



香港建築師學會
The Hong Kong Institute of Architects

30 September 2010

Our Ref. : BLA/P&L/LCPFSEH/RCP/AK/cw/1009

Hon Fred LI Wah-ming, SBS, JP
Chairman
Panel on Food Safety and Environmental Hygiene
Legislative Council
c/o Legislative Council Secretariat
3/F Citibank Tower
3 Garden Road
Hong Kong

By Email and By Post
Email : panel_fseh@legco.gov.hk

Dear Mr Li

**Special Meeting of Panel on Food Safety and Environmental Hygiene
On 20 September 2010**

We refer to the special meeting of Panel on Food Safety and Environmental Hygiene held on 20 September 2010 to invite public views regarding the public consultation on review of columbarium policy.

Further to the verbal presentation delivered by the undersigned at the above meeting, we are pleased to provide the enclosed paper regarding our views and comments on the review of columbarium policy for your consideration. The paper is also submitted to Food and Health Bureau as a written submission for the public consultation. A copy of the slides presented at the above special meeting is also enclosed for your reference.

Yours sincerely

Anna S Y Kwong MH FHKIA
President

Encl

c.c. Prof Hon Patrick Lau, Member, Legislative Council (Architectural, Planning and Surveying)



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Response to the Public Consultation on Review of Columbarium Policy**

There are immediate needs for quick actions to provide more columbarium facilities. Columbarium and cemeteries facilities could be viewed as housing for the deceased, and the government should make provision for a certain percentage of the facilities affordable to the less privileged, in order to prevent the situation where the private sector provide, all the required niches affordable only to the rich.

Alternatives for Increasing Supply of Columbarium Facilities

To increase the supply of columbarium facilities, alternative and legal means for providing columbarium facilities should be explored, as explained below:-

- In the urban areas, small columbaria annexed to parks or even country parks, underground columbaria, defunct air-raid shelters, rock cravens, abandoned land fills etc. should be explored.
- More columbarium facilities at existing cemetery facilities should be encouraged but scientific analysis on sufficiency of infrastructure and transport facilities during peak seasons should be studied to justify the anticipated increase.
- It is quite common to have columbaria situated within religious compounds in China and other parts of the world. Considerations should be given to allowing certain amount of niches as ancillary facilities to religious compounds (i.e. no need for OZP or lease modifications). However, limits shall be set on the number of niches allowed (according to site area or Gross Floor Area).
- Other possible means would include allowing high-rise buildings for storage of urns, and converting industrial buildings into columbarium facilities.
- For best use of available columbarium sites, consideration should be given to central urn storage facilities. Urns could be hand-delivered or mechanically delivered to small ceremonial halls for bereavers to pay tributes to the deceased upon advance bookings.
- Quick and immediate actions on planning and design of the last remaining zoned piece of land for large scale columbarium facilities at Tuen Mun Planning Area 46 should be carried out.
- More environmentally-friendly and sustainable means of handling ashes should be promoted, for example—
 - Construction of more Gardens of Remembrance, time-limited lease and incentive scheme for the return of niches are supported.
 - New columbaria in remote areas are not encouraged as this will induce damages to the environment, wastage of energies on transportation and inconvenience to the public. Columbaria in remote areas are only acceptable if the problems on means of transportation during peak seasons can be resolved (for examples, on outlying islands served by ferries during peak seasons).



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Private Columbarium Development

Regarding the private columbarium development, we are of the view that:-

- To protect consumers, operators of private columbarium service providers should make available approved plans, future expansion plans, Outline Zoning Plan (OZP) and relevant lease conditions for customer's inspection (similar to purchasing a flat).
- Lands Department and Planning Department should strictly enforce cases of lease and OZP violations respectively (government should however have contingency plans for accommodation of remains of the deceased after enforcement).
- On licensing of columbarium facilities, besides strict compliance to Building Regulations, criteria like greening, maximum number of niches, air pollution abatement measures, and infrastructure capacity should all be taken into consideration (smaller facilities, e.g. ancillary to religious compounds, can be exempted from compliance to some of these criteria).

Good Design for Columbaria

It will be beneficial if the Government would consider holding design competitions for soliciting innovative ideas on locations and designs of columbaria at each of the 18 districts. We believe beautiful columbaria in an appropriate setting will make them more acceptable to the public.

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