfilment of the Building Department (BD)'s requirements, the maximum number of persons on each floor of the subject NTEH will have to be controlled not to exceed 10 persons (including minimum one staff). Considering the FSA Report and the average boarding percentage of the existing mini-bus service, it is proposed that number of visitors per (30-minute) session will be limited to 4 persons. This introduces additional or more stringent controls to further enhance fire safety and operational management.

In order to fulfill the bounding conditions as mentioned in the FSA Report, the final discharge of the required staircase on ground floor (G/F) will be modified. The existing door on G/F will be demolished and blocked by a wall. New wall opening and new step with metal balustrade will be provided such that there will be no door at the exit point to facilitate the evacuation process. The management office on G/F will be converted into the fire service (F.S.) pump room. The administrative office of Koon Yam Tong will change to the Applicant's another office in Yuen Long, i.e. G/F of No. 151 Ping Ha Road.

In order to further minimise disturbances to the surrounding area, the Applicant proposes to reduce the lighting inside the building, and to provide one-way window glass film on each window. Besides, the Applicant is planned to dismantle the existing toilet facilities within the NTEH and a portable toilet will be provided within the site. The toilet rooms will be converted into store rooms in future. Floor plans, elevation plans and section plan of Koon Yam Tong are shown in **Plan E – Plan J**.

The above improvement measures as proposed under this s.12A application 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 **Attachment 1 of Annex II of Appendix III**), the latest Management Plan has been prepared with full reference to the 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 positively to fire safety and overall operational management. All other core recommendations from the FSA Report have been fully adopted.

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.

(b) Development Schedule

Development schedule for the present application is shown in **Table 4.1**. The subject development is low-rise in nature with a total GFA of not exceeding 195.12m². It is compatible with the surrounding rural character.

As stated above, the total number of niches in Koon Yam Tong will be reduced from originally 3,162 to 967. New arrangement on distribution of niches for Koon Yam Tong is shown in **Table 4.2**. In regards to the 2,195 niches that are no longer under this s.12A application and the PCL application, the Applicant will further discuss with relevant Government departments under the PCL application on the way forward to permanently sealed off the niches in future.

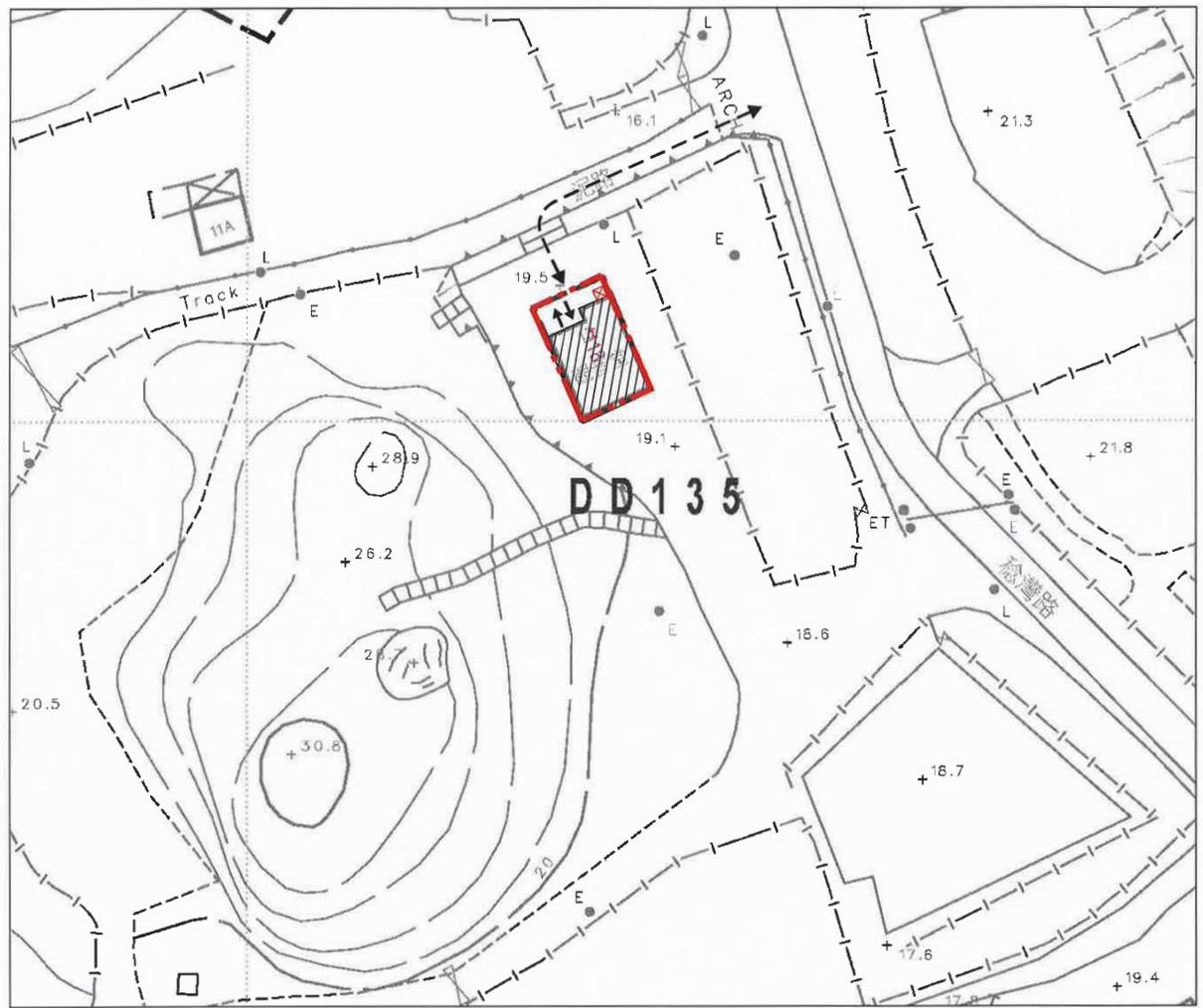
Table 4.1: Development Schedule for the Present Application

Application Site																							
Site Area (m ²)	About 92.9m ²																						
Plot Ratio	2.1 (approximate)																						
Proposed GFA (m ²)	Not exceeding 195.12m ²																						
	<table border="1"> <thead> <tr> <th>Floor</th> <th>Facilities</th> <th>GFA</th> </tr> </thead> <tbody> <tr> <td rowspan="4">G/F</td> <td>Columbarium</td> <td>50.75m²</td> </tr> <tr> <td>F.S. Pump Room</td> <td>6.97m²</td> </tr> <tr> <td>Store Room</td> <td>2.92m²</td> </tr> <tr> <td>Access</td> <td>4.40m²</td> </tr> <tr> <td rowspan="2">1/F</td> <td>Columbarium</td> <td>58.98m²</td> </tr> <tr> <td>Access</td> <td>6.06m²</td> </tr> <tr> <td rowspan="2">2/F</td> <td>Columbarium</td> <td>58.98m²</td> </tr> <tr> <td>Access</td> <td>6.06m²</td> </tr> </tbody> </table>	Floor	Facilities	GFA	G/F	Columbarium	50.75m ²	F.S. Pump Room	6.97m ²	Store Room	2.92m ²	Access	4.40m ²	1/F	Columbarium	58.98m ²	Access	6.06m ²	2/F	Columbarium	58.98m ²	Access	6.06m ²
Floor	Facilities	GFA																					
G/F	Columbarium	50.75m ²																					
	F.S. Pump Room	6.97m ²																					
	Store Room	2.92m ²																					
	Access	4.40m ²																					
1/F	Columbarium	58.98m ²																					
	Access	6.06m ²																					
2/F	Columbarium	58.98m ²																					
	Access	6.06m ²																					
Site Coverage	70% (approximate)																						
No. of Block(s)	1																						
Max. Building Height	Not more than 7.6m (3 storeys)																						
No. of Niche(s)	967 niches																						

Table 4.2: New Arrangement on Distribution of Niches in Koon Yam Tong

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	245	851
	Double-urn	112	0	0	112
Total		445	277	245	967

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



- LEGEND:**
- SITE BOUNDARY
 - CERTIFIABLE BUILDING (IN COMPLIANCE WITH SECTION 3(1)(b) OF SCHEDULE 2 TO THE PRIVATE COLUMBARIA ORDINANCE)
 - PROPOSED PORTABLE TOILET FOR PUBLIC
 - BUILDING ENTRANCE/EXIT
 - PEDESTRIAN ROUTE

Handwritten signature of Tang Fu Sing

14/10/2025 TANG FU SING
Date (dd/mm/yyyy) Name and Signature of Applicant (if the applicant is a natural person) / Authorized Person/Authorized Partner

Proposed Layout Plan (Plan No. 002)
Scale 1:500

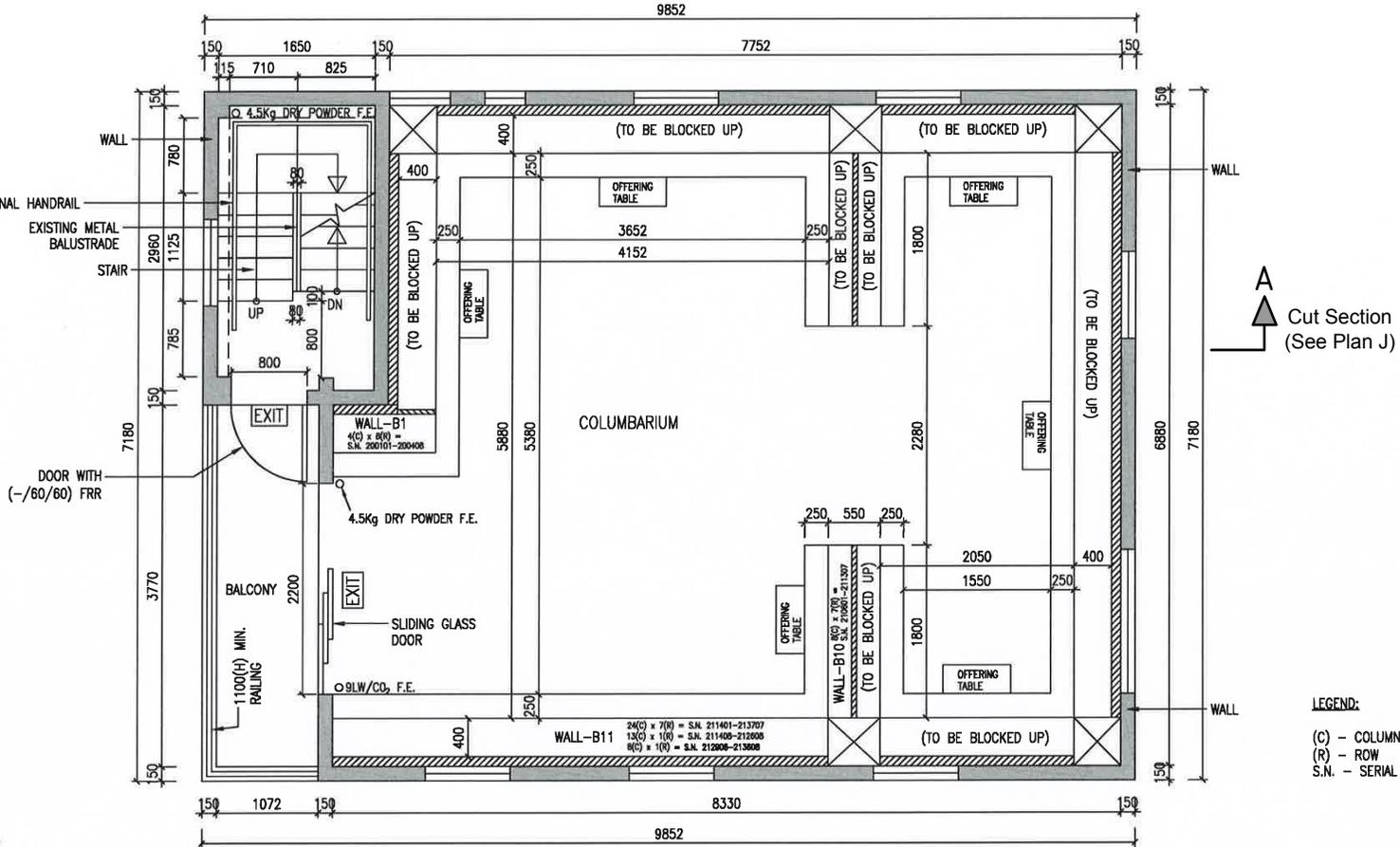
Handwritten signature of Lee Siu Man, Ervin

14/10/2025 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))

(Extracted of PCL Application's Annex 13 Drawing - Proposed Layout Plan Submitted to the PCLB)

Scale 1:750

The angle of Elevation
(See Plan I)



The angle of Elevation
(See Plan H)



LEGEND:
(C) - COLUMN
(R) - ROW
S.N. - SERIAL NUMBER

Tang Fu Sing

Lee Siu Man, Ervin

17/12/2025 TANG FU SING

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

Proposed Floor Plan of 1/F (Plan No. 004)

Scale 1:50

17/12/2025 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))

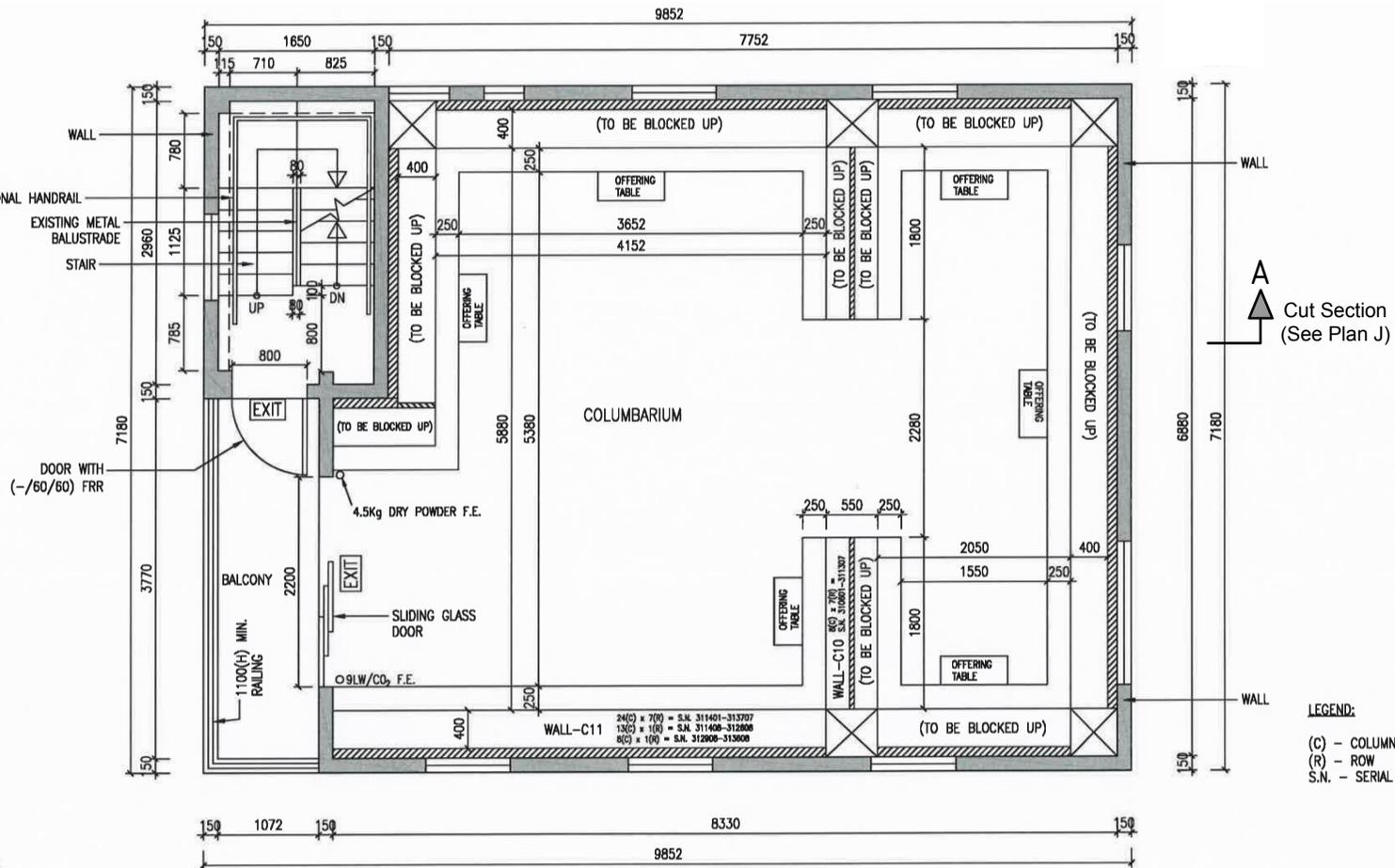
(Extracted of PCL Application's Annex 13 Drawing - Proposed Layout Plan Submitted to the PCLB)

Scale 1:75

The angle of Elevation
(See Plan I)



The angle of Elevation
(See Plan H)



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LEE SIU MAN, ERVIN

17/12/2025 TANG FU SING

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

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

Scale 1:50

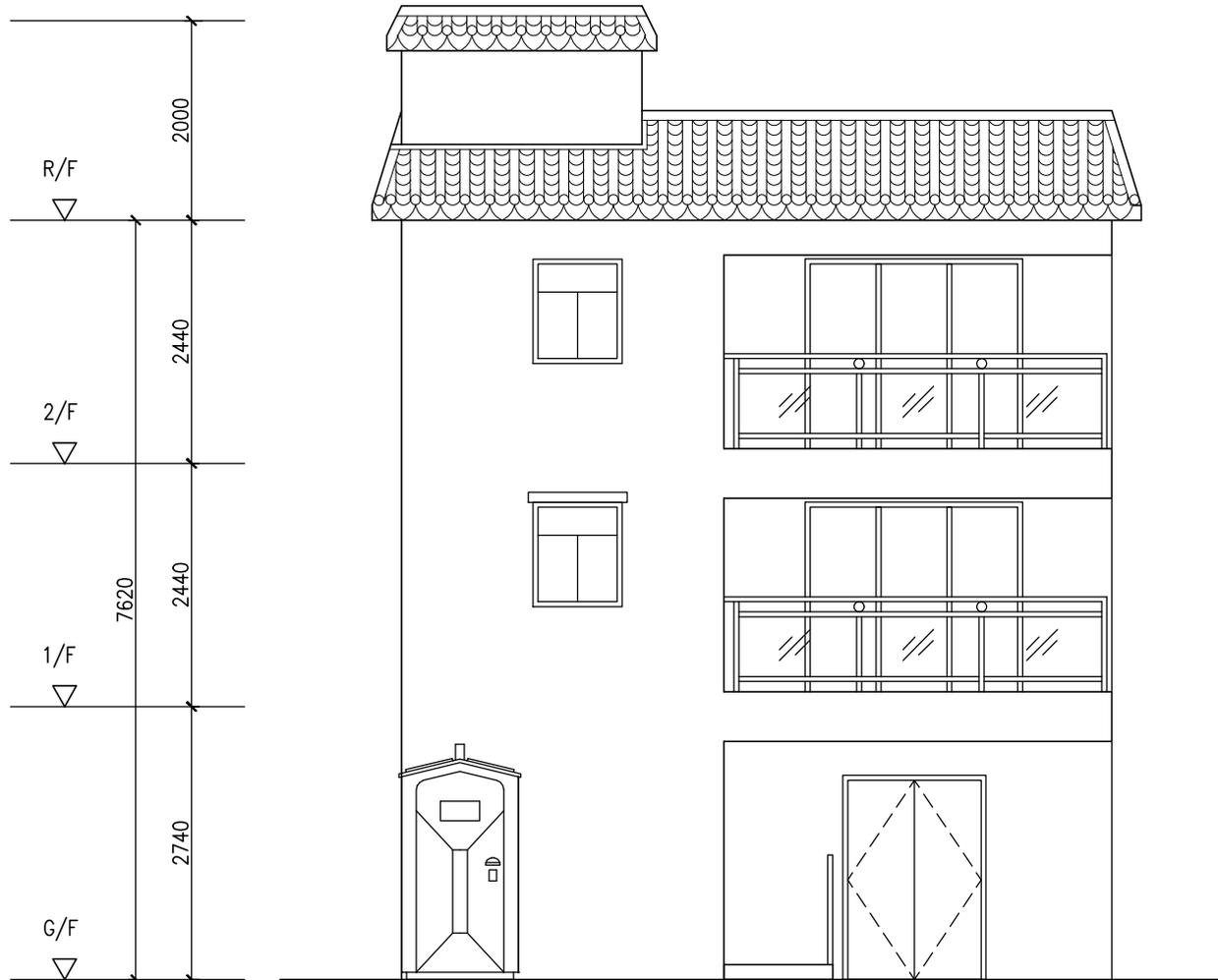
17/12/2025

LEE SIU MAN, ERVIN

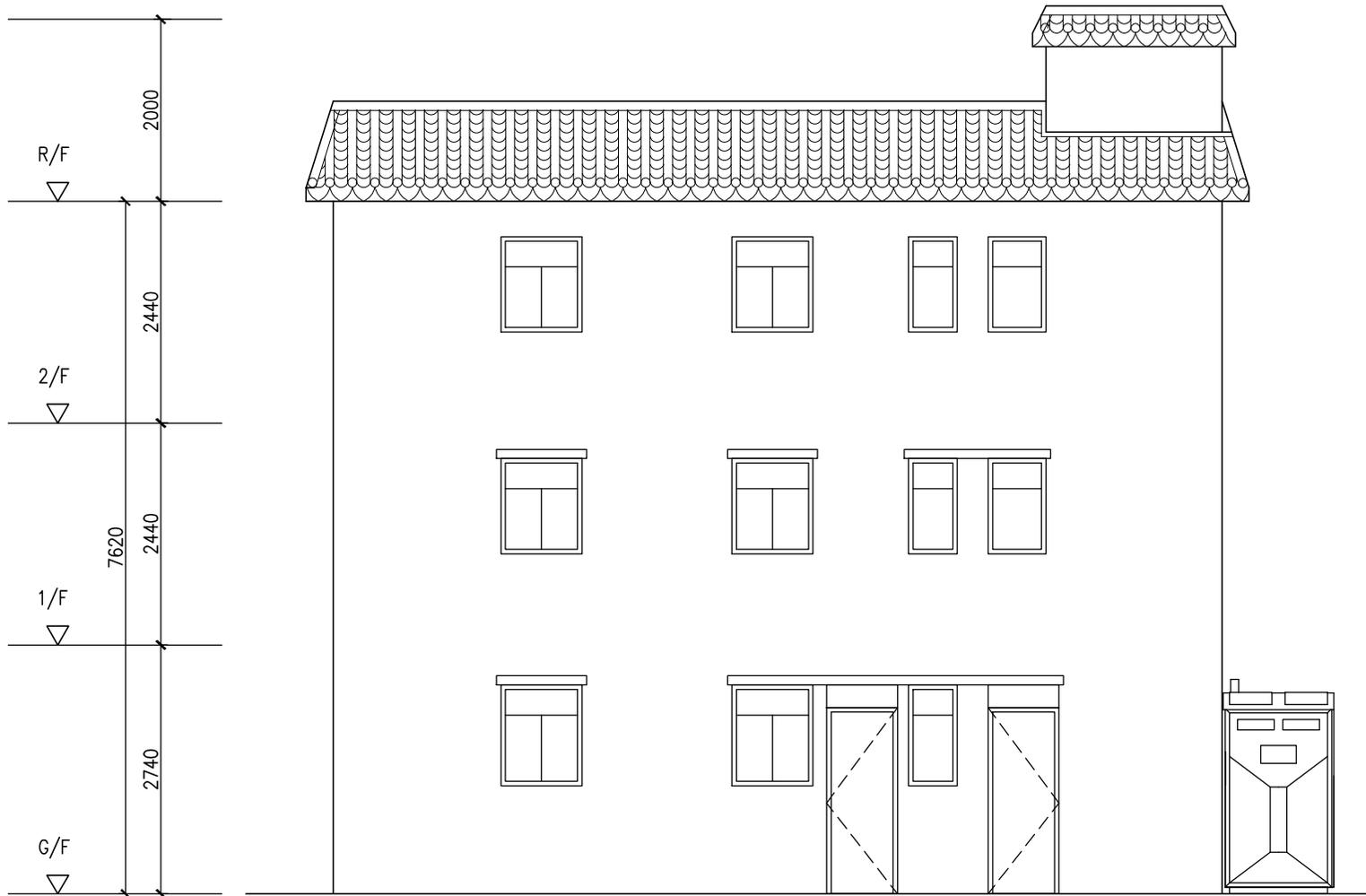
Date (dd/mm/yyyy) Signature and Name of Authorized Person/Registered Structural Engineer* (Authorized Person / Registered Structural Engineer means a person registered under section 3 of the Building Ordinance (Cap.123))

Scale 1:75

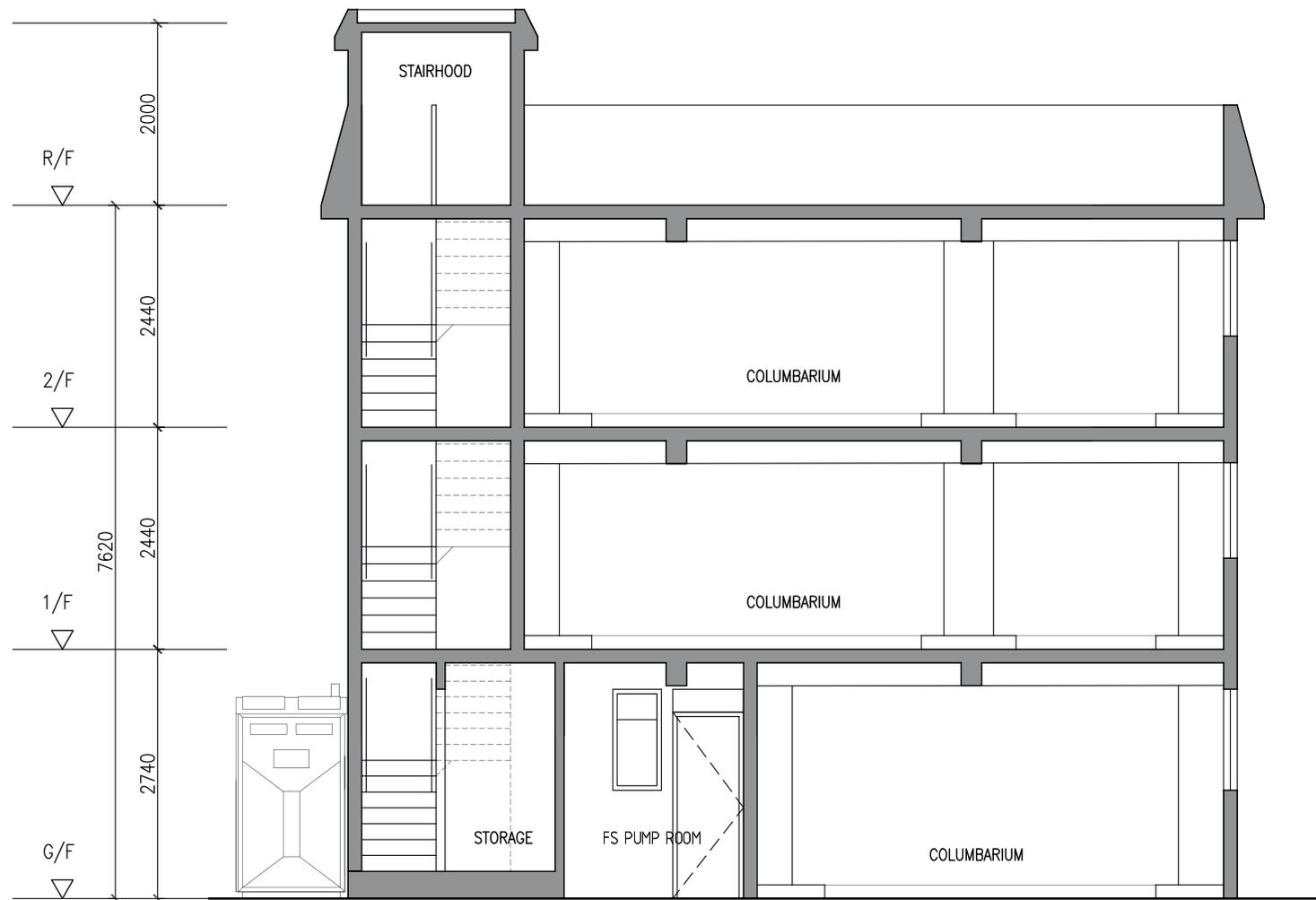
(Extracted of PCL Application's Annex 13 Drawing - Proposed Layout Plan Submitted to the PCLB)



Scale 1:75



Scale 1:75



4.2 Special Traffic and Pedestrian Arrangements

The application site is located off the western side of Nim Wan Road in Ha Pak Nai. It is a NTEH, and has no internal transport facilities. Nim Wan Road in vicinity of the site runs along the coastline from Ha Pak Nai to Sheung Pak Nai. It then continues northward as Deep Bay Road towards Lau Fau Shan, where it connects with Lau Fau Shan Road providing external regional access. Internal transport facilities are not provided at present within the application site, and cannot be provided in future.

GMB No. 33 is the only public transport service which operates along Nim Wan Road. In order to manage and minimise the potential traffic and pedestrian impact, special traffic and pedestrian arrangements are proposed by the Applicant. Details are described in paragraphs below.

(a) Opening Hours

During the Ching Ming and Chung Yeung Festival Periods, i.e. within 4 weeks before and 4 weeks after the Ching Ming Festival Period Day, and within 4 weeks before and 4 weeks after the Chung Yeung Festival Day, visitation to Koon Yam Tong is by appointment only and is from 7:00am to 5:00pm on weekdays, i.e. Monday to Friday, and closed on Saturdays, Sundays, and public holidays, including Ching Ming and Chung Yeung Festival Days.

Outside the Festival Periods, visitation to Koon Yam Tong is also by appointment only and is from 9:00am to 4:00pm on Mondays to Fridays; and, closed on Saturdays, Sundays, and public holidays.

(b) Visit-by-Appointment Arrangement

Visit-by-Appointment Arrangement will be implemented by the Applicant requiring all visitors to register at least 2 days prior to visiting Koon Yam Tong at all times. Hence, the number of grave sweepers can be regulated.

Registration will be available via internet, smart phone application, or by phone. Visitors are required to provide the Applicant with the expected number of visitors, the niche to be visited, and the intended visiting time and date. The registration will only be regarded as successful after the Applicant has confirmed the visiting details with the grave sweepers.

(c) Transport Arrangement

The Applicant will advise and encourage all visitors to access Koon Yam Tong by GMB No. 33. Visitors will also be reminded access by private car and taxi are discouraged, and car parking is not available in Koon Yam Tong.

(d) Notice on Visiting and Transport Arrangements

Under the condition of sale of niches, the Applicant will clearly state and emphasise the following:

- (i) Opening hours and closure period;
- (ii) Visit-by-Appointment Arrangement required;
- (iii) Encourage the use of GMB Service;
- (iv) Discourage access by private car and taxi;
- (v) No parking in Koon Yam Tong; and
- (vi) The Applicant reserves the right to adjust the closure period and other operational arrangement without prior notice.

Niches owners will be reminded prior to each Ching Ming and Chung Yeung Festival Periods of the above condition of sale.

(e) Visiting Capacity

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.

According to the FSA Report prepared for Koon Yam Tong, the maximum occupancy on each floor is 10 people at any one time. Hence, limiting the visiting capacity at 4 visitors per session is considered necessary to ensure no more than 10 people would occupy Koon Yam Tong at any one time, say, during the time in-between 2 sessions, with a departing group of 4 visitors, and an arriving group of 4 visitors and 2 staff.

(f) Waiting Areas

In view that the number of visitors is limited to only 4 per session, a designated waiting area is not needed.

(g) Availability of Internet Memorial Service

Internet memorial service will be provided by the Applicant for all niche owners as an alternative to in-person visitation.

(h) Data Collection and Review of the Special Traffic and Pedestrian Arrangement

The Applicant will maintain records on visit-by-appointment, number of niches occupied, and observed operation condition etc., after obtaining the Town Planning Approval and the Columbarium Licence. This information can be used to review and evaluate the operation efficiency of the special traffic and pedestrian arrangement.

A revised TCMP can be submitted to the Transport Department and the Hong Kong Police Force for follow-up reviews, and if necessary makes amendments. The special traffic and pedestrian arrangements and visit-by-appointment arrangements will be detailed in the TCMP of the full Licence, and the implementation of these arrangements will be closely monitored by the PCLB to ensure compliance.

The above special traffic and pedestrian arrangements have been elaborated in detail in the TIA and Management Plan attached in **Appendix IV** and **Appendix V** respectively.

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. The Applicant is committed to follow good operation practice and administrative measures recommended in Guidelines on Air Pollution Control for Joss Paper Burning at Chinese Temples, Crematoria and Similar Places published by Environmental Protection Department (EPD), and also reminded to comply with the Air Pollution Control Ordinance (APCO).

To maintain a peaceful and tranquil environment, no funeral service would be allowed at the application site. The religious and worshipping activities would be properly monitored to ensure no nuisance would be caused by the noise generated from the site. Staff will be deployed to manage the site in a proper and tranquil manner. In addition, there will be no extensive fixed noise sources or any public address/loudspeaker to be operated associated with the proposal. The Applicant is reminded that the operation of the proposal, should it be approved by TPB, is controlled under Noise Control Ordinance (NCO), and the Applicant will design and operate the proposal in full compliance with the relevant requirements and recommendations under Hong Kong Planning Standards and Guidelines (HKPSG), Professional Persons Environmental Consultative Committee Practice Notes (ProPECC PN) and NCO.

Although there are two existing toilet facilities served with a septic tank within the NTEH, the Applicant is planned to dismantle the toilet facilities and a portable toilet with a size of 400 litre sewage capacity will be provided within the site. Sewage and waste from the portable toilet shall be collected and disposed by licensed collectors. The location of the portable toilet is shown in **Plan E**. In addition, there will be no construction works to be conducted in future. Mitigation measures to ease the water quality impacts during construction phase are therefore not required. Nevertheless, the Applicant is reminded to comply with the Water Pollution Control Ordinance (WPCO).

In order to minimise the potential drainage impacts that may arise from the site during the operation phase, a Drainage Proposal has been prepared and attached in **Appendix VI**. It is recommended that the existing U-channel and the proposed U-channel and underground pipe have proven to provide capacity for the design peak flow. However, since the existing U-channel has not been properly maintained, improvement works will be carried out by the Applicant to allow it to restore its functionality to the design capacity.

4.4 Implementation Programme

This s.12A application is intended to facilitate the regularisation of a Pre-cut-off Columbarium under the name of Koon Yam Tong on the application site. In view of the validity period of TSOL for Koon Yam Tong will lapse on 10.11.2027, the Applicant will have to comply with the remaining licensing requirements, including but not limited to town planning, management plan, building safety on fire aspect and land lease, as soon as practicable in order to obtain the full Licence.

5. PLANNING JUSTIFICATIONS

The columbarium in Koon Yam Tong has been in operation within the NTEH at the application site for more than 15 years. For regularising a Pre-cut-off Columbarium, each planning application shall be assessed on individual merit based on the following criteria:

- (a) analysis on columbarium history, site background, and Government's intention;
- (b) assessments on site suitability and land use compatibility; and
- (c) technical and precedent concerns have been adequately addressed.

Planning and technical assessments have indicated that the proposed rezoning is well justified and complies with the above criteria for the reasons as presented in this section.

5.1 Long History of the Existing House and Establishment of Koon Yam Tong

Since the 1970s, the Government has been encouraging cremations instead of traditional burials. In accordance with an Executive Council decision, the Government has stopped processing applications for private cemeteries where permanent earth burials may be permitted since 1976. The number and percentage of cremations have risen substantially in the past 40 years. However, the progress in providing new public columbaria is mainly constrained by the limited land supply and most people's 'not in my back yard' attitude.

The NTEH on the application site was built in 1981 (see **Plan K**), and has not been demolished or re-built since then. In other words, it has been in existence at the site long before the gazettal of the first Sheung Pak Nai and Ha Pak Nai IDPA Plan on 14.9.1990. The NTEH was previously occupied by domestic use for several years. However, due to its isolated and inconvenient location, they moved out and the house left vacant for a long period of time. In view of the public demand for columbarium niche spaces in Hong Kong in the past 40 years, as well as the site suitability for columbarium use due to its secluded and tranquil location, the NTEH has been renovated and operated as a columbarium under the name of Koon Yam Tong since 2010.

5.2 Essential Planning Mechanism to Comply with the Private Columbaria Ordinance

This s.12A application for rezoning the application site from "CPA" to "G/IC" for columbarium use is fully in line with the Government's policy objectives to regularise the Pre-cut-off Columbarium in Koon Yam Tong for the following reasons:

(a) The Government's Intention to Resolve the Historic Problems

The Government has emphasised in many public occasions that they are prepared to adopt a pragmatic and sensitive approach to resolve the historic problem of these Pre-cut-off Columbaria so as to minimise any social disruption arising from people who have purchased these niches and massive displacement of interred ashes before the introduction of regulatory regime. In contemplating these policy initiatives, the Government would take into account the overall interests of the community so as to avoid affecting the descendants (see **Appendix I**).



(Aerial Photo No. 45792 Taken on 30.11.1982 by Lands Department)

Scale 1:1 500



Plan K: Aerial Photo in 1982

(Prepared on 20.6.2025)

On 30.6.2017, the PCO came into effect and the private columbarium in Hong Kong must be covered with a Licence, Exemption or TSOL. The policy objectives aim at stipulating proper regulation on private columbaria so that they could complement the public columbaria to meet the social needs for ancestral worshipping, to add supply and choice of niches and related services. As such, the Applicant had submitted the PCL application for Koon Yam Tong before the expiry date on 29.3.2018 to apply for a Licence (see **Annex I** of **Appendix II**).

(b) Essential Planning Mechanism to Comply with the Licensing Requirements

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 (see **Annex II** and **Annex III** of **Appendix II**). During the 3 years validity period of TSOL, the Applicant has to satisfy, including but not limited to, town planning, land lease and building safety. To comply with the town planning requirements, the Applicant is required to submit s.12A application or section 16 application unless the columbarium is an "Existing Use" (in existence before the publication of the first Sheung Pak Nai and Ha Pak Nai IDPA Plan No. IDPA/YL-KTN/1 on 14.9.1990). Since the Pre-cut-off Columbarium in Koon Yam Tong has been in operation since 2010, the Applicant can only comply with the town planning requirement by way of planning application.

Since 'Columbarium' use does not fall under Column 1 or Column 2 of the current "CPA" zone, the Applicant herein submits a s.12A application to amend the zoning of the site to "G/IC" with 'Columbarium' use to be placed under Column 1 of the new zoning. This could streamline the development control process for Koon Yam Tong to comply with the town planning requirements for the PCL application. Thus, the proposed rezoning is an essential mechanism to facilitate regularisation of the columbarium ancillary to Koon Yam Tong. It is in line with the Government's intention to take care of the sentiment of the descendants, in particular their wish not to upset the resting place of the deceased as far as practicable.

As of today, there are a number of Pre-cut-off Columbaria that have applied for Licence and still have not met the town planning requirements. Therefore, the Private Columbaria (Amendment) Ordinance 2025 was gazetted on 30.5.2025, and the Government introduced an additional option for the operators of Pre-cut-off Columbarium to submit a new Exemption application² to the PCLB. With such pragmatic and sympathetic approach, it enables the Pre-cut-off Columbaria to continue operating at their current scale, avoids social disruption from large-scale ash disposal. However, Koon Yam Tong is not eligible to submit this new Exemption application, as it cannot fulfill one of the conditions that no planning application in respect of the columbarium has been refused by the Board. Hence, the Applicant has no other alternative but to continue with the Licence application.

² Pre-cut-off Columbaria that may have successfully obtained an Exemption through the new application can retain niches they sold before the enactment of the PCO. Unlike that applicable to a Licence, an Exemption application is not required to fulfil the planning-related requirement, nor submit a management plan for prior approval by the PCLB.

5.3 Fully Conforming the Government's Intention

The TPB as a public body has a duty to act fairly and reasonably, while consistency and fairness are linked concerning Government's policy initiatives for Pre-cut-off Columbaria, which are highly relevant. As detailed in **Section 5.2(a)**, the Government introduced the PCO to establish a licensing regime in order to ensure private columbaria's compliance with statutory and Government requirements, enhance protection of consumer interests, and foster adoption of a sustainable mode of operation by the industry. The intention of this s.12A application has fully complied with the Government's policy objectives, such as:

(a) Policy Initiative to Safeguard Overall Interest of the Community

Burial arrangement is a necessary element to allow family, relatives and friends pay respect to their ancestors and loved ones, which is an important matter for both the departed and the living. The wish of deceased to have their cremated ashes to be properly placed should be respected. With the introduction of PCO, the Government have strong intention to resolve the historic problems of Pre-cut-off Columbaria under the sensitive approach towards the consumers who have purchased these niches, and the dedicated persons, to minimise their losses and any social disruption arising from massive displacement of interred ashes.

The subject columbarium exists before the pre-cut-off time and the present application is in line with the spirit of PCO to regulate the operation of private columbaria through a licensing scheme. The Applicant has a genuine intention to regularise the existing columbarium and the total number of 967 niches under this application is the same as the latest PCAO's record.

(b) Meeting the Strong Demand for Columbarium Niche Spaces in Hong Kong

According to the Census and Statistics Department, Hong Kong has an annual death rate of about 7.1% (see **Table 5.1**). The numbers indicate a relatively steady increase in annual demand for niche spaces. With a growing ageing population and other factors in Hong Kong, the number of deaths and cremations have been gradually rising annually, resulting in an increasing public demand for columbarium facilities. Thus, the demand for niche spaces will continue to increase.

Although columbaria are essential facilities for the community, it is not easy to develop given the small geographical size and the large population as well as strong local resistance against such facilities to be provided in their area. The subject columbarium with 967 niche spaces available for sale at this suitable location can facilitate in increasing the supply of columbarium niches to help meeting the urgent public demand.

Table 5.1: No. of Death and Death Rate in Hong Kong (2018 - 2023)

	2018	2019	2020	2021	2022	2023
No. of Death	47,477	48,704	50,650	51,536	61,556	56,774
Death Rate	6.4	6.5	6.8	7	8.4	7.5

(c) Meeting the Special New Demand for Internet Memorial Worshipping Service

Over the past 5 years, relevant sources from census and media reflect that there were over 300,000 Hong Kong people migrated to other countries such as England, Canada, Australia and Taiwan. Due to the strong influence by Chinese traditional culture, the elders with emigrant children would prefer to be buried in Hong Kong after death. Therefore, the internet memorial service provided by the Applicant is aimed at meeting special new demand for emigrants who can pay tribute and show condolence to their lost loved ones at any time, and from anywhere by way of website.

This s.12A application is in line with the policy objectives which aim at stipulating proper regulation on private columbaria so that they could complement the public columbaria to meet the social needs for ancestral worshipping, to add supply and choice of niches and related services.

5.4 Site Suitability for Columbarium Use

A planning assessment on the site suitability for columbarium use in Koon Yam Tong has been conducted and the findings are summarised as follows:

(a) Accessible Location

Although the application site is situated in a rural setting, it is well-connected by Nim Wan Road to the entire Pak Nai area. The site is located less 1 minute walking distance from the nearest minibus stop. The green minibus route (No. 33) running along Nim Wan Road connecting Ha Pak Nai and Yuen Long New Town area. Thus, visitors can easily reach Koon Yam Tong by public transport and then walk to the site via the existing footpaths in the area.

Moreover, Highways Department is now undertaking a study on the improvement of Nim Wan Road from an existing single lane carriageway with two-way traffic to a single two-lane carriageway to meet the latest traffic need and current design standards, including reducing sharp curves, improving driving sightline and traffic safety. With the completion of Nim Wan Road improvement proposal, the traffic situation in the area will be significantly improved in the future.

(b) Segregation from Domestic Uses

Koon Yam Tong is located at a secluded part of Ha Pak Nai area and is far away from populated residential settlements. The existing 3-storey NTEH within the application site is low-rise in nature and it is hardly able to see from outside due to its topography and visual barriers by mature trees, orchards and small knoll. Thus, no social interface problem is anticipated. The existing environment within Koon Yam Tong allows the visitors to commemorate their ancestors in a convenient and peaceful environment. Up to the present moment, the Applicant has demonstrated smooth operation of Koon Yam Tong without create any unnecessary nuisance to the surrounding areas.

(c) Land Use Compatibility

Land use character in the vicinity of the site is shown in **Plan L**. The proposed (existing) columbarium within the NTEH fully integrates with the surrounding areas which are predominately rural in character, predominantly covered with mature trees, orchards, small knoll, religious institution, temporary structures, vacant land, latrine and vehicular access roads (i.e. Nim wan Road and tracks). The current scheme is intended to regularise the existing operation of the columbarium at the site without changing the overall form of the existing building or proposing any new building. As regard the development intensity, a built-over area of about 65.04m² and a building height of not more than 7.6m (3 storeys) are considered compatible with the surrounding areas. Kwun Yam Tin Kau Temple is about 50m west of the application site.

(d) No Insurmountable Constraints

As detailed in **Section 5.7 - Section 5.9** and the technical assessments in the Appendices, the subject development is sustainable in visual, landscape, traffic, environmental and engineering terms. The subject development is small scale in nature and there would be no insurmountable problems caused by the development taken into account the improvement measures proposed in the technical assessments.

In view of the observations above, the application site is well suitable for columbarium use in terms of locational advantage, reasonable distance away from residential use, and good management in the past. With the proposed mitigation measures adopted, the potential impacts of the small scale development to the vicinity would be minimised.

5.5 No Ecological Impact or Adverse Impact on the Existing "CPA" Zone

The proposed "G/IC" zone will not result in adverse impact on the existing "CPA" zone at the application site and its surrounding areas based on the following reasons:

(a) Rationalisation of the Existing Land Use Pattern

The application site has been zoned "CPA" since the gazettal of the first Sheung Pak Nai and Ha Pak Nai OZP on 10.6.1994 and remains unchanged since then. Although the planning intention of the "CPA" zone is mainly to conserve, protect and retain the natural coastlines and the sensitive coastal natural environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological value, with a minimum of built development, it should be highlighted that the site has been hard paved and occupied by the subject NTEH since before the gazettal of the first Sheung Pak Nai and Ha Pak Nai IDPA Plan on 14.9.1990 (see **Plan M**). Since then, the NTEH on the site has not been demolished or re-built, and has been renovated for columbarium use in 2010. This s.12A application only aims to regularise the columbarium use at the NTEH without changing the overall form of the existing building or proposing any new building.



Plan L: Land Use Compatibility Plan

(Prepared on 20.6.2025)



The Application Site

(Aerial Photo No. A22716 Taken on 14.9.1990 by Lands Department)

Not to Scale



Plan M: Aerial Photo in 1990

(Prepared on 20.6.2025)

(b) Never functioned as Coastal Protection Area

When the statutory planning control of the Sheung Pak Nai and Ha Pak Nai area came into force on 14.9.1990, the TPB had taken a comprehensive approach to zone the entire area into "Unspecified Use". Subsequently on 10.6.1994, the entire area stretching westward from Nim Wan Road to the coast line had been rezoned to "CPA" in order to preserve the natural coastline with a minimum of built development, and to serve as natural protection areas which shelter the nearby development from the effects of coastal erosion. Since the subject NTEH, as well as the adjacent Kwun Yam Tin Kau Temple, is located western side of Nim Wan Road, it had been included in the larger "CPA" zone.

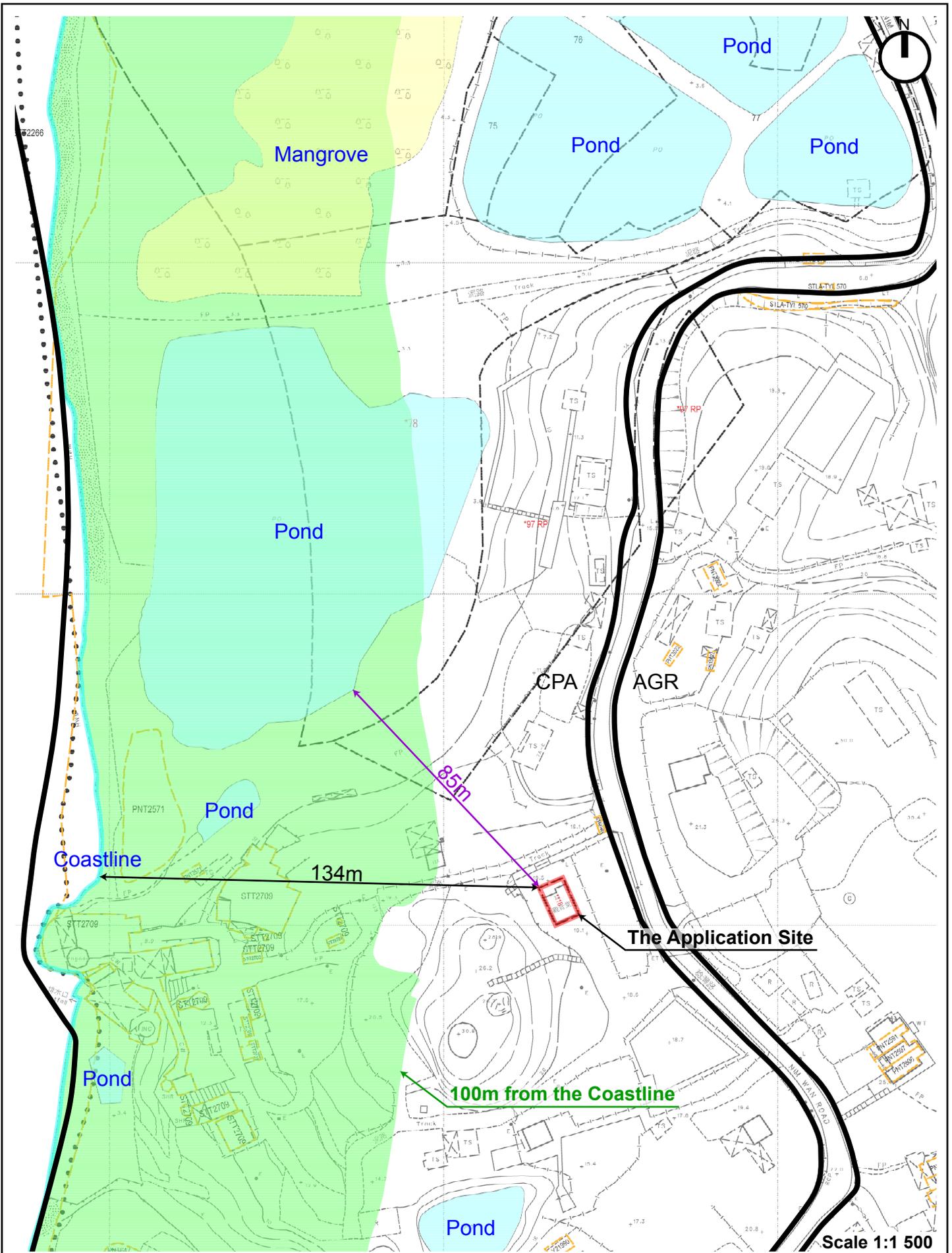
As stated above, the application site, being hard paved and occupied by a NTEH for a long period of time, has never been functioned as "CPA" since the gazettal of the first Sheung Pak Nai and Ha Pak Nai OZP in 1994. For example, the site is not located at the coastline or the sensitive coastal natural environment. It is surrounded by mature trees and located more than 100m from the coastline or at least 80m away from any potential ecological sensitive areas such as pond (see **Plan N**). The function of the site being serves as natural protection area sheltering nearby developments against the effects of coastal erosion is low.

Due to the long history of valid building entitlement at the application site, it is considered not appropriate, and the Applicant has no obligation, to demolish the existing NTEH. Instead of leaving the NTEH vacant, the regularisation of Pre-cut-off Columbarium with a stringent TCMP presents an opportunity to better utilise the site for more desirable use that are compatible with the surrounding areas and not subject to adverse traffic, environmental and ecological impacts. In fact, the site has a small area of about 90m², which represents less than 0.01% of the entire "CPA" zone (i.e. 789,635m²) on the Sheung Pak Nai and Ha Pak Nai OZP. Hence, the proposed (existing) use would not result in a significant loss of "CPA" land.

(c) No Adverse Impact on the Surrounding "CPA" Zone

Moreover, approval of this s.12A application will not result in any significant adverse impact on the surrounding "CPA" zone. In order to avoid any potential unnecessary disturbance to the adjacent area as far as practicable, an all-year-round-visit-by-appointment-and-management system will be implemented and all visitors must pre-book with the Applicant and they are required to go to/leave the NTEH by taking the existing public GMB service. The number of visitors per (30-minute) session will be limited to 4 persons only. Therefore, vehicular emission will not increase due to additional visitors.

Burning of joss stick, joss papers, incense and candles is strictly prohibited within the site. Koon Yam Tong will not involve burning of joss paper and offerings within or outside the NTEH. In addition to the proposed measures on reducing the light



Plan N: Sufficient Buffer Distance for Coastal Protection in the Area

(Prepared on 20.6.2025)

inside the building and providing one-way window glass film on each window to minimise disturbances to the surrounding area, the Applicant will restrict the visiting time to 9:00am to 4:00pm throughout the year, and to 7:00am to 5:00pm only for weeks before and after Ching Ming Festival and Chung Yeung Festival during the operation phase.

5.6 Significant Improvement of the Proposed Scheme over the Previous Scheme

The application site and its adjoining Government land is the subject of a previous s.12A application (No. Y/YL-PN/7) for rezoning from "CPA" to "G/IC" for regularisation of columbarium development with 1,000 niches. The previous application was rejected by the Board on 3.2.2017 mainly on the grounds in relation to no strong justification for columbarium to be located in "CPA" zone, technical concern (i.e. traffic, landscape and ecological aspects) and precedent effect arising from the development.

The consultant team has comprehensively studied the previous application and the Applicant has made utmost effort to address the above TPB's concerns. This s.12A application represents a significant improvement over the previous scheme for the following reasons:

(a) **Strong Justification for the Proposed Rezoning**

As detailed in **Section 5.2** and **Section 5.3**, the Applicant had submitted PCL application for Koon Yam Tong before the expiry date on 29.3.2018 to apply for a Licence. This is totally in line with the Government's intention to address the Pre-cut-off Columbarium under a pragmatic and sensitive approach so as to minimise any social disruption arising from people who have purchased these niches.

The previous application was considered by the Board before the introduction of the PCO on 30.6.2017. The importance of the Pre-cut-off Columbaria Policy was noted in the Gig Lok Monastery (GLM) Appeal Decision³. The Town Planning Appeal Board (TPAB) considered that the TPB as a public body has a duty to act fairly and reasonably, while consistency and fairness are linked concerning Government's policy initiatives for Pre-cut-off Columbaria, i.e.:-

- (i) Government's purpose was to take into account the "overall interests of the community"; to minimise losses and "any social disruption"; and "to avoid affecting the descendants in particular their wish not to disturb the interred ashes of the deceased as far as practicable".
- (ii) On how such aims would be achieved, this included reference to the fact

³ GLM, a Pre-cut-off Columbarium located in Tuen Mun, lodged a planning appeal No. 5 of 2021 against the TPB's decision. On 29.9.2023, the TPAB allowed GLM's appeal and granted them the planning approval.

that niches were purchased and ashes interred before members of the public knew that Government would introduce a regulatory regime in the PCO, which came into effect on 30.6.2017, and was not retrospective.

The TPAB also raised the point that Government's policy initiative and Press Release are highly relevant. As consistency is a cardinal principle of good administration, a pragmatic and sensitive approach (rather than strict, over legalistic, or literalistic) are appropriate.

Hence, the proposed rezoning is well justified to facilitate the regularisation of Pre-cut-off Columbarium at the site. As detailed in **Section 5.5**, the site being hard paved and occupied by a NTEH for a long period of time has never been functioned as "CPA" since the gazettal of the first Sheung Pak Nai and Ha Pak Nai OZP in 1994. It is surrounded by mature trees and located more than 100m from the coastline.

(b) Traffic Impact has been Addressed

Although the current ash interment capacity of Koon Yam Tong has been based on that as at the cut-off time, which is totally in line with the requirement of Pre-cut-off Columbarium under the PCO, the Applicant has decided to largely reduce the total number of niches from 3,162 to 967 in order to minimise the potential traffic impact. Moreover, a TIA with a workable traffic plan has been prepared and it indicates that the amount of traffic to be induced by the site would be small and the potential traffic impact to be induced by the columbarium would not pose adverse traffic impacts to the road network in the vicinity of the site. In addition, the TCMP has been incorporated to the Management Plan which will be enforced by the PCLB subsequent to the approval of the current s.12A application and the approval of the License. Any violation to the TCMP and the traffic/ pedestrian situations not being controlled as planned would result in the revoke of license from the PCLB. The proposed measures are thus considered enforceable and implementable.

(c) Landscape Impact has been Addressed

In comparison with the previous application which covers both the application site and its adjoining Government land, the site boundary under this s.12A application has been largely reduced. It only covers the subject lot which is mostly covered by the NTEH and there is no existing landscape resource within the application site. Thus, landscape impact arising from the subject use on the surrounding areas is not anticipated.

(d) Ecological Impact has been Addressed

As discussed in **Section 5.5**, significant improvements have been made as compared to the previous application to ensure the current scheme would not cause adverse ecological impacts and are summarised as follows:

- The site area has been largely reduced and only covers the existing NTEH;
- The site is located more than 100m away from the coastline or at least 80m away from any potential ecological sensitive areas such as pond, and with a buffer of mature trees. The function of the site being serves as natural protection area sheltering nearby developments against the effects of coastal erosion is low;
- Under the all-year-round-visit-by-appointment-and-management system, all visitors must pre-book with the Applicant and they are required to go to/leave the NTEH by taking the existing public GMB service, without proposing additional services. The number of visitors per (30-minute) session will be limited to 4 persons only. Therefore, vehicular emission will not increase due to additional visitors;
- Burning of joss stick, joss papers, incense and candles is strictly prohibited within the site. Koon Yam Tong will not involve burning of joss paper and offerings within or outside the NTEH; and
- The Applicant is planned to dismantle the existing toilet facilities and septic tank replacing them with a portable toilet with a size of 400 litre sewage capacity within the site. Sewage and waste from the portable toilet shall be collected and disposed regularly by licensed collectors, to reduce contamination of the surrounding environment; and
- In addition to the proposed measures on reducing the light inside the NTEH and providing one-way window glass film on each window to minimise disturbances to the surrounding area, the Applicant will restrict the visiting time to 9:00am to 4:00pm throughout the year, and to 7:00am to 5:00pm only for weeks before and after Ching Ming Festival and Chung Yeung Festival during the operation phase.

(e) No Precedent within the Subject "CPA" Zone

As discussed in **Section 5.10**, a comprehensive site study was conducted and no similar case (i.e. Pre-cut-off Columbarium) was found within the subject "CPA" zone. Thus, the risk of "creating a precedent" due to the approval of this application is highly unlikely.

In view of the above, the Applicant has addressed all the concerns raised by the Board for the previous application. It is hoped that the relevant Government departments and the Board will not judge this application based on the previous rejected case which is a totally different scheme in comparison with this application (see **Table 5.2**). Each application would be considered based on its individual merits.

Table 5.2: Current Scheme vs Previous Scheme (No. Y/YL-PN/7)

	Current Scheme	Previous Scheme
Site Area	92.9m ² (Not involving Government land)	1,352.8m ² (incl. 1,259.9m ² Government land)
Proposal	Only intended to regularise the Pre-cut-off Columbarium within the NTEH.	Regularise the existing columbarium within the NTEH and proposed car park and lay-by.
No. of Niche(s)	967 niches for on-site in-person grave sweeping, with alternative internet memorial service.	1,000 niches for on-site in-person grave sweeping.
Planning Parameters <ul style="list-style-type: none"> • Proposed GFA (m²) • No. of storey • Max. Building Height 	195.12m ² 3 storeys 7.6m	195.12m ² 3 storeys 7.6m
Traffic Scheme	Visit-by-appointment system; Restricted to 80 visitors per day; Utilisation of the existing GMB service.	Proposed shuttle bus service; 16 car parking spaces; 15m long general layby.
Landscape Scheme	N/A (Site mostly covered by the NTEH)	2m wide planting zone along the eastern boundary.
Environmental Measures	No burning of joss papers; and Dismantle the existing toilet facilities and septic tank replacing them with a portable toilet.	No burning of joss papers; and Only staff will use the existing toilet in the office and visitors will use the portable toilet.
Ecological Measures	Reduce the light in the NTEH; and Provide one-way window glass film on each window	N/A

5.7 No Adverse Impact in Traffic

A Traffic Impact Assessment has been carried out as presented in **Appendix IV**. It has the following conclusions:

- (a) The application site, Koon Yam Tong, is located at No. 13 Nim Wan Road, Ha Pak Nai, Yuen Long, i.e. Lot No. 118 in D.D. 135, which is an existing NTEH being used as a columbarium. The Applicant proposes to provide no more than 967 niches. As of September 2025, it has 4 occupied niches.
- (b) Internal transport facilities are not provided at present within the application site, and cannot be provided in the future.
- (c) As traffic and pedestrian management measure, Koon Yam Tong will open by appointment only on weekday, and be closed on Saturdays, Sundays, and public holidays, including the Ching Ming and Chung Yeung Festival Days.
- (d) During the Ching Ming and Chung Yeung Festival Periods, visitation to Koon Yam Tong is by appointment and is from 0700 to 1700 hours on weekdays, i.e. Monday to Friday, and closed on Saturdays, Sundays, and public holidays, including Ching Ming and Chung Yeung Festival Days
- (d) Outside the Festival Period, visitation to Koon Yam Tong is also by appointment and is from 0900 to 1600 hours on Mondays to Fridays, and closed on Saturdays, Sundays, and public holidays.
- (e) Visit-by-Appointment arrangement will be implemented year-round with a visiting capacity of 4 persons per each 30-minute session, and all reservations must be made at least 2 days in advance. Hence, the number of visitor will be controlled.
- (f) Visitors are advised and encouraged to use public transport service, i.e. GMB No. 33, and reminded that access by private car and taxi are discouraged, and car parking is not available at Koon Yam Tong.
- (g) Internet memorial service will be provided by the Applicant for all niche owners as an alternative to in-person visitation.
- (h) Manual traffic counts were conducted at selected junction and road links on a weekday in April 2025, and the observed traffic flows are used as basis to estimate the 2033 traffic flows for analyses without and with the development.
- (i) Pedestrian flows were counted at the track between the application site and Nim Wan Road, and the observed pedestrian flows are used as basis to estimate the 2033 pedestrian flows for analyses without and with the development.

- (j) Occupied survey for public transport service, i.e. GMB No. 33, was conducted and has identified spare capacities.
- (k) Pedestrian generation of the development will be controlled by the Visit-by-Appointment Arrangement, with an hourly generation of 8 visitors per hour. Hence, the additional passenger demand on GMB No. 33 is 8 passengers per hour, and there will be no additional traffic generation.
- (l) In view completion year of the Upgrading of Deep Bay Road and Nim Wan Road are both uncertain as of September 2025, the 2033 junction and road link capacity analyses were performed for the scenarios without and with the planned upgrading work.
- (m) The year 2033 traffic and pedestrian analyses concluded that Koon Yam Tong will the proposed special traffic and pedestrian arrangements implemented, it will not result in traffic and pedestrian impact.
- (n) Existing GMB No. 33 has sufficient capacity to accommodate the additional passenger demand generated by the subject columbarium. Potentially, additional carrying capacity could be introduced.

In view of the above, the subject development is acceptable from traffic engineering aspect. Based on the TCMP as proposed in the TIA, the Management Plan has been updated and attached in **Appendix V**. This will ensure the future operation of Koon Yam Tong can be run in a safe, orderly and smooth fashion, and avoid any potential unnecessary disturbance to the surrounding area as far as practicable.

5.8 Minimum Environmental Impact

The proposed (existing) development will not result in any significant environmental impact (i.e. air quality, vehicular emission, noise, water quality, sewerage and drainage) based on the following considerations:

(a) Air Quality Aspect

Major source of air pollutants during the operation of a columbarium would be burning of ritual papers at the site. However, there will be no incineration process and no burning of joss stick, joss papers, incense, and candles at indoor or outdoor area of the subject development as administrative measure. The worship activities, if any, would be mainly carried out at indoor and staff will be deployed to manage the site in a proper and tranquil manner. Thus, the operation of Koon Yam Tong will not cause unacceptable air quality impact to the surrounding. Potential air sensitive receivers (ASRs), such as temporary (domestic) structures, are properly segregated by mature trees and access roads.

On the other hand, there is no major air and odour emission sources in the vicinity of the columbarium. The application site is situated at a relatively remote location mainly surrounded by mature trees, orchards and small knoll. Based on the site visit conducted in April 2025, no chimneys were identified within 500m from the site. Hence, visitors and staffs in the columbarium will not be subjected to adverse air quality impact from the surrounding.

(b) Vehicular Emission Aspect

Air pollutions related to vehicular emissions are resulted from the nearby traffic emissions and concentration levels of these pollutants are related to dispersion distance of the pollutants. The application site can only be allowed to be reached on foot from Nim Wan Road. Air quality impacts due to the traffic emissions from the surrounding road of the site may assess based on the criteria of HKPSG, which stated the minimum buffer distance requirement from different road types to different open space uses in Table 3.1 of Chapter 9 of the Guideline.

Table 5.3: Distance between the Site and the Roads in the Vicinity of the Site

Road/Street	Distance from the subject site	Road Type	Buffer distance from passive recreational uses stated in HKPSG for different road type	Compliance with the HKPSG
Nim Wan Road	~20m	Rural Road	Not specified in the HKPSG >5m following the Local Road	Yes
Rural track at the north of the site	~10m	Rural Road	Not specified in the HKPSG >5m following the Local Road	Yes

Table 5.3 shows the distance between the application site and the roads around the site. The distance between the subject rural track situated north of the site and Koon Yam Tong has a distance of about 10m, which meets HKPSG's

requirements. Moreover, based on the latest traffic arrangement, no internal transport facilities will be provided within the application site. Visitors are advised and encouraged to take the GMB from Yuen Long and drop off at the nearby GMB stop in Nim Wan Road, and then walk through a footpath to access the application site. Therefore, no significant vehicular emission impact will be imposed to the application site.

(c) Noise Aspect

There will be no extensive fixed noise sources or any public address/loudspeaker to be operated associated with the proposal. The Applicant is reminded that the operation of the proposal, should this s.12A application be approved by TPB, is controlled under NCO, and the Applicant will design and operate the proposal in full compliance with the relevant requirements and recommendations under HKPSG, ProPECC PN and NCO.

Since the columbarium is not designed for noise sensitive use, it is not considered as noise sensitive receiver, as such, the noise criteria specified in HKPSG is not applicable to the site. Also, due to the columbarium is not designed for conducting any funeral ceremony, and the general operation activities such as worships/ praying to be mainly carried out at the site is relatively quiet in nature, adverse noise impact due to operation of the columbarium on the surrounding areas is not expected. The worshipping activities would be properly monitored to ensure no nuisance would be caused by the noise generated from the site.

(d) Water Quality, Sewerage and Drainage Aspects

There will be no construction works to be conducted for the project. Thus, mitigation measures to ease the water quality impacts during construction phase are not required. During operation phase, sewage/wastewater generation from staff and visitor is the major source of water pollution. There is no catering service provided to the visitors or site staff.

Although there are two existing toilet facilities served with a septic tank within the NTEH, the Applicant is planned to dismantle the toilet facilities and a portable toilet will be provided within the site. In accordance with the results of TIA, a maximum 80 visitors and max. 2 staffs per day will visit the columbarium. With reference to the Environmental Impact Assessment (EIA) report of Sandy Ridge Cemetery, the estimated sewage flows during festive periods for the columbarium has been suitably adopted as presented in **Table 5.4**. A more conservative approach has been applied that 70% (instead of 50%) of the total number of visitors and visitor escort coordinators will be assumed to use toilet and contribute to sewage flow generation. The peak daily flow for the development is estimated to be 0.3056m³ per day. It is recommended a portable toilet with a size of 400 litre sewage capacity within the site to cater the need. Sewage and waste from the portable toilet shall be collected and disposed by licensed collectors. To

ensure no adverse odour impact arising from the portable toilet, the Applicant is committed to increase the frequency of collected the sewage and waste by the licensed collectors, and ensure proper maintenance of the portable toilet.

Table 5.4: Sewage Generation of Visitors during Festival Periods

Total No. of visitors	A	80 visitors/day	As advised by the Traffic Consultant
Total No. of staffs to be stationed on-site at all time during the opening hours	B	2 staffs/day	As advised by the Traffic Consultant
Unit flow fate (for staffs)	C	0.08m ³ /person/day	Refer to Commercial Employee of GESF ⁽¹⁾
Unit flow fate (for visitors and visitor escort coordinators)	D	0.0026m ³ /person/visit	200ml micturition ⁽²⁾ + 1L flushing ⁽³⁾ + 1.4L Handwashing ⁽⁴⁾
% of visitors will go to toilet	E	70%	Based on other Monastery Project ⁽⁵⁾
Total unit flow rate (visitors and visitor escort coordinators + staffs)	F	0.3056m ³ /day = 305.6 Litres/day	(A x E x D) + (B x C)

1. EPD publication Guidelines for Estimating Sewage Flows (GESF) for Sewage Infrastructure Planning Version 1.0, March 2005
2. Human's micturition is assumed to be 200mL in accordance with p. 3081 of "Magill's Medical Guide", 6th ed.
3. The volume of flushing system is advised by the supplier of chemical/container toilet
4. BEAM Plus New Buildings Version 1.2 in July 2012
5. Reference has been made to the sewage flow calculation from the Tai Po Tsz Shan Monastery project, in which 50% of the total number of visitors were assumed to contribute to sewage flow generation. Due to the relatively remote location of Koon Yam Tong site, a more conservative approach has been applied that we have assumed 70% of the total number of visitors will use toilet and contribute to sewage flow generation.

In order to minimise the potential drainage impacts that may arise from the site, a Drainage Proposal has been prepared and attached in **Appendix VI**. It has the following conclusions and recommendations:

- The existing U-channel and the proposed U-channel and underground pipe have proven to provide capacity for the design peak flow.
- However, since the existing U-channel has not been properly maintained, improvement works will be carried out by the Applicant to allow it to restore its functionality to the design capacity.
- Considering the very low peak flow rate contributed by the site's runoff, and that improvement works will be carried out to the existing U-channel near the site, a positive drainage impact is expected.
- Up to the present moment, Home Affairs Department, DLO and Drainage Services Department have indicated that they are not responsible for the maintenance of the existing drainage components. In the absence of any Government department assuming maintenance responsibility, it is proposed that restoration works be undertaken, with the assignment of future maintenance responsibilities to be clarified at a later stage.

(e) Waste Management Aspect

Since no construction work will be required for the project, it is anticipated that no construction waste will be generated. The only major type of waste that will be

generated from the operation of the site would be municipal solid waste (MSW). This will be collected and disposed of regularly by a licensed waste collector and disposed of at an appropriate waste disposal facility. Since no catering service will be provided, no significant amount of food waste will be generated during the operation phase. In addition, different types of waste will be reused and recycled by the Applicant as far as practicable before they are disposed. As such, no adverse waste management impact is anticipated and no special measures are likely to be required to manage MSW.

The Applicant will be reminded to comply with relevant environment protection and pollution control ordinances, including APCO, NCO and WPCO.

5.9 Minimum Visual and Landscape Impacts

The proposed (existing) development will not result in any significant visual and landscape impacts based on the following considerations:

- (a) The application site is topographically located in a secluded area of Ha Pak Nai in Yuen Long and is far away from populated residential settlements. The site and its surrounding area is rural in character intermixed with mature trees, orchards, small knoll, religious institution, temporary structures and access roads. With a small site size of 92.9m², it is mostly occupied by a 3-storey NTEH, which was built at the site in 1981. The existing building at the site is low-rise and small-scale in nature and it has been used for columbarium use for a long period time. The subject small NTEH, which is well segregated by mature trees and access roads, is hardly visible from outside.
- (b) This s.12A application is intended to comply with the requirements of PCO to regularise the columbarium use at an existing 3-storey NTEH at the application site. It does not involve any alterations and additions to the existing building and no new building has been proposed at the site. Taking into account the reasonable separation from nearby residential developments, the location of the application site, as well as the existing hill slope and landscape features surrounding the site, the proposed (existing) development is unlikely result in significant visual impacts on the surrounding area.
- (c) Based on the aerial photo of 2023 (see **Plan N** after Page 19), the application site is situated in an area of rural landscape character dominated by mature trees, temporary structures, vacant land and access roads. A local temple is also found to the further west of the site. Since the columbarium is located within the NTEH which was built in 1981, as well as there is no existing landscape resource within the application site, landscape impact arising from the subject use on the surrounding areas is not anticipated. The development is considered not incompatible with the surrounding environment.

5.10 Unlikely to Set an Undesirable Precedent

In view of its secluded location, small scale and new policy initiatives, the present application will unlikely become an undesirable precedent for similar application based on the following justifications:

(a) The Subject Development is not an Undesirable Use

The existing NTEH on the application site was built in 1981 and has not been demolished or re-built. It has been renovated and operated as a columbarium under the name of Koon Yam Tong since 2010. This application is to seek TPB's approval to rectify the existing columbarium use at the site, which is in line with the policy objective for regularising the private columbarium existed before the introduction of PCO. It involves the retention of existing building which is low-rise and low-density in nature.

The application site and the surrounding "CPA" zone are far away from residential uses, and are well segregated from them by mature trees, small knoll and access roads. Koon Yam Tong located in such isolated location is not incompatible with the surrounding land uses. It is relatively a clean facility and is not an undesirable use.

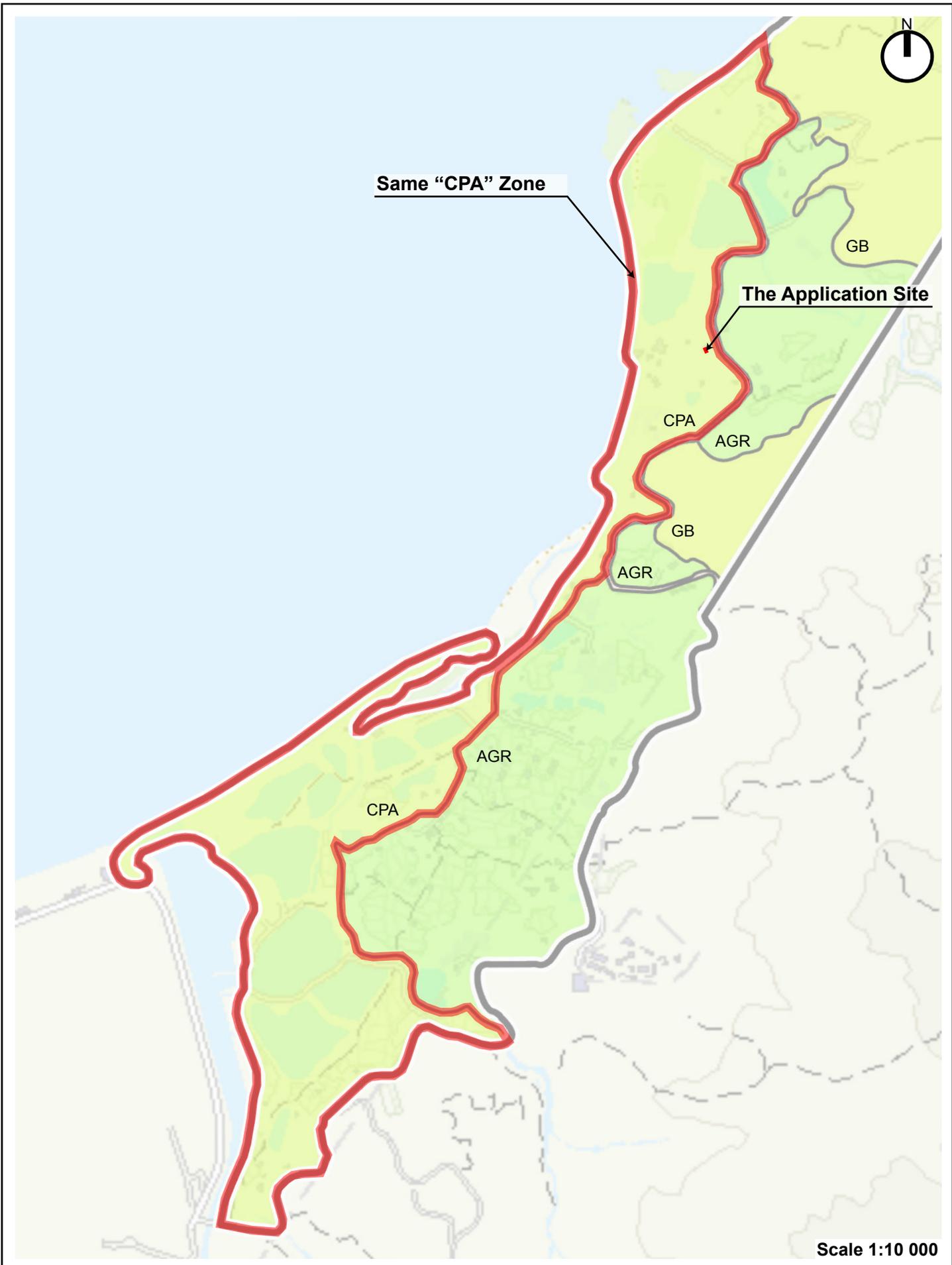
(b) Special Type of Columbarium Application

The columbarium in Koon Yam Tong can be defined as a Pre-cut-off Columbarium which refers to columbarium that was in operation, and in which ashes was interred in niches, immediately before 8 a.m. on 18 June 2014. In response to the latest requirement of PCO, the Applicant had submitted both applications for Columbarium Licence and TSOL for Pre-cut-off Columbarium in Koon Yam Tong to the PCLB before the expiry date of 29.3.2018. In order to facilitate the columbarium licensing application, the Applicant has to comply with all statutory requirements, including town planning, land lease and building safety. Thus, this s.12A application is submitted to regularise the existing columbarium and the nature of this application is totally different to those planning application for providing a new columbarium or increasing number of columbarium niches.

(c) No Similar Case in the Same "CPA" zone

Apart from Koon Yam Tong, it is noticed that there is no other Pre-cut-off Columbarium within the same "CPA" zone (see **Plan O**). Therefore, the risk of "creating a precedent" due the present application is not substantial.

Hence, approval of this application will not result in setting an undesirable precedent for similar applications. The Applicant trusts that the Board could consider each case on its individual merits to ensure no adverse impact will be resulted, similar to a s.16 application (No. A/YL-PN/84) for a proposed Thai Buddhist Monastery with ancillary facilities and filling of land within the same "CPA" zone that has been recently approved by the Board on 1.8.2025.



Plan O: Assessment on Similar Case

(Prepared on 20.6.2025)

6. CONCLUSION

On 30.6.2017, the PCO came into effect to resolve properly the historic problems which have accumulated over the years. In response to the requirements of PCO, the Applicant had submitted the PCL application for Koon Yam Tong to the PCLB on 6.3.2018. 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. During the validity period of TSOL until 10.11.2027, the Applicant has to satisfy a list of stringent statutory requirements, including town planning, land lease and building safety.

In order to fulfill the town planning requirement, this s.12A application is submitted to seek TPB's agreement to amend the zoning of the site covering Lot No. 118 in D.D. 135 from "CPA" to "G/IC" on the Approved Sheung Pak Nai and Ha Pak Nai OZP No. S/YL-PN/9. The present scheme does not involve any change in the overall form of the existing building, and will not propose any new building. The proposed "G/IC" zone will facilitate the continual operation of the existing Pre-cut-off Columbarium with 967 niches in Koon Yam Tong.

Planning and technical assessments have indicated that the present application is well justified based on the following reasons:-

- (a) the NTEH has been in existence at the site since 1981, before the statutory town plan of the area came into force in 1990, and it has been renovated and operated as a columbarium since 2010;
- (b) this s.12A application is aimed at regularising the columbarium niches as at the cut-off-time (i.e. 8 a.m. on 18.6.2014), which is in line with the spirit of PCO to resolve the Pre-cut-off Columbarium under a pragmatic and sensitive approach;
- (c) it is also in line with the Government's intention to relieve part of the urgent demand for columbarium niche spaces in Hong Kong;
- (d) the internet memorial service provided by the Applicant can take of the filial descendants who emigrated overseas to pay respects to their ancestors;
- (e) the application site is suitable for columbarium use as it is located at a secluded and tranquil location, and is far away from residential development;
- (f) the columbarium is only confined within the NTEH which is small scale in nature, and is compatible with the surrounding rural character;
- (g) the total number of niches in Koon Yam Tong has been largely reduced from 3,162 niches, thus the expected visitor demand per year for Koon Yam Tong will be significantly reduced;
- (h) the application site, being hard paved and mostly occupied by a NTEH for a long period of time, has never functioned as Coastal Protection Area; it is surrounded by mature trees and located more than 100m from the coastline or at least 80m away from any potential ecological sensitive areas;
- (i) the small scale development will not result in any significant adverse impact on

- land use, traffic, visual, environmental, drainage, sewerage, landscape and ecological aspects of the locality;
- (j) the small scale development will not result in any significant adverse impact on land use, traffic, visual, environmental, drainage, sewerage, landscape and ecological aspects of the locality; and
 - (k) the proposed "G/IC" zone is tailor-made for Koon Yam Tong and it will not set a bad precedent for similar applications in the area in view of its secluded location, small scale, new measures and new policy initiatives.

In view of the small scale development and planning justifications presented in this Planning Statement, honourable members of the TPB are requested to agree with this s.12A application.

PART II- LIST OF APPENDICES

- Appendix I Policy Initiatives for Pre-cut-off Columbaria*
- Appendix II Supporting Documents submitted to the
Private Columbaria Licensing Board*
- Appendix III Departmental Comments Received
during the Pre-submission Stage*
- Appendix IV Traffic Impact Assessment*
- Appendix V Management Plan*
- Appendix VI Drainage Proposal*

Press Release

Private Columbaria Ordinance

Press Release

Important Dates

Frequently Asked Questions

Alternative Means of Disposal of Ashes

Private Columbaria Affairs Office

Enquiry, Suggestion and Complaint

Related Links

Policy initiatives related to land premium and traffic impact assessment of pre-cut-off columbaria announced by Government

The Government today (November 22) announced that the Chief Executive in Council has approved two policy initiatives to address the land premium and traffic impact assessment (TIA) issues of pre-cut-off columbaria seeking a licence.

According to the Private Columbaria Ordinance, a 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. 8am on June 18, 2014.

Policy initiatives in line with overall interests of the community

A government spokesman said, "We need to resolve properly the historic problems which have accumulated over the years. Quite a number of people had purchased niches from these columbaria or even interred the ashes of their deceased relatives therein before they knew that the Government would introduce a regulatory regime. Given this, we need to adopt a pragmatic and sensitive approach towards the consumers who have purchased these niches, and the dedicated persons, to minimise their losses and any social disruption arising from massive displacement of interred ashes.

"In contemplating these policy initiatives, the Government mainly takes into account the overall interests of the community so as to avoid affecting the descendants, in particular their wish not to disturb the interred ashes of the deceased as far as practicable.

"We must emphasise that all pre-cut-off columbaria will not automatically get a licence as a result of the policy initiatives. The Private Columbaria Licensing Board will still consider each application in accordance with the requirements for applying for a licence as set out in the Ordinance."

Land premium arrangement and safeguards to protect consumers

On land premium, in respect of pre-cut-off sold niches, originally only pre-cut-off columbaria eligible for an exemption in all other respects (in operation before January 1, 1990) were allowed to apply for waiving payment for the regularisation exercise (the waiving arrangement). The Government has now decided to extend the waiving arrangement to allow pre-cut-off columbaria eligible for a licence in all other respects (in operation before 8am on June 18, 2014) to apply.

The Government spokesman added, "Only those pre-cut-off columbaria eligible for a licence in all other respects can apply. In other words, the prerequisites are that the operator: 1) must be a pre-cut-off columbarium; 2) must fulfil the licensing criteria for a licence in all other respects, which include more than 10 relevant requirements on planning, building and fire safety.

Specifically, a pre-cut-off columbarium confirmed to be eligible for a licence in all other respects may apply for administratively regularising, in respect of the pre-cut-off sold niches, breaches of relevant lease conditions and/or unlawful occupation of unleased land by way of a waiver and/or a short term tenancy (STT), and waiving the relevant waiver fees, STT rentals and administrative fees before and during the licence

Updated
Information for Consumers

Updated
Information for Operators

Private Columbaria Licensing Board

List of Applications for Specified Instruments Received

Ash Temporary Storage Service by FEHD

Updated
Application Guide and Forms for Licence and Other Specified Instruments

Updated
Guidelines for Carrying out the Prescribed Ash Disposal Procedures

Updated
Other Multimedia Information

Updated
Information on Ash Disposal by Columbaria

period. However, each application will be considered on a case-by-case basis having regard to its circumstances and merits.

The Government will impose a series of safeguards on pre-cut-off sold niches covered by the waiving arrangement, including that the operators are not allowed to impose extra charges beyond what was provided in the original agreements with the consumers concerned.

At the same time, the operators should seek the agreement of the consumers to abide by the restrictions below: (1) for those partially filled or unfilled niches, replacing the name of a dedicated person where his/her ashes have yet to be interred with another person is only limited to his/her relative (in accordance with the definition of "relative" in the Ordinance); (2) for filled niches, if any interred ashes are removed subsequently in the future, such niches are not allowed to be "refilled". After the niches referred to in (1) have become the niches referred to in (2) in future, the restriction in (2) would also apply to them. As such, the operators have to provide to the Licensing Board registers for endorsement for the purpose of the restrictions in (1) and (2) above.

For the number of niches without agreement between the operator and the consumers being reached, or in the absence of other equally effective means to ensure compliance with the above safeguards, a full market value (FMV) land premium will be payable. If FMV land premium is paid, such niches could be traded in the market free of the above restrictions. The operators must pay an FMV land premium for all the post-cut-off sold or newly let out niches.

"The above waiving arrangement is aimed at protecting consumers. From the consumer's perspective, whether a pre-cut-off columbarium applies for an exemption or a licence should make no difference to them as they have already purchased or even have been using the relevant niches. If the operators recoup land premium from consumers who have purchased the niches in the past or they pass on the land premium to consumers who will purchase niches in future, various kinds of disputes will arise," said the spokesman.

Initiative relating to TIA

Taking into account the overall interests of the community, the Government has decided to use an empirical evidence approach as the basis for assessing traffic impacts when the Government departments process the licence application from a pre-cut-off columbarium whose operation only involves the number of niches sold before June 30, 2017 (the enactment date of the Ordinance).

The Government has studied this issue in depth and has the following three observations. Firstly, the columbaria concerned are not brand-new planned establishments but have already been in existence and operation in the community for a long time. Secondly, the traffic and pedestrian flow problem mainly surface during the grave-sweeping seasons (Ching Ming Festival and Chung Yeung Festival) and the situation outside the grave-sweeping seasons is usually not a major concern. Thirdly, an applicant for a licence would have to submit a management plan covering the traffic and crowd control measures for prior approval by the Licensing Board, and is required to comply with the licensing conditions relating to the traffic and pedestrian flow management measures imposed by the Board.

According to on-site observation, traffic and pedestrian flow management arrangements are already implemented by the Government departments in some of the areas where a number of columbaria are located together. The Government departments concerned have prepared contingency plans in areas with needs to cater for ad hoc situations. The Government has also noticed that some columbaria also

actively make some traffic arrangements during Ching Ming Festival and Chung Yeung Festival, such as providing dedicated coaches to pick up and drop off gravesweepers. If only niches sold as at June 30, 2017 of pre-cut-off columbaria are counted, the traffic level in those areas during the peak hours is, overall speaking, still at an acceptable level. On the part of individual columbaria, operators have the responsibility to provide practicable mitigation measures within their capability. The Government departments will reflect to the Licensing Board their views on suitable mitigation measures that should be followed up by individual cases. We believe that the Licensing Board will, having regard to the situation, vet the management plan of the operators and impose appropriate licensing conditions.

If a pre-cut-off columbarium would like to sell or newly let out niches after June 30, 2017, or any post-cut-off columbarium would like to submit planning or licence applications for their development, the TIA mechanism is applicable to them.

Responsibilities of private columbarium operators

"The operation of a private columbarium in Hong Kong must be covered by a licence, an exemption or a temporary suspension of liability according to the Ordinance. Only private columbaria that have obtained licences may sell or newly let out niches. This fundamental principle has not been changed and will not be changed," added the spokesman.

"Operators of private columbaria have the responsibility to abide by the various licensing requirements as stipulated under the Ordinance."

According to section 99 of the Ordinance, a person who commits an offence of providing information that is false or misleading is liable on conviction to a fine of \$500,000 and to imprisonment for two years. In addition, if an operator deceives the Government, thus resulting in prejudice to the Government, that person commits the offence of fraud under the Theft Ordinance, which would render an offender liable on conviction to a maximum penalty of imprisonment for 14 years. Moreover, if a columbarium operator and a consumer conspire to deceive the Government, they commit the offence of conspiracy to defraud. Such an act is contrary to Common Law and punishable under the Crimes Ordinance, which would render an offender liable to a maximum penalty of imprisonment for 14 years.

A Legislative Council brief on the above arrangements can be downloaded from the Food and Health Bureau's website (www.fhb.gov.hk/download/press_and_publications/otherinfo/160700_columbarium/e_legco_brief_on_land_premium_TIA.pdf).

Ends/Wednesday, November 22, 2017

Issued at HKT 17:30

Appendix II

Relevant Documents in Relation to the PCL Application

Annex I – Submission Letter for Applications for Private Columbaria Licensing Application

Annex II – Approval-in-principle for Temporary Suspension of Liability Application

Annex III – Approved Extension of Time for Temporary Suspension of Liability Application

DCL 德勤顧問服務有限公司

Derkon Consultant Limited

Your ref. :
 Our ref. : 4481/OUT/004
 Date : 6th March, 2018

send by hand

Private Columbaria Affairs Office
 Lui Kee Education Services Centre,
 269 Queen's Road East,
 Wanchai, Hong Kong (Tel.: 2350 7319)

Dear Sir/ Madam,

Re: Application for License and Other Specified Instruments for Pre-Cut-Off Columbarium under the Private Columbarium Ordinance (Cap.630) for Koon Yam Tong, No.13 Nim Wan Road, Lau Fau Shan Ha Pak Nai, Yuen Long in D.D. 135 LOT No.118
Submission of Form and Supporting Documents for Application of License in respect of a Pre-Cut-Off Columbarium and Temporary Suspension of Liability

Pursuant to the Private Columbaria Ordinance (Cap. 630), we would like to submit herewith the followings for your processing of the application for the captioned venue:-

1. A duly signed and completed Application Form (Annex 2);
2. A duly signed and completed Statement of Particulars of Applicant and Related Persons (Appendix);
3. 19 sets duly signed proposed plans(11 sets for License and 8 sets for TSOL);
4. Supporting documents for Part IV(A) listed in Application Form (Annex 2);
5. Supporting documents for Part IV(B) listed in Application Form (Annex 2)
 - (i) Land-related Requirements (2 sets);
 - (ii) Planning-related Requirements (2 sets);
 - (iii) Building-related Requirements (sets);
 - (iv) Right to use the Columbarium Premises;
 - (v) Management Plan (6 sets with 3 sets financial statement);
 - (vi) Deed of Mutual Covenant (Not Applicable);
 - (vii) Sample of agreement for scale of interment right;
 - (viii) Application summary

Should you have any enquires, please contact the undersigned further information and clarification.

Yours faithfully,
 For and on behalf of
 Derkon Consultant Ltd


 Wong Him Sun
 Authorized Person – AP(E) 61/99

EW/rt

Encl: as stated above



認收回條

致： 賴玉雯 (姓名) 先生 / 女士
觀音堂 (骨灰安置所名稱)

本辦事處已收到閣下於 2018 年 3 月 6 日 提交的申請。



私營骨灰安置所事務辦事處
食物環境衛生署

- 6 MAR 2018

日期： _____



食物環境衛生署
Food and Environmental
Hygiene Department

私營骨灰安置所事務辦事處
Private Columbaria Affairs Office

覆函請寄交食物環境衛生署並引用本署檔案編號

本署檔號: (145) in FEHD PC 72-40/62/2018/034 Pt. 3

掛號郵件

新界元朗下白泥稔灣路 13 號
嘉福服務有限公司
(獲授權人士：鄧富勝先生)

鄧先生：

根據《私營骨灰安置所條例》(第630章)(《條例》)
申請指明文書

骨灰安置所名稱:	觀音堂
骨灰安置所地址:	新界元朗流浮山下白泥稔灣路 13 號 (丈量約份第 135 約地段第 118 號)
申請人:	嘉福服務有限公司 (Ka Fuk Services Limited)
私營骨灰安置所發牌委員會 收到申請的日期:	2018 年 3 月 6 日
申請指明文書類別:	就截算前骨灰安置所申請牌照及暫免法律責任書

原則上同意暫免法律責任書申請
通知書

現致函通知上述申請人，私營骨灰安置所發牌委員會(發牌委員會)已決定就上述名為「觀音堂」的私營骨灰安置所給予「原則上同意暫免法律責任書申請」，有效期為3年，由發出此通知書的日期開始計算(即有效期由2021年11月11日至2024年11月10日)。

請注意以下事項:

2. 在上述有效期內，申請人須遵守以下的條件：
 - (i) 申請人須確保該骨灰安置所持續符合由消防處制定及適時更新的“私營骨灰安置所消防安全規定”（請參看「私營骨灰安置所牌照及其他指明文書申請指引」附件 9 的附錄 1）；
 - (ii) 申請人須有效執行管理措施，以確保 1 樓及 2 樓鎖上並限制只供管理人員進出，以便進行維修保養；以及
 - (iii) 申請人須在通往 1 樓及 2 樓的通道及樓梯的顯眼位置，展示一份尺寸不少於 420 毫米(長)及 297 毫米(闊)的中英文告示，告示須以耐用物料製成，以不少於 72 點的字體及數字，述明“限制只供管理人員進出”。申請人須確保上述告示持久地展示在通往 1 樓及 2 樓的通道及樓梯的顯眼位置，並須確保其完整和維持良好狀況。
3. 如果申請人在「原則上同意暫免法律責任書申請」的有效期內不遵守上文第2段所述的條件，發牌委員會可能考慮取消上述「原則上同意暫免法律責任書申請」，並立即就整組申請作定奪。若屆時申請人仍未符合與該暫免法律責任書申請一併提交的牌照申請的所有規定和要求，發牌委員會將可能拒絕整組申請，在該情況下，上述骨灰安置所須結束營運，並按《條例》的相關規定處置骨灰。
4. 在上述3年的有效期內，申請人須根據載於附件為了符合有關的暫免法律責任書申請要求而提交並獲發牌委員會接納的行動計劃連同時間表，合理地迅速採取所有必需步驟，以符合與該暫免法律責任書申請一併提交的牌照申請的要求，並盡快向發牌委員會(由骨灰所辦代收)提交有關的證明文件及資料。
5. 現時發牌委員會並未就上述暫免法律責任書申請作出最終定奪，在上述「原則上同意暫免法律責任書申請」的有效期間，上述骨灰安置所仍處於寬限期。若在「原則上同意暫免法律責任書申請」的有效期內，申請人已符合上述牌照申請的所有規定和要求，發牌委員會會考慮直接就該牌照申請作出定奪，並舉行公開會議審議該申請。在定奪上述指明文書申請時，發牌委員會須顧及公眾利益及可顧及任何其他相關因素。
6. 發牌委員會給予「原則上同意暫免法律責任書申請」並不代表上述牌照申請最終一定獲批。現時就「觀音堂」的牌照申請的建議圖則(包括龕位資料)的審核工作仍在進行中，給予「原則上同意暫免法律責任書申請」並不表示發牌委員會已接納與此暫免法律責任書申請一併提交的牌照申請的建議圖則(包括龕位資料)內的資料。

7. 當上述「原則上同意暫免法律責任書申請」期限接近屆滿時，發牌委員會會考慮應否延續有效期。若申請人仍未符合與該暫免法律責任書申請一併提交的牌照申請的所有規定和要求，亦未能證明致使發牌委員會信納申請人已合理地迅速採取所有必需步驟，以符合《條例》中有關上述牌照申請的所有規定和要求，發牌委員會將不會延續「原則上同意暫免法律責任書申請」的有效期，而會就上述整組申請作定奪。若申請人在發牌委員會作出定奪時仍未符合有關上述牌照申請的所有規定和要求，發牌委員會將拒絕整組申請。在此情況下，骨灰安置所須結束營運，並按《條例》的相關規定處置骨灰。

8. 若有任何疑問，請致電 2350 7327 或發送電郵致pc_app@fehd.gov.hk與個案經理林建超先生聯絡。

私營骨灰安置所發牌委員會秘書林綺萍



2021年11月11日

重要提示

骨灰安置所營辦者有責任確保骨灰安置所符合所有適用於其骨灰安置所的法例和政府規定，並且遵守所有相關當局(包括但不限於建築事務監督、地政總署署長、規劃署署長、消防處處長、警務處處長、運輸署署長、環境保護署署長、機電工程署署長或其他決策局、政府部門以及有關的主管當局)按其執行的法例或職權所訂立的一切要求及條件，以及須就違反的事項承擔各類刑罰及法律責任。

重要事項

《私營骨灰安置所條例》第 99 條 — 提供虛假或具誤導性的資料的罪行

- (1) 任何人如 —
 - (a) 根據本條例，就某骨灰安置所提出申請，而在該申請中，或在與該申請相關的情況下，提供在要項上屬虛假或具誤導性的資料；或
 - (b) 在知悉某資料在要項上屬虛假或具誤導性的情況下，根據本條例，向署長、獲授權人員或公職人員，提供該資料，即屬犯罪。
- (2) 任何人犯第(1)款所訂罪行，一經定罪，可處罰款五十萬元及監禁 2 年。

重要提醒

任何私營骨灰安置所在 2018 年 3 月 29 日之後，如果沒有暫免法律責任書申請在處理中，亦未取得任何指明文書，便不能繼續營辦。任何人士在沒有指明文書的情況下營辦、維持、管理或以任何方式控制骨灰安置所即屬違法，循簡易程序定罪，可處罰款二百萬元及監禁 3 年；如循公訴程序定罪，則可處罰款五百萬元及監禁 7 年。

在寬限期後而沒有持有任何指明文書的情況下繼續營運骨灰安置所，或停辦骨灰安置所，營辦人須根據《私營骨灰安置所條例》附表 5 的「訂明骨灰處置程序」處置存放於該骨灰安置所內的骨灰，否則即屬犯罪，違例者可被檢控，循簡易程序定罪，可處最高罰款二百萬元及監禁 3 年；而循公訴程序定罪，則可處最高罰款五百萬元及監禁 7 年。

副本送：

暫免法律責任書申請檔案：FEHD PC 72-40/64/2018/038



私營骨灰安置所事務辦事處
Private Columbaria Affairs Office

覆函請寄交食物環境衛生署並引用本署檔案編號

本署檔號:

(12) in FEHD PC 72-40/62/2018/034 Pt.5

(36) in FEHD PC 72-40/64/2018/038 Pt.2

掛號郵件

新界元朗下白泥稔灣路13號

嘉福服務有限公司

(獲授權人士：鄧富勝先生)

鄧先生：

根據《私營骨灰安置所條例》(第630章)(《條例》)
指明文書申請

骨灰安置所名稱	觀音堂
骨灰安置所地址	新界元朗流浮山下白泥稔灣路 13 號 (丈量約份第 135 約地段 118 號)
申請人	嘉福服務有限公司
私營骨灰安置所 發牌委員會(發牌委員會) 收到申請的日期	2018 年 3 月 6 日
指明文書申請類別	就截至前骨灰安置所申請牌照及暫免 法律責任書

私營骨灰安置所發牌委員會

延長「原則上同意暫免法律責任書申請」的有效期限通知書

私營骨灰安置所事務辦事處(骨灰所辦)曾於 2021 年 11 月 11 日發信通知申請人，給予「原則上同意暫免法律責任書申請」，有效期為 3 年(即由 2021 年 11 月 11 日至 2024 年 11 月 10 日)。

2. 發牌委員會於 2024 年 5 月 10 日、2024 年 6 月 19 日及 2024 年 8 月 22 日收到申請人提交延長「原則上同意暫免法律責任書申請」的

有效期申請及所需文件，在考慮了申請人所採取的實際行動和已提交的文件及有關部門的意見後，發牌委員會決定延長上述「原則上同意暫免法律責任書申請」的有效期 3 年至 2027 年 11 月 10 日。

請注意以下事項

3. 在上述有效期內，申請人須繼續遵守由消防處及屋宇署建議的以下條件：

- (i) 申請人須確保該骨灰安置所持續符合由消防處制定及適時更新的“私營骨灰安置所消防安全規定”（請參看「私營骨灰安置所牌照及其他指明文書申請指引」附件 9 的附錄 1）；
- (ii) 申請人須有效執行管理措施，以確保 1 樓及 2 樓鎖上並限制只供管理人員進出，以便進行維修保養；以及
- (iii) 申請人須在通往 1 樓及 2 樓的通道及樓梯的顯眼位置，展示一份尺寸不少於 420 毫米(長)及 297 毫米(闊)的中英文告示，告示須以耐用物料製成，以不少於 72 點的字體及數字，述明“限制只供管理人員進出”。申請人須確保上述告示持久地展示在通往 1 樓及 2 樓的通道及樓梯的顯眼位置，並須確保其完整和維持良好狀況。

4. 如果申請人在「原則上同意暫免法律責任書申請」的有效期內不遵守上文第 3 段所述的條件，發牌委員會可能考慮取消上述「原則上同意暫免法律責任書申請」，並立即就整組申請作定奪。若屆時申請人仍未符合與該暫免法律責任書申請一併提交的牌照申請的所有規定和要求，發牌委員會將可能拒絕整組申請，在該情況下，上述骨灰安置所須結束營運，並按《條例》的相關規定處置骨灰。

5. 在上述 3 年的有效期內，申請人須根據為了符合此暫免法律責任書申請要求而提交並獲發牌委員會接納的更新行動計劃連同時間表，合理地迅速採取所有所需步驟，以符合與該暫免法律責任書申請一併提交的牌照申請的要求，並盡快向發牌委員會(由骨灰所辦代收)提交有關的證明文件及資料。

6. 現時發牌委員會並未就上述暫免法律責任書申請作出最終定奪，在上述「原則上同意暫免法律責任書申請」的有效期間，上述骨灰安置所仍處於寬限期。若在「原則上同意暫免法律責任書申請」的有效

期內，申請人已符合上述牌照申請的所有規定和要求，發牌委員會會考慮舉行公開會議審議該申請，以直接就該牌照申請作定奪。在定奪上述指明文書申請時，發牌委員會須顧及公眾利益及可顧及任何其他相關因素。

7. 發牌委員會給予「原則上同意暫免法律責任書申請」並不代表上述牌照申請最終一定獲批。現時就「觀音堂」的牌照申請的審核工作仍在進行中，給予延長「原則上同意暫免法律責任書申請」並不表示發牌委員會已接納與此暫免法律責任書申請一併提交的牌照申請。

8. 若申請人在「原則上同意暫免法律責任書申請」屆滿時仍未符合與該暫免法律責任書申請一併提交的牌照申請的所有規定和要求，發牌委員會會考慮就上述整組申請作定奪並可能拒絕整組申請，在此情況下，骨灰安置所須結束營運，並按《條例》的相關規定處置骨灰。

9. 若有任何疑問，請致電 2350 7326 或電郵發送致 pc_app@fehd.gov.hk 與個案經理陳茵茵女士聯絡。

食物環境衛生署署長

(劉穎賢



代行)

2024年11月8日

重要事項

提供虛假或具誤導性資料的罪行

《私營骨灰安置所條例》第 99 條 — 提供虛假或具誤導性的資料的罪行

(1) 任何人如 —

- (a) 根據本條例，就某骨灰安置所提出申請，而在該申請中，或在與該申請相關的情況下，提供在要項上屬虛假或具誤導性的資料；或
- (b) 在知悉某資料在要項上屬虛假或具誤導性的情況下，根據本條例，向署長、獲授權人員或公職人員，提供該資料，
即屬犯罪。

(2) 任何人犯第(1)款所訂罪行，一經定罪，可處罰款五十萬元及監禁 2 年。

寬限期和處置骨灰的規定

任何私營骨灰安置所在 2018 年 3 月 29 日之後，如果沒有暫免法律責任書申請在處理中，亦未取得任何指明文書，便不能繼續營辦。任何人士在沒有指明文書的情況下營辦、維持、管理或以任何方式控制骨灰安置所即屬違法，循簡易程序定罪，可處罰款二百萬元及監禁 3 年；如循公訴程序定罪，則可處罰款五百萬元及監禁 7 年。

在寬限期後而沒有持有任何指明文書的情況下繼續營運骨灰安置所，或停辦骨灰安置所，營辦人須根據《私營骨灰安置所條例》附表 5 的「訂明骨灰處置程序」處置存放於該骨灰安置所內的骨灰，否則即屬犯罪，違例者可被檢控，循簡易程序定罪，可處最高罰款二百萬元及監禁 3 年；而循公訴程序定罪，則可處最高罰款五百萬元及監禁 7 年。

須遵從法例和政府規定

骨灰安置所營辦者有責任確保骨灰安置所符合所有適用於其骨灰安置所的法例和政府規定，並且遵守所有相關當局(包括但不限於建築事務監督、地政總署署長、規劃署署長、消防處處長、警務處處長、運輸署署長、環境保護署署長、機電工程署署長或其他決策局、政府部門以及有關的主管當局)按其執行的法例或職權所訂立的一切要求及條件，以及須就違反的事項承擔各類刑罰及法律責任。

Table 3.1 Proposed Schedule of Uses for "G/IC" Zone

GOVERNMENT, INSTITUTION OR COMMUNITY

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Columbarium (specified number of niches in paragraph (a) under Remarks)	

Planning Intention

This zone is intended primarily for columbarium use.

Remarks

- (a) On land designated "Government, Institution or Community", the maximum number of niches for columbarium use shall not exceed 967.
- (b) No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of the maximum building height of 3 storeys or the height of the existing building, whichever is the greater.
- (c) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the number of niches/building height restriction stated in paragraphs (a) and (b) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

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 First Pre-submission 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 Second Pre-submission 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.	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. It is hope that the above improvement measures have adequately addressed your comments.

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 Received on 1.12.2025</u>		
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>	<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.</p>
DSD (B2)	<p>(b) In Drawing No. SK-02, the invert level of component A is higher than the cover level. Please review.</p>	<p>Noted. Please find the revised drawing SK-02 Rev C in the latest Drainage Proposal (see Appendix VI).</p>
DSD (B3)	<p>Please note that our comments (a), (e) (f) in para. 1 and general comments/requirements in para. 2 in previous reply are still valid.</p>	<p>Noted. The comments/requirements will be addresses/followed.</p>

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.	<p>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.</p>
EPD (A3)	In addition, Joss-stick/candle burning is not allowed and there is no incineration process. One smoke-free increase 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.	<p>From environmental planning perspective, we have no objection to the pre-submission of rezoning application. Nevertheless, please</p>
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>
<i>Comments on <u>Second Pre-submission</u> Received on 21.11.2025</i>		
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>
<p>EPD (B2)</p>	<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)	<p>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.</p>	Noted.
FEHD (A2)	<p>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.</p>	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>(a) Opening hours of PC</p> <p>(b) Mode of Grave Sweeping</p> <p>(c) Transportation</p> <p>(d) Visiting Capacity</p> <p>(e) Fire Safety Management</p>	<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>

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><i>(Remarks: for comment's details, please refer to Annex I of this Appendix III)</i></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. Equipment for the staff including first aid box, etc. 	
FEHD (A9)	<p><u>Item (8) Contingency plans for emergencies</u></p> <ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. Please refer to item (8) of the updated Management Plan in Appendix V. 2. Ditto. 3. Ditto.
FEHD (A10)	<p><u>Item (11) Complaint Handling</u></p> <ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. 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"> 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. 	<ol style="list-style-type: none"> 1. 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"> 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</i> 	<ol style="list-style-type: none"> 1. 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><i>(Remarks: for comment's details, please refer to Annex II of this Appendix III)</i></p>	<p>Noted.</p> <p>Table 4.2 of the Planning Statement has been amended accordingly.</p>
FEHD (B2)	<p>On Item A3 of Item 2.5 RtoC from FEHD of Appendix III, the applicant has opted</p>	<p>Noted.</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
<i>Comments on First Pre-submission Received on 4.8.2025</i>		
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>
<i>Comments on Second Pre-submission Received on 21.11.2025</i>		
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
Comments on <u>First Pre-submission</u> Received on 4.8.2025		
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> <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.
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 Received on 12.11.2025</u>		
LandsD (B1)	Please tick as appropriate: <input checked="" type="checkbox"/> No objection / No adverse comment * <input type="checkbox"/> No comment <input type="checkbox"/> Objection / Have adverse comment*	Noted.
LandsD (B2)	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:- (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 65.04m ² ; 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.

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>	Noted.

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)	<p>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>	<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.
<i>Comments on <u>Second Pre-submission</u> Received on 15.12.2025</i>		
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>Page IV-6&7 of Fire Engineering Study Report</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. 14-6</p> <hr/> <p>Fotlon 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: 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>Page IV-12 of Fire Engineering Study Report</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 border="1" data-bbox="1018 1025 1302 1182"> <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>Page IV-6 of Fire Engineering Study Report</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: 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: 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: 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: 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>Page IV-13 of Fire Engineering Study Report</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訪客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> <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 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> <ul style="list-style-type: none"> No smoking or naked flame is allowed. Burning of joss stick, joss paper, incense and candle is prohibited in the building. <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 Ref. (14),(35) in FEHD PC 72-40/62/2018/034 Pt. 4 (Licence)
dated 5.12.2022, 14.12.2023 Fax No. 2827 2908
e-mail. yunw@fehd.gov.hk
No. vwylau@fehd.gov.hk
Total Pages (68),(70),(73),(75),(77),(80),(81),(83),(85)

**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).

- 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.
- 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)

ts - 263238, 280657

* Delete where inapplicable.

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夠有效維持，並確保本計劃中提到的防火安排及程序能夠得到充分實施。

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啓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

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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	The applicant should provide appropriate information having regard to the actual circumstances of the private columbarium on the following: <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

Outlook

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: <u>Ka Fuk Services Limited</u> 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: <u>No. 13 Nim Wan Road, Ha Pak Nai, Yuen Long, New Territories (Lot No. 118 in D.D. 135)</u> (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 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 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.



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Appendix I
 (Total 14 pages)

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. 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.*

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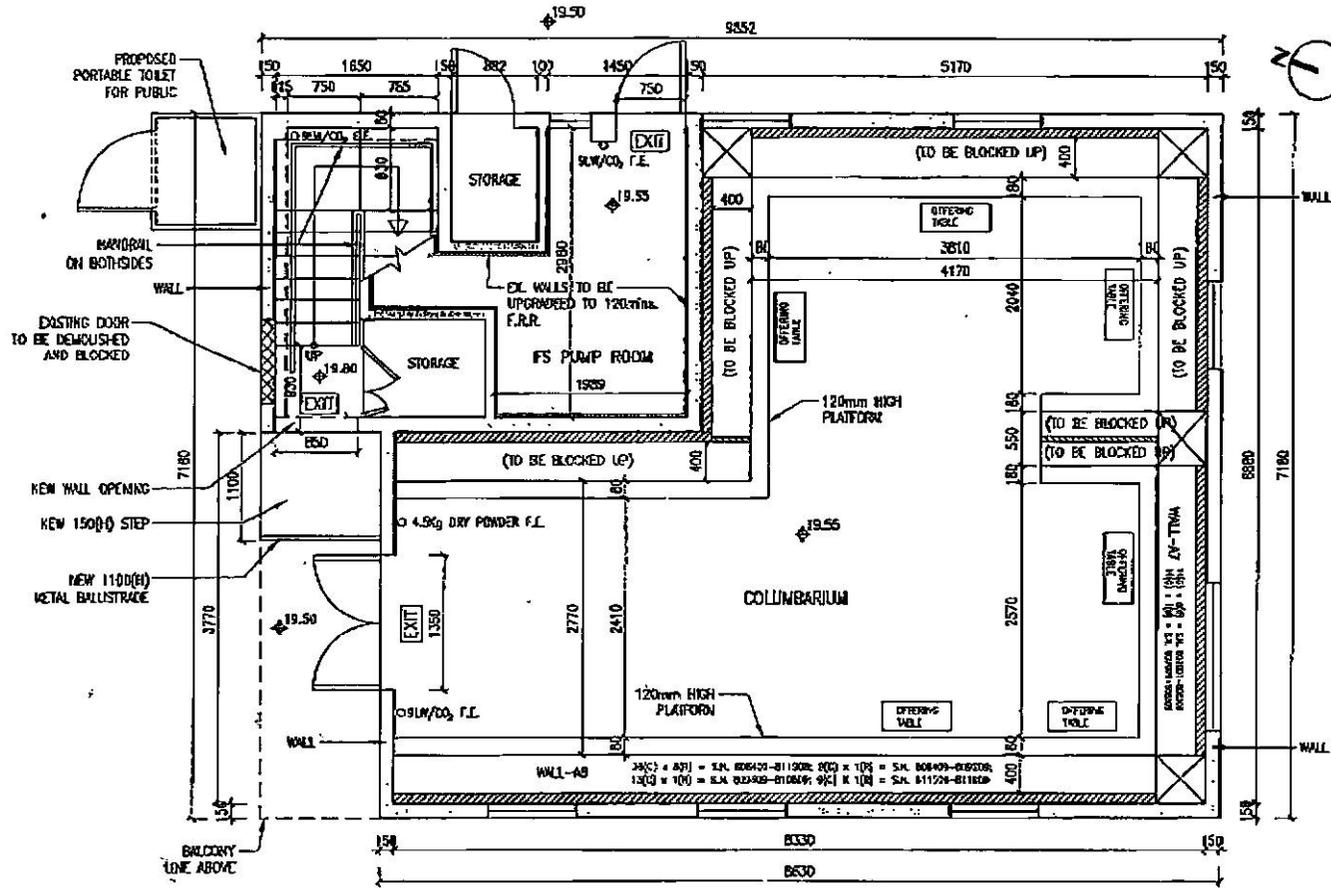
Address: Address: Unit B1, 11/F, Cheung Kong Factory Building, 5 Cheung Shun Street and 6 Cheung Yee Street, Cheung Sha Wan, Kowloon

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



LEGEND:
(C) - COLUMN
(R) - ROW
S.N. - SERIAL NUMBER

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

Chop of Body Corporate / Partnership (if applicable)
Must conform to the register under section 3 of the Buildings Ordinance (Cap. 123)
Delete if inapplicable

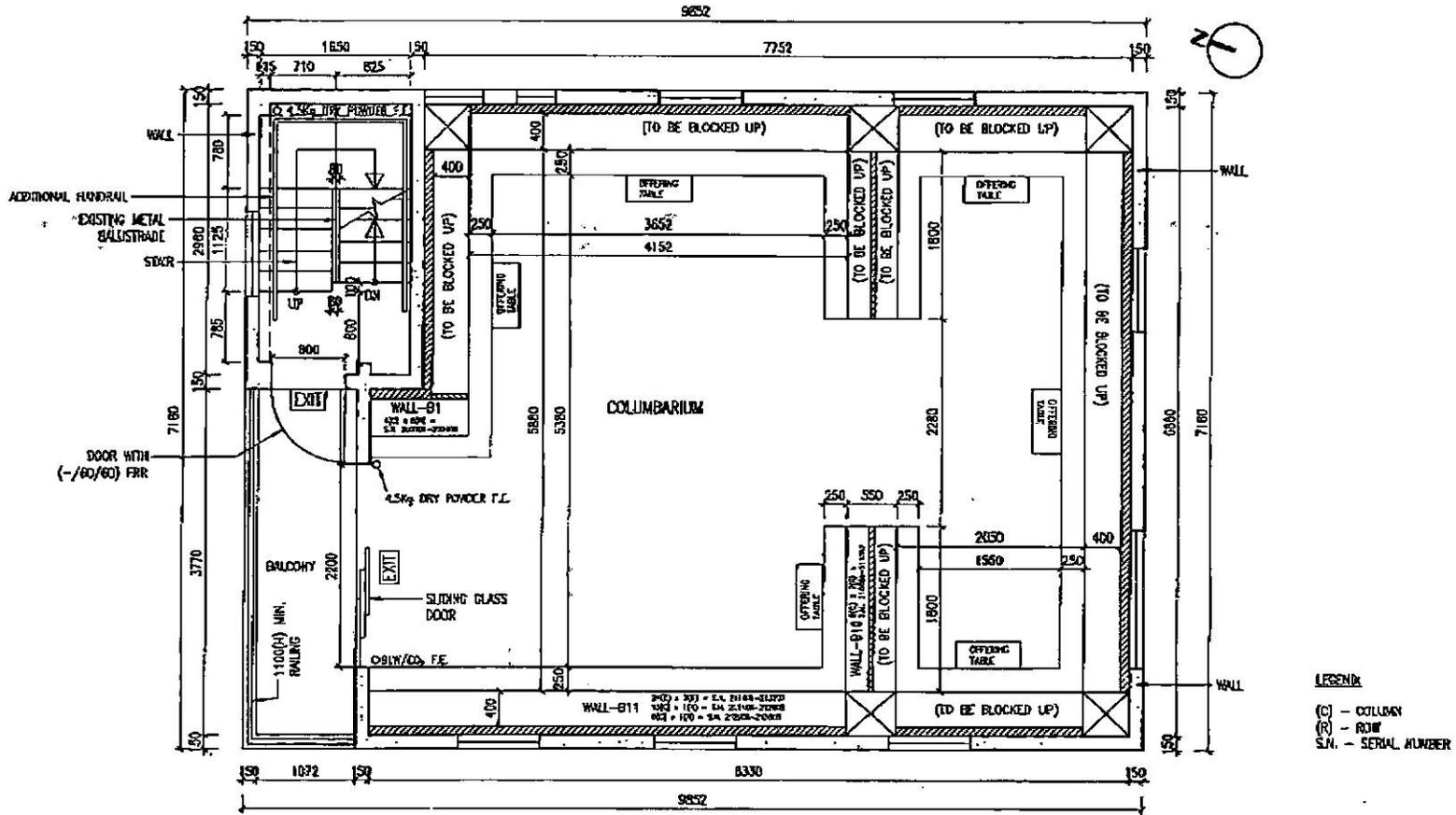
Proposed Floor Plan of G/F (Plan No. 003)
Scale 1:50

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

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 (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

Proposed Floor Plan of 1/F (Plan No. 004)

Scale 1:50

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

- 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 floor plan; and
 Item(A)(ii) – 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:

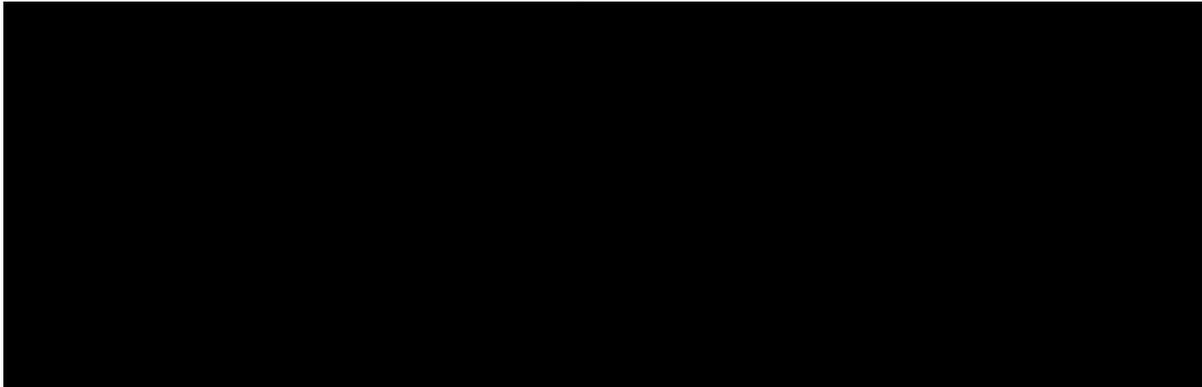
- (i) except for SCPC and CB, no part of a private columbarium shall be located under or over any structures built without the approval and consent of the BD;

- (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





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



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



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 addition 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

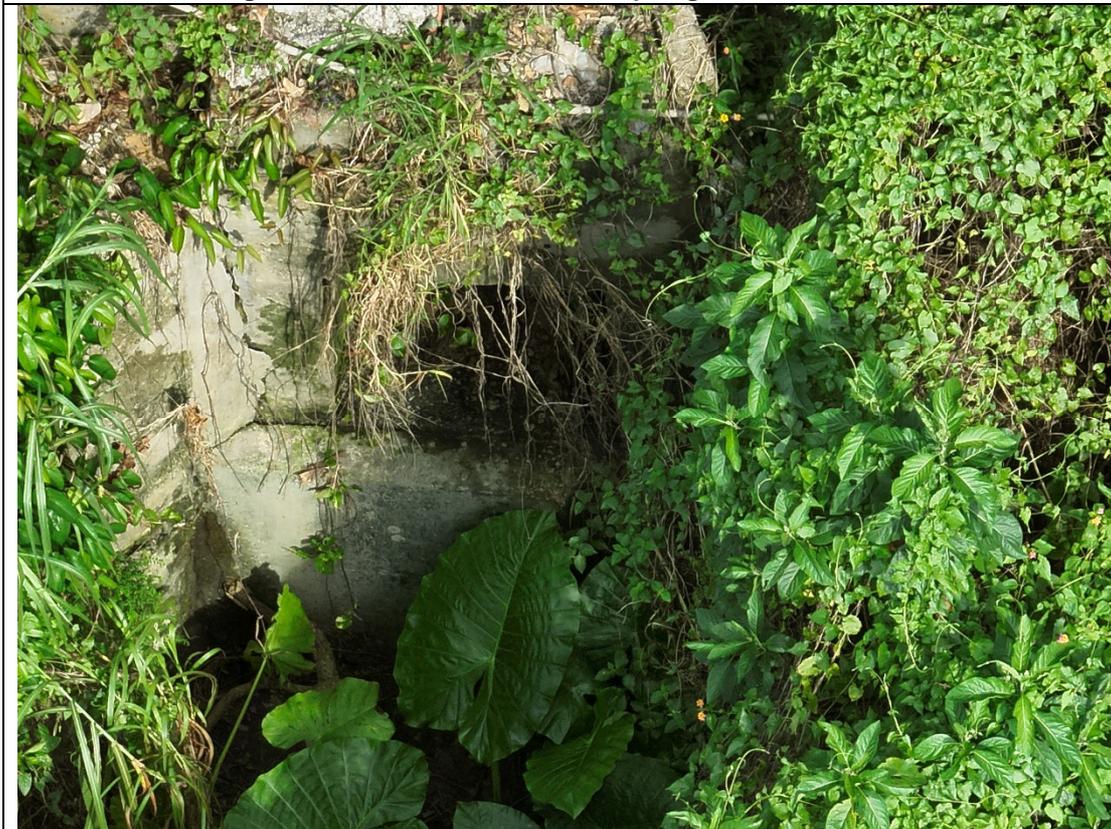


Photo 5 – Existing 1200mm (approx.) underground pipe and open drainage pit

Existing Drainage Components Photos



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



LEGENDS

① Photo Number and Direction

FOTTON ELA ARCHITECTS LTD.
 李北民建築師有限公司

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 NO. SK-05
 SCALE 1:400

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

DRAWING TITLE Photographic Record Index Plan

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PROJECT REF. _____
 CAD REF. 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

**Proposed Columbarium,
Koon Yam Tong, 13 Nim Wan Road
Lot No. 118 in D.D. 135, Ha Pak Nai
Yuen Long, New Territories**

Traffic Impact Assessment
18th December, 2025

Prepared by: CKM Asia Limited

Prepared for: Ka Fuk Services Limited

Proposed Columbarium,
Koon Yam Tong, 13 Nim Wan Road
Lot No. 118 in D.D. 135, Ha Pak Nai
Yuen Long, New Territories

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**Proposed Columbarium,
Koon Yam Tong, 13 Nim Wan Road
Lot No. 118 in D.D. 135, Ha Pak Nai
Yuen Long, New Territories**

TABLES

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- 2.1 Surveyed Junctions and Road Links
- 2.2 Existing Junction Operational Performance
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- 2.5 Public Transport Service Operating near the Subject Site
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Proposed Columbarium,
Koon Yam Tong, 13 Nim Wan Road
Lot No. 118 in D.D. 135, Ha Pak Nai
Yuen Long, New Territories

FIGURES

NUMBER

- 1.1 Location of the Subject Site
- 2.1 Existing Layout of the Subject Site
- 2.2 Area of Influence, and Locations of Surveyed Junction, Road Links and Pedestrian Track
- 2.3 Existing Columbarium Peak Hour Traffic Flows
- 2.4 Road-based Public Transport Services operating Near the Subject Site
- 4.1 2033 Columbarium Peak Hour Traffic Flow Without and With the Proposed Columbarium

1.0 INTRODUCTION

Background

- 1.1 The Subject Site, which is known as Koon Yam Tong, is located at 13 Nim Wan Road, Ha Pak Nai, Yuen Long, i.e. Lot No. 118 in D.D. 135. **Figure 1.1** shows the location of the Subject Site.
- 1.2 At present, the Subject Site is a 3-storey New Territories Exempted House (“NTEH”) which was constructed in the early 1980s, and has been used for storage of cremated human bodies, i.e. columbarium, since 2010. (hereinafter the “Proposed Columbarium”).
- 1.3 To comply with the Private Columbaria Ordinance (Cap. 630), the Applicant has submitted an Application for Private Columbarium License and an Application for Temporary Suspension of Liability for operation of the Proposed Columbarium, referred as Pre-Cut-Off Columbarium, to the Private Columbaria Licensing Board (“PCLB”) of Food and Environmental Hygiene Department (“FEHD”). A prerequisite of the private columbarium license is to obtain approval of planning permission from the Town Planning Board; hence, a S12A Rezoning Application is being submitted. CKM Asia Limited, a traffic and transportation planning consultancy firm, is commissioned by the Applicant to carry out a Traffic Impact Assessment (“TIA”) for the Proposed Columbarium as part of the S12A Rezoning Application.
- 1.4 To minimise potential traffic and pedestrian impact, the Applicant proposes to provide **967** niches within the Proposed Columbarium, and the following special traffic and pedestrian arrangements are proposed:
- (i) During the Ching Ming and Chung Yeung Festival Periods i.e. within 4 weeks before and 4 weeks after the Ching Ming Festival Day, and within 4 weeks before and 4 weeks after the Chung Yeung Festival Day (hereinafter the “Festival Periods”), visitation to the Proposed Columbarium is by appointment only and is from 0700 to **1700** hours on weekdays, i.e. Monday to Friday, and closed on Saturdays, Sundays, and public holidays, including Ching Ming and Chung Yeung Festival Days;
 - (ii) Outside the Festival Periods, visitation to the Proposed Columbarium is also by appointment only and is from 0900 to 1600 hours on Mondays to Fridays; but, closed on Saturdays, Sundays, and public holidays;
 - (iii) Visit-by-appointment arrangement will be implemented with a capacity of 4 visitors per 30-minute session, and all reservations must be made at least 2 days in advance;
 - (iv) All visitors are advised and encouraged to use public transport service, i.e. Green Minibus (“GMB”) No. 33 (“GMB 33”) from Yuen Long to Ha Pak Nai via Tin Shui Wai, and reminded that access by private car and taxi are discouraged, and car parking is not available at the Proposed Columbarium and in the vicinity; and
 - (v) Internet memorial service will be provided by the Applicant for all niche owners as an alternative to in-person visitation.

Scope of Study

1.5 The main objectives of this study are as follows:

- To present existing traffic information associated with the Subject Site;
- To review the traffic conditions in the vicinity of the Subject Site;
- To present the proposed traffic and pedestrian management measure for the Proposed Columbarium;
- To quantify the traffic and pedestrian generated by the Proposed Columbarium;
- To examine the traffic and pedestrian impact on the local road junctions, road links, pedestrian facilities, and public transport services; and
- To identify deficiencies, if any, in the road network and pedestrian facilities in accommodating the impact associated with the Proposed Columbarium.

Contents of the Report

1.6 After this introduction, the remaining chapters contain the following:

- Chapter Two - Describes the existing condition and surveys,
- Chapter Three - Outlines the Proposed Columbarium and the proposed special traffic and pedestrian arrangement,
- Chapter Four - Presents the traffic, pedestrian, public transport impact analyses, and
- Chapter Five - Summarises the overall conclusion.

2.0 THE EXISTING SITUATION

The Subject Site and Proposed Columbarium

- 2.1 The Subject Site is located off the western side of Nim Wan Road in Ha Pak Nai. **Figure 2.1** shows the existing layout. It is a NTEH, and has no internal transport facilities. As of December 2025, the Proposed Columbarium has 4 occupied niches.

The Road Network

- 2.2 Nim Wan Road in vicinity of the Subject Site runs along the coastline from Ha Pak Nai to Sheung Pak Nai. It then continues northward as Deep Bay Road towards Lau Fau Shan, where it connects with Lau Fau Shan Road providing external regional access.
- 2.3 At present, both Nim Wan Road and Deep Bay Road are single track roads with passing bays and passing areas serving local developments and villages between Ha Pak Nai and Lau Fau Shan. Some sections of carriageway are around 6m allowing concurrent 2-way traffic flow.

Traffic Surveys

- 2.4 In view the Proposed Columbarium will only open on weekdays, traffic surveys were conducted on Tuesday, 8th April, 2025, which is the first Tuesday after the 2025 Ching Ming Festival Day on Friday, 4th April, 2025, i.e. a weekday within the Ching Ming Festival Period. Details of the traffic surveys are described in below paragraphs.

Traffic Counts at Junction and Road Links

- 2.5 Manual classified traffic counts were conducted at the selected junction and road links within the Area of Influence ("AOI") as indicated in **Figure 2.2**, and summarised in Table 2.1.

TABLE 2.1 SURVEYED JUNCTION AND ROAD LINKS

Ref.	Surveyed Location
Road Junction	
J01	Lau Fau Shan Roundabout
Road Link	
L01	Deep Bay Road south of Lau Fau Shan Roundabout
L02	Deep Bay Road / Nim Wan Road in Sheung Pak Nai
L03	Nim Wan Road near the Subject Site

- 2.6 The traffic counts were classified by vehicle types to enable traffic flows in passenger car unit ("pcu") to be calculated. The AM, Noon, and PM peak hour identified are 0800 to 0900 hours, 1300 to 1400 hours, and 1700 to 1800 hours, and the peak hour traffic flows are shown in **Figure 2.3**.

Operational Performance at Surveyed Junction and Road Links

- 2.7 Existing operational performance of the surveyed junction and road links are calculated based on the peak hour traffic flows, and the analysis method found in Volume 2 of the Transport Planning and Design Manual (“TPDM”). Tables 2.2 and 2.3 summarises the analysis results, and the detailed calculations are found in **Appendix A**.

TABLE 2.2 EXISTING JUNCTION OPERATIONAL PERFORMANCE

Junction		Peak Hour RFC		
		AM	Noon	PM
J01	Lau Fau Shan Roundabout	0.326	0.429	0.348

Note: RFC – Ratio of Flow to Capacity

- 2.8 Table 2.2 indicates the Lau Fau Shan Roundabout operates with capacities during the analysed peak hours.

TABLE 2.3 EXISTING LINK OPERATIONAL PERFORMANCE

Link		Peak Hour P/Df		
		AM	Noon	PM
L01	Deep Bay Road south of Lau Fau Shan Roundabout	2.04	2.00	1.88
L02	Deep Bay Road / Nim Wan Road, Sheung Pak Nai	0.72	0.62	0.60
L03	Nim Wan Road near the Subject Site in Ha Pak Nai	0.50	0.38	0.29

Note: P/Df - Peak Hourly Flows/ Design Flow Ratios, where design flow in reference with TPDM for single track access road, i.e. 100 veh/hr.

- 2.9 Table 2.3 indicates Deep Bay Road south of Lau Fau Shan Roundabout (L01) currently operates over-capacity during the analysed peak hours. Whereas, Deep Bay Road / Nim Wan Road in Sheung Pak Nai (L02), and Nim Wan Road near the Subject Site (L03) operate with capacities.

Pedestrian Count at Pedestrian Facilities

- 2.10 Pedestrian counts were conducted at the track between Nim Wan Road and the Subject Site as indicated in **Figure 2.2**.
- 2.11 Based on the peak hour pedestrian flows observed, the Level of Service (“LOS”) analysis with reference to TPDM Volume 6, Section 10.4 was conducted and Table 2.4 summarize the pedestrian flows and analysis results.

TABLE 2.4 EXISTING PEDESTRIAN FACILITIES OPERATIONAL PERFORMANCE

Pedestrian Facilities	Measured Width (m)	Effective Width (m)	Peak Hour						
			2-way Pedestrian Flow (ped/hour)			Flow Rates [LOS] (ped/m/min)			
			AM	Noon	PM	AM	Noon	PM	
FP01	Pedestrian Track between Nim Wan Road and the Subject Site	3.0m	2.0m	5	5	5	0.1 [A]	0.1 [A]	0.1 [A]

Note: Due to small amount of pedestrian, 2-way pedestrian flows are rounded-up to nearest 5.

- 2.12 Table 2.4 shows that the surveyed pedestrian track operates satisfactorily.

Public Transport Service

- 2.13 GMB 33 is the only public transport service which operates along Nim Wan Road, and Table 2.5 summarises the details.

TABLE 2.5 PUBLIC TRANSPORT SERVICE OPERATING NEAR THE SUBJECT SITE

Route	Routing	Service Hour	Frequency (minutes)
GMB 33	Yuen Long (Tai Fung Street) ↔ Ha Pak Nai	Daily 0500 – 2130 hours	20 - 30

Source: HKeMobility, Transport Department

Occupancy of Existing Public Transport Service

- 2.14 Occupancy survey for GMB 33 was conducted at the Lau Fau Shan Roundabout on Tuesday, 8th April, 2025, and the results are summarised in Table 2.6.

TABLE 2.6 RESULTS OF OCCUPANCY SURVEY FOR GMB 33

Hour	Inbound towards Ha Pak Nai				Outbound towards Yuen Long			
	Number of Trips Observed (trips/hr)	⁽¹⁾ Hourly Capacity (pax/hr)	Number of Passenger Observed (pax/hr)	Surplus Capacity (pax/hr)	Number of Trips Observed (trips/hr)	⁽¹⁾ Hourly Capacity (pax/hr)	Number of Passenger Observed (pax/hr)	Surplus Capacity (pax/hr)
0700 – 0800	2	32	18	14	2	32	20	12
0800 – 0900	2	32	21	11	2	32	17	15
0900 – 1000	2	32	17	15	2	32	18	14
1000 – 1100	2	32	16	16	2	32	17	15
1100 – 1200	2	32	21	11	2	32	18	14
1200 – 1300	2	32	9	23	2	32	14	18
1300 – 1400	2	32	15	17	2	32	20	12
1400 – 1500	2	32	12	20	2	32	17	15
1500 – 1600	2	32	14	18	2	32	19	13
1600 – 1700	2	32	13	19	2	32	21	11
1700 – 1800	2	32	14	18	2	32	19	13
1800 – 1900	2	32	15	17	2	32	17	15

(1) Only 16-seat vehicles were observed operating GMB 33.

- 2.15 Table 2.6 shows GMB 33 operates with capacity during the surveyed period at present.

3.0 THE PROPOSED COLUMBARIUM

Layout of the Subject Site with the Proposed Columbarium

- 3.1 Layout of the Subject Site with the Proposed Columbarium remains as in the present and is shown in **Figure 2.1**.
- 3.2 The Proposed Columbarium will accommodate 967 niches, of which 4 has been occupied as of December 2025.

Internal Transport Facilities

- 3.3 The Proposed Columbarium has no internal transport facilities, and all staff and visitors are advised and encouraged to arrive and depart using public transport service, and are also reminded that the use of private cars and taxis are discouraged in view that car parking is not available at the Proposed Columbarium.

Pedestrian Access of the Subject Site

- 3.4 Pedestrian access of the Subject Site, including the Proposed Columbarium, will remain unchanged as in the present condition.

Special Traffic and Pedestrian Arrangements

- 3.5 Special traffic and pedestrian arrangements are proposed by the Applicant to manage and minimise the potential traffic and pedestrian impact. Details are described in below paragraphs below.

Opening Hours

- 3.6 During the Ching Ming and Chung Yeung Festival Periods i.e. within 4 weeks before and 4 weeks after the Ching Ming Festival Day, and within 4 weeks before and 4 weeks after the Chung Yeung Festival Day, visitation is by appointment only and is from 0700 to 1700 hours on weekdays, i.e. Monday to Friday, and closed on Saturdays, Sundays, and public holidays, including Ching Ming and Chung Yeung Festival Days.
- 3.7 Outside the Festival Periods, visitation is also by appointment only and is from 0900 to 1600 hours on Mondays to Fridays; and closed on Saturdays, Sundays, and public holidays.

Visit-by-Appointment Arrangement

- 3.8 Visit-by-Appointment Arrangement will be implemented by the Applicant requiring all visitors to register at least 2 days prior to visiting at all times; hence, the number of grave sweepers can be regulated.
- 3.9 Registration will be available via internet, smartphone application, or by phone. Visitors are required to provide the Applicant with the expected number of visitors, the niche to be visited, and the intended visiting time and date. The registration will only be regarded as successful after the Applicant has confirmed the visiting details with the grave sweepers.

Transport Arrangement

- 3.10 The Applicant will advise and encourage all visitors to access the Proposed Columbarium by GMB 33. Visitors will also be reminded access by private car and taxi are discouraged, and car parking is not available at the Proposed Columbarium.

Notice on Visiting and Transport Arrangements

- 3.11 Under the condition of sale of niches, the Applicant will clearly state and emphasise the following:
- (i) Opening hours and closure period,
 - (ii) Visit-by-Appointment Arrangement required,
 - (iii) Encourage the use of GMB Service,
 - (iv) Discourage access by private car and taxi,
 - (v) No parking at the Proposed Columbarium, and
 - (vi) The Applicant reserves the right to adjust the closure period and other operational arrangement without prior notice.
- 3.12 Niche owners will be reminded prior to each Ching Ming and Chung Yeung Festival Periods of the above condition of sale.

Visiting Capacity

- 3.13 Visiting capacity will be limited to 4 visitors per session, and the length of each session is 30 minutes, i.e. 8 visitors per hour.
- 3.14 According to the "Fire Safety Management Plan" ("FSMP") prepared for the Proposed Columbarium, the maximum occupancy on each floor is 10 people at any one time. Hence, limiting the visiting capacity at 4 visitors per session is considered necessary to ensure no more than 10 people would occupy the Proposed Columbarium at any one time, say, during the time in-between 2 sessions, with a departing group of 4 visitors, an arriving group of 4 visitors and 2 staff.
- 3.15 An extract of the FSMP is found in Appendix B for reference.

Waiting Areas

- 3.16 In view that the number of visitors is limited to only 4 per session, a designated waiting area is not needed.

Availability of Internet Memorial Service

- 3.17 Internet memorial service will be provided by the Applicant for all niche owners as an alternative to in-person visitation.

Data Collection and Review of the Special Traffic and Pedestrian Arrangement

- 3.18 The Applicant will maintain records on visit-by-appointment, number of niches occupied, and observed operation condition etc., after obtaining the Town Planning Approval and the Private Columbarium License. This information can be used to review and evaluate the operation efficiency of the special traffic and pedestrian arrangement.

3.19 A revised Traffic and Crowd Management Plan can be submitted to the Transport Department and the Hong Kong Police Force for follow-up reviews, and if necessary, makes amendments. The special traffic and pedestrian arrangements will be detailed in the Traffic and Crowd Management Plan of the Private Columbarium Licence, and implementation of these arrangements will be closely monitored by the PCLB to ensure compliance.

Comparison on Visiting Demand and Visiting Capacity

3.20 Table 3.1 compares the estimated visitor demand and visiting capacity for the Proposed Columbarium during the Festival Periods.

TABLE 3.1 COMPARISON ON VISITOR DEMAND AND VISITING CAPACITY DURING THE FESTIVE PERIODS

Estimated Visitor Demand for each Festive Period	
Number of visitors / occupied niches	= 2.89 visitors/niche ^(Note 1)
Total number of niches	= 967 niches
Total number of visitors per year (Each niche is visited once per year)	= 967 niches x 2.89 visitors/niche = 2,795 visitors
Visiting Capacity for each Festive Period	
Visiting capacity	= 4 persons per session
Number of sessions / hour	= 60 min/hr ÷ 30 min/session = 2 sessions/hr
Opening hours of the Subject Site	= 0700 to 1700 hours = 10 hrs/day
Number of sessions / day	= 10 hrs/day x 2 sessions/hr = 20 sessions/day
Daily visiting capacity	= 4 visitors/session x 20 sessions/day = 80 visitors/day
Number of Weekdays	<u>Ching Ming Festival Period</u> = 5 days / week x 8 weeks – 5 public holidays ^(Note 2) = 35 weekdays
	<u>Chung Yeung Festival Period</u> = 5 days / week x 8 weeks – 3 public holidays ^(Note 3) = 37 weekdays
Minimum Visiting Capacity	<u>Ching Ming Festival Period</u> = 35 days x 80 visitors / day = 2,800 visitors > Visitor Demand of 2,795 hence, OK
	<u>Chung Yeung Festival Period</u> = 37 days x 80 visitors / day = 2,960 visitors > Visitor Demand of 2,795 hence, OK

Note 1: Based on surveys conducted at the Memorial Park Hong Kong located at 93 Fo Tan Village, Sha Tin, which is an existing columbarium approved under Rezoning Application TPB Y/ST/47, and PCLB Serial 1 with Approval-in-Principle under License Application.

Note 2: Ching Ming Festival Period has 5 public holidays, including (i) Ching Ming Festival Day, (ii) Good Friday, (iii) the Day following Good Friday, (iv) Easter Monday, and (v) Labour Day (1st May).

Note 3: Chung Yeung Festival Period has 3 public holidays, including (i) Chung Yeung Festival Day, (ii) National Day (1st October), and (iii) the Day following Mid-Autumn Festival.

3.21 Table 3.1 shows the visitor demand is estimated to be 2,795 per festive period, which is less than the visiting capacity of 2,800 visitors during Ching Ming Festival Period, and 2,960 visitors during Chung Yeung Festival Period.

- 3.22 Hence, the proposed visiting capacity of 4 persons for each visiting session to be implemented during the Festive Periods, is considered acceptable, and will be sufficient to accommodate the expected festive visitor demand.

Pedestrian and Traffic Generation of the Proposed Columbarium

- 3.23 Pedestrian generation associated with the Proposed Columbarium will be controlled with the implementation of the Visit-by-Appointment. Table 3.2 summarises the peak hour pedestrian generation of the Proposed Columbarium.

TABLE 3.2 PEAK HOUR PEDESTRIAN GENERATION OF THE PROPOSED COLUMBARIUM

Item	Peak Hour Pedestrian Generation
Number of visitors controlled by visit-by-appointment arrangement (From Table 3.1)	= 4 visitors / sessions x 2 sessions / hour = 8 visitors / hour
TOTAL	= 8 people / hour

- 3.24 As mentioned above, all visitors are advised and encouraged to access the Proposed Columbarium by GMB 33, and are discouraged from using private cars and taxis. Hence, there is **NO** additional peak hour traffic generation, but only 8 additional passengers per hour on GMB 33.

Placement of Cremated Ashes

- 3.25 Placing of cremated ashes into niches must also follow above management arrangement. It will be by appointment only, and considered as a regular visiting session.

4.0 TRAFFIC IMPACT

Design Year

4.1 A planning horizon of 5 years is assumed for the Proposed Columbarium to obtain its Private Columbarium Licence from the PCLB, i.e. say by 2030, and the assessment year adopted is 2033, i.e. 3 years after its license approval. The following scenarios are assessed:

- (i) Year 2033 without the Proposed Columbarium; and
- (ii) Year 2033 with the Proposed Columbarium.

Population Projection

4.2 Reference is made to the “*Projections of Population Distribution 2023 - 2031*” published by the Planning Department for new towns located nearby including Tin Shui Wai New Town and Hung Shui Kiu / Ha Tsuen New Town. Table 4.1 presents the population projections.

TABLE 4.1 PROJECTED POPULATIONS FOR NEARBY NEW TOWNS

Year	Population Projection		
	Tin Shui Wai New Town	Hung Shui Kiu / Ha Tsuen New Town	TOTAL
2025	281,000	47,700	328,700
2031	277,500	52,900	330,400
Average Annual Growth (2025 to 2031)			+0.1%

4.3 Table 4.1 shows that population for new towns in the vicinity are projected to increase by 0.1% per annum from 2025 to 2031.

Historic Traffic Flow

4.4 The annual average daily traffic (“AADT”) of roads located in the vicinity from the Annual Traffic Census (“ATC”) published by Transport Department, are presented in Table 4.2.

TABLE 4.2 AADT OF ATC STATIONS IN THE VICINITY

ATC Station No.	5689	5858	6603	Overall
Road	Ping Ha Road	Ping Ha Road & Lau Fau Shan Road	Deep Bay Road	
From	Hung Tin Road	Tin Ha Road	Lau Fau Shan Road	
To	Tin Ha Road	Deep Bay Road	Nam Sha Po	
Year	Annual Average Daily Traffic (vehicles / day)			
2017	16,800	12,370	2,330	31,500
2018	17,210	12,680	2,920	32,810
2019	17,090	12,590	2,320	32,000
2020	-	-	-	-
2021	-	-	-	-
2022	-	-	-	-
2023	20,170	8,590	2,960	31,720
2024	20,220	8,610	3,180	32,010
Average Annual Growth				+0.2%

Note: Due to COVID-19 pandemic, AADT between 2020 and 2022 are disregarded and not shown above.

- 4.5 Disregarding the AADT for 2020 to 2022 due to the COVID-19 pandemic, Table 4.2 shows that the overall average annual growth in AADT is +0.2% between 2017 and 2024.

Traffic Forecast

- 4.6 The design year traffic flows are estimated as follows:
- (i) Expected traffic growth from 2025 to 2033;
 - (ii) Traffic generated by other known planned / committed developments located in the vicinity, and
 - (iii) Traffic generation of the Proposed Columbarium

(i) Traffic Growth Rate

- 4.7 In view that the population growth from 2025 to 2031, is +0.1% per annum (Table 4.1 refers), and the historic traffic flow from 2017 to 2024 is +0.2% per annum (Table 4.2 refers), a conservative growth rate of +0.5% per annum is adopted to derive the 2033 traffic flows.

(ii) Other Known Major Planned / Committed Developments

- 4.8 A review of public domain, including the Town Planning Board's Statutory Planning Portal 3, etc., was undertaken to identify other known major planned / committed developments located within the AOI, and details are presented in **Table 4.3**.

TABLE 4.3 DETAILS OF OTHER KNOWN MAJOR PLANNED / COMMITTED DEVELOPMENT

Ref.	Planned / Committed Development	Parameter
A.	Proposed Temporary Transitional Housing with Ancillary Uses (Approved Planning Application Nos. A/YL-LFS/425 and A/YL-LFS/509)	1,233 flats

(iii) Traffic Generation of the Proposed Columbarium

- 4.9 As stated in Paragraph 3.24, the Proposed Columbarium is **not** anticipated to generate any additional traffic.

2033 Traffic Flow

- 4.10 Year 2033 traffic flows for the following cases are derived:

$$2033 \text{ Traffic Flows without the Proposed Columbarium [A]} = 2025 \text{ Existing Traffic Flows} + \text{Traffic Growth from 2025 to 2033} + \text{Traffic Generated by Other Development}$$

$$2033 \text{ Traffic Flows with the Proposed Columbarium} = [A]$$

- 4.11 **Figure 4.1** shows the year 2033 peak hour traffic flow for the case without the Proposed Columbarium, which is also the same as the case with the Proposed Columbarium in view no additional traffic will be generated.

Planned Upgrading of Deep Bay Road and Nim Wan Road by the Government - Public Works Programme (“PWP”) Item No. 878th

Upgrading of Deep Bay Road

- 4.12 On 10th December 2021, the Government gazetted the widening work to upgrade the section of Deep Bay Road between Lau Fau Shan Roundabout and Nim Wan Road, from the existing single lane access track configuration to become standard single 2-lane carriageway.

Upgrading of Nim Wan Road (North)

- 4.13 As part of PWP Item No. 878th, the Nim Wan Road (North) section between Deep Bay Road and the West New Territories Landfill is proposed for upgrading which include realigning and widening the existing single lane carriageway with 2-way traffic to become a standard single 2-lane carriageway.

Implementation Programme

- 4.14 According to the Legislative Council (“LegCo”) Paper No. CB(1)177/2022(05), dated 25th April 2022, the Upgrading of Deep Bay Road and the Upgrading of Nim Wan Road (North) are anticipated to be completed in phases by around 2029.

Year 2033 Capacity Analysis

- 4.15 In view completion year of the Upgrading of Deep Bay Road and Nim Wan Road are both uncertain as of December 2025, the 2033 junction and road link capacity analyses were performed by adopting the following scenarios:

Scenario (1): Without upgrading of Deep Bay Road and Nim Wan Road, i.e. both remain as single track access road as in present condition;
and

Scenario (2): With upgrading of Deep Bay Road and Nim Wan Road, i.e. both become single-2 lane carriageway standard.

- 4.16 Tables 4.4 and 4.5 summarise the analysis results, and detailed calculations are found in **Appendix A**.

TABLE 4.4 YEAR 2033 JUNCTION OPERATIONAL PERFORMANCE

Junction		Scenario	Peak Hour RFC					
			Without Proposed Columbarium			With Proposed Columbarium		
			AM	Noon	PM	AM	Noon	PM
J01	Lau Fau Shan Roundabout	(1)	0.365	0.472	0.386	0.365	0.472	0.386
		(2)	0.340	0.440	0.360	0.340	0.440	0.360

Note: RFC – Ratio of Flow to Capacity

Scenario (1) - Without upgrading of Deep Bay Road, i.e. no modification of Lau Fau Shan Roundabout.

Scenario (2) - With upgrading of Deep Bay Road, i.e. includes modification of Lau Fau Shan Roundabout.

TABLE 4.5 YEAR 2033 LINK OPERATIONAL PERFORMANCE

Link		Scenario	Peak Hour P/Df					
			Without Proposed Columbarium			With Proposed Columbarium		
			AM	Noon	PM	AM	Noon	PM
L01	Deep Bay Road south of Lau Fau Shan Roundabout)	(1)	2.110	2.080	1.950	2.110	2.080	1.950
		(2)	0.151	0.149	0.139	0.151	0.149	0.139
L02	Deep Bay Road / Nim Wan Road, Sheung Pak Nai	(1)	0.750	0.650	0.620	0.750	0.650	0.620
		(2)	0.054	0.046	0.044	0.054	0.046	0.044
L03	Nim Wan Road near the Subject Site in Ha Pak Nai	(1)	0.520	0.390	0.300	0.520	0.390	0.300
		(2)	0.037	0.028	0.021	0.037	0.028	0.021

Note: P/Df - Peak Hourly Flows/ Design Flow Ratios
Scenario (1) - Without upgrading of Deep Bay Road and Nim Wan Road, Design flow in reference with TPDM for single track access road, i.e. 100 veh/hr.
Scenario (2) - With upgrading of Deep Bay Road and Nim Wan Road, Design flow in reference with TPDM for single 2-lane 6.75m carriageway, i.e. 1,400 veh/hr for **both** direction of flow.

4.17 Tables 4.4 and 4.5 show that, with the proposed special traffic and pedestrian arrangements implemented, the Proposed Columbarium will not result in traffic impact at the surveyed junctions and road links.

Pedestrian Forecast

4.18 Year 2033 columbarium peak hour pedestrian flows are estimated based on the existing pedestrian flow and the estimated pedestrian growth to 2033 shown in Table 4.1. To be conservative, a growth rate of 0.5% per annum is adopted to derive the 2033 pedestrian flows:

Year 2033 Reference Case without the Proposed Columbarium [A] = *Existing Pedestrian Flows + Estimated Pedestrian Growth to 2033*

Year 2033 Design Case with the Proposed Columbarium = *[A] + Pedestrian Generation associated with Proposed Columbarium*

Year 2033 Pedestrian Facilities Operation Performance

4.19 Year 2033 columbarium peak hour pedestrian facilities operational performance is calculated and summarised in Table 4.6.

TABLE 4.6 YEAR 2033 PEDESTRIAN FACILITIES OPERATIONAL PERFORMANCE

Pedestrian Facilities	Actual Width (m)	Effective Width (m)	Item	Without Proposed Columbarium			With Proposed Columbarium		
				AM	Noon	PM	AM	Noon	PM
FP01	3.0m	2.0m	2-way Ped. Flow (ped/hr)	5	5	5	20	20	20
			Flow Rate (ped/min/m)	0.1	0.1	0.1	0.2	0.2	0.2
			LOS	[A]	[A]	[A]	[A]	[A]	[A]

Note: Due to small amount of pedestrian, 2-way pedestrian flow is rounded-up to nearest 5.

4.20 Table 4.6 shows during columbarium peak hours, the pedestrian track analysed shall operate satisfactorily, i.e. LOS C or better.

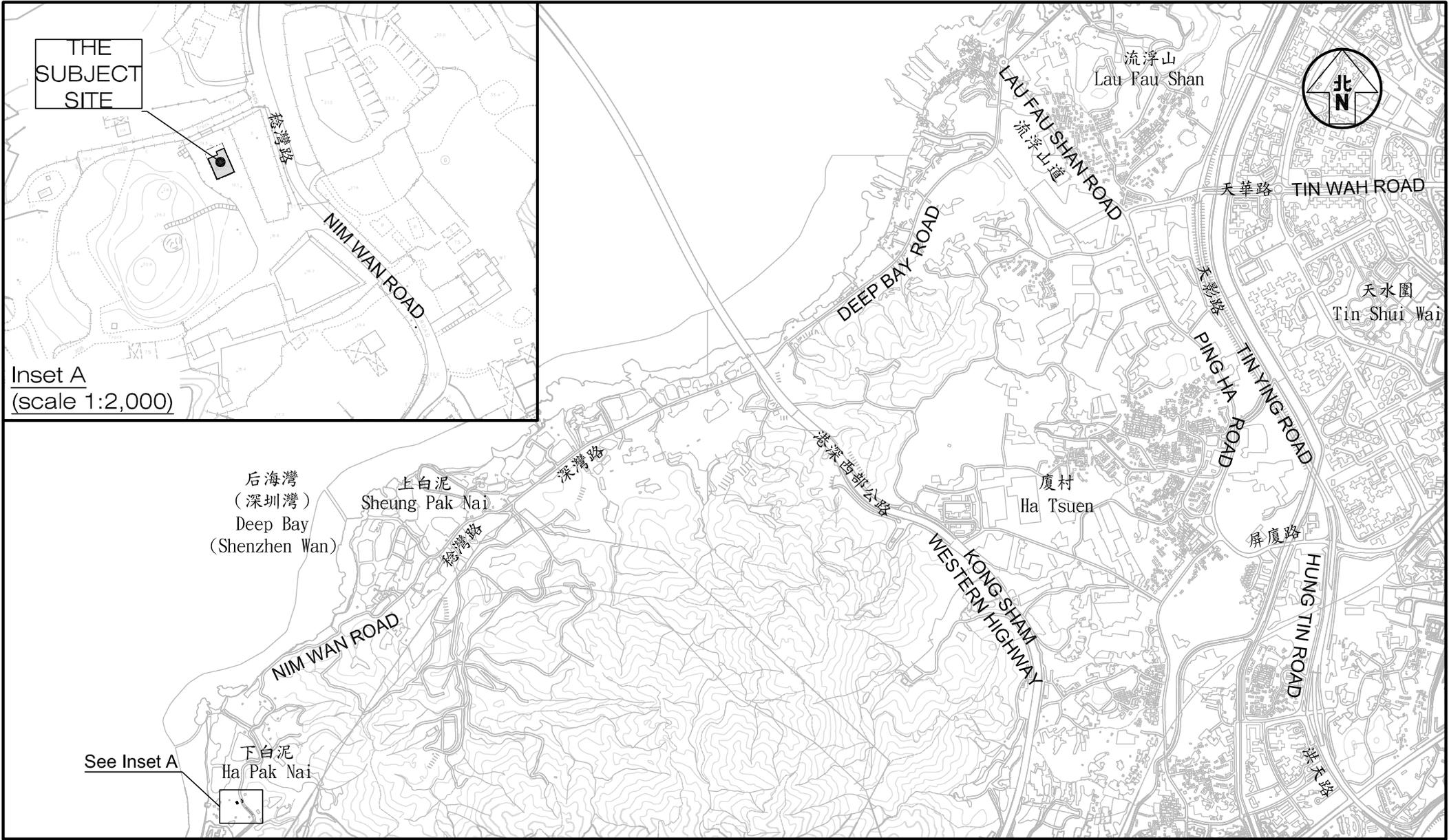
Assessment on Public Transport Service

- 4.21 As mentioned in Paragraph 3.24, up to 4 visitors will access the Proposed Columbarium during each 30-minute session, i.e. a total 8 additional passengers will be generated on GMB 33 for each hour in each direction on weekday.
- 4.22 Table 2.6 shows GMB 33 operates with spare capacity at present during the opening hours of the Proposed Columbarium. For inbound towards Ha Pak Nai, 11 to 23 seats is available hourly. For outbound towards Yuen Long, 11 to 18 seats is available. Both inbound and outbound services have sufficient capacity to accommodate the additional passenger demand of 8 passengers per hour per direction.
- 4.23 In addition, Table 2.5 shows GMB 33 is scheduled to operate at a frequency of 20 to 30 minutes, i.e. 2 to 3 trips per hour, where Table 2.6 shows only 2 trips were observed for each hour, i.e. an additional 1 trip per hour could be added under the present service schedule to increase the hourly capacity.
- 4.24 Also, GMB 33 currently operates with 16-seat vehicles, of which these vehicles have gradually been replaced by 19-seat vehicles in the territory. Hence, in long term, the carrying capacity will also increase by 3 seats per vehicle.
- 4.25 With an additional 1 trip and replacement with 19-seat vehicles, the hourly capacity of GMB 33 could be increased with an additional 25 seats per hour [*Calculation: 1x 19-seat + 2x 3 additional seats = 25 seats*], an increase of 78%.

5.0 SUMMARY

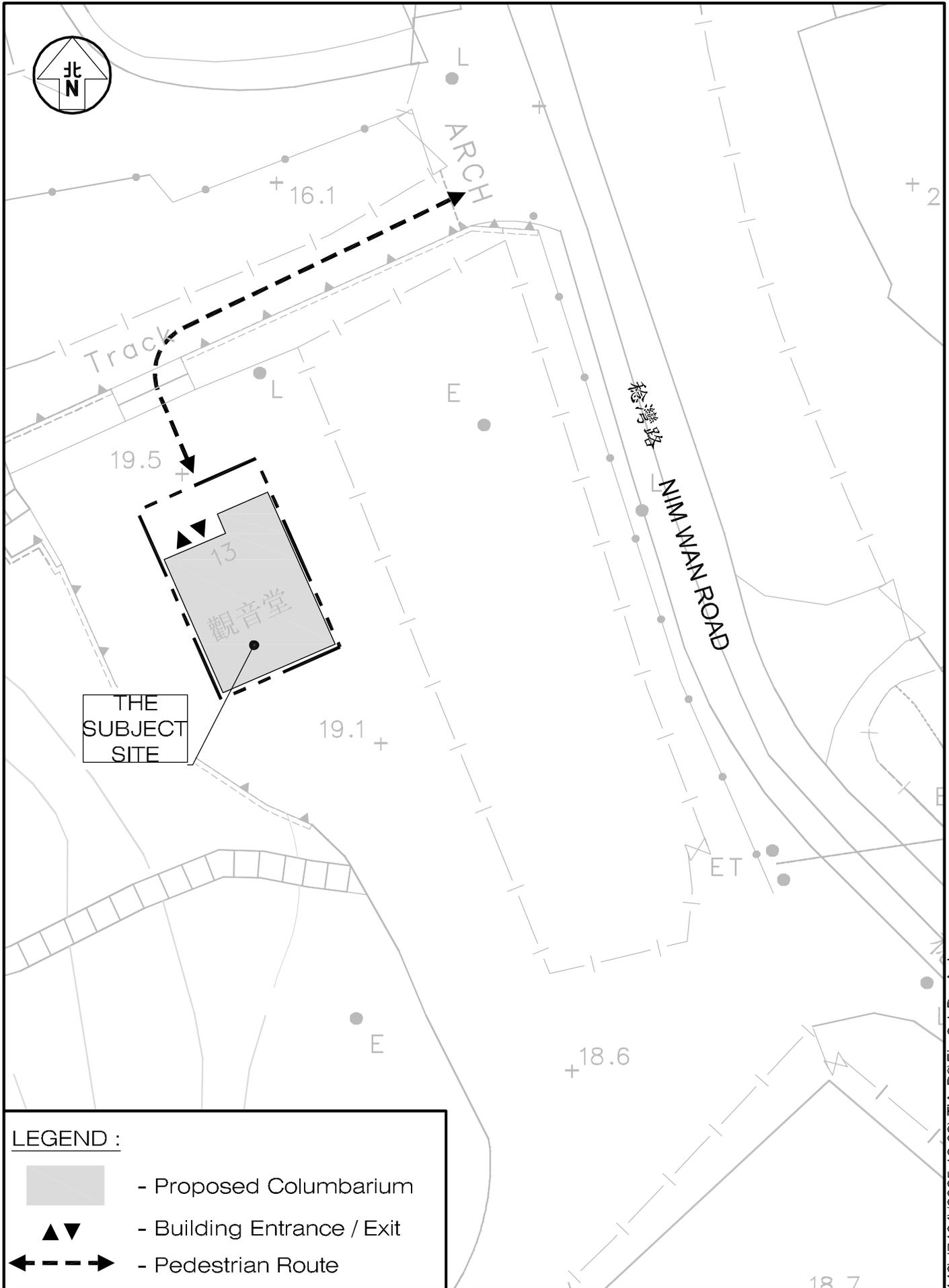
- 5.1 The Subject Site, Koon Yam Tong, is located at 13 Nim Wan Road, Ha Pak Nai, Yuen Long, i.e. Lot No. 118 in D.D. 135, which is an existing NTEH being used as a columbarium, i.e. the Proposed Columbarium. The Applicant proposes to provide 967 niches. As of December 2025, it has 4 occupied niches.
- 5.2 Internal transport facilities are not provided at present within the Subject Site, and cannot be provided in the future.
- 5.3 As traffic and pedestrian management measure, the Proposed Columbarium will open by appointment only on weekday, and be closed on Saturdays, Sundays, and public holidays, including the Ching Ming and Chung Yeung Festival Days.
- 5.4 During the Ching Ming and Chung Yeung Festival Periods, visitation to the Proposed Columbarium is by appointment only and is from 0700 to 1700 hours on weekdays, i.e. Monday to Friday, and closed on Saturdays, Sundays, and public holidays, including Ching Ming and Chung Yeung Festival Days.
- 5.5 Outside the Festival Periods, visitation to the Proposed Columbarium is also by appointment only and is from 0900 to 1600 hours on Mondays to Fridays, and closed on Saturdays, Sundays, and public holidays
- 5.6 Visit-by-Appointment arrangement will be implemented year-round with a visiting capacity of 4 persons per each 30-minute session, and all reservations must be made at least 2 days in advance. Hence, the number of visitor will be controlled.
- 5.7 Visitors are advised and encouraged to use public transport service, i.e. GMB 33, and reminded that access by private car and taxi are discouraged, and car parking is not available at the Proposed Columbarium.
- 5.8 Internet memorial service will be provided by the Applicant for all niche owners as an alternative to in-person visitation.
- 5.9 Manual traffic counts were conducted at selected junction and road links on a weekday in April 2025, and the observed traffic flows are used as basis to estimate the 2033 traffic flows for analyses without and with the Proposed Columbarium.
- 5.10 Pedestrian flows were counted at the track between the Subject Site and Nim Wan Road, and the observed pedestrian flows are used as basis to estimate the 2033 pedestrian flows for analyses without and with the Proposed Columbarium.
- 5.11 Occupancy survey for public transport service, i.e. GMB 33, was conducted and has identified spare capacities.

- 5.12 Pedestrian generation of the Proposed Columbarium will be controlled by the Visit-by-Appointment Arrangement, with an hourly generation of 8 visitors per hour. Hence, the additional passenger demand on GMB 33 is 8 passengers per hour, and there will be no additional traffic generation.
- 5.13 In view completion year of the Upgrading of Deep Bay Road and Nim Wan Road are both uncertain as of December 2025, the 2033 junction and road link capacity analyses were performed for the scenarios without and with the planned upgrading work.
- 5.14 The year 2033 traffic and pedestrian analyses concluded that the Proposed Columbarium with the proposed special traffic and pedestrian arrangements implemented, it will not result in traffic and pedestrian impact.
- 5.15 Existing GMB 33 has sufficient capacity to accommodate the additional passenger demand generated by the Proposed Columbarium. Potentially, additional carrying capacity could be introduced.
- 5.16 In view of the above, the Proposed Columbarium is acceptable from traffic engineering aspect.



Project Title PROPOSED COLUMBARIUM, KOON YAM TONG, 13 NIM WAN ROAD LOT NO. 118 IN D.D. 135, HA PAK NAI, YUEN LONG, NEW TERRITORIES	Figure No. 1.1	Revision A	CKM Asia Limited Traffic and Transportation Planning Consultants 21st Floor, Methodist House, 36 Hennessy Road, Wan Chai, Hong Kong Tel : (852) 2520 5990 Fax : (852) 2528 6343 Email : mail@ckmasia.com.hk	
Figure Title LOCATION OF THE SUBJECT SITE	Designed by W C H	Drawn by S C Y		Checked by K C
	Scale in A4 1 : 25,000	Date 12 DEC 2025		

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LEGEND :

-  - Proposed Columbarium
-  - Building Entrance / Exit
-  - Pedestrian Route

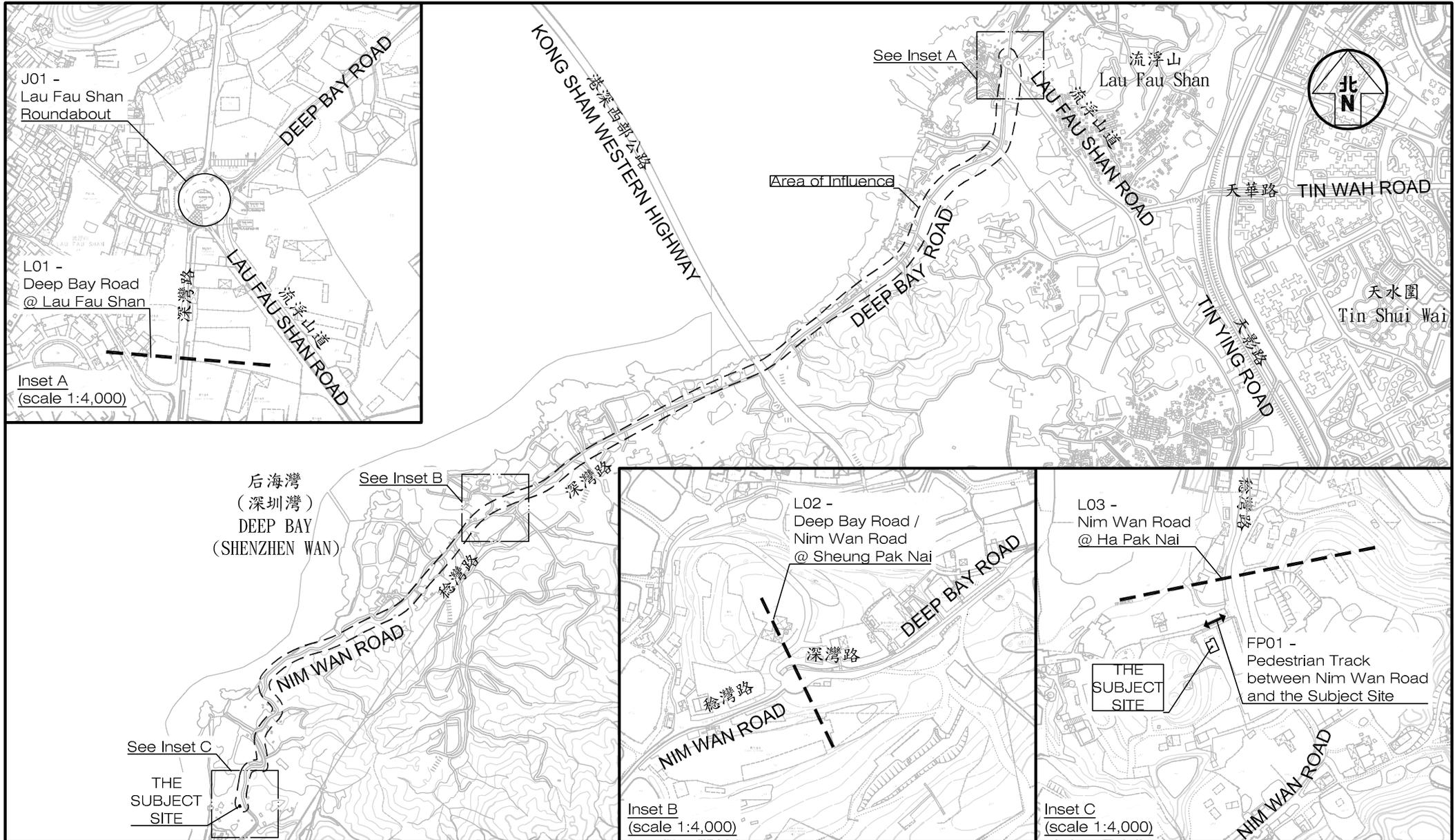
Project Title
**PROPOSED COLUMBARIUM, KOON YAM TONG, 13 NIM WAN ROAD
 LOT NO. 118 IN D.D. 135, HA PAK NAI, YUEN LONG, NEW TERRITORIES**

Figure Title
EXISTING LAYOUT OF THE SUBJECT SITE

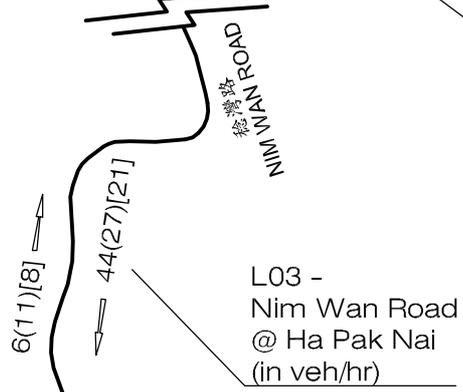
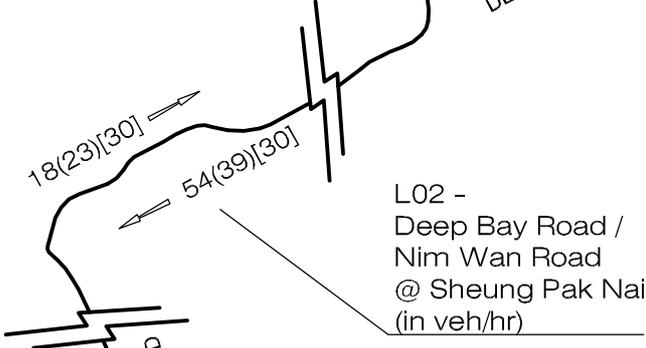
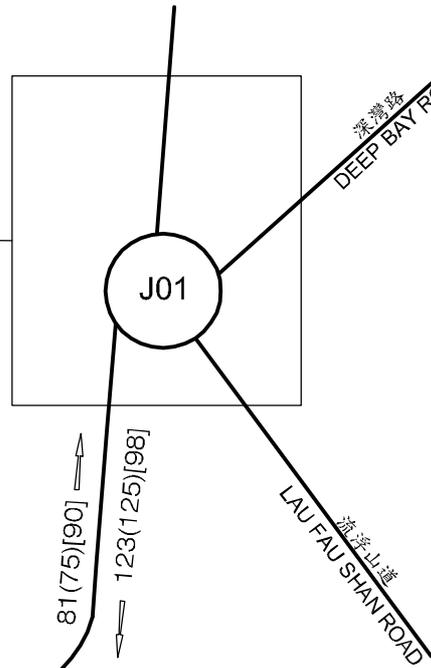
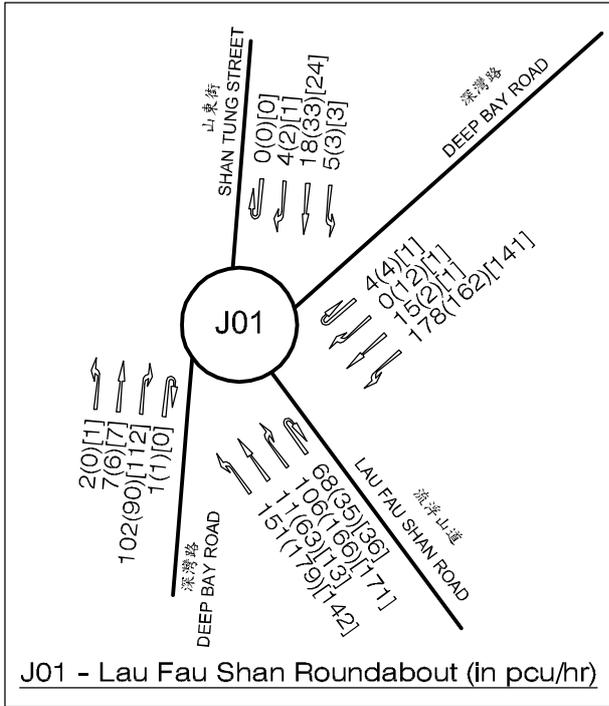
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		Date 12 DEC 2025	

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Project Title PROPOSED COLUMBARIUM, KOON YAM TONG, 13 NIM WAN ROAD LOT NO. 118 IN D.D. 135, HA PAK NAI, YUEN LONG, NEW TERRITORIES	Figure No. 2.2	Revision A	CKM Asia Limited Traffic and Transportation Planning Consultants
Figure Title AREA OF INFLUENCE AND LOCATIONS OF SURVEYED JUNCTION, ROAD LINKS AND PEDESTRIAN TRACK	Designed by W C H	Drawn by S C Y	Checked by K C
	Scale in A4 1 : 25,000	Date 12 DEC 2025	
	21st Floor, Methodist House, 36 Hennessy Road, Wan Chai, Hong Kong Tel : (852) 2520 5990 Fax : (852) 2528 6343 Email : mail@ckmasia.com.hk		

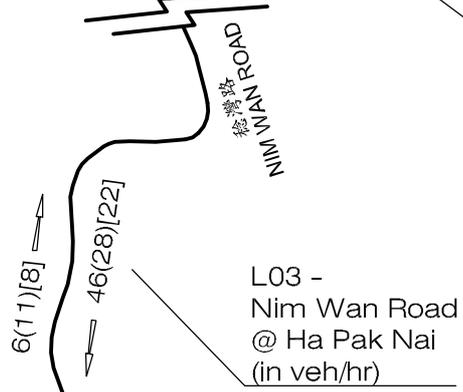
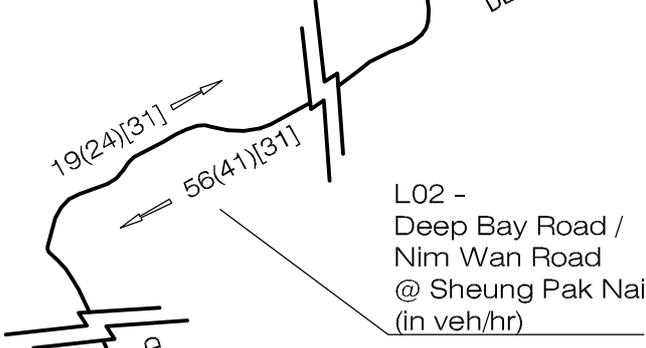
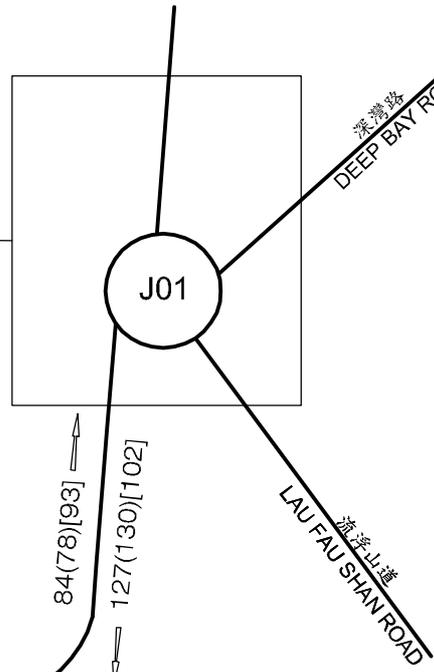
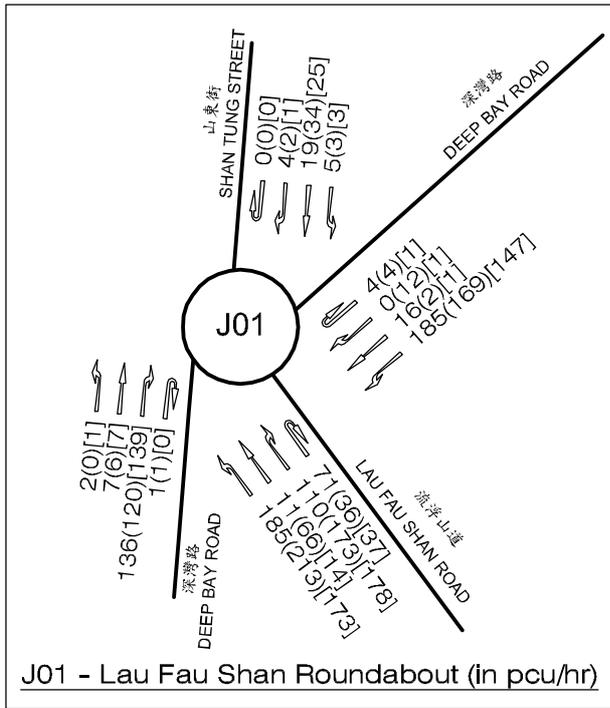


THE SUBJECT SITE

LEGEND :
12(34)[56] - AM(Noon)[PM] Peak Hour Traffic Flow

Project Title PROPOSED COLUMBARIUM, KOON YAM TONG, 13 NIM WAN ROAD LOT NO. 118 IN D.D. 135, HA PAK NAI, YUEN LONG, NEW TERRITORIES	Job No. J7404	Figure No. 2.3	Scale in A4 N.T.S.	
	Designed by W C H	Drawn by S C Y	Checked by K C K	Revision A
Figure Title EXISTING COLUMBARIUM PEAK HOUR TRAFFIC FLOWS	Date 12 DEC 2025			
	CKM Asia Limited Traffic and Transportation Planning Consultants 21st Floor, Methodist House, 36 Hennessy Road, Wan Chai, Hong Kong Tel : (852) 2520 5990 Fax : (852) 2528 6343 Email : mail@ckmasia.com.hk			

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THE SUBJECT SITE

LEGEND :

12(34)[56] - AM(Noon)[PM] Peak Hour Traffic Flow

Project Title	PROPOSED COLUMBARIUM, KOON YAM TONG, 13 NIM WAN ROAD LOT NO. 118 IN D.D. 135, HA PAK NAI, YUEN LONG, NEW TERRITORIES	Job No.	Figure No.	Scale in A4	
		J7404	4.1	N.T.S.	
Figure Title	2033 COLUMBARIUM PEAK HOUR TRAFFIC FLOWS - WITHOUT AND WITH THE PROPOSED COLUMBARIUM	Designed by	Drawn by	Checked by	Revision
		W C H	S C Y	K C K	A
		Date			
		12 DEC 2025			
		CKM Asia Limited			
		Traffic and Transportation Planning Consultants			
		21st Floor, Methodist House, 36 Hennessy Road, Wan Chai, Hong Kong			
		Tel : (852) 2520 5990 Fax : (852) 2528 6343 Email : mail@ckmasia.com.hk			

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**Appendix A –
Junction Capacity Analysis**

Roundabout Analysis

Junction: Lau Fau Shan Road / Deep Bay Road / Shan Tung Street - Lau Fau Shan Roundabout Job Number: J7404
 Scenario: 2025 Existing Weekday J01 - P. 1
 Design Year: 2025 Designed By: WCH Checked By: WCH Date: 10 October 2025

AM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	68	151	11	106					336	24
From B	102	1	2	7					112	189
From C	18	4	0	5					27	288
From D	178	15	0	4					197	193
From E										
From F										
From G										
From H										
Total	366	171	13	122					672	

Noon Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	35	179	63	166					443	21
From B	90	1	0	6					97	280
From C	33	2	0	3					38	302
From D	162	2	12	4					180	313
From E										
From F										
From G										
From H										
Total	320	184	75	179	0	0	0	0	758	

PM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	36	142	13	171					362	4
From B	112	0	1	7					120	222
From C	24	1	0	3					28	327
From D	141	1	1	1					144	329
From E										
From F										
From G										
From H										
Total	313	144	15	182	0	0	0	0	654	

Legend

Arm	Road (in clockwise order)
A	Lau Fau Shan Road
B	Deep Bay Road (Pak Nai)
C	Shan Tung Street
D	Deep Bay Road (Tsim Pei Tsui)
E	
F	
G	
H	

Geometric Parameters

Arm	e (m)	v (m)	r (m)	L (m)	D (m)	∅ (°)	S
From A	4.5	3.5	10.0	3.0	40	55	0.5
From B	4.5	3.5	20.0	3.0	40	55	0.5
From C	4.0	3.0	15.0	5.0	40	55	0.3
From D	5.0	2.5	40.0	5.0	40	25	0.8
From E							
From F							
From G							
From H							

Predictive Equation $Q_E = K(F - f_c q_c)$

Q_E	Entry Capacity
q_c	Circulating Flow across the Entry
K	$= 1 - 0.00347(\emptyset - 30) - 0.978[(1/r) - 0.05]$
F	$= 303x_2$
f_c	$= 0.210t_D(1 + 0.2x_2)$
t_D	$= 1 + 0.5/(1 + M)$
M	$= \exp[(D - 60)/10]$
x_2	$= v + (e - v)/(1 + 2S)$
S	$= 1.6(e - v)/L$

Limitation

e	Entry Width	4.0 - 15.0 m
v	Approach Half Width	2.0 - 7.3 m
r	Entry Radius	6.0 - 100.0 m
L	Effective Length of Flare	1.0 - 100.0 m
D	Inscribed Circle Diameter	15 - 100 m
∅	Entry Angle	10° - 60°
S	Sharpness of Flare	0.0 - 3.0

Ratio-of-Flow to Capacity (RFC)

Arm	x_2	M	t_D	K	F	f_c	Q_E			Entry Flow			RFC		
							AM	Noon	PM	AM	Noon	PM	AM	Noon	PM
From A	3.984	0.135	1.440	0.864	1207	0.543	1032	1034	1041	336	443	362	0.326	0.429	0.348
From B	3.984	0.135	1.440	0.913	1207	0.543	1009	963	992	112	97	120	0.111	0.101	0.121
From C	3.610	0.135	1.440	0.897	1094	0.521	846	840	828	27	38	28	0.032	0.045	0.034
From D	3.462	0.135	1.440	1.042	1049	0.512	990	926	917	197	180	144	0.199	0.194	0.157
From E															
From F															
From G															
From H															

Roundabout Analysis

Junction: Lau Fau Shan Road / Deep Bay Road / Shan Tung Street - Lau Fau Shan Roundabout Job Number: J7404
 Scenario: 2033 Without Proposed Columbarium (No Upgrading of Deep Bay Road) J01 - P. 2
 Design Year: 2033 Designed By: WCH Checked By: WCH Date: 10 October 2025

AM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	71	185	11	110					377	25
From B	136	1	2	7					146	196
From C	19	4	0	5					28	329
From D	185	16	0	4					205	231
From E										
From F										
From G										
From H										
Total	411	206	13	126					756	

Noon Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	36	213	66	173					488	21
From B	120	1	0	6					127	291
From C	34	2	0	3					39	340
From D	169	2	12	4					187	351
From E										
From F										
From G										
From H										
Total	359	218	78	186	0	0	0	0	841	

PM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	37	173	14	178					402	4
From B	139	0	1	7					147	231
From C	25	1	0	3					29	362
From D	147	1	1	1					150	364
From E										
From F										
From G										
From H										
Total	348	175	16	189	0	0	0	0	728	

Legend

Arm	Road (in clockwise order)
A	Lau Fau Shan Road
B	Deep Bay Road (Pak Nai)
C	Shan Tung Street
D	Deep Bay Road (Tsim Pei Tsui)
E	
F	
G	
H	

Geometric Parameters

Arm	e (m)	v (m)	r (m)	L (m)	D (m)	∅ (°)	S
From A	4.5	3.5	10.0	3.0	40	55	0.5
From B	4.5	3.5	20.0	3.0	40	55	0.5
From C	4.0	3.0	15.0	5.0	40	55	0.3
From D	5.0	2.5	40.0	5.0	40	25	0.8
From E							
From F							
From G							
From H							

Predictive Equation $Q_E = K(F - f_c q_c)$

Q_E	Entry Capacity
q_c	Circulating Flow across the Entry
K	$= 1 - 0.00347(\emptyset - 30) - 0.978[(1/r) - 0.05]$
F	$= 303x_2$
f_c	$= 0.210t_D(1 + 0.2x_2)$
t_D	$= 1 + 0.5/(1 + M)$
M	$= \exp[(D - 60)/10]$
x_2	$= v + (e - v)/(1 + 2S)$
S	$= 1.6(e - v)/L$

Limitation

e	Entry Width	4.0 - 15.0 m
v	Approach Half Width	2.0 - 7.3 m
r	Entry Radius	6.0 - 100.0 m
L	Effective Length of Flare	1.0 - 100.0 m
D	Inscribed Circle Diameter	15 - 100 m
∅	Entry Angle	10° - 60°
S	Sharpness of Flare	0.0 - 3.0

Ratio-of-Flow to Capacity (RFC)

Arm	x_2	M	t_D	K	F	f_c	Q_E			Entry Flow			RFC		
							AM	Noon	PM	AM	Noon	PM	AM	Noon	PM
From A	3.984	0.135	1.440	0.864	1207	0.543	1032	1034	1041	377	488	402	0.365	0.472	0.386
From B	3.984	0.135	1.440	0.913	1207	0.543	1005	958	988	146	127	147	0.145	0.133	0.149
From C	3.610	0.135	1.440	0.897	1094	0.521	827	822	812	28	39	29	0.034	0.047	0.036
From D	3.462	0.135	1.440	1.042	1049	0.512	969	906	899	205	187	150	0.211	0.207	0.167
From E															
From F															
From G															
From H															

Roundabout Analysis

Junction: Lau Fau Shan Road / Deep Bay Road / Shan Tung Street - Lau Fau Shan Roundabout Job Number: J7404
 Scenario: 2033 With Proposed Columbarium (No Upgrading of Deep Bay Road) J01 - P. 3
 Design Year: 2033 Designed By: WCH Checked By: WCH Date: 10 October 2025

AM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	71	185	11	110					377	25
From B	136	1	2	7					146	196
From C	19	4	0	5					28	329
From D	185	16	0	4					205	231
From E										
From F										
From G										
From H										
Total	411	206	13	126					756	

Noon Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	36	213	66	173					488	21
From B	120	1	0	6					127	291
From C	34	2	0	3					39	340
From D	169	2	12	4					187	351
From E										
From F										
From G										
From H										
Total	359	218	78	186	0	0	0	0	841	

PM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	37	173	14	178					402	4
From B	139	0	1	7					147	231
From C	25	1	0	3					29	362
From D	147	1	1	1					150	364
From E										
From F										
From G										
From H										
Total	348	175	16	189	0	0	0	0	728	

Legend

Arm	Road (in clockwise order)
A	Lau Fau Shan Road
B	Deep Bay Road (Pak Nai)
C	Shan Tung Street
D	Deep Bay Road (Tsim Pei Tsui)
E	
F	
G	
H	

Geometric Parameters

Arm	e (m)	v (m)	r (m)	L (m)	D (m)	∅ (°)	S
From A	4.5	3.5	10.0	3.0	40	55	0.5
From B	4.5	3.5	20.0	3.0	40	55	0.5
From C	4.0	3.0	15.0	5.0	40	55	0.3
From D	5.0	2.5	40.0	5.0	40	25	0.8
From E							
From F							
From G							
From H							

Predictive Equation $Q_E = K(F - f_c q_c)$

Q_E	Entry Capacity
q_c	Circulating Flow across the Entry
K	$= 1 - 0.00347(\emptyset - 30) - 0.978[(1/r) - 0.05]$
F	$= 303x_2$
f_c	$= 0.210t_D(1 + 0.2x_2)$
t_D	$= 1 + 0.5/(1 + M)$
M	$= \exp[(D - 60)/10]$
x_2	$= v + (e - v)/(1 + 2S)$
S	$= 1.6(e - v)/L$

Limitation

e	Entry Width	4.0 - 15.0 m
v	Approach Half Width	2.0 - 7.3 m
r	Entry Radius	6.0 - 100.0 m
L	Effective Length of Flare	1.0 - 100.0 m
D	Inscribed Circle Diameter	15 - 100 m
∅	Entry Angle	10° - 60°
S	Sharpness of Flare	0.0 - 3.0

Ratio-of-Flow to Capacity (RFC)

Arm	x_2	M	t_D	K	F	f_c	Q_E			Entry Flow			RFC		
							AM	Noon	PM	AM	Noon	PM	AM	Noon	PM
From A	3.984	0.135	1.440	0.864	1207	0.543	1032	1034	1041	377	488	402	0.365	0.472	0.386
From B	3.984	0.135	1.440	0.913	1207	0.543	1005	958	988	146	127	147	0.145	0.133	0.149
From C	3.610	0.135	1.440	0.897	1094	0.521	827	822	812	28	39	29	0.034	0.047	0.036
From D	3.462	0.135	1.440	1.042	1049	0.512	969	906	899	205	187	150	0.211	0.207	0.167
From E															
From F															
From G															
From H															

Roundabout Analysis

Junction: Lau Fau Shan Road / Deep Bay Road / Shan Tung Street - Lau Fau Shan Roundabout Job Number: J7404
 Scenario: 2033 Without Proposed Columbarium (With Upgrading of Deep Bay Road) J01 - P. 4
 Design Year: 2033 Designed By: WCH Checked By: WCH Date: 10 October 2025

AM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	71	185	11	110					377	25
From B	136	1	2	7					146	196
From C	19	4	0	5					28	329
From D	185	16	0	4					205	231
From E										
From F										
From G										
From H										
Total	411	206	13	126					756	

Noon Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	36	213	66	173					488	21
From B	120	1	0	6					127	291
From C	34	2	0	3					39	340
From D	169	2	12	4					187	351
From E										
From F										
From G										
From H										
Total	359	218	78	186	0	0	0	0	841	

PM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	37	173	14	178					402	4
From B	139	0	1	7					147	231
From C	25	1	0	3					29	362
From D	147	1	1	1					150	364
From E										
From F										
From G										
From H										
Total	348	175	16	189	0	0	0	0	728	

Legend

Arm	Road (in clockwise order)
A	Lau Fau Shan Road
B	Deep Bay Road (Pak Nai)
C	Shan Tung Street
D	Deep Bay Road (Tsim Pei Tsui)
E	
F	
G	
H	

Geometric Parameters

Arm	e (m)	v (m)	r (m)	L (m)	D (m)	∅ (°)	S
From A	6.0	3.5	12.5	3.0	40	55	1.3
From B	4.5	3.5	20.0	3.0	40	55	0.5
From C	4.0	3.0	15.0	5.0	40	55	0.3
From D	5.0	2.5	40.0	5.0	40	25	0.8
From E							
From F							
From G							
From H							

Predictive Equation $Q_E = K(F - f_c q_c)$

Q_E	Entry Capacity
q_c	Circulating Flow across the Entry
K	$= 1 - 0.00347(\emptyset - 30) - 0.978[(1/r) - 0.05]$
F	$= 303x_2$
f_c	$= 0.210t_D(1 + 0.2x_2)$
t_D	$= 1 + 0.5/(1 + M)$
M	$= \exp[(D - 60)/10]$
x_2	$= v + (e - v)/(1 + 2S)$
S	$= 1.6(e - v)/L$

Limitation

e	Entry Width	4.0 - 15.0 m
v	Approach Half Width	2.0 - 7.3 m
r	Entry Radius	6.0 - 100.0 m
L	Effective Length of Flare	1.0 - 100.0 m
D	Inscribed Circle Diameter	15 - 100 m
∅	Entry Angle	10° - 60°
S	Sharpness of Flare	0.0 - 3.0

Ratio-of-Flow to Capacity (RFC)

Arm	x_2	M	t_D	K	F	f_c	Q_E			Entry Flow			RFC		
							AM	Noon	PM	AM	Noon	PM	AM	Noon	PM
From A	4.182	0.135	1.440	0.884	1267	0.555	1108	1110	1118	377	488	402	0.340	0.440	0.360
From B	3.984	0.135	1.440	0.913	1207	0.543	1005	958	988	146	127	147	0.145	0.133	0.149
From C	3.610	0.135	1.440	0.897	1094	0.521	827	822	812	28	39	29	0.034	0.047	0.036
From D	3.462	0.135	1.440	1.042	1049	0.512	969	906	899	205	187	150	0.211	0.207	0.167
From E															
From F															
From G															
From H															

Roundabout Analysis

Junction: Lau Fau Shan Road / Deep Bay Road / Shan Tung Street - Lau Fau Shan Roundabout Job Number: J7404
 Scenario: 2033 With Proposed Columbarium (With Upgrading of Deep Bay Road) J01 - P. 5
 Design Year: 2033 Designed By: WCH Checked By: WCH Date: 10 October 2025

AM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	71	185	11	110					377	25
From B	136	1	2	7					146	196
From C	19	4	0	5					28	329
From D	185	16	0	4					205	231
From E										
From F										
From G										
From H										
Total	411	206	13	126					756	

Noon Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	36	213	66	173					488	21
From B	120	1	0	6					127	291
From C	34	2	0	3					39	340
From D	169	2	12	4					187	351
From E										
From F										
From G										
From H										
Total	359	218	78	186	0	0	0	0	841	

PM Peak Hour

Arm	To A	To B	To C	To D	To E	To F	To G	To H	Total	q _c
From A	37	173	14	178					402	4
From B	139	0	1	7					147	231
From C	25	1	0	3					29	362
From D	147	1	1	1					150	364
From E										
From F										
From G										
From H										
Total	348	175	16	189	0	0	0	0	728	

Legend

Arm	Road (in clockwise order)
A	Lau Fau Shan Road
B	Deep Bay Road (Pak Nai)
C	Shan Tung Street
D	Deep Bay Road (Tsim Pei Tsui)
E	
F	
G	
H	

Geometric Parameters

Arm	e (m)	v (m)	r (m)	L (m)	D (m)	∅ (°)	S
From A	6.0	3.5	12.5	3.0	40	55	1.3
From B	4.5	3.5	20.0	3.0	40	55	0.5
From C	4.0	3.0	15.0	5.0	40	55	0.3
From D	5.0	2.5	40.0	5.0	40	25	0.8
From E							
From F							
From G							
From H							

Predictive Equation $Q_E = K(F - f_c q_c)$

Q_E	Entry Capacity
q_c	Circulating Flow across the Entry
K	$= 1 - 0.00347(\emptyset - 30) - 0.978[(1/r) - 0.05]$
F	$= 303x_2$
f_c	$= 0.210t_D(1 + 0.2x_2)$
t_D	$= 1 + 0.5/(1 + M)$
M	$= \exp[(D - 60)/10]$
x_2	$= v + (e - v)/(1 + 2S)$
S	$= 1.6(e - v)/L$

Limitation

e	Entry Width	4.0 - 15.0 m
v	Approach Half Width	2.0 - 7.3 m
r	Entry Radius	6.0 - 100.0 m
L	Effective Length of Flare	1.0 - 100.0 m
D	Inscribed Circle Diameter	15 - 100 m
∅	Entry Angle	10° - 60°
S	Sharpness of Flare	0.0 - 3.0

Ratio-of-Flow to Capacity (RFC)

Arm	x_2	M	t_D	K	F	f_c	Q_E			Entry Flow			RFC		
							AM	Noon	PM	AM	Noon	PM	AM	Noon	PM
From A	4.182	0.135	1.440	0.884	1267	0.555	1108	1110	1118	377	488	402	0.340	0.440	0.360
From B	3.984	0.135	1.440	0.913	1207	0.543	1005	958	988	146	127	147	0.145	0.133	0.149
From C	3.610	0.135	1.440	0.897	1094	0.521	827	822	812	28	39	29	0.034	0.047	0.036
From D	3.462	0.135	1.440	1.042	1049	0.512	969	906	899	205	187	150	0.211	0.207	0.167
From E															
From F															
From G															
From H															

Road Link Analyses

Project Number: J7404

Date: 10 October 2025

Page: 1 of 1

2025 Existing

Link	Peak Hour Traffic Flow (vph)			Design Flow	Peak Hourly Flow / Design Flow Ratios		
	AM	Noon	PM		AM	Noon	PM
L01	204	200	188	100	2.040	2.000	1.880
L02	72	62	60	100	0.720	0.620	0.600
L03	50	38	29	100	0.500	0.380	0.290

2033 Without Proposed Columbarium - No Upgrading of Deep Bay Road & Nim Wan Road

Link	Peak Hour Traffic Flow (vph)			Design Flow	Peak Hourly Flow / Design Flow Ratios		
	AM	Noon	PM		AM	Noon	PM
L01	211	208	195	100	2.110	2.080	1.950
L02	75	65	62	100	0.750	0.650	0.620
L03	52	39	30	100	0.520	0.390	0.300

2033 With Proposed Columbarium - No Upgrading of Deep Bay Road & Nim Wan Road

Link	Peak Hour Traffic Flow (vph)			Design Flow	Peak Hourly Flow / Design Flow Ratios		
	AM	Noon	PM		AM	Noon	PM
L01	211	208	195	100	2.110	2.080	1.950
L02	75	65	62	100	0.750	0.650	0.620
L03	52	39	30	100	0.520	0.390	0.300

2033 Without Proposed Columbarium - With Upgrading of Deep Bay Road & Nim Wan Road

Link	Peak Hour Traffic Flow (vph)			Design Flow	Peak Hourly Flow / Design Flow Ratios		
	AM	Noon	PM		AM	Noon	PM
L01	211	208	195	1,400	0.151	0.149	0.139
L02	75	65	62	1,400	0.054	0.046	0.044
L03	52	39	30	1,400	0.037	0.028	0.021

2033 With Proposed Columbarium - With Upgrading of Deep Bay Road & Nim Wan Road

Link	Peak Hour Traffic Flow (vph)			Design Flow	Peak Hourly Flow / Design Flow Ratios		
	AM	Noon	PM		AM	Noon	PM
L01	211	208	195	1,400	0.151	0.149	0.139
L02	75	65	62	1,400	0.054	0.046	0.044
L03	52	39	30	1,400	0.037	0.028	0.021

**Appendix B –
Extract of “Fire Safety Management Plan”**

**Fire Safety Management Plan for Koon
Yam Tong at No. 13 Nim Wan Road, Ha
Pak Nai, Lau Fau Shan, Yuen Long**

**元朗流浮山下白泥稔灣路 13 號觀音堂
消防安全管理計劃**

(FSMP)

Issue 1

第一版

28 Mar 2024

2024 年 03 月 28 日

Prepared by Arch & Fire Professional (Int'l) Ltd.

本計劃由 Arch & Fire Professional (Int'l) Limited 編寫

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Undertaking Letter 承諾書

To whom it may concern

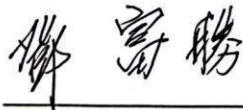
Undertaking Letter for Fire Safety Management Plan

Dear Sir/Madam,

I, Tang Fu Sing, as the operator of Koon Yam Tong (觀音堂) Columbaria at No. 13 Nim Wan Road, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in D.D. 135), fully understand that the approval of the building plans with Fire Safety Assessment Report being submitted to Food and Environmental Hygiene Department Private Columbaria Affairs Office in regards to the application for "Temporary Suspension of Liability" and "Pre-cut-off Columbarium License" for the subject columbaria is subject to the conditions that all compensatory measures as stated in the Fire Safety Management Plan are complied with. We will manage the premises complying with all the measures as stated in Fire Safety Management Plan. The Fire Safety Management Plan will be incorporated into the conditions in every assignment/sub-letting or as part of the tenancy/leasing agreement of the premises, if any.

Thank you for your attention.

Yours faithfully,
For and on behalf of
Koon Yam Tong (觀音堂)



Tang Fu Sing
HKIC No. C245718(9)

Summary 摘要

This Fire Safety Management Plan (FSMP) describes the arrangements and procedures to reduce the risk of fire and protect the safety of occupants and property for the private columbarium building, Koon Yam Tong. The building is served by only one staircase with winders, which cannot comply with relevant statutory requirements.

本消防安全管理計劃(“計劃”)闡述防火安排及程序以減低私營骨灰安置所“觀音堂”的火災風險,並保障建築內的人員及財物安全。該建築只有一道帶斜踏的樓梯,不符合相關的法定要求。

This FSMP addresses responsibilities of staff who should implement the FSMP and the training of staff to perform their duties. To ensure safe evacuation of occupants, fire action plan is developed. The FSMP also contains measures to prevent fire and the maintenance regime of fire safety provisions.

本計劃內容涉及執行本計劃工作人員的責任以及相關培訓。為確保建築內人員的安全疏散,製定了相應的火警行動方案。本計劃亦載有防火措施及消防安全設施的保養方案。

This FSMP should be endorsed by the owner to ensure that the FSMP will be implemented throughout the lifetime of the development in order to assure the fire safety. An undertaking letter endorsed by the building owner should be incorporated into this FSMP.

業主應簽名確認本計劃將會在建築使用期內予以執行,以確保消防安全。由業主簽署的承諾書須納入本計劃書內。

A set of approved General Building Plan (GBP), Fire Service Installations (FSI) plans and any relevant documents shall be incorporated into this FSMP. Copies of FSMP should be kept at building management office. The management procedures stated in the FSMP should be effectively implemented.

獲批准的建築圖則、消防裝置圖則及任何有關文件均須納入本消防安全管理計劃內。消防安全管理計劃副本應備存於物業管理處。消防安全管理計劃所訂立的管理程序須得到有效執行。

The FSMP should be regularly reviewed to ensure that it reflects the most up-to-date status of the building.

消防安全管理計劃應進行定期檢討,以確保計劃能反映建築最新狀態。

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.

將在大樓外的空地區域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、聯絡人、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

Management Plan for Private Columbarium at Koon Yam Tong

1. Basic information of the columbarium

Name of the columbarium: Koon Yam Tong (觀音堂)

Address of the columbarium: No. 13 Nim Wan Road, Ha Pak Nai, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in D.D. 135)

Year of establishment: Year 2010

Name of operator: Ka Fuk Services Limited

Status of operator: land owner of the premises under a lease of 37 years (36 years and 364 days) from 02-07-2010 to 30-06-2047

Religion of the columbarium: Buddhism

2. Site information and building arrangement

This columbarium has a site area of about 92.9 square metres and a total building floor area of about 195.12 square metres. It is composed of:

1 Columbarium block(s);

0 joss paper burner(s);

0 refuse storage rooms.

Other buildings which are facilities necessary for or ancillary to the operation of the columbarium: (please specify nature and number) N/A

Other facilities necessary for or ancillary to the operation of the columbarium:

1 Portable Toilet, to be cleaned at the beginning of the day of any appointment made by visitors.

3. Visitor Holding Capacity and Admission Control

3.1 Opening Hours

- Ordinary Days (outside Ching Ming and Chung Yeung Festive Periods):
Monday to Friday, 09:00 to 16:00 (except Public Holidays)
- Ching Ming and Chung Yeung Festive Periods (within 4 weeks before and after the Festival Days):
Monday to Friday, 07:00 to 17:00
- Closed on Saturdays, Sundays, and Public Holidays (including Ching Ming and Chung Yeung Festival Days)

3.2 Visitor Limit and Appointment Control

- All visits are strictly by appointment only, year-round
- Each session allows a maximum of 4 visitors and lasts 30 minutes
- Minimum booking lead time: 2 days prior to intended visit
- No walk-ins are permitted under any circumstances
- The columbarium remains closed if no appointments are scheduled
- Staff are deployed only when confirmed appointments exist

Daily capacity varies depending on operating hours:

- During Ching Ming and Chung Yeung periods:
 - Operating hours: 09:00 to 16:00
 - Total sessions per day: 14
 - Maximum daily visitors: 56 (14 sessions × 4 visitors)
- During all other weekdays:
 - Operating hours: 07:00 to 17:00
 - Total sessions per day: 20
 - Maximum daily visitors: 80 (20 sessions × 4 visitors)
- **Placement of Notice:**
A notice outlining the appointment arrangement and opening hours timetable will be posted at the entrance/exit of the columbarium building, as per Appendix A

3.3 Internet Memorial Worshipping Services

All niche owners are permitted to commemorate their loved ones either through in-person visits or via the internet memorial worshipping platform, in accordance with the terms set out in the sale agreement.

- **In-person worship** is available by appointment across all three floors — G/F(地下), 1/F(一樓), and 2/F(二樓) — subject to occupancy control and fire safety measures.
- **Internet memorial worshipping services** are provided as an alternative option for niche owners who prefer remote commemoration.
- Each niche owner is provided with a **private link** to a dedicated online tribute page
- No login is required; the link allows family members to **submit photos, messages, and virtual offerings** directly
- Each tribute page functions like a **private memorial forum**, where family members can post freely
- An **email notification system** is in place: subscribers receive alerts when new content is posted to their niche's page
- The platform is managed and monitored by the operator to ensure respectful use and data protection
- This arrangement is designed to support descendants living overseas or those preferring remote commemoration

This dual-mode arrangement ensures flexibility for all niche owners, including those living overseas or with mobility constraints, while maintaining orderly and safe operations at the columbarium.

3.4 Admission Measures

3.4.1 Transport Arrangement

- Visitors are strongly advised and recommended to use Green Minibus Route No. 33
- No car parking is available on-site or in the vicinity
- Reminder notices regarding visiting and transport arrangements will be issued prior to each Ching Ming and Chung Yeung period

3.4.2 Policy Agreement

As a condition of sale, all niche owners must comply with the columbarium's admission control policies, including the mandatory visit-by-appointment requirement. This agreement ensures operational efficiency and prevents unregulated access.

3.4.3 Data Collection and Review

The columbarium operator regularly analyzes visitor registration records, attendance figures, and group sizes. The collected data helps assess the effectiveness of admission control measures and identifies opportunities for improvement, ensuring a smoother experience for future visitors. Additionally, the review informs adjustments to transport policies and operational procedures, reinforcing commitment to efficient crowd management and accessibility.

4. Traffic and Public Transport Arrangement

4.1 Traffic Facilities

No carpark or loading/unloading bay will be provided. Access to the columbarium is encouraged and advised via public transportation, such as Green Minibus No. 33.

4.2 No Car Parking Policy

Car parking will not be provided at any time throughout the year. Grave sweepers and visitors are **strongly discouraged from driving to Koon Yam Tong**. To maintain order and minimize traffic congestion along Nim Wan Road, access to the columbarium is encouraged via public transportation, such as Green Minibus No. 33. This approach supports safe and regulated visitation while ensuring compliance with operational and traffic policies

4.3 Visitor Access Arrangement

Visitors cannot enter the premises without a confirmed appointment. The columbarium will remain locked at all times outside scheduled sessions, ensuring a supervised, secure, and controlled visitation process aligned with the site's operational and safety policies.

4.4 Conditions of Sale

To ensure adherence to transport regulations, all niche owners must accept these arrangements as part of the conditions of sale. This includes the mandatory no car

parking policy, the visit-by-appointment requirement, and the use of public transport for accessing the columbarium. By integrating these requirements into the purchase agreement, the operator ensures that visitors comply with the established traffic arrangements.

5. Crowd Management

The columbarium employs a structured plan to regulate visitor flow, ensuring safety, efficiency, and an organized experience for all attendees. Given the site's compact layout and limited capacity, crowd management is fully controlled by the restricted number of visitors allowed at any time, as governed by the appointment system.

5.1 Monitoring Capacity

To ensure a controlled and safe environment, access is permitted across all three floors - G/F, 1/F, and 2/F - during scheduled appointments. A maximum of 4 visitors per session is allowed, in accordance with Section 3.2. One staff member is stationed at the building to monitor visitor numbers and regulate access to the niche areas, maintaining safety and comfort for all.

5.2 Staff Deployment

1 staff member is deployed per confirmed appointment session. Their responsibilities include:

- Managing visitor registration
- Guiding visitors to their designated worship areas
- Monitoring visitor conduct and movement
- Providing assistance as needed during the session

Staff presence ensures smooth and efficient operations, allowing for an organized and controlled environment at all times. No staff are present when no appointments are scheduled.

6. Security Management

6.1 Manpower

- Deployment of a trained staff member for security and emergency management which his/her duties include:

- ensure that only visitors with confirmed appointments are admitted; unauthorized or unappointed access is strictly prevented
- Staff presence supports orderly access across the ground floor, first floor, and second floor during scheduled visitor sessions
- In case of emergency, the staff member initiates response protocols and liaises with relevant authorities, in accordance with the fire safety strategy outlined in Section 8
- Routine fire safety inspections are conducted by qualified contractors; the staff member maintains awareness of evacuation procedures and assists as needed

6.2 Facilities

- Sprinkler, emergency lighting, fire alarm systems, visual fire alarm systems, and fire hydrant/hose reel systems.
- Smoke detectors for early fire detection; heat detectors in pump rooms.
- Structural enhancements such as handrails, slip-resistant flooring, upgraded fire doors, and modified exits.

6.3 Occupant and Visitor Control

- Visit-by-appointment system used to regulate population flow and prevent overcrowding
- Access to the premises is restricted to confirmed visitors only
- Staff monitor visitor movement and ensure compliance with safety protocol

6.4 Fire Prevention and Maintenance

- Housekeeping practices to keep escape routes clear and limit fire loads.
- Regular inspection and maintenance of fire service installations (FSI).
- Staff training on fire management and biannual fire drills

7. Manpower Deployment

7.1 Staffing

The columbarium operates with 1 permanent staff member and 3 part-time staff members. While each role is assigned specific responsibilities, the Manager may also perform the duties of part-time staff when required to ensure operational continuity.

7.1.1 Manager (Permanent Staff)

Responsible for overall operations, administrative duties, and visitor coordination, including:

- Visitor registration and appointment management
- On-site visitor coordination, including crowd control and general assistance during scheduled sessions
- Complaint handling and record keeping
- Financial reporting and coordination with external auditors
- Fire safety management and emergency response coordination
- Security and contingency planning as detailed in Section 6.1
- Conducting fire drills, maintaining fire safety records, and liaising with emergency services
- Monitoring fire service installations and escape routes
- Overseeing visitor control and ensuring compliance with licensing conditions
- Supporting cleaning, maintenance, and visitor assistance tasks as needed

7.1.2 Maintenance Staff (Part-Time)

- Conducts routine inspections and maintenance of equipment and facilities to ensure regulatory compliance.
- Maintains the cleanliness and upkeep of the columbarium.

7.1.3 Cleaning Staff (Part-Time)

- Responsible for general cleaning and housekeeping to maintain a safe and hygienic environment.

7.1.4 Visitor Support Staff (Part-Time)

- Assists with on-site visitor coordination during scheduled appointment sessions when necessary
- Supports registration, crowd control, and general visitor assistance when necessary
- Assists with complaint handling and documentation when necessary

7.2 Staff Training

7.2.1 General Training

- Conducts sessions on fire safety protocols, evacuation procedures, and first aid basics.

- Equips staff with skills to enforce operational policies effectively.
- Ensures familiarity with the use of fire safety equipment and response to fire alarms.

7.2.2 Specialized Training

- The Manager is trained to oversee fire drills and inspections and coordinate evacuation procedures.
- Maintenance staff receive training on regulatory standards for facility upkeep and safe equipment handling.
- Visitor Support Staff receive training on complaint handling, visitor coordination, and emergency communication procedures.

7.2.3 Regular Drills and Evaluations

- Conducts biannual fire drills to test evacuation routes and staff readiness.
- Organizes simulated scenarios to assess staff coordination and response to emergencies.

7.3 Equipment Provided for Staff

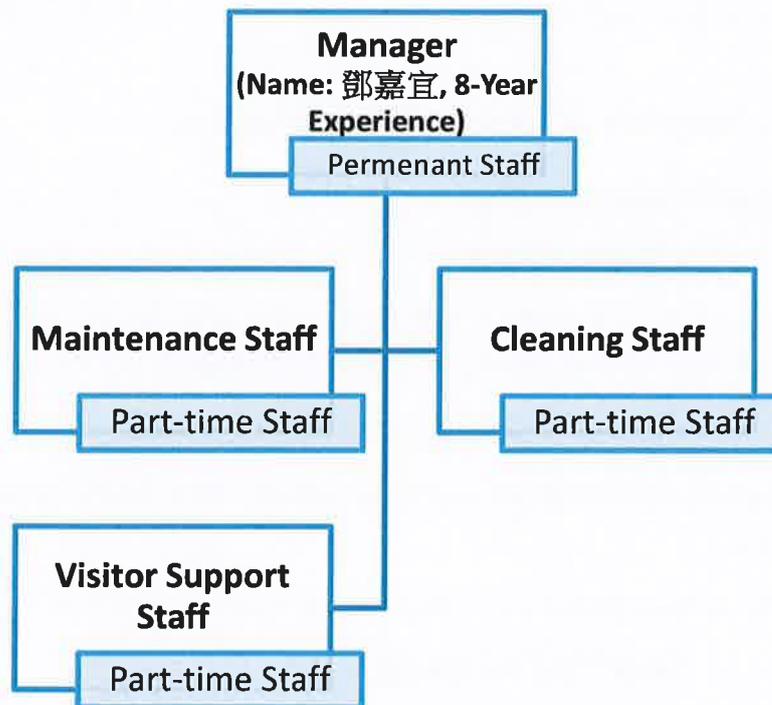
To ensure safe and efficient operation of the columbarium, the following equipment is provided to staff:

- First Aid Kit
 - A fully stocked first aid box is kept on-site for use in minor injuries or emergencies
 - Includes bandages, antiseptics, gloves, and basic medical supplies
 - Staff are trained in basic first aid procedures
- Fire Safety Equipment
 - Fire extinguishers are installed at designated locations and inspected regularly
 - Staff are trained in proper usage and evacuation procedures
 - Escape route maps are displayed prominently on-site
- Communication Tools
 - Mobile phones are provided to staff for coordination during visitor sessions and emergencies
 - Emergency contact numbers are listed and accessible to all staff
- Visitor Management Materials

- Printed appointment logs and visitor records are maintained for each session
- Staff are equipped with clipboards, pens, and signage for crowd control and registration
- **Protective Gear**
 - Staff conducting cleaning and maintenance are provided with gloves, masks, and appropriate protective clothing
 - Additional supplies are available during peak periods or special maintenance tasks
- **Administrative Supplies**
 - Office stationery and record-keeping materials are provided for complaint handling, financial documentation, and compliance reporting

All equipment is maintained in good condition and replenished as needed. Staff are briefed regularly on proper usage and safety protocols.

7.4 Organization Chart



7.5 Top Management Details

7.5.1 Manager

- The top management personnel is Ms. Tang Ka Yee (鄧嘉宜), who serves as the sole permanent staff member of the columbarium

- She has over 8 years of experience in columbarium operations, site administration, and licensing compliance
- Formal training in fire safety, including evacuation procedures and inspection of fire service installations will be acquired before the start of operation of the proposed columbarium.
- First aid certificate issued by a recognized training institution will be acquired before the start of operation of the proposed columbarium.
- She is familiar with the Private Columbaria Ordinance, relevant licensing conditions, and operational standards
- Her background includes coordination with government departments, handling public enquiries, and supervising site operations
- All operational, safety, and emergency duties assigned to her are detailed in Section 7.1.1 of this Management Plan
- Handles financial reporting, fund monitoring, and preparation of annual statements
- Has over 8 years of experience in financial record-keeping, budgeting, and compliance reporting

8. Contingency Plans for Emergencies

8.1 Responsibilities and Duties

8.1.1 Fire Safety Officer

- The sole permanent staff member is responsible for overseeing fire safety measures and ensuring evacuation procedures are followed.
- Conducts fire safety training and organizes fire drills.
- Supervises evacuations, assists occupants, and conducts headcounts at the assembly area.
- The contact detail of the Fire Safety Officer is as follows:”
 - **Name:** Tang Ka Yee (鄧嘉宜)
 - **Position:** Manager
 - **Telephone:** 2472 1366
- Staff training and qualifications:

Relevant fire safety training and first aid training will be acquired before the start of operation of the proposed columbarium.

8.2 Actions in Case of Fire

8.2.1 On Discovering a Fire

- Activate the nearest fire alarm call point.
- Notify the Fire Services Department by calling 999 and provide details of the fire.
- Alert all occupants to evacuate.

8.2.2 Evacuation

- Follow designated escape routes.
- Assist others in safely evacuating to the assembly area.
- Stay low if smoke is present.

8.2.3 Fire Safety Officer Actions

- Verify the fire emergency and notify the Fire Services Department if necessary.
- Supervise the evacuation process and conduct a roll call at the assembly area.

8.3 Staff Training and Fire Drills

8.3.1 Training

- Conduct annual fire safety training to ensure familiarity with evacuation procedures and safety protocols.
- Maintain knowledge of fire safety equipment and emergency response procedures.

8.3.2 Fire Drills

- Conduct biannual fire drills to reinforce evacuation procedures.
- Evaluate and document drill outcomes, including necessary improvements.

8.4 Equipment Provision

8.4.1 Fire Safety Installations:

- Emergency lighting installed throughout the building and along all exit routes to enhance visibility during evacuations.
- Fire alarm system integrated with hose reel points, providing actuating points and audio warning devices.
- Visual fire alarm systems implemented in common areas to ensure clear evacuation signals.

- Fire hydrant and hose reel system on each floor:
 - Coverage of up to 30 meters with fire service hose reel tubing.
 - Supported by a dedicated 500-liter water tank for effective firefighting.

8.4.2 Fire Detection Systems:

- Smoke detectors provided in columbarium areas from G/F(地下), 1/F(一樓) and 2/F(二樓), ensuring early fire detection:
 - Horizontal distance between detectors limited to 4.5 meters, complying with enhanced standards.
- Heat detectors installed in the pump room.
 - Fire detection signals, including smoke detectors and break glass units, linked directly to the Fire Services Communication Centre through the Fire Alarm Control Panel.

8.4.3 Enhanced Fire Services Measures:

- Improvised direct feed sprinkler system with fast-response sprinkler heads installed throughout the building (excluding the FS pump room).
- Upgraded separation walls and ceilings in the FS pump room with (-/120/120) fire resistance rating.
- Fire doors leading to required staircases upgraded to (-/60/60) fire resistance rating.

8.4.4 The locations of the equipment on each floor are presented in the following layout plans:

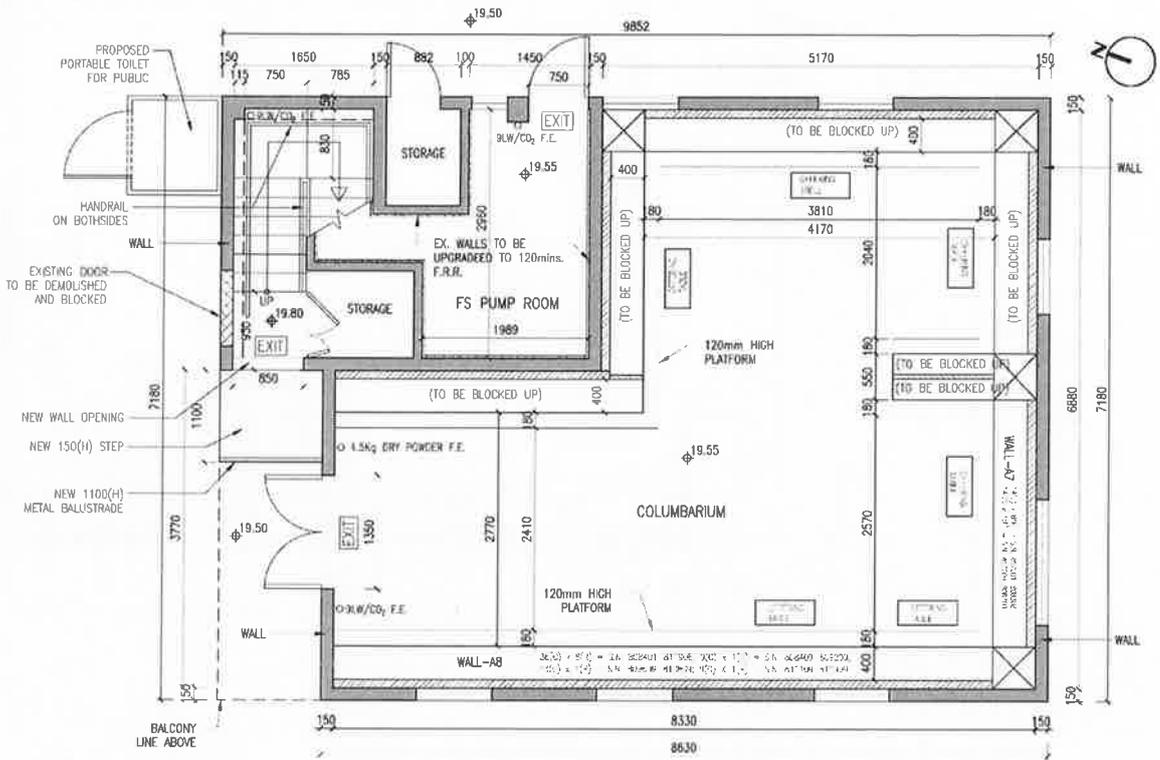


Figure 8.3.4.1 - G/F (地下) Layout Plan

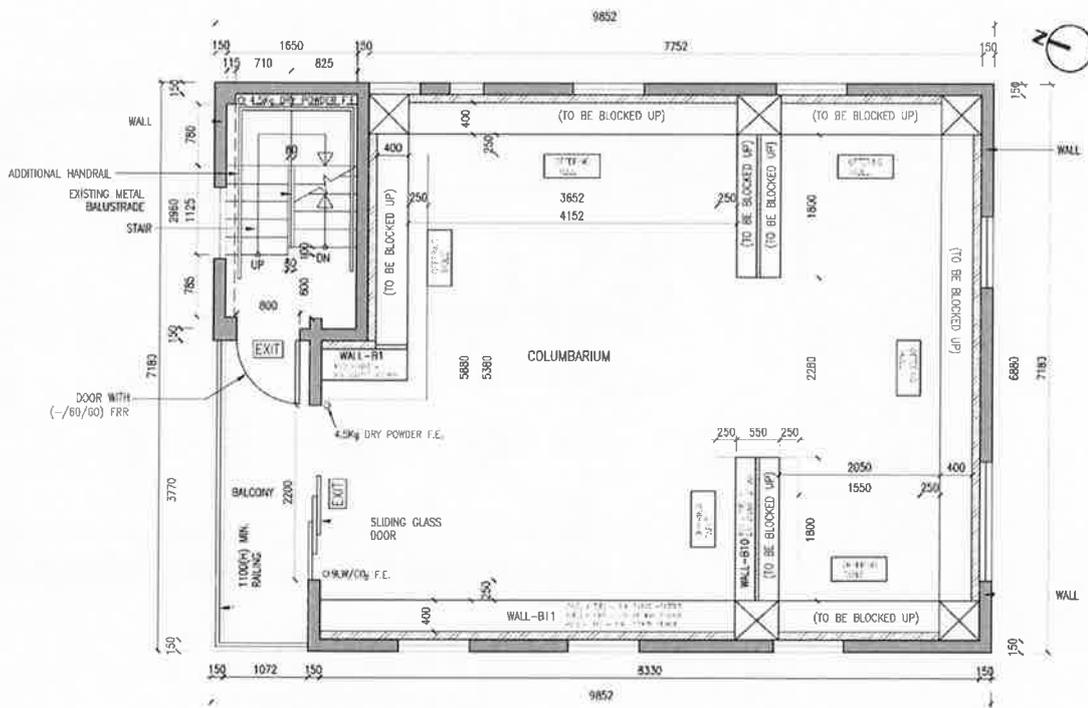


Figure 8.3.4.2 - 1/F (一樓) Layout Plan

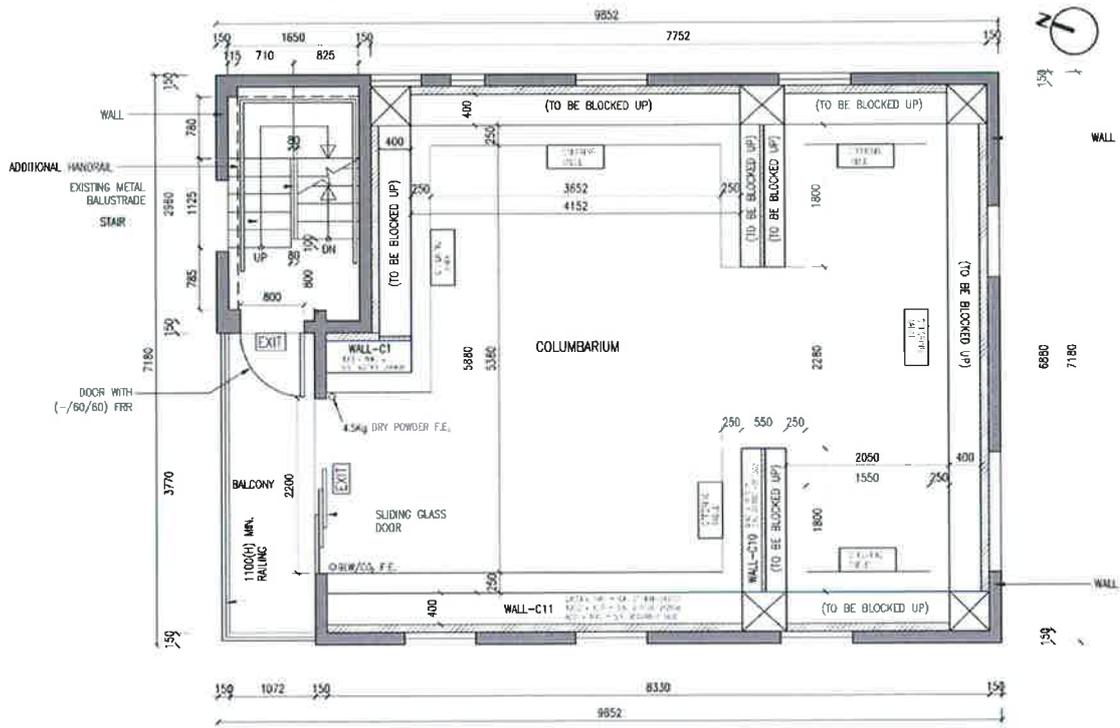
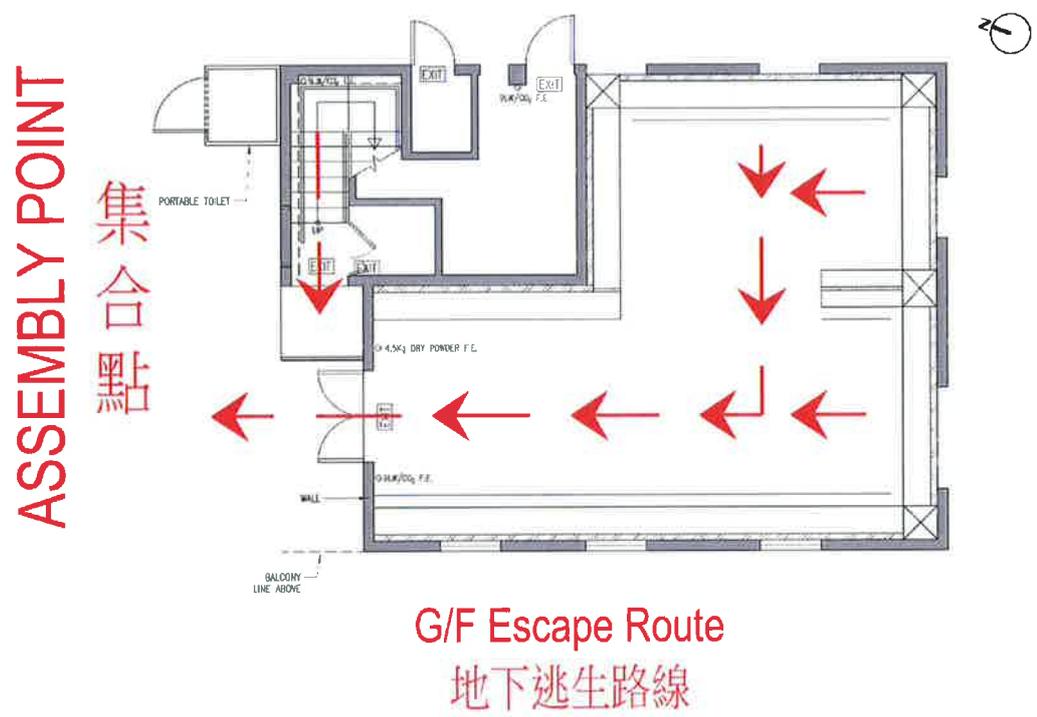


Figure 8.3.4.3 - 2/F (二樓) Layout Plan

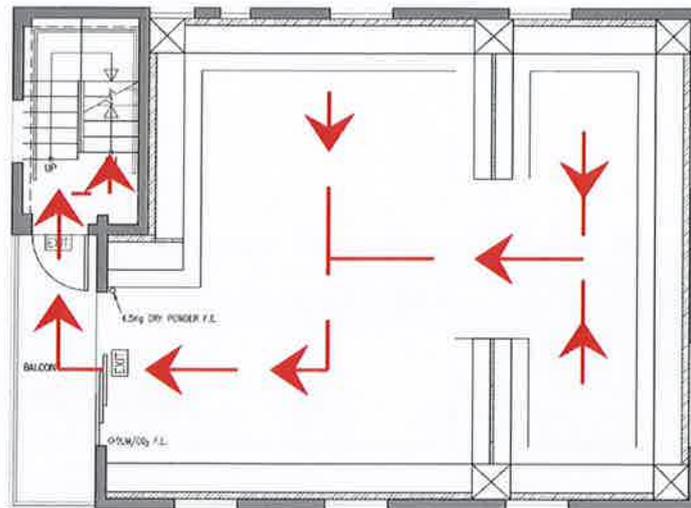
8.5 Escape Routes Plans

The Escape Routes are as follows:



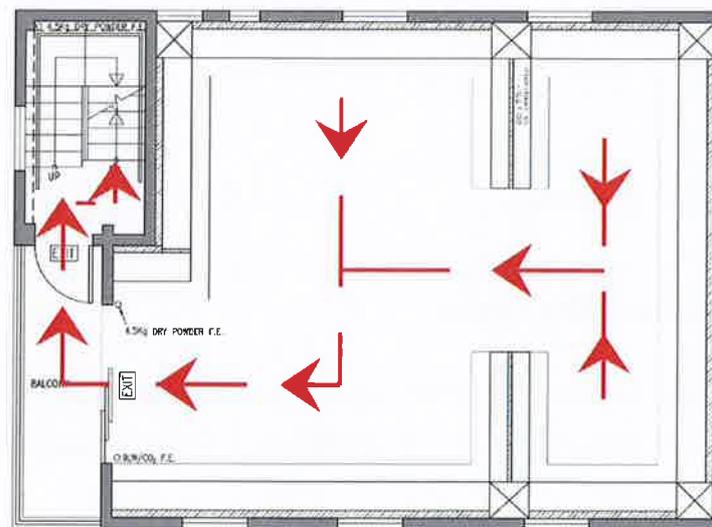
G/F Escape Route
地下逃生路線

Figure 8.4.1 – G/F (地下) Escape Route



1/F Escape Route
一樓逃生路線

Figure 8.4.2 – 1/F (一樓) Escape Route



2/F Escape Route
二樓逃生路線

Figure 8.4.3 – 2/F (二樓) Escape Route

- These escape route plans will be posted at conspicuous positions near the entrances/exits of each respective floor.

8.6 Emergency Vehicular Access (EVA)

The EVA plan with vehicular turning simulation of a major pump fire engine is illustrated below:

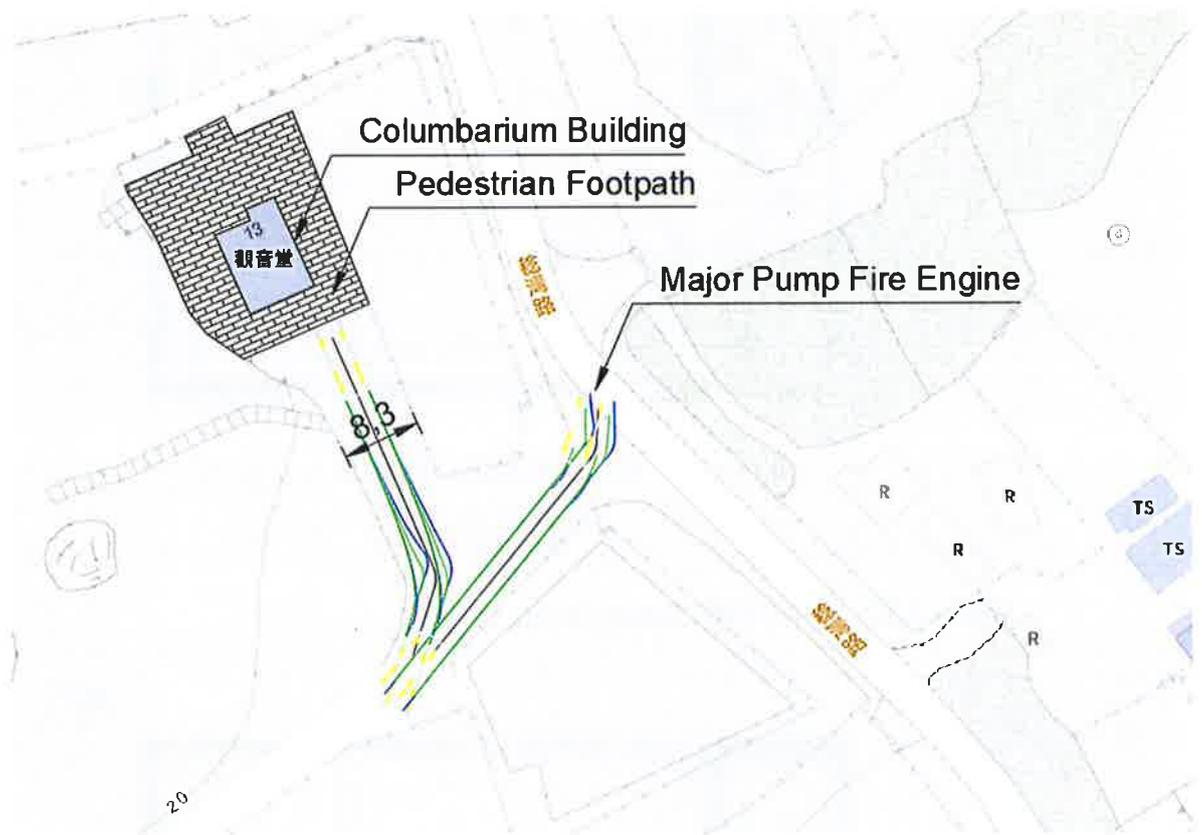


Figure 8.4.5.1 – EVA Plan

9. Compliance Measures

With reference to Section 3 of the Fire Safety Assessment Report (Issue 5) for the subject columbarium, there are non-compliance items as listed below:

9.1 Non-Compliance Items

9.1.1 Means of Escape (MOE) Provisions:

The building must comply with the prevailing Fire Safety Code (FS Code) and Building (Planning) Regulations (Cap. 123F), ensuring adequate MOE provisions.

However, the current building has only one staircase, which fails to meet the requirement of two escape staircases for above or below ground storeys (Clause 16, Annex 4).

The existing staircase also has winders and is not arranged in straight flights, failing to comply with Clause B14.2 of FS Code.

9.1.2 Challenges in Adding a Second Staircase:

- **Internal Addition:** Structural alterations would be difficult and affect sold niches.
- **External Addition:** Encroaches on government land, requiring a lengthy short-term tenancy application with the Lands Department.
- **Policy Non-Compliance:** Adding an external staircase would exceed the maximum allowable roofed-over area, violating the New Territories Small House Policy.

9.2 Proposed Alternative Fire Engineering Measures for Building Safety Compliance

9.2.1 Fire Safety Installations (FSD):

- **Emergency Lighting:** Installed throughout the building and exit routes to ground level.
- **Fire Alarm System:** Incorporates an actuating point and audio warning device at each hose reel point, linked to the manual fire alarm system.
- **Visual Fire Alarm System:** Deployed in common areas.
- **Fire Hydrant/Hose Reel System:** Ensures hose reels cover the entire building within 30m length, supported by a 500-liter water tank.
- **Fire Detection System:** Includes:
 - Smoke detectors in columbarium areas with a 4.5m coverage radius, exceeding the required standards for early fire warning.
 - Heat detectors in the pump room.
 - All detectors linked to the Fire Services Communication Centre.

9.2.2 Staircase and Evacuation Enhancements:

- **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.

9.2.3 Fire Prevention and Housekeeping:

- Use non-combustible materials for wall niches, decorations, and furniture.
- Prohibit smoking, burning of joss sticks, incense, and candles indoors.
- Maintain clear escape routes and control worshipping materials to minimize fire risks.

9.2.4 Occupant and Visitor Management:

- Limit to maximum 4 visitors per session and only limited to 1 single floor, excluding staff, to ensure effective population control.
- Visitors required to register their details and adhere to appointment-based visits, especially during festivals.
- Provide appointment-based access and on-site coordination to control visitor flow and reduce congestion.

9.2.5 Enhanced Fire Services and Safety Measures:

- **Improved Sprinkler System:**
 - Covers the entire building except the FS pump room.
 - Utilizes fast-response sprinkler heads for early fire control.
- **Separation Walls and Ceiling for FS Pump Room:** Upgraded to (-/120/120) F.R.R. using Promatech-H boards.

9.2.6 Management Measures:

- **Fire Load Control:** Maintain minimal combustible items and ensure waste is disposed of regularly.
- **Inspection and Maintenance:** Conduct routine checks of FSI by licensed contractors.
- **Fire Evacuation Strategy:** Details actions and controls for smooth evacuation during emergencies.

- **Fire Drill and Staff Training:**

- Assign specific roles to staff for fire safety.
- Conduct fire drills every six months and provide regular training on evacuation protocols.

9.2.7 Environmental Protection Compliance

- Adhere to the Environmental Protection Department's (EPD) regulations on air quality, waste management, and noise control.
- Implement measures to minimize environmental impact, such as proper disposal of ashes and waste generated by visitors.

9.2.8 Operational and Management Standards

- Maintain accurate records of niche sales, occupancy, and visitor appointments to ensure transparency and accountability.
- Provide clear and accessible information to visitors, including building accessibility for persons with disabilities.
- Train staff on emergency response, fire safety, and customer service to uphold high operational standards.

9.3 Operational Compliance with Licensing Conditions

The applicant is committed to ensuring full compliance with all licensing conditions, guidelines, and codes of practice issued by the Private Columbaria Licensing Board (PCLB). The following measures have been established to support this commitment:

9.3.1 Staff Familiarization and Training

Maintain accurate records of niche sales, occupancy, and visitor appointments to ensure transparency and accountability.

- All staff, including part-time personnel, will receive initial orientation and regular refresher training on the relevant provisions of the Private Columbaria Ordinance, licensing conditions, and applicable codes of practice
- Training sessions will cover topics such as fire safety protocols, visitor control procedures, complaint handling, and record-keeping standards
- Staff will be provided with written guidelines summarizing key compliance requirements and operational procedures

9.3.2 Monitoring and Record-Keeping

- A compliance checklist will be maintained by the Manager to monitor adherence to licensing conditions on a monthly basis
- Records of visitor appointments, staff training, maintenance activities, and fire safety inspections will be kept in a central logbook and reviewed regularly
- Any incidents, complaints, or deviations from standard procedures will be documented and addressed promptly
- The Manager will prepare annual compliance reports summarizing operational performance and submit them to the relevant authorities as required

9.3.3 Operational Controls

- A visit-by-appointment system is in place to regulate visitor flow and prevent public nuisance
- Visitor access is managed through appointment-based scheduling and on-site coordination by staff to ensure orderly admission and population control
- Fire safety measures, including equipment maintenance and evacuation planning, are implemented in accordance with the Fire Services Department's guidelines
- The emergency evacuation plan is posted at conspicuous positions near the entrance and exit for public awareness

9.3.4 Oversight and Review

- The applicant will conduct internal reviews of operational procedures and compliance status at least twice a year
- Any updates to licensing conditions or guidelines issued by the PCLB will be promptly incorporated into staff training and operational protocols
- The applicant remains responsible for ensuring that all activities at the columbarium are conducted in accordance with the approved Management Plan and licensing framework

These measures collectively ensure that both managerial and frontline staff are well-informed and that the columbarium operates in full compliance with the regulatory requirements throughout the license period.

10. Fire Safety Adjustments Based on Visitor Restrictions

With reference to the Fire Safety Assessment Report (Issue 5) for the subject columbarium, this management plan implements visitor controls in accordance with the approved fire safety strategy. Access is permitted to **one single floor only** during each session, with a **maximum of 678 niches** in use. Visitor access is regulated through an appointment-based system, with **no more than 4 visitors allowed per session**.

The adoption of a **stringent fire safety approach** is driven by two key considerations: the deliberate limitation of visitor numbers per session, and the need to mitigate stress on the local transportation system. These controls ensure low population density within the building and reduce congestion in the surrounding area, particularly during peak periods.

While core fire safety installations - including emergency lighting, fire alarm systems, hose reel coverage, smoke and heat detection, and sprinkler systems - remain unchanged, the fire safety management protocols have been made **more stringent** to address the operational realities of single-floor access and limited staff presence. Staff are deployed only to the floor designated for access during each session, and evacuation procedures are designed to ensure safe egress from that floor while maintaining readiness across the entire building. Monitoring systems and oversight measures have been reinforced to ensure compliance with licensing conditions and to uphold a high level of safety throughout the columbarium.

11. Complaint Handling

11.1 Channels for Receiving Complaints:

- Complaints can be submitted through multiple channels, such as:
 - **Dedicated Email Address:** For submitting written complaints.
 - **Phone Hotline:** Operating during business hours for direct verbal complaints.
 - **In-Person Submission:** directly submit to the Manager
- The contact information of the Manager, including the job title and telephone number will be posted at a conspicuous location near the entrance/exit on G/F (地下).

11.2 Procedures and Time Frame for Handling Complaints:

- **Step 1: Acknowledgment:**

- Acknowledge receipt of complaints within **three working day** through the preferred contact method of the complainant.
- Provide a reference number for tracking the complaint.
- **Step 2: Categorization and Assignment:**
 - Classify the complaint (e.g., service quality, safety issues).
 - Assign it to the relevant department or responsible personnel.
- **Step 3: Investigation:**
 - Conduct a thorough investigation within **10 working days** (or sooner for urgent issues).
 - Gather all relevant information, including interviewing involved parties and reviewing documents.
- **Step 4: Resolution:**
 - Develop a resolution plan and finalize it within **20 working days** of receiving the complaint.

11.3 Investigation Procedures:

- Identify the root cause of the issue by examining:
 - Relevant records (e.g., visitor logs, inspection reports).
 - Evidence, such as CCTV footage or on-site inspections.
- Engage witnesses or staff involved for additional insights.

11.4 Response Mechanism:

- Notify the complainant of the investigation's findings and resolution plan.
- Ensure responses are clear, professional, and empathetic.
- For unresolved complaints, escalate to higher management for further review.

11.5 Remedial Actions:

- **Depending on the nature of the complaint, remedial actions may include:**
 - Correcting the issue (e.g., resolving service or safety deficiencies).
 - Implementing process improvements to prevent recurrence.
 - Offering apologies or other compensation, if necessary.

11.6 Recording Arrangements:

- **Maintain a Complaint Register, including:**
 - Date and time of the complaint.

- Nature and details of the complaint.
- Investigation findings and resolution.
- Follow-up actions taken.
- **Regularly review complaints to identify trends and enhance overall services.**

12. Financial Plan

A comprehensive financial plan will be enclosed in a separate envelope. This document will include but is not limited to the following components:

12.1 Business Strategy

- Maintain financial stability through:
 - Lump-sum payments.
 - Installment plans for interment rights.
- Establish a **reserve fund** to ensure:
 - Long-term operational sustainability.
 - Fulfillment of service obligations.
- Implement cost-saving measures, such as:
 - Routine maintenance.
 - Efficient resource management.
- Conduct regular financial reviews to:
 - Adapt strategies based on market dynamics.
 - Ensure compliance with regulations.

12.2 Major Businesses and Income Sources

- **Core Operations:**
 - Sale or lease of interment rights, which include:
 - **Management Fees:** Cover routine maintenance, and operational needs.
 - **Administrative Fees:** Support processing and administrative costs.
 - **Memorial Services:** Provide memorial plaques with porcelain photographs and engraving.

- **Legal Services:** Facilitate legal contract arrangements for interment rights.
- **Facility Maintenance:**
 - Continuous upkeep of facilities, including cleaning, repairs, and fire safety compliance.

12.3 Other Businesses

- **Worship-Related Services:**
 - Provide items such as flowers.
 - Generate supplemental income to offset operational expenses.

12.4 Operation and Maintenance Fund

- **Purpose:**
 - Support major renovations.
 - Cover routine repairs and day-to-day maintenance.
- **Source of Capital:**
 - Allocate a percentage of revenue from interment rights sales.
- **Accounting and Auditing:**
 - Managed by the finance team.
 - Subject to annual external audits for compliance.

12.5 Finance Team

The finance team consists of one member: the permanent staff (Manager)

Responsibilities include:

- Preparing and maintaining financial records and annual statements
- Managing the Operation and Maintenance Fund to ensure long-term sustainability
- Monitoring income and expenditure, including niche sales and management fees
- Ensuring compliance with licensing conditions related to financial reporting
- Supporting contingency planning and maintaining financial reserves
- Preparing financial documents for submission to relevant authorities

This arrangement ensures effective financial oversight and operational continuity throughout the license period.

12.6 Estimated Income and Expenditure

- **Income Sources:**
 - Revenue from:
 - Interment rights sales.
 - Management fees.
 - Worship-related services.
 - Online memorial platform.
- **Expenditure Categories:**
 - Operational costs (e.g., staffing, utilities, and compliance measures).
 - Maintenance and upgrades to meet safety standards.
- Provide a yearly breakdown for income and expenditure during the validity period.

12.7 Projected Balance Sheet

- Include yearly projections for:
 - **Assets:**
 - Revenue streams.
 - Facility valuation.
 - Reserve funds.
 - **Liabilities:**
 - Outstanding obligations.

12.8 Projected Cash Flow Statement

- Provide annual projections for:
 - Cash inflow from income sources.
 - Cash outflow for operational expenses and compliance costs.

12.9 Financial Arrangements

- Prepare contingency measures for negative cash flow:
 - External financing options (e.g., lines of credit).
 - Maintain an emergency reserve fund.

12.10 Basis of Projections

- **Assumptions:**

- Predict sales rates for interment rights.
- Stable cost of operations with inflation adjustments.
- **Premises:**
 - Anticipate continued demand for columbarium services.
 - Expect minimal changes to regulatory requirements.

12.11 Risk Analysis

- **Potential Changes:**
 - Economic fluctuations or regulatory shifts impacting revenue or costs.
- **Mitigation Measures:**
 - Diversify income sources through ancillary services, such as the online memorial platform.
 - Review and revise pricing and operational strategies as needed.

13. Measures to Ensure Compliance with Licensing Conditions, Guidelines and Codes of Practice

The columbarium's operational framework is designed to ensure full compliance with all licensing conditions, guidelines, and codes of practice issued by the Private Columbaria Licensing Board (PCLB). The following measures are in place:

13.1 Staff Familiarisation and Accountability

The permanent staff member is responsible for maintaining an up-to-date reference file of all PCLB-issued documents. This includes licensing conditions, guidelines, and codes of practice. Part-time frontline staff are briefed on relevant operational procedures, including appointment-only access, visitor limits, session structure, and opening hours. Updates are reviewed upon issuance and incorporated into daily operations.

13.2 Operational Safeguards

As stated in Section 3.1 and 3.2 of the Management Plan, all visits are strictly by appointment only. No walk-ins are permitted. The columbarium remains closed unless confirmed bookings exist, and staff are deployed accordingly. These controls ensure that operations remain compliant with approved operating hours and visitor capacity limits.

13.3 Monitoring and Record-Keeping

The permanent staff member maintains structured records of visitor appointments, session logs, and staff deployment schedules. These records support internal oversight and can be made available for inspection. The columbarium does not operate unless appointments are confirmed, which inherently limits risk of non-compliance.

13.4 Reporting and Review

Any incidents, deviations, or operational irregularities are documented and addressed promptly. The Management Team conducts periodic reviews to ensure continued alignment with licensing conditions. External support may be engaged when necessary to interpret new guidelines or assist with compliance validation.

13.5 Public Notice and Transparency

A bilingual notice outlining the appointment arrangement and opening hours timetable is posted at the entrance/exit of the columbarium building, as referenced in Section 3.2 and Appendix A. This ensures transparency and reinforces adherence to approved operating protocols.

14. Person Responsible for Implementation and Approval

The person responsible for the implementation and approval of this Management Plan is:

- Name: Mr. Tang Fu Sing
- Position: Director, Ka Fuk Services Limited
- Contact Telephone No.: 2472 1366
- Email Address: koonyamtong@yahoo.com.hk

Mr. Tang Fu Sing oversees the execution of all operational, compliance, and administrative arrangements outlined in this Management Plan. He is also responsible for ensuring that the columbarium operates in accordance with the licensing conditions, guidelines, and codes of practice issued by the Private Columbaria Licensing Board.

Submitted for and on behalf of the above named columbarium

Name: Tang Fu Sing

Position: Director

Contact telephone no.: 2472 1366

Email address: koonyamtong@yahoo.com.hk

Signature: _____



Date: 17/12/2025

觀音堂骨灰龕開放時間及參拜時段

Koon Yam Tong Columbarium –

Opening Hours & Visiting Time Slots

為確保運作有序及安全，所有訪客必須預約，並按照指定時段及樓層進行參拜。每節只開放一層供參拜，樓層安排由營運方決定，並於預約時通知。

To ensure orderly operation and safety, all visits must be pre-booked and conducted within designated time slots and on the assigned floor. Only one floor is opened for visit per session, and the floor assignment is determined by the operator and communicated at the time of booking.

開放日 **Opening Days**

星期一至星期五 Monday to Friday

※ 星期六、星期日及公眾假期休息

Closed on Saturdays, Sundays and Public Holidays

※ 清明節及重陽節期間指節日前後四星期內的參拜時段；

唯清明節及重陽節當日休息

Ching Ming and Chung Yeung Festive Periods refer to the 4 weeks before and 4 weeks after the respective Festival Days; only the Ching Ming and Chung Yeung Festival Days are closed.

開放時間 **Opening Hours**

一般日子：星期一至星期五上午 9 時至下午 4 時

Regular Days: Monday to Friday, 09:00–16:00

清明及重陽節期間：星期一至星期五上午 7 時至下午 5 時

Ching Ming & Chung Yeung Festive Periods: Monday to Friday, 07:00–17:00

星期六、星期日及公眾假期休息

Closed on Saturdays, Sundays & Public Holidays

Appendix A

參拜時段 Visiting Time Slots

時段編號 Session No.	時間 Time	人數上限 Visitor Limit
第 1 節 Session 1*	07:00 – 07:30	4 位訪客 / 4 visitors
第 2 節 Session 2*	07:30 – 08:00	4 位訪客 / 4 visitors
第 3 節 Session 3*	08:00 – 08:30	4 位訪客 / 4 visitors
第 4 節 Session 4*	08:30 – 09:00	4 位訪客 / 4 visitors
第 5 節 Session 5	09:00 – 09:30	4 位訪客 / 4 visitors
第 6 節 Session 6	09:30 – 10:00	4 位訪客 / 4 visitors
第 7 節 Session 7	10:00 – 10:30	4 位訪客 / 4 visitors
第 8 節 Session 8	10:30 – 11:00	4 位訪客 / 4 visitors
第 9 節 Session 9	11:00 – 11:30	4 位訪客 / 4 visitors
第 10 節 Session 10	11:30 – 12:00	4 位訪客 / 4 visitors
第 11 節 Session 11	12:00 – 12:30	4 位訪客 / 4 visitors
第 12 節 Session 12	12:30 – 13:00	4 位訪客 / 4 visitors
第 13 節 Session 13	13:00 – 13:30	4 位訪客 / 4 visitors
第 14 節 Session 14	13:30 – 14:00	4 位訪客 / 4 visitors
第 15 節 Session 15	14:00 – 14:30	4 位訪客 / 4 visitors
第 16 節 Session 16	14:30 – 15:00	4 位訪客 / 4 visitors
第 17 節 Session 17	15:00 – 15:30	4 位訪客 / 4 visitors
第 18 節 Session 18	15:30 – 16:00	4 位訪客 / 4 visitors
第 19 節 Session 19*	16:00 – 16:30	4 位訪客 / 4 visitors
第 20 節 Session 20*	16:30 – 17:00	4 位訪客 / 4 visitors

每日最多參拜人數 Daily Maximum Capacity

一般日子：最多 56 位訪客 / 56 visitors (14 節 × 每節 4 位)

Regular Days: Maximum 56 visitors (14 sessions × 4 visitors)

清明及重陽節期間：最多 80 位訪客 / 80 visitors (20 節 × 每節 4 位)

Ching Ming & Chung Yeung Festive Periods: Maximum 96 visitors (24 sessions × 4 visitors)

備註 Remarks

第 1 至 4 節及第 19 至 20 節僅適用於清明節及重陽節期間之特別安排

Sessions 1–4 and 19–24 are applicable only during Ching Ming and Chung Yeung festive periods

資料用途聲明

(根據《個人資料(私隱)條例》作出)

(向資料當事人展示或提供)

收集資料的目的

1. 本管理方案提供的個人資料，乃供發牌委員會及其他有關政府部門在處理管理方案內所述私營骨灰安置所的牌照申請(該申請)時使用，包括用以和骨灰安置所的負責人聯絡，以及就實施《私營骨灰安置所條例》而採取執法行動。
2. 提供上述個人資料，純屬自願。但是，如果你沒有提供足夠的資料，發牌委員會可能無法處理該申請。

查閱個人資料

3. 根據《個人資料(私隱)條例》第 18 條及第 22 條以及附表 1 第 6 原則的規定，你有權查閱及改正所提交的個人資料，包括有權取得所提交的個人資料的副本。應查閱要求提供資料時，或須收取費用。

查詢

4. 如對該申請(包括透過本管理方案收集的個人資料)有任何查詢，請與私營骨灰安置所事務辦事處牌照組主管聯絡，詳情如下：

私營骨灰安置所事務辦事處

牌照組

電話號碼： 2892 2731

電郵地址： pc_app@fehd.gov.hk

郵寄地址： 長沙灣郵政局郵政信箱 80011 號

DRAINAGE PROPOSAL FOR
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)

Date: 2025 Dec 16
Version: 3
Prepared by: Fotton ELA Architects Ltd.

1. Introduction

- 1.1 Fotton ELA Architects Limited is appointed to act as an engineering consultant to prepare a drainage proposal for a Temporary S.12A Planning Application for a Columbarium known as Koon Yam Tong at No. 13 Nim Wan Road, Lau Fau Shan, Yuen Long, New Territories (Lot No. 118 in D.D. 135)

2. Location and the Environs of the Application Site

- 2.1 The Site lies within the Coastal Protection Area (CPA). With reference to drawing no. SK-02, the Site is situated approximately 15 meters from Nim Wan Road, with the nearest shoreline of Deep Bay (Shenzhen Bay) located about 130 meters to its west.
- 2.2 The application area consists solely of the columbarium building and a small forecourt, both of which are directly bordered by paved surfaces enclosed by vegetated land.
- 2.3 Immediately west of the Site, there is a small sandy hill with scattered large rocks and clusters of trees.
- 2.4 From a broader perspective, the Site is surrounded by substantial tree coverage and unpaved land.

3. Proposed Operational Nature of the Site

- 3.1 The Site is proposed to be used as a columbarium, providing a resting place for the deceased and a space for mourners to pay their respects.
- 3.2 Air and noise controls will be implemented where no joss sticks, incense, or candles will be allowed in the Site.

4. Site Survey

- 4.1 In order to better understand the topography and hydrology of the Site and its surrounding, a survey of the site and its surrounding was conducted on 18 June 2025 from 12:30 p.m. to 1:30 p.m., utilizing both drone-based aerial survey and on-ground inspection. Notably, approximately 46.3 mm of rainfall had been recorded on the preceding day, providing a valuable opportunity to observe post-rainfall drainage behavior. The following observations were made:
 - 4.1.1 With reference to drawings SK-01, the Site is generally surrounded by vegetated government land, sparsely scattered buildings, and paved roads.
 - 4.1.2 The roof of the columbarium building was identified as the primary source of surface runoff. It was found to be clean, with only several outdoor air-conditioning units placed on it.
 - 4.1.3 Existing downpipes are found connecting from the roof to ground level to discharge collected runoff.
 - 4.1.4 No surface ponding was observed in the surrounding areas, whether vegetated or paved.
 - 4.1.5 The drone-based aerial survey allowed for a more accurate determination of the gravitational flow of surface runoff. The estimated flow directions are marked on drawings SK-01 to SK-03 for easy reference. The sections of the Site and its surroundings can be found in drawings SK-04.
 - 4.1.6 The upland catchment area was estimated and denoted as Area A on drawing SK-02.
 - 4.1.7 The catchment area sharing the same natural gravitational flow paths as the Site was also determined and denoted as Area B on drawing SK-02.
 - 4.1.8 Considering the Site catchment (Area C) only comprised of a columbarium building and a small forecourt totaling an area of approximately 92.9m, it does

not block the flow of surface runoff from the upland catchment (Area A) and surrounding area (Area B).

- 4.1.9 In order to better understand the existing runoff discharge pathways at the broader scale, the surrounding drainage facilities were also investigated.
- 4.1.10 With reference to drawings SK-01 and SK-02, a U-channel was identified near the Site along Nim Wan Road. Although partially obstructed by debris, it remains structurally serviceable and is proposed for reuse following improvement works.
- 4.1.11 Moreover, an open pit with discharging point and catch basin was found about 60m from the Site diverting collected runoff by a section of U-channel along Nim Wan Road into the sea.
- 4.1.12 The forest-covered upland to the east of the Site is also found to be relatively flat and there are only small hills with mild steepness, surface runoff is expected to be fairly low due to high level of interception by vegetation and infiltration into the soil.
- 4.1.13 Other parts of the Site surrounding exhibits substantial arboreal coverage and unpaved lands, strong interception by vegetation and infiltration into the soil were expected. Moreover, a very high proportion of these lands are Government lands.
- 4.1.14 No flooding has been observed near the close vicinity of the Site due to its relatively elevated location and high surrounding arboreal coverage. This area is also not within flooding black spot.
- 4.1.15 A search for government-constructed and maintained drainage facility drawings was conducted, and no relevant records could be retrieved.
- 4.1.16 Based on the above, it was found that the surface runoff in the area of Ha Pak Nai is not systematically collected and is allowed to either freely flow down the gradient into the sea or absorbed by the soil of which mostly fall within government lands.
- 4.1.17 Based on the above survey results, it is proposed to reuse a section of the existing U-channel near the Site for discharging runoff collected on-site.
- 4.1.18 Since a U-channel is proposed to pass through the sandy grassland to the east of the Site, the catchment area of this area is also estimated and denoted as Area D as marked on drawing SK-02.
- 4.1.19 Since the existing 300 mm channel is proposed for reuse, the runoff collected from its surrounding catchment must be estimated. This includes the relevant catchment area of the rolling forest located east of the Site, identified as Area E on drawing SK-02.

5. Evaluations and Calculations

5.1 To support the conclusion made in 4.1.18, the following is proposed:

- 5.1.1 The flow from the existing downpipes which collect surface runoff from the roof will be collect by the proposed U-channels.
- 5.1.2 Surface runoff collected by the Site and the surrounding catchments are proposed to be discharged to the existing 300mm U-channel with reference to drawings SK-02 and SK-03.
- 5.1.3 The catchpit and manhole standard drawings are shown on drawings D-02 and D-03.
- 5.1.4 As the condition of the existing 300 mm U-channel is currently suboptimal, improvement works will be undertaken to restore its capacity to the intended design level. And to support the proposal with calculations:
- 5.1.5 For simplicity, rational method is chosen to estimate the peak runoff.

- 5.1.6 For Area A, it can be regarded as a sandy rolling forest with some large stones on the slopes. A runoff coefficient of 0.25 is chosen.
- 5.1.7 For the concrete paved area (Area B) around the site, a runoff coefficient of 0.9 is chosen.
- 5.1.8 Since the Site is paved, a runoff coefficient of 0.9 is chosen.
- 5.1.9 Area D is regarded as flat sandy grassland and a runoff coefficient of 0.15 is chosen.
- 5.1.10 For the rolling forest to the East of the site (Area E), the soil was found to be sandy and mild in steepness and a small total area of land paved, a runoff coefficient of 0.25 is chosen.
- 5.1.11 Considering the very small catchment area, the elevated location of the Site and its surroundings, and the lack of maintained drainage infrastructure in the Ha Pak Nai area, a duration of 60 minutes and a return period of 10 years have been chosen to provide a more realistic rainfall intensity for calculations. According to Table 2a of the Stormwater Drainage Manual (with Eurocodes incorporated), Fifth Edition, May 2018, issued by the Drainage Services Department, Government of Hong Kong (the 'Manual'), this corresponds to a rainfall intensity of 104 mm/h.
- 5.1.12 With reference to Table 28 of the Corrigendum No. 1/2022 of the Manual, a rainfall increase due to Climate Change for projection towards end of 21st Century of 16% plus an allowance of 12.1% due to climate change are applied to the estimated intensity above giving an adjusted 60-minute duration and 10-year return period rainfall intensity i of 133mm/h.
- 5.1.13 By rational method, with reference to Manual:

$$\text{Given } Q_p = 0.278 CiA$$

where $Q_p = \text{peak runoff in m}^3/\text{s}$
 $C = \text{runoff coefficient (dimensionless)}$
 $i = \text{rainfall intensity in mm/hr}$
 $A = \text{catchment area in km}^2$

- 5.1.14 With reference to drawing SK-02, the catchment area of the Site and its surrounding is determined and their peak runoff values are tabulated below:

Catchment Area	C	i (mm/h)	A (km ²)	Q _p (m ³ /s)
A – Rolling forest to the west of Site	0.25	133	0.000225	0.00208
B – Paved land surrounding the Site	0.9	133	0.0003	0.00998
C – Site columbarium building and forecourt	0.9	133	0.0000929	0.00309
D – Sandy grassland to the east of the Site	0.15	133	0.000494	0.00274
E – Rolling forest to the East of the Site	0.25	133	0.011899	0.10999
			Total	0.12788

5.2 The following conclusions can be drawn:

- 5.2.1 Due to the very small size of the upland, Site and the surrounding catchments, the estimated volumetric peak runoff rates Q_p are very low.
- 5.2.2 Considering the low Q_p of Area A, it can reasonably be assumed that most of the runoff is absorbed into the soil and thus very little runoff will enter Area B and the Site.

- 5.2.3 The low Q_p of Area B ensures that there will not be any significant addition to the surface runoff collected by the surrounding catchments of the Site.
- 5.2.4 Similarly the Site Q_p is also very low and there will be a very insignificant addition to the runoff collected by the surrounding catchments.
- 5.2.5 Since surface channels are proposed to be installed around the Site, surface runoff from Area A, B, D and the Site will be collected and discharged through the proposed drainage system.
- 5.2.6 The capacities of the proposed and existing U-channels as well as the proposed underground pipe surrounding the Site is estimated as follows:

With Manning's Formula for discharge capacity of drain

$$Q_c = \frac{1}{n} AR^{\frac{2}{3}} S^{\frac{1}{2}}$$

where Q_c = discharge capacity of drain in m^3/s
 n = roughness coefficient
 A = flow area in m^2
 P = wetted perimeter in m
 $R = A/P$ = hydraulic radius in m
 S = bed gradient

5.2.7 For the 225m U-channel,

$n = 0.011$ for concrete channel with neat cement finish
 $A = 0.01988 m^2$ (225mm U-channel, 225mm height)
 $P = 0.353429 m$
 $R = 0.05625 m$
 $S = 1/100$

$$\Rightarrow Q_{c225mm} = 0.02653 m^3/s \text{ (fig 5.1)}$$

Sum of peak flow rate of collected runoff in Area A, B, C and D = $0.01789m^3/s < Q_{c225mm}$

Therefore, the proposed 225mm U-channel will provide enough capacity.

5.2.8 For the proposed 160mm underground pipes at 85% bore,

$n = 0.009$ for uPVC pipe
 $A = 0.0182m^2$
 $P = 0.375m$
 $R = 0.0485m$
 $S = 0.04$

$$\Rightarrow Q_{c160mm} = 0.0538m^3/s \text{ (fig 5.2)}$$

Sum of peak flow rate of collected runoff in Area A, B, C and D = $0.01789m^3/s < Q_{c160mm}$

Therefore, the proposed 160mm underground uPVC pipe will provide enough capacity.

5.2.9 For the Existing 1:25 300mm U-channel

$n = 0.011$ for concrete channel with neat cement finish (after restoration)
 $A = 0.0353 m^2$ (300mm U-channel, 100mm height)
 $P = 0.471 m$
 $R = 0.075 m$

S = 1:25

$$\Rightarrow Q_{c300mm} = 0.286 \text{ m}^3/\text{s} \text{ (fig 5.1)}$$

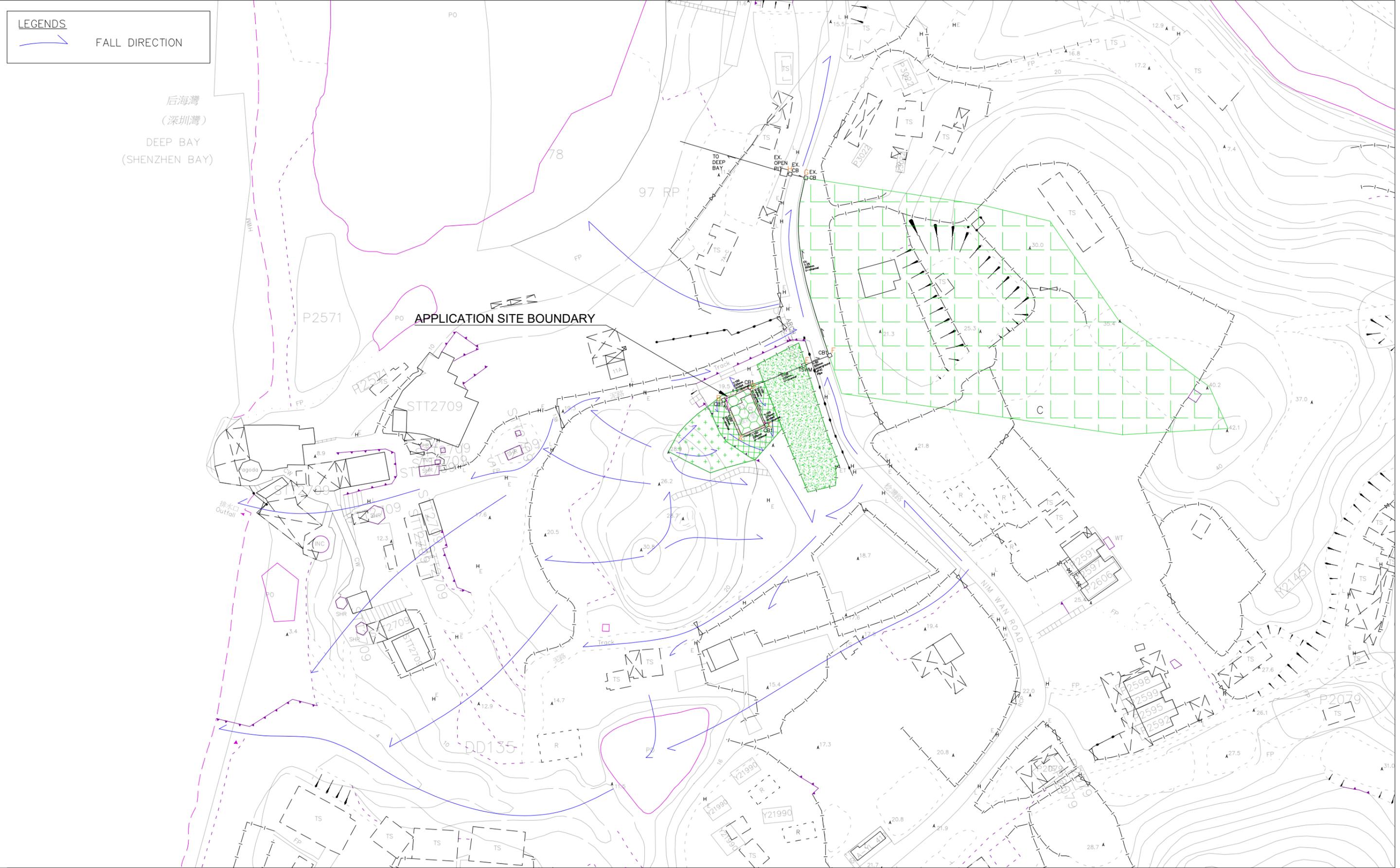
Sum of peak flow rate of collected runoff in Area A, B, C, D and E

$$= 0.12788 \text{ m}^3/\text{s} < Q_{c300mm}$$

Therefore, the proposed restoration of the existing 300mm U-channel will provide enough capacity.

6. Conclusions and Recommendations

- 6.1 The existing U-channel and the proposed U-channel and underground pipe shown on drawings SK-02 and SK-03 have proven to provide enough capacity for the design peak flow.**
- 6.2 However, since the existing U-channel has not been properly maintained, improvement works will be carried out by the Applicant to allow it to restore its functionality to the design capacity.**
- 6.3 Considering the very low peak flow rate contributed by the Site's runoff, and that improvement works will be carried out to the existing U-channel near the Site, a positive drainage impact is expected.**
- 6.4 As of the date of this report, the Yuen Long District Office (HAD), Yuen Long District Land Office (DLO), and the Drainage Services Department (DSD) have indicated that they are not responsible for the maintenance of the existing drainage components. In the absence of any government department assuming maintenance responsibility, it is proposed that restoration works be undertaken, with the assignment of future maintenance responsibilities to be clarified at a later stage.**



FOTTON ELA ARCHITECTS LTD.
 李北民建築師有限公司

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 NO.	SK-01	Rev.	Date	Description	Drawn by	Checked by	Approved by
SCALE	1:1000	A	10SEP2025	SUBMISSION			

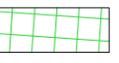
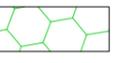
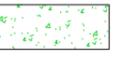
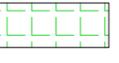
DRAWING TITLE GENERAL SURROUNDING OF SITE AND FALL DIRECTION

PROJECT REF. _____
 CAD REF. 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

ALL MEASUREMENTS MUST BE CHECKED AT THE SITE - DO NOT SCALE DRAWINGS - ALL DRAWING SPECIFICATIONS AND THEIR COPY RIGHT ARE THE PROPERTY OF ENGINEERS, ARCHITECTS, DESIGNERS, AND SHALL BE RETURNED AT THE COMPLETION OF THE WORK - THIS DRAWING IS NOT VALID FOR CONSTRUCTION PURPOSES UNLESS EXPRESSEDLY CERTIFIED.



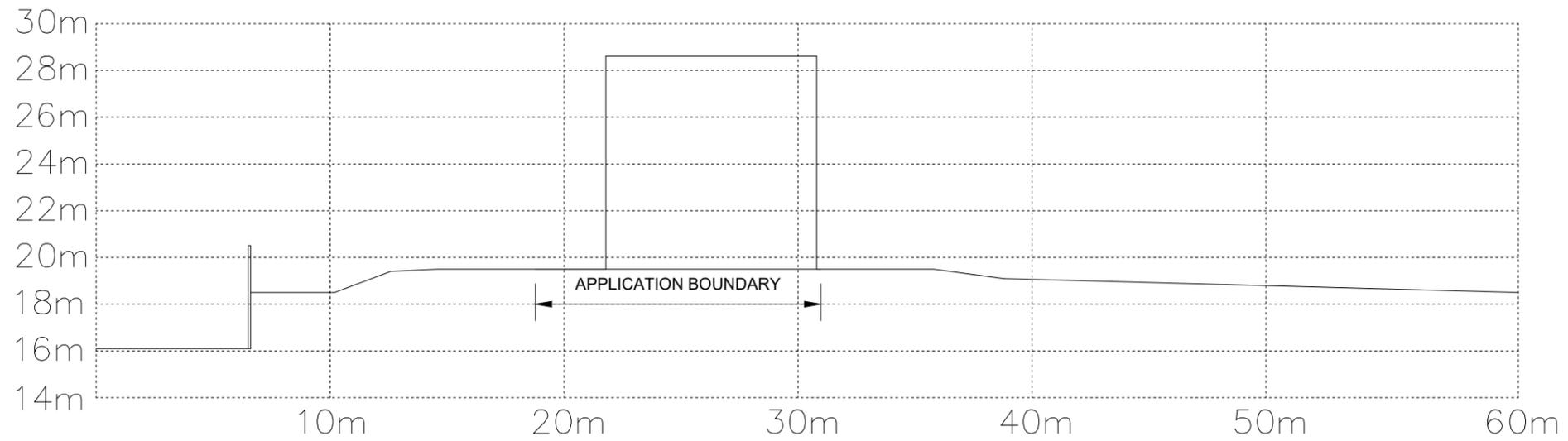
LEGENDS

-  CATCHMENT AREA A
AREA = 0.0002249 km²
-  CATCHMENT AREA B
AREA = 0.0003 km²
-  CATCHMENT AREA C (SITE)
AREA = 0.0000929 km²
-  CATCHMENT AREA D
AREA = 0.0004396 km²
-  CATCHMENT AREA E
AREA = 0.011899 km²
-  FALL DIRECTION

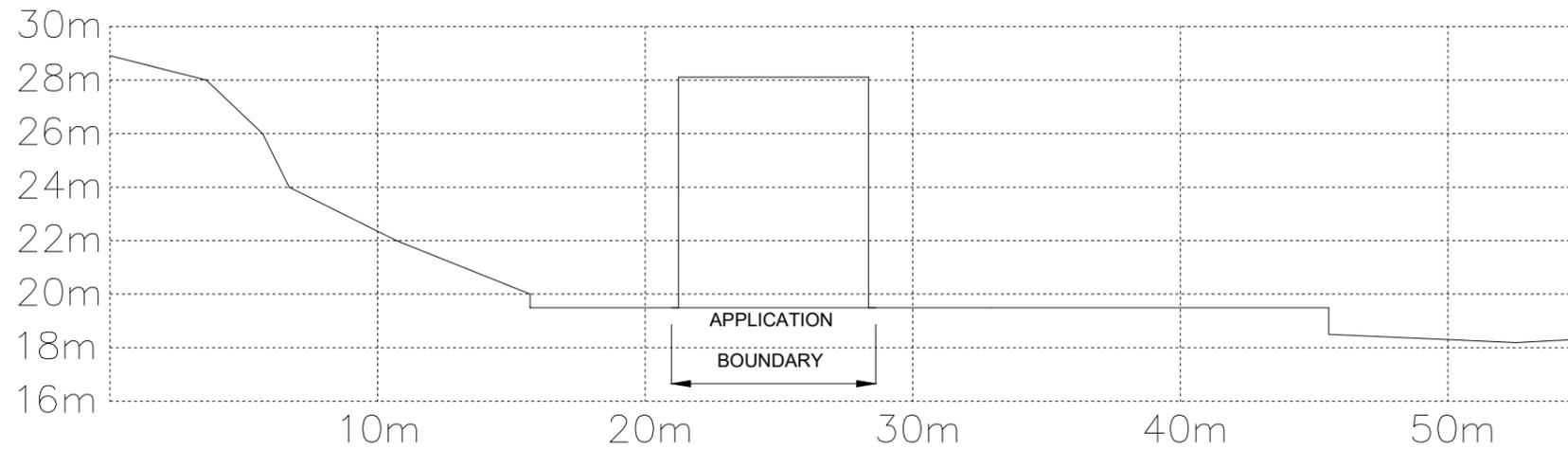
Component	Type	Cover Level (mPD)	Invert Level (mPD)
A	U-channel	19.5	19.49
B	Catchpit	19.5	19.39
C	Catchpit	19.5	19.43
D	Catchpit	19.5	19.32
E	Catchpit with trap	19.5	17.75
F	Catchpit	18.62	17.61
G	Catchpit	16.1	15.2
H	Ex. Manhole	16.1	13.9 (Approx.)

ALL MEASUREMENTS MUST BE CHECKED AT THE SITE - DO NOT SCALE DRAWINGS - ALL DRAWING SPECIFICATIONS AND THEIR COPY RIGHT ARE THE PROPERTY OF ENGINEERS, ARCHITECTS, DESIGNERS, AND SHALL BE RETURNED AT THE COMPLETION OF THE WORK - THIS DRAWING IS NOT VALID FOR CONSTRUCTION PURPOSES UNLESS EXPRESSEDLY CERTIFIED.





SECTION A-A



SECTION B-B

Urgent Return receipt Expand Group Restricted Prevent Copy

Belva Yuen King TONG/PLAND

寄件者: Wilfred Ka Hing CHU/PLAND
寄件日期: 2026年01月05日星期一 14:11
收件者: tpbpd/PLAND
副本: Belva Yuen King TONG/PLAND
主旨: Fw: Supplementary Information for Planning Application No. Y/YL-PN/12
附件: Plan I 20260105.pdf; Plan H 20260105.pdf; Plan J 20260105.pdf

SI for Y/YL-PN/12

From: Toco Planning Consultants Ltd TOCO <[REDACTED]>
Sent: Monday, January 5, 2026 2:05 PM
To: Wilfred Ka Hing CHU/PLAND <wkhchu@pland.gov.hk>
Cc: Belva Yuen King TONG/PLAND <byktong@pland.gov.hk>; Janet Hiu Nga FUNG/PLAND <jhnfung@pland.gov.hk>
Subject: Supplementary Information for Planning Application No. Y/YL-PN/12

Dear Mr. Chu,

We refer to your email today.

Further to the Project Architect's checking, it is confirmed that that building height is not more than 7.6m. Thus, please find enclosed updated Plan H, I, and J for your attention.

Regards,
Toco Planning Consultants Ltd.

寄件者: Wilfred Ka Hing CHU/PLAND <wkhchu@pland.gov.hk>
寄件日期: 2026 年 1 月 5 日 11:37
收件者: tocoplanning <[REDACTED]>
副本: Belva Yuen King TONG/PLAND <byktong@pland.gov.hk>; Janet Hiu Nga FUNG/PLAND <jhnfung@pland.gov.hk>
主旨: Supplementary Information for Planning Application No. Y/YL-PN/12

Dear Mr. Chan,

Regarding your submission of planning application no. Y/YL-PN/12, please find below our comments for your further action.

1. According to the Elevation Plans (Plans H-J) in your submission, the building height is 7.62m rather than *not more than 7.6m* as indicated in your application form and planning statement. Hence, please review whether the application form, planning statement or any plans/drawings should be revised.

For the timely processing of this application, grateful if you could provide the supplementary information in a separate email to us **by 6.1.2026 (Tue)**. Thank you.

Urgent Return receipt Expand Group Restricted Prevent Copy

Thanks and Regards,

Wilfred CHU

TP/YLW4, TMYLW DPO, PlanD

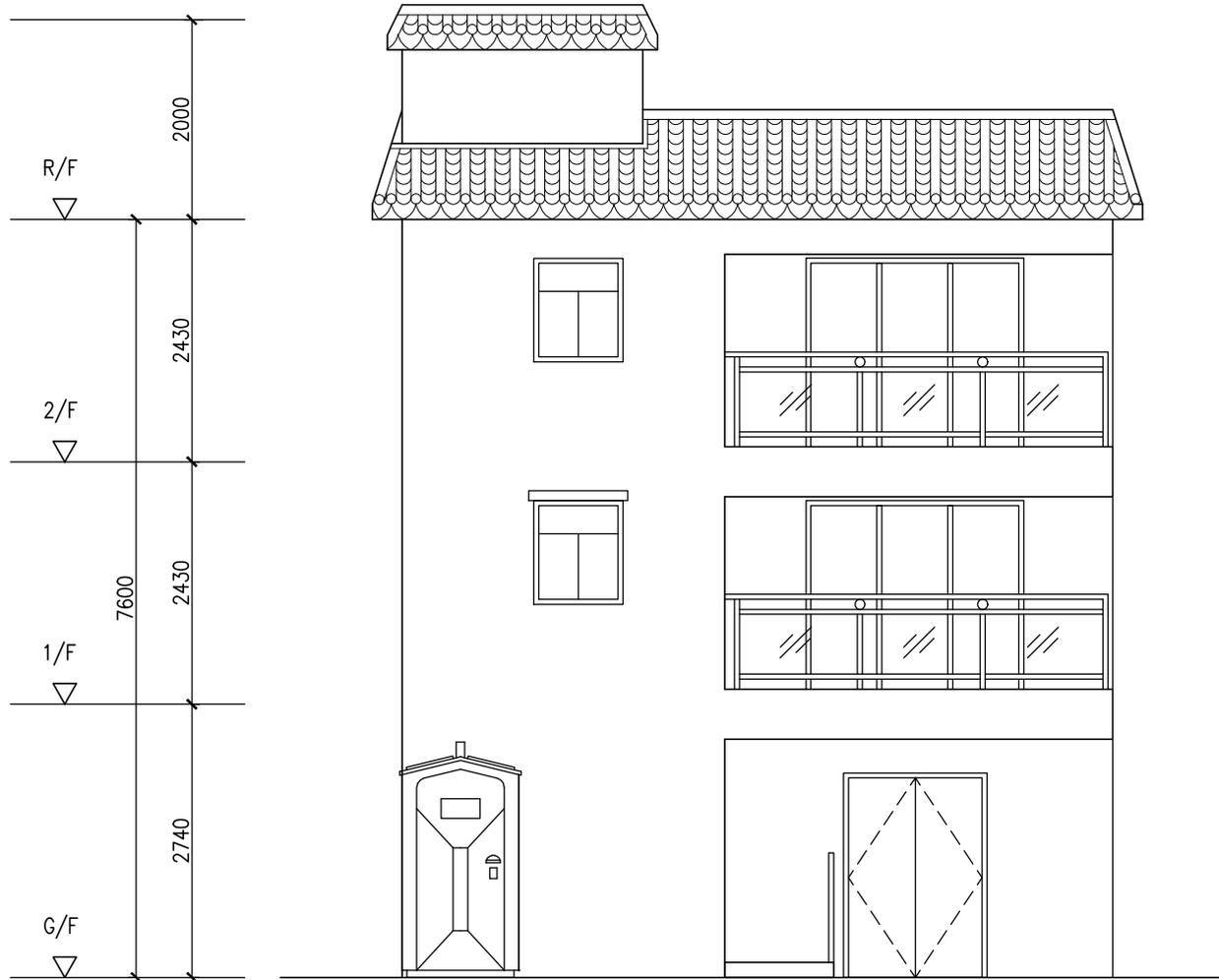
Tel: 2158 6290



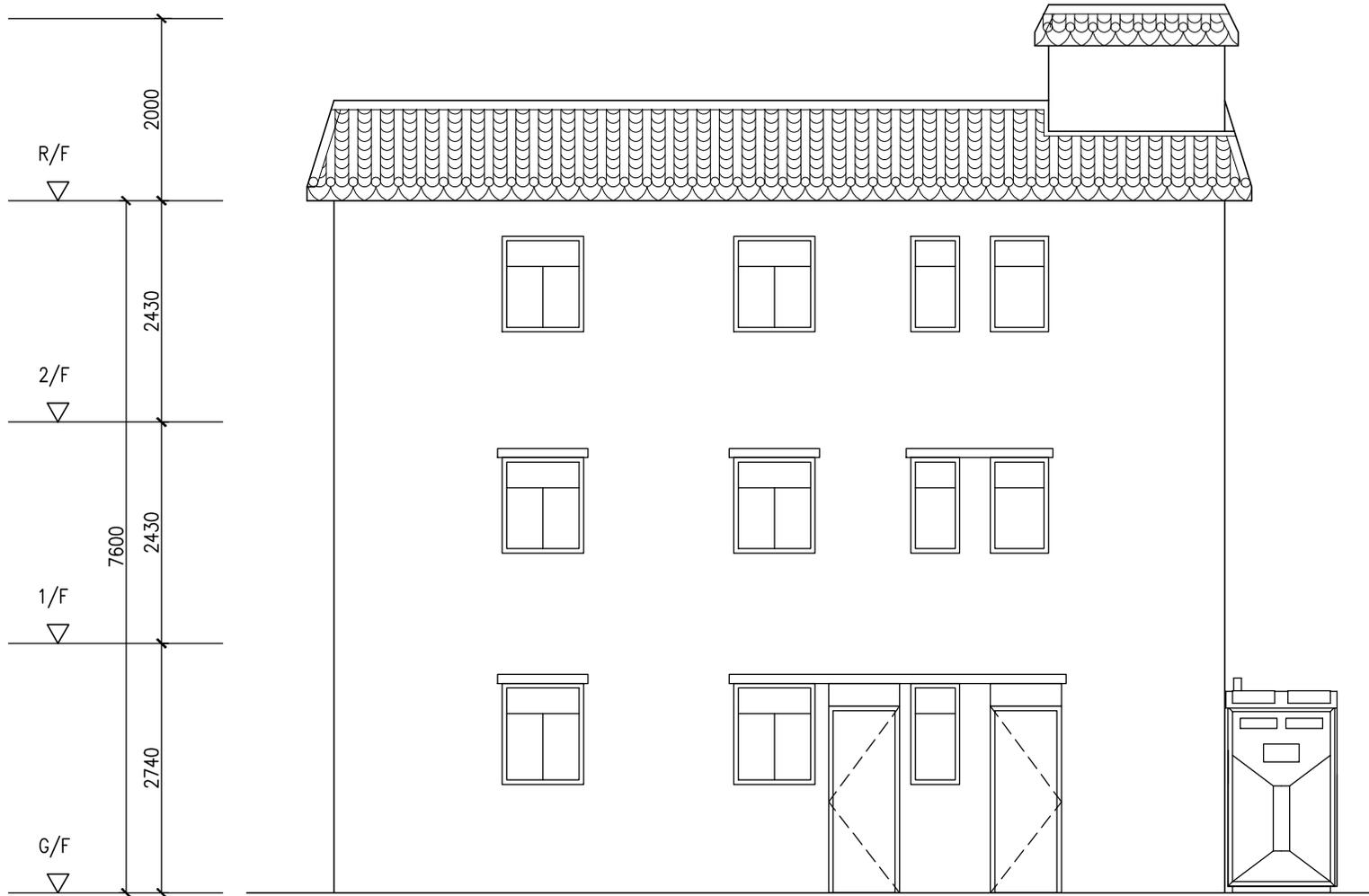
規劃署
Planning
Department

透過規劃工作，使香港成為一個宜居、具競爭力和可持續發展的亞洲國際都會
We plan to make Hong Kong a Liveable • Competitive • Sustainable ASIA'S WORLD CITY





Scale 1:75



Scale 1:75

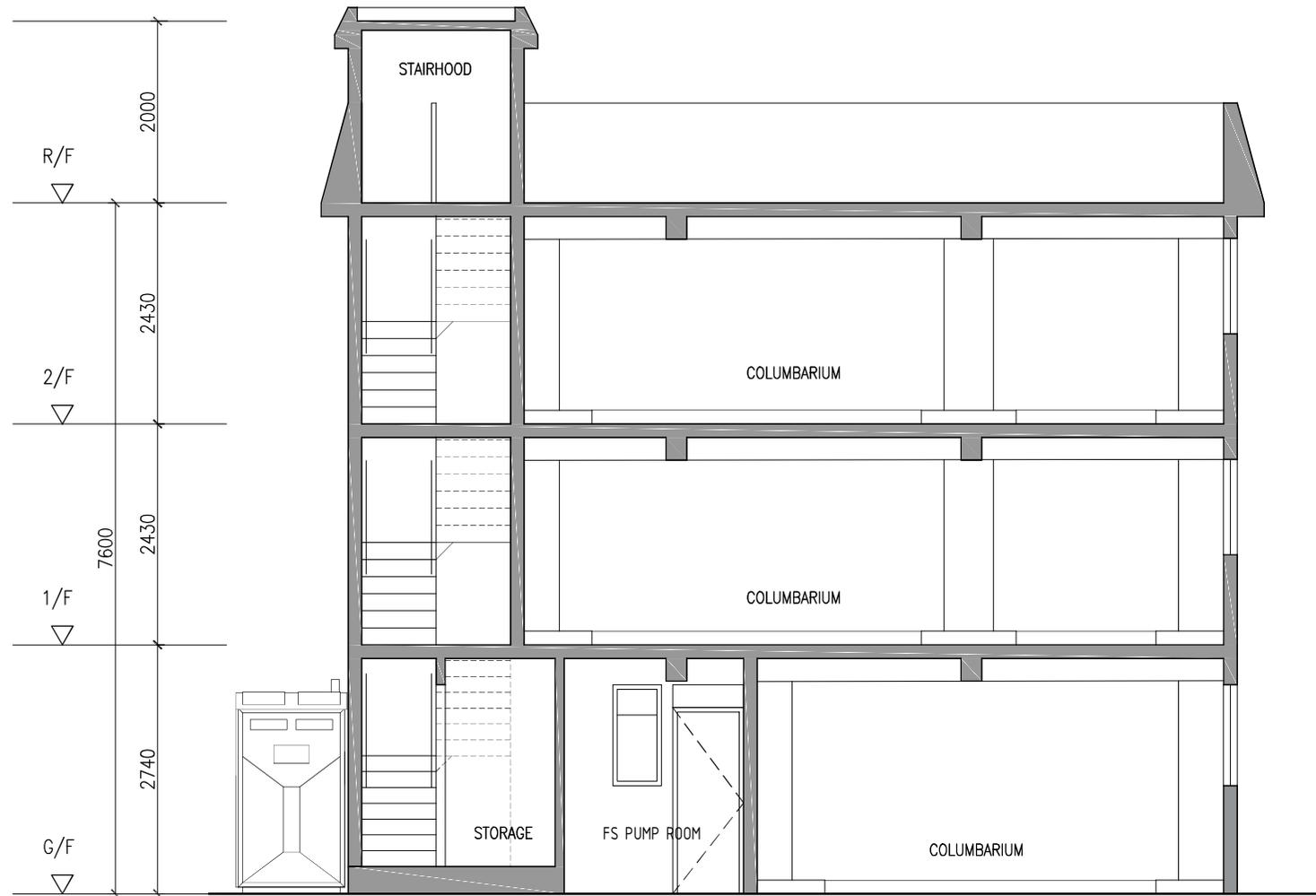


Table 3.1 Proposed Schedule of Uses for "G/IC" Zone

GOVERNMENT, INSTITUTION OR COMMUNITY

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Columbarium (specified number of niches in paragraph (a) under Remarks)	

Planning Intention

This zone is intended primarily for columbarium use.

Remarks

- (a) On land designated "Government, Institution or Community", the maximum number of niches for columbarium use shall not exceed 967.
- (b) No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of the maximum building height of 3 storeys or the height of the existing building, whichever is the greater.
- (c) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the number of niches/building height restriction stated in paragraphs (a) and (b) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

Previous Rezoning Applications Covering the Application Site

Rejected Application

	<u>Application No.</u>	<u>Proposed Amendment</u>	<u>Zoning</u>	<u>Date of Consideration (RNTPC/TPB)</u>	<u>Rejection Reasons</u>
1	Y/YL-PN/7	Rezoning from “CPA” to “G/IC” for columbarium development with 1,000 niches	CPA	3.2.2017	(1) to (3)

Rejection Reasons

- (1) No strong planning justification for the development at the site.
- (2) Failure to demonstrate adverse landscape, drainage, ecological and traffic impacts could be satisfactorily addressed.
- (3) Setting an undesirable precedent.

Detailed Comments from Relevant Government Departments

Licencing

- (a) Comments of the Chief Building Surveyor/New Territories West (CBS/NTW), BD:
- (i) Except for Structures Certifiable for Pre-cut-off Columbarium (“SCPC”) and Certifiable Building (“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 unauthorised building works (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 Private Columbaria Licensing Board (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 Buildings Ordinance (BO) albeit covered by the application of an SI;
 - (iv) If alteration of a New Territories Small Building (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 Certificate of Exemption (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.

Fire Safety

- (b) Comments of the Director of Fire Services (D of FS):
- (i) Detailed fire safety requirements will be formulated upon receipt of formal submission of general building plans and referral from relevant licencing authority.
 - (ii) Furthermore, the Emergency Vehicular Access provision in the Site shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011 under the Building (Planning) Regulation 41D which is administered by the Buildings Department.

Drainage

- (c) Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD) on the submitted drainage proposal:
- (i) In Drawing No. SK-02, the proposed U-channel is 225mm in dimension but the cover level and invert level of Component A, B, C, D (i.e. U-channel and catchpit) are not consistent with the size of U-channel. Please review and revise.
 - (ii) The applicant should submit a revised drainage proposal, implement and maintain the proposed drainage facilities to the satisfaction of DSD.

Environment

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

Should the application approved by the Town Planning Board, the applicant is reminded to comply with relevant environmental protection and pollution control ordinances, including Air Pollution Control Ordinance, Noise Control Ordinance and Water Pollution Control Ordinance.