

**Business Facilitation Advisory Committee
Town Planning Task Force**

***Problems with Qualitative Guidelines –
Draft Town Planning Board Guidelines for
Submission of Visual Impact Assessment to TPB***

General Concerns

Whenever a set of guidelines is promulgated, it often turns into a bible and the officer-in-charge will stick to it word for word. If descriptions are open-ended or qualitative, the officer-in-charge usually takes a very conservative interpretation which could become extremely subjective at times.

2. Visual Impact Assessments (VIA) are currently being carried out for sites which are located at visually sensitive areas e.g. waterfront, or areas which may affect the ridgeline, etc. Important vantage points are usually agreed with the Urban Design Section of Planning Department and photomontages/perspectives/sections etc. are produced to demonstrate the impact. There is no need to have yet another set of guidelines on this subject. The Draft TPB Guidelines for VIA is attached for your information.

Specific Concerns

Scope and Applications of VIA

- Definition of landscape sensitive areas is too wide covering “Agriculture”, “GB”, “Open Space”, “Recreation”, etc.
- Definition of visually sensitive areas is very loose, such as major view corridors, popular vantage points, hiking trail, urban fringe, etc.
- VIA may be required for all applications at the end of the day.

Primary Consideration of VIA

The guidelines request that alternative design options to achieve best design with the least adverse visual impact should be thoroughly explored and reported. How much resources are expected to be spent on this? Visual impact is after all one factor of consideration in building design.

Assessment Area

The assessment area is the area where views and viewers may be affected. How should one define “may be affected”? How far a viewer should be taken into account?

Visually Sensitive Receivers (VSRs)

VSRs include all categories e.g. residents, workers, drivers, etc. If the officer-in-charge takes a conservation view, a great deal of resources will be required. Why should we not concentrate on permanent public viewpoints?

Types of Visual Impact

Visual incompatibility – is our city only looking for homogeneity and mediocrity?

Visual intrusion, visual obstruction – what extent is unacceptable?

Visual Sensitivity

Low, medium, high – too subjective

Magnitude of Change

Small, intermediate, large – too subjective

Extent of Visual Impact

Negligible, slight, moderate, significant – too subjective

Evaluation of Overall Visual Impact

Cumulative visual impact to all identified VSR groups – over-simplification based on a series of subjective judgments and open to a lot of potential arguments.

For Discussion

3. Should the Visually Sensitive Areas and Landscape Sensitive Areas be specifically identified followed by public consultation and clearly indicated on OZPs? Should VIAs be just required for such special areas?

4. Should permanent public views be the major consideration rather than private views or transient views?

5. Should assessment area be generally limited to area within 500m radius of the proposed development?
6. Should alternative designs not be required?
7. Should there be a Panel of Urban Design experts to judge on visual impact of special areas rather than relying on individual officers?

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