

Columbarium Redevelopment
at
Lots 613 RP (Part), 614 and 1229 in D.D.453,
and adjoining Government Land,
Lo Wai, Tsuen Wan, N.T.

Applicant : Longest Profit (Hong Kong) Ltd.
Architect : Casa Design International Ltd.
Traffic Consultant : LLA Consultancy Ltd.
Landscape Consultant : Landes Ltd.

August 2024

Table of Content

	<u>Page</u>
Executive Summary (English)	i.
Executive Summary (Chinese)	ii.
1. The Proposal	1/8
2. Background	1/8
3. Compliance of Town Planning Board Guidelines	2/8
4. Licensing Procedure	2/8
5. Planning Intention	3/8
6. Land Use Compatibility	4/8
7. Traffic Impact and Crowd Management	5/8
8. Environmental Impact	6/8
9. Visual Impact	7/8
10. Conclusion	8/8
Architectural Drawings, Niches Layout Plans & Elevations and Perspectives	
Appendix 1	Site Location Plans
Appendix 2	Lands Department's letter on 29 November 2016
Appendix 3	Zoning Plan Draft Plan for Exhibition from Town Planning Board on 28 April 2023
Appendix 4	Town Planning Ordinance
Appendix 5	Temple/Monastery/Graveyard Developments at Fu Yung Shan Foothill
Appendix 6	Management Plan
Appendix 7	Site Survey Plan
Appendix 8	Landscape Proposal & Tree Preservation Proposal
Appendix 9	Photomontage of Proposed Redevelopment
Appendix 10	Traffic Impact Assessment Report

Executive Summary

This application seeks planning permission under Section 16 of the Town Planning Ordinance for the redevelopment of the former Columbarium, which previously had 8,850 niches. The proposed redevelopment aims to demolish and rebuild the Columbarium in compliance with TPB guidelines and relevant government departments' requirements.

The proposed site is located at Lot 613 RP (Part), 614 and 1229 in D.D. 453, and adjoins Government Land in Lo Wai, Tsuen Wan, N.T.

Currently, the subject site is zoned as 'Government, Institution or Community (10)', for columbarium use under Column 2, on the OZP No. S/TW/37.

The proposed redevelopment consists of one 2-storey columbarium block with a height of 9.60m, one 1-storey ancillary block with a height of 5.00m (including reception/waiting area), and one 2-storey ancillary block with a height of 5.85m (including carparks, toilets and storage room).

The total site area is about 2,250m², including approximately 660m² of government land. The total gross floor area (GFA) is approximately 1,880m², plot ratio is approximately 0.84, and site coverage is approximately 42%. The parking spaces provided include 4 for private cars (one of which is an accessible parking space) and 3 for motorcycles. One loading and unloading space is provided for light goods vehicle, and one pick-up/drop-off lay-by is provided for taxis (2.5m x 10.0m). The total number of niches provided in this redevelopment has been reduced from 8,850 in the former Columbarium to 4,250 (approximately 48% of the total number of niches in the former Columbarium), which includes 70 niches provided for local villagers facing financial difficulties or for other charitable purposes. The terms and conditions of this provision will be detailed and agreed upon by the relevant government authorities in the management plan.

The application follows the planning criteria under TPB guidelines within the G/IC (10) zone use. One of the most important planning criteria, which concerns the control of vehicular traffic and crowd management, has been given special consideration.

The proposed redevelopment is in line with the government policy to implement a regulatory framework for private columbaria and promote cremation over burial.

This proposed redevelopment complies with the relevant government departments' regulations and the Private Columbarium Ordinance under the Food and Environmental Hygiene Department (FEHD) licensing procedure.

The Management Plan, which includes a Traffic and Crowd Management Plans, will be submitted to the Private Columbaria Licensing Board (PCLB). To avoid generating additional traffic volume in Lo Wai area during the Ching Ming and Chung Yeung festival days, as well as the immediate Saturday and Sunday before the festival days (shadow period), the proposed columbarium will be closed to visitors for the entire shadow period. All visitors must make their visits only on other normal weekdays and weekends. This operational arrangement will form part of the Management Plan to be submitted to PCLB for monitoring and enforcement purposes.

The proposed redevelopment has demonstrated that it will not have any adverse impacts on local land uses, the environment, traffic, landscape, visual impact and infrastructures in the locality. Moreover, it aligns with current government policies and alleviates the pressing demand for niches that exist in society.

內容摘要

本申請旨在根據城市規劃條例第 16 條，為原有 8,850 壁龕位的「靈灰安置所」重建發展申請規劃許可。擬議重建發展目的是以清拆及重建現存的「靈灰安置所」至符合城規會及有關政府部門的條例及法規。

擬議發展地點位於荃灣老圍丈量約份第 453 約地段第 613 號餘段(部分)、第 614 號及第 1229 號和毗鄰政府土地。

目前擬議發展地段在分區計劃大綱圖編號 S/TW/37 中劃為《政府、機構或社區設施(10)》列表 2，「靈灰安置所」用途。

擬議重建「靈灰安置所」包括一座 2 層高 9.60 米「靈灰安置所」、一座 1 層高 5.00 米的附屬樓(其用途包括接待及等候室)、以及一座 2 層高 5.85 米的附屬樓(包括停車位/洗手間/儲存室)。

擬議發展地盤總面積約 2,250 平方米，包括政府土地面積約 660 平方米。總樓面面積約 1,880 平方米，地積比率約 0.84，上蓋面積約 42%。提供私家車停車位 4 個(包括 1 個無障礙停車位)、電單車停車位 3 個、輕型貨車裝卸車位 1 個、的士上落客接載區 1 個(2.5 米 x 10.0 米)。此擬議發展提供壁龕位已從原靈灰安置所 8,850 個壁龕位減少至 4,250 個(祇是約原「靈灰安置所」壁龕位的 48%)，其中包括 70 個供當地有經濟困難的村民使用或可分配作為其他慈善用途。有關條款將會在管理方案中詳細說明並須相關政府部門認可。

本申請是遵循《政府、機構或社區設施(10)》的規劃要求。其中最受關注的規劃要求之一，車和人流量管理已得到充份處理達至規劃要求。

擬議重建發展是符合有關政府部門的政策，即對現行私人「靈灰安置所」增強監控和管理，及推廣火葬替代土葬之政策。

本擬議發展是符合有關政府部門法規及食物環境衛生署(食環署)《私營骨灰安置所發牌條例》發牌要求。

擬議發展將提交私營骨灰安置所發牌委員會一份管理方案，其中包括交通和人群管理方案。該管理方案將註明因須避免增加清明和重陽節及節前後的星期六及日的規定時段(規定時段)在老圍路產生額外的交通流量。擬議發展「靈灰安置所」是會在規定時段對外關閉。所有訪客只可在其他正常工作日和週末獲准到訪「靈灰安置所」進行探訪。上述管理方案，將提交私營骨灰安置所發牌委員會備案，以便監控及執行。

擬議發展已認證對當處土地用途、環境、交通、綠化建設、視覺感觀及市政配套設施上都沒有造成不良影響。此外，這重建發展除了能滿足政府現行政策外，亦是可緩解現社會對壁龕迫切需求的重建項目。

1. The Proposal

- 1.1 This proposal seeks planning permission under Section 16 of the Town Planning Ordinance for the redevelopment of the former Columbarium at Nos. 613 RP (Part), 614 and 1229 in D.D.453, as well as adjoining Government Land, Lo Wai, Tsuen Wan, N.T. (The subject site) (Appendix 1).
- 1.2 To redevelop the former Columbarium in accordance with the Notes of the OZP, it falls in column 2 as specified under the ‘Government, Institution or Community (10)’ zone.
- 1.3 The proposed redevelopment aims to demolish and rebuild the Columbarium in compliance with the relevant regulations of government departments.

2. Background

- 2.1 The Columbarium that existed known as Wing Sing Yuen (永盛園), commenced operations in 2010. It was converted from a 2-storey structure without obtaining the necessary permissions from the Buildings Department and the Lands Department.
- 2.2 The sale of the Columbarium was suspended due to non-compliance with Lease conditions, as requested in the violation letter from Lands Department. A copy of this violation letter is attached (Appendix 2).
- 2.3 After the Food and Environmental Hygiene Department (FEHD) acknowledged the completion of handover procedure for the unclaimed arches to the Director and disposal process, all the unauthorized Columbarium buildings were demolished for redevelopment.
- 2.4 The former Columbarium that existed comprised a total of 8,850 niches. The breakdown of the sale and occupation conditions is as follows:-

Sale and Occupation Condition		
Sold and Occupied	Single Niches	103
	4 Member Niches	0
Sold and Unoccupied	Single Niches	181
	4 Member Niches	0
Unsold	Single Niches	8,386
	4 Member Niches	180
Total no. of Ashes		9,390
Total no. of Niches		8,850

- 2.5 The subject site is currently zoned as ‘Government, Institution or Community (10)’ (G/IC (10)), for Columbarium use under Column 2, on the OZP No. S/TW/37 (Appendix 3).

3. Compliance with Town Planning Board Guidelines

- 3.1 This application follows Town Planning Board Guidelines No. 16 for ‘Application for Development/Redevelopment within the ‘G/IC’ zone for uses other than Government Institution or Community Use under Section 16 of the Town Planning Ordinance (TPO), which is relevant to this application (Appendix 4).
- 3.2 The planning intention of the ‘G/IC’ zone is primarily to provide GIC facilities that cater to the local residents’ needs and/or a wider district, region, or the territory. It also aims to allocate land for uses directly related to or supporting the work of the government, organizations providing social services to meet community needs, and other institutional establishments.
- 3.3 The proposed redevelopment demonstrates sustainability in relation to the capacities of both the existing and planned infrastructure. Adequate parking and loading/unloading provisions will be made in accordance with the Hong Kong Planning Standard and Guidelines and to the satisfaction of the Transport Department.
- 3.4 The proposed redevelopment would not cause, directly or indirectly, any adverse environmental impacts on the surrounding area. Otherwise, adequate environmental mitigation, monitoring, and audit measures will be provided.
- 3.5 In light of the above, the current application to regularize Columbarium use within an existing site complies with the TPB Guidelines for Application for Development/Redevelopment within ‘G/IC’ zone for uses other than GIC uses under Section 16 of the Town Planning Ordinance (TPB PG-No.16).

4. Licensing Procedure

- 4.1 The Private Columbarium Ordinance (PCO), which regulates the operation of private columbaria through a licensing scheme, came into operation on 30 June 2017. On 22 November 2017, the government announced two policy initiatives to address the Land Premium and Traffic Impact Analysis issues pertinent to pre-cut-off columbaria seeking a license. To comply with the regulation set forth by various government departments and the PCO under FEHD, an application for approval will be submitted to relevant government departments, and a Management Plan will be submitted to the PCLB following TPB Section 16 approval.
- 4.2 Under the PCO, only private columbaria that have obtained a license may sell or newly let out niches. Any private columbarium which applies for a license has to comply with the planning-related requirements and other requirements prescribed in the ordinance, or specified by Private Columbaria Licensing Board (the Licensing Board).

4. Licensing Procedure (cont'd)

- 4.3 A license applicant is required to submit a management plan to the Licensing Board for approval. In determining whether to approve an application for a license, the Licensing Board must regard the public interest and may have taken into account any other relevant considerations.
- 4.4 The Management Plan submitted to the Licensing Board would address issues such as Traffic and Crowd Management, which must be accepted by the relevant government departments and the Board at the time of approval for the planning application. If a license application is granted by the Licensing Board, the Private Columbaria Affairs Office (PCAO) will be responsible for monitoring the implementation of the approved Management Plan.
- 4.5 Once the redevelopment of the Columbarium receives approval from TPB, an application for plans approval will be submitted to the Buildings Department, and the land exchange process will be carried out with the Lands Department as required under Licensing Board regulations.

5. Planning Intention

- 5.1 This application aims to rectify the existing non-compliance with relevant government departments' regulations for columbarium use. The planning intention for this redevelopment takes into account the prevailing requirements of government departments and the land use compatibility of the site, aiming to avoid traffic, environmental, and visual impacts on its surroundings.
- 5.2 The proposed redevelopment aligns with the government policy to implement a regulatory regime on private columbaria and to promote cremation over burial. There is a significant shortage in the provision of columbarium niches to meet current and future demands. The redevelopment of the Columbarium in this application will not only represent a better utilization of valuable land resources but also maximize the development potential of the limited lands suitable for columbaria use under relevant government regulations.
- 5.3 According to FEHD statistics, in 2028 approximately 92% (43,803) of the deceased were cremated, the number of deaths is forecast to gradually increase from 47,000 in 2018 to 73,900 in 2038 and 1,200,000 cremations are expected to take place between 2019 and 2038. Consequently, the demand for columbarium niches is extremely high and increasing. Increasing the supply of niches through Private Columbarium facilities is definitely an alternative means to alleviate the pressure on the growing demand from various public sectors.

5. Planning Intention (cont'd)

5.4 The application for this redevelopment planning permission aims to regularize the existing columbarium. The acceptability of this redevelopment proposal should comprehensively consider the land use compatibility of the site with its neighboring assessed uses and the traffic and environmental impact arising from the redevelopment.

5.5 The total number of niches provided in this redevelopment has been reduced to 4,250, which represents approximately 48% of the niches in the former Columbarium that was demolished on 20 February 2024.

5.6 Proposed redevelopment parameter schedule scheme

Site Area	:	approx. 2,250m ²
Total GFA	:	approx. 1,880m ² (OZP restriction : max. 1,900m ²)
Plot Ratio	:	approx. 0.84
Site Coverage	:	approx. 42%
No. of Storeys	:	columbarium (2-storey/9.60m high) (OZP restriction : max. 2 storeys) ancillary block (2-storey/5.85m high) ancillary block (1-storey/5.00m high)
No. of Niches	:	4,250 (comprising 2,125 single niches and 2,125 double niches, with 70 single niches provided free of charge to local villagers with financial need or for other charitable purposes)
Parking Spaces		
• Private Car	:	4 (including 1 accessible parking space)
• Motorcycle	:	3
• LGV	:	1 loading/unloading bay (3.5m x 7.0m)
• Taxi	:	2 taxi pick up/drop off lay-by (10m in length)

6. Land Use Compatibility

6.1 The site is located at the foothill of Fu Yung Shan area. Currently, the surrounding area is predominantly occupied by three types of land uses: homes for the elderly, religious institutions and columbaria.

6.2 There are over 40 temples and monasteries, and 4 graveyards dispersed in the vicinity of the subject site, such as Yuen Yuen Home for the Aged (圓玄安老院) and Yuen Yuen Care and Attention Home for the Aged (圓玄護理安老院) to its north and north-west; Hong Kong Chi Hong Ship Monastery (香港慈航船廟), Tung Kwok Monastery (東覺禪林), Chow Ying Monastery (潮音淨院), Dai Chong Kok (地藏閣) and Fat Kwong Ching Che Monastery (佛光淨舍) to its south-east, south, and south-west (Appendix 5).

6. Land Use Compatibility (cont'd)

- 6.3 A large cluster of various monasteries and temples with columbarium facilities is situated to the south-east of the subject site. The largest one, Yuen Institute, comprises 50,000 niches in its existing compound and additional 20,000 niches in its extension, as approved under Application No. A/TW/379.
- 6.4 To the north-east of the subject site is Western Monastery, which received permission under TPO Section 16 for a total no. of 11,046 niches, approved with conditions by TPB on 6 May 2022.
- 6.5 Since the area is already interspersed with existing temples and monasteries of varying scales, some of which contain columbarium use, the proposed redevelopment parameters for the Columbarium are compatible with existing land use.

7. Traffic Impact and Crowd Management

- 7.1 Presently, the site is directly served by one minibus (route no. 81) along Lo Wai Road and several other public buses (route nos. 32, 36, 32M and 43X) and minibuses (route nos. 82, 82M, 94 and 312) that stop at Sam Tung Uk Road.
- 7.2 To mitigate any additional traffic volume in the Lo Wai area during the Ching Ming and Chung Yeung festival days as well as the immediate Saturday and Sunday before and after the festival days (shadow period), the proposed columbarium will be closed to visitors during the entire shadow period. All visitors must make their visits only on other normal weekdays and weekends. This operational arrangement will be included in the Management Plan to be submitted to the PCLB for monitoring and enforcement purposes.
- 7.3 LLA Consultancy Limited has been commissioned to conduct a Traffic Impact Assessment (TIA) Study. The findings indicate that the proposed Columbarium redevelopment will not cause additional adverse impacts on the operation of Lo Wai Road on normal weekdays and weekends, provided that the proposed columbarium redevelopment remains closed to visitors during the festival days and its shadow period (Appendix 10).
- 7.4 The proposed Columbarium redevelopment will provide 4 private car parking spaces (including 1 for accessible parking space), 3 motorcycle parking spaces and 1 LGV loading/unloading bay. A 10m in length pick-up/drop-off taxi lay-by is also provided.

7. Traffic Impact and Crowd Management (cont'd)

- 7.5 Furthermore, a 'Visit by Appointment' system is proposed for the Columbarium redevelopment. All visitors are required to make an appointment at least 2 working days in advance before the visit. Implementing this system will provide additional control to alleviate traffic volume on Lo Wai Road and enhance internal traffic flow management. This type of management mode has been accepted by the PCLB as one of the enforceable management mechanisms.
- 7.6 The 'Visit by Appointment' system is to be incorporated into the Management Plan as one of the operating modes (Appendix 6).
- 7.7 Visitors are encouraged to use public transport when visiting the columbarium. Parking spaces for cars must be reserved in advance; otherwise visitors will be denied entry to the subject site.

8. Environmental Impact Assessment

- 8.1 As part of the redevelopment, environmental mitigation measures and best practices will be implemented. This includes prohibiting the burning of incense, joss papers or candles on the subject site and ensuring that religious and worshipping activities are conducted indoors. There will be no other emission sources arising from the redevelopment. Additionally, funeral services will not be permitted on the premises.
- 8.2 The Sewage Impact Assessment, the Drainage Impact Assessment and the Fresh Water and Flushing Water Demand Assessment submitted for the Section 12A application have demonstrated that the proposed redevelopment will not have any unacceptable impacts on local sewage, drainage or fresh/flushing water supply. The redevelopment shall comply with requirements under Water Pollution Control Ordinance (Cap. 358).
- 8.3 It is noted that the redevelopment will be within the tunnel protection zone of DSD's Tsuen Wan Drainage Tunnels (TWDT), with some proposed structures to be situated on its Main Tunnel and Intake I-2 Main Adit Tunnel near Lo Wai. The guidelines and requirements as stated in DSD's Practice Note No. 2/2017 "Assessment on the Effects of Construction Activities on Drainage and Sewage Tunnels and their Associated Structures", and all technical advice from the CEDD/GEO will be followed before any works commence.

8. Environmental Impact Assessment (cont'd)

- 8.4 There is no noise impact (e.g., ventilation, cooling system, kitchen, traffic) arising from the future operation of the columbarium to nearby NSRs. Additionally, there are no noisy activities (e.g., music, loudspeakers, etc.) associated with the future use.
- 8.5 A site survey was conducted on 8 January 2024, and there are no active industrial chimneys or any other air and odour emission source within 200m from the redevelopment site boundary (Appendix 7). Any air-sensitive uses of the redevelopment such as offices are located away from any emission sources and nearby temples.
- 8.6 To address environmental concerns, the columbarium redevelopment will incorporate green building approaches in its design and operation. Necessary control measures will be proposed accordingly to minimize noise and the potential impact on air quality during the construction stage.
- 8.7 With the permission of TPB and the approval of other relevant government departments, the construction phase of the redevelopment will adhere to the Recommended Pollution Control Clauses (RPCC) to minimize any potential environmental inconvenience and nuisance for sensitive receptors throughout the construction stage. The potential water quality impact during construction phase and proposed respective mitigation measures will be followed.

9. Visual Impact Assessment

- 9.1 The proposed Columbarium is situated in a rural setting and is surrounded by tall trees, slopes, an elevated road, and a natural hillside, which serve to shield the redeveloped columbarium from its surroundings. A conceptual Landscape Proposal was prepared based on the tree survey conducted on 27 September 2022 (Appendix 8).
- 9.2 The redeveloped columbarium will be a 2-storey, low rise building situated in a secluded and tranquil environment, away from the main road – Lo Wai Road. Photomontages comparing the proposed images of the redeveloped Columbarium to the existing building (Appendix 9) reveal that the redevelopment is low rise and heavily surrounded by vegetation, making it completely compatible with its surrounding.
- 9.3 The design of the Columbarium features three intersecting rings with a sloping roof on two levels. In addition to representing the Buddhist concept of Buddhism – the cycle of death and rebirth, this form is designed to complement the neighboring Yuen Yuen Care & Attention Home for the Aged, which features a dominated curvilinear form.

9. Visual Impact Assessment (cont'd)

- 9.4 The partially elevated columbarium, with its sloping roof, creates a visually light, floating structure that provides unobstructed visual links to the surrounding area through its visual effects.
- 9.5 The circular form and open air courtyards give the Columbarium a slim and dynamic appearance.
- 9.6 The unobtrusive and subtle façade of the columbarium, combined with a colour and material palette that blends with its surroundings, harmonizes with nearby Chinese temples.
- 9.7 In view of the above, the redevelopment of the Columbarium will not result in any adverse visual impact. On the contrast, it will enrich and enhance the existing urban fabric of the area.

10. Conclusion

In light of the above, the enhanced appearance and ambiance of the redeveloped Columbarium could create a more attractive, well-maintained and respectful environment through sheltered areas, architectural features and landscaping. By monitoring and implementing a management scheme, it will help ensure the columbarium remains properly operational, has no adverse impacts on the locality and meets the community's urgent needs. The proposed redevelopment complies with all TPB guidelines and relevant government department requirements, aligns with prevailing government policies and fulfills societal needs.

The support of the TPB for the Columbarium redevelopment is eagerly anticipated, as it will enable the facility to better serve the community's in the near future.