

## ***Appendix D***

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### **Visual Impact Assessment**

**APPROVED LAM TEI AND YICK YUEN OZP  
No. S/TM-LTTY/12**

**Proposed Rezoning from “Residential (Group B)1” Zone to “Residential (Group B)4” Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun**

## **VISUAL IMPACT ASSESSMENT**

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**January 2024**

**Applicant:  
Wing Mau Tea House Ltd.**

**Prepared by:  
KTA Planning Ltd.**



**PLANNING LIMITED**  
規劃顧問有限公司



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## **Amendment to Approved Lam Tei and Yick Yuen OZP No. S/TM-LTY Y/12**

### **Proposed Rezoning from “Residential (Group B)1” Zone to “Residential (Group B)4” Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun**

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#### **Visual Impact Assessment**

## **1. INTRODUCTION**

### **1.1 Purpose**

1.1.1 This Visual Impact Assessment (“VIA”) report is prepared on behalf of Wing Mau Tea House Limited (the “Applicant”) in support of the proposed medium-rise residential development to include a footpath for public development (“Proposed Development”) at various lots and adjacent Government Land in DD130, Lam Tei, Tuen Mun (the “Application Site”).

1.1.2 The Application Site is located within an area zoned “Residential (Group B)1” (“R(B)1”) in Lam Tei on the Approved Lam Tei and Yick Yuen OZP No. S/TM-LTY Y/12 (the “Approved OZP”), meaning housing development is permitted as-of-right with a plot ratio (“PR”) of 1.0 and building height (“BH”) of 15m (up to four storeys over a single-storey car park). Besides, the Application Site is subject to an approved rezoning proposal for medium-density housing development with a domestic PR of about 2.5, a domestic GFA of about 19,650m<sup>2</sup>, and a maximum BH of +35mPD (hereafter referred to as the “approved scheme” or “approved residential development”). **Figure 1.1** shows the site location.

1.1.3 Subsequent to the approval, the Applicant reviewed the latest planned public and private residential developments nearby as well as the capacity of the major infrastructure and considers possible to further increase the PR from 2.5 to 5 so as to better utilize the scarce land resource and to boost housing supply.

1.1.4 In light of the acute housing shortage in Hong Kong, the Applicant is proposing to increase the development intensity of the Application Site bearing in mind that the proposed residential development should remain compatible with the sub-urban character in the area. The Applicant proposes to increase the PR from 2.5 (i.e. the approved PR) to 5 with a maximum BH adjusted to not more than 27 storeys and not exceeding +107.8mPD by way of a new “Residential (Group B)4” (“R(B)4”) zone.

1.1.5 To rationalize the proposed “R(B)4” zoning boundary near the proposed ingress / egress, the Application Site (i.e. about 9,300m<sup>2</sup>) includes an additional strip of Government Land while the Development Site is referring to the developable land accountable for PR calculation (i.e. about 8,896m<sup>2</sup>).

1.1.6 In this connection, in accordance with the Town Planning Board Guidelines on Submission of Visual Impact Assessment for Planning Applications to TPB (“TPB PG-NO.41”), this VIA will evaluate the potential visual impact of the Proposed Development to the surrounding areas against the approved scheme and concludes with recommendation on mitigation measures if necessary.

## 1.2 Report Structure

1.2.1 Following this introductory section, the methodology adopted in this assessment will be set out in Section 2. The baseline review of the Application Site and the surrounding area is included in Section 3. Section 4 explains the Proposed Development Scheme. The visual envelop, visually sensitive receivers and representative viewpoints will be identified in Section 5, followed by an assessment of the visual impact in Section 6. Section 7 concludes and summarizes the findings of this Visual Impact Assessment.

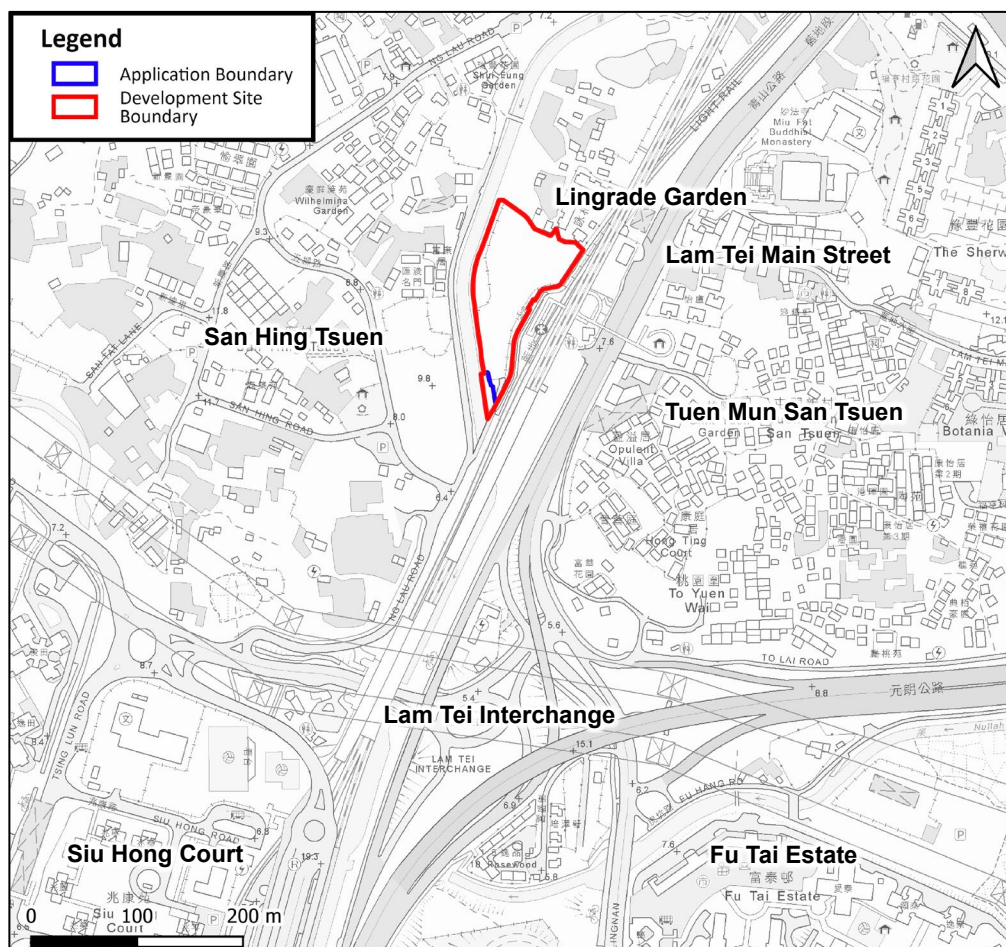


Figure 1.1 Site Location

## 2. METHODOLOGY

### 2.1 Visual Impact Assessment Approach

2.1.1 This VIA will evaluate the potential visual impact of the Proposed Development to the surrounding areas (i.e. to the visually sensitive receivers (“VSRs”)) by comparing it to the visual effect of the approved scheme with a maximum BH of +35mPD permitted on the Application Site (i.e. the Baseline Development Scheme; to be discussed in Section 2.2).

2.1.2 According to TPB PG-No. 41, the visual impact shall be assessed based on i) the sensitivity of key public viewers; ii) the degree of visual resources and visual amenities likely to be affected; iii) the magnitude, extent and duration of impact and any resultant improvement or degradation in the visual quality and character of the surrounding area; and iv) the planning intention and known planned developments of the area.

2.1.3 The visual impact could be either beneficial or adverse. The visual sensitivity of public viewers is determined taking into account the activity of the VSRs, the duration and distance over which the proposed development would remain visual, and the public perception of the value attached to the views being assessed. It is typically graded as high, medium or low.

2.1.4 Visual changes caused by the Proposed Development could be positive or negative and they are not necessarily mutually exclusive. In considering the effect of visual changes, it covers the following four aspects:

- the total effect on the **Visual Composition** of the surrounding context;
- the degree of **Visual Obstruction** to key public viewing points;
- the **Effect on Visual Resources**; and
- the visual **Effect on Public Viewers** (perception of value of views and magnitude in change the visual **Effect on Public Viewers** (perception of value of views and magnitude in change

2.1.5 The magnitude of visual changes will be qualitatively graded as Substantial, Moderate, Slight or Negligible. The resultant overall impact will be concluded as enhanced, partly enhanced/partly adverse, negligible, slightly adverse, moderately adverse and significantly adverse.

2.1.6 The VIA will be undertaken in the following steps:

- A baseline review will be conducted to capture the existing visual elements in the surrounding area and the planning context of the Application Site.
- The Proposed Development on the Application Site will be briefly presented.
- The Visual Envelope (“VE”) (i.e. the Assessment Area surrounding the Proposed Development from which it is visible from key sensitive viewers)

and appropriate public viewpoints (“VPs”) will be identified.

- Each VP and the potential visual impact of the Proposed Development on the VSRs will be analyzed based on the photomontages prepared for the selected VPs.
- The overall visual impact will be assessed with conclusion on the visual acceptability of the Proposed Development.

## **2.2 Indicative Baseline Development Scheme for Comparison**

2.2.1 The Application Site is subject to an approved rezoning scheme, which was approved by the Board in September 2021 under TPB Ref. Y/TM-LTTY/9. The Applicant has proven in the approved application that it is technical feasible to put forward a residential development of 9 blocks of not more than 8 storeys to provide a total of 307 units, at a domestic PR of 2.5 and a maximum BH of +35mPD. The visual changes and impact of the current scheme will be compared against this Baseline Development Scheme.



### 3. BASELINE REVIEW

#### 3.1 Site Condition

3.1.1 The Application Site is paved and flat with a general site level of +6.6mPD to +6.8mPD (see **Photos 3.1** and **3.2** below). It is bisected by a footpath on the Applicant’s landholding heavily used by the locals across the nullah getting to and from Castle Peak Road (see **Figure 3.1** below).

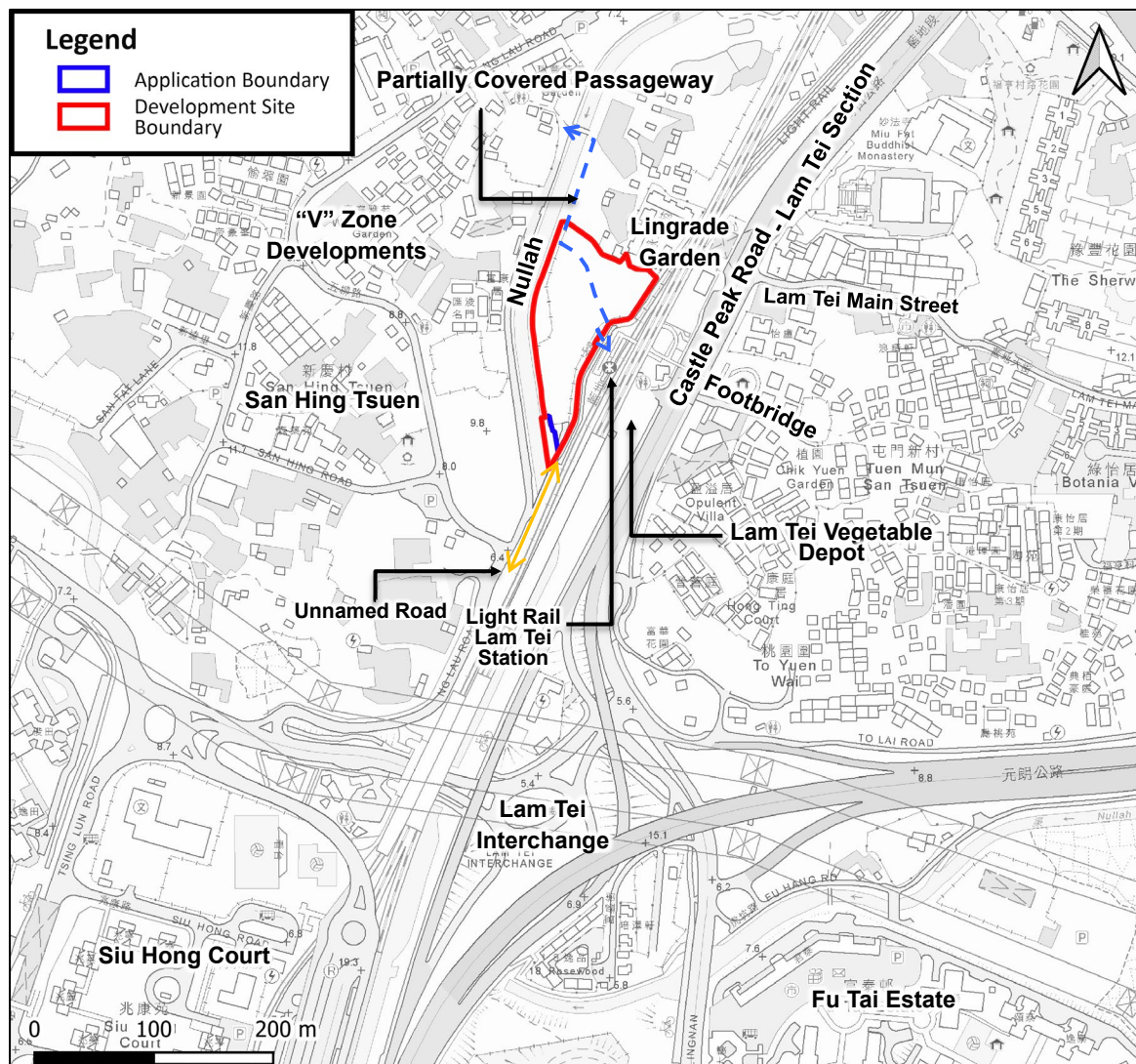


Figure 3.1 Site and Surrounding Context

### 3.2 Statutory Zoning and Planned Developments

#### Zoning

3.2.1 The Application Site falls within an area zoned “R(B)1” on the OZP. According to the Notes of the OZP, the “R(B)1” zone is imposed with a PR restriction of 1, maximum site coverage of 40%, maximum no. of storeys of 4 storeys over a single-storey car park and a BH restriction of 15m. This zone is intended primarily for sub-urban medium-density residential developments in rural area where commercial uses serving the residential neighborhood may be permitted on application to the Board. **Figure 3.2** shows the zoning context of the Application Site.

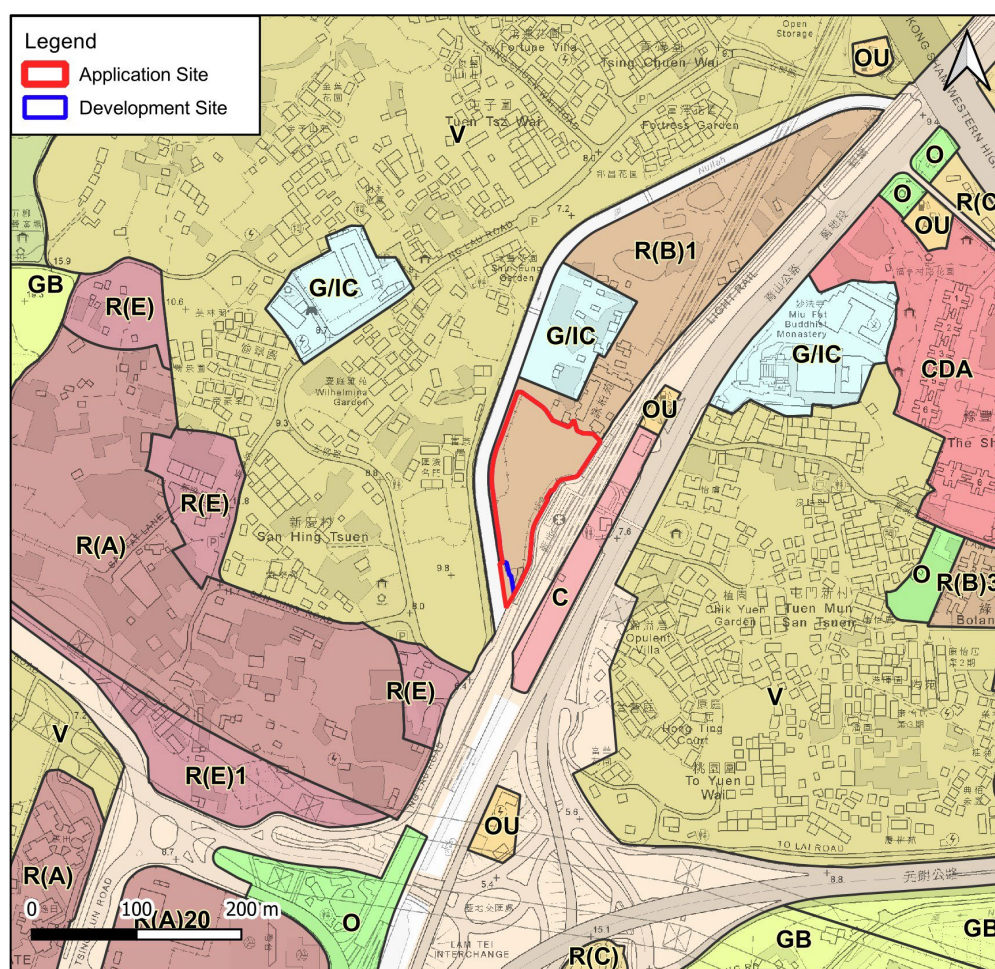


Figure 3.2 Zoning Plan (Extract from OZP No. S/TM-LTYY/12)

#### Planned and Committed Developments in the Vicinity

3.2.2 To the south of the Application Site across the railway, a residential development with provision of shop and services at the elongated site zoned “Commercial” (“C”) was recently approved with permission for a minor relaxation of PR to 5 and BH to +64.45mPD (TPB Ref.: A/TM-LYTT/426

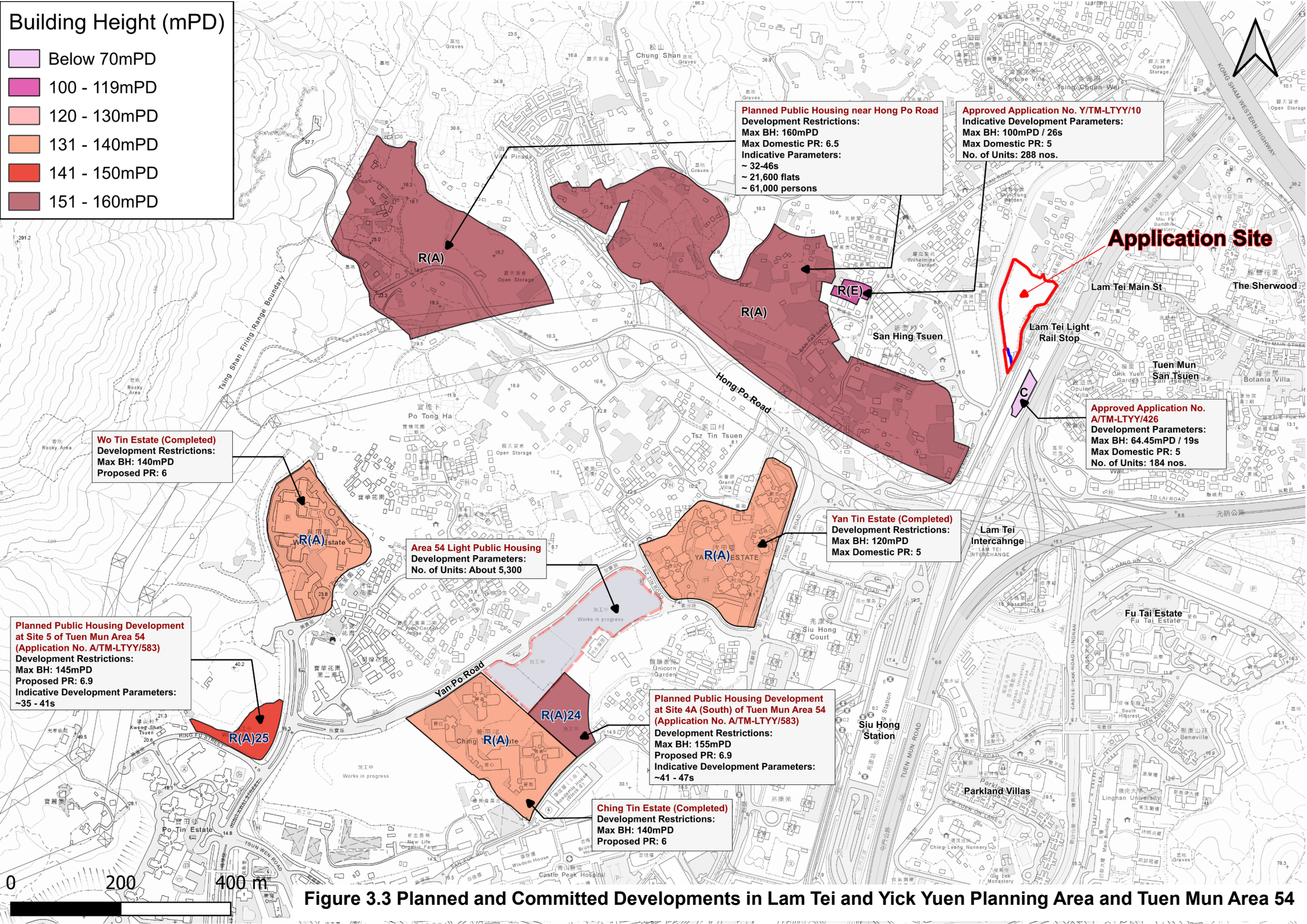


refers). Stepping near towards the town center of Tuen Mun, there were three approved planning applications for high-density public housing developments in Tuen Mun Area 54 near Yan Po Road. Besides, an extensive portion of land to the south of Hong Po Road with a total area of about 21.52ha has been rezoned from “Residential (Group E)” (“R(E)”) and “Green Belt” (“GB”) zonings to “Residential (Group A)” (“R(A)”) and “Government, Institution or Community” (“G/IC”) zonings for high-density public housing developments of about 22 residential towers and 21,600 units with a maximum BH of +160mPD. The area is expected to be transformed from a sub-urban environment to a medium to high-density residential area.

3.2.3 **Figure 3.3** illustrates the planned and committed developments as well as the building height profile in south-west Lam Tei and Tuen Mun Area 54.

# Building Height (mPD)

- Below 70mPD
- 100 - 119mPD
- 120 - 130mPD
- 131 - 140mPD
- 141 - 150mPD
- 151 - 160mPD



**Planned Public Housing near Hong Po Road**  
**Development Restrictions:**  
 Max BH: 160mPD  
 Max Domestic PR: 6.5  
**Indicative Parameters:**  
 ~ 32-46s  
 ~ 21,600 flats  
 ~ 61,000 persons

**Approved Application No. Y/TM-LTY/10**  
**Indicative Development Parameters:**  
 Max BH: 100mPD / 26s  
 Max Domestic PR: 5  
 No. of Units: 288 nos.

## Application Site

**Approved Application No. A/TM-LTY/426**  
**Development Parameters:**  
 Max BH: 64.45mPD / 19s  
 Max Domestic PR: 5  
 No. of Units: 184 nos.

**Wo Tin Estate (Completed)**  
**Development Restrictions:**  
 Max BH: 140mPD  
 Proposed PR: 6

**Area 54 Light Public Housing**  
**Development Parameters:**  
 No. of Units: About 5,300

**Yan Tin Estate (Completed)**  
**Development Restrictions:**  
 Max BH: 120mPD  
 Max Domestic PR: 5

**Planned Public Housing Development at Site 5 of Tuen Mun Area 54 (Application No. A/TM-LTY/583)**  
**Development Restrictions:**  
 Max BH: 145mPD  
 Proposed PR: 6.9  
**Indicative Development Parameters:**  
 ~35 - 41s

**Planned Public Housing Development at Site 4A (South) of Tuen Mun Area 54 (Application No. A/TM-LTY/583)**  
**Development Restrictions:**  
 Max BH: 155mPD  
 Proposed PR: 6.9  
**Indicative Development Parameters:**  
 ~41 - 47s

**Ching Tin Estate (Completed)**  
**Development Restrictions:**  
 Max BH: 140mPD  
 Proposed PR: 6



**Figure 3.3 Planned and Committed Developments in Lam Tei and Yick Yuen Planning Area and Tuen Mun Area 54**



### 3.3 Visual Elements in the Surrounding Context

3.3.1 The Application Site is immersed in a sub-urban built environment that is made up by a mix of medium-rise residential developments, village houses and brownfield sites. Located adjacent to the Tuen Ma Line viaduct, light rail track and major road network, the Application Site is highly accessible to the core of Tuen Mun New Town. **Figure 3.4** shows the surrounding land-use of the Site.

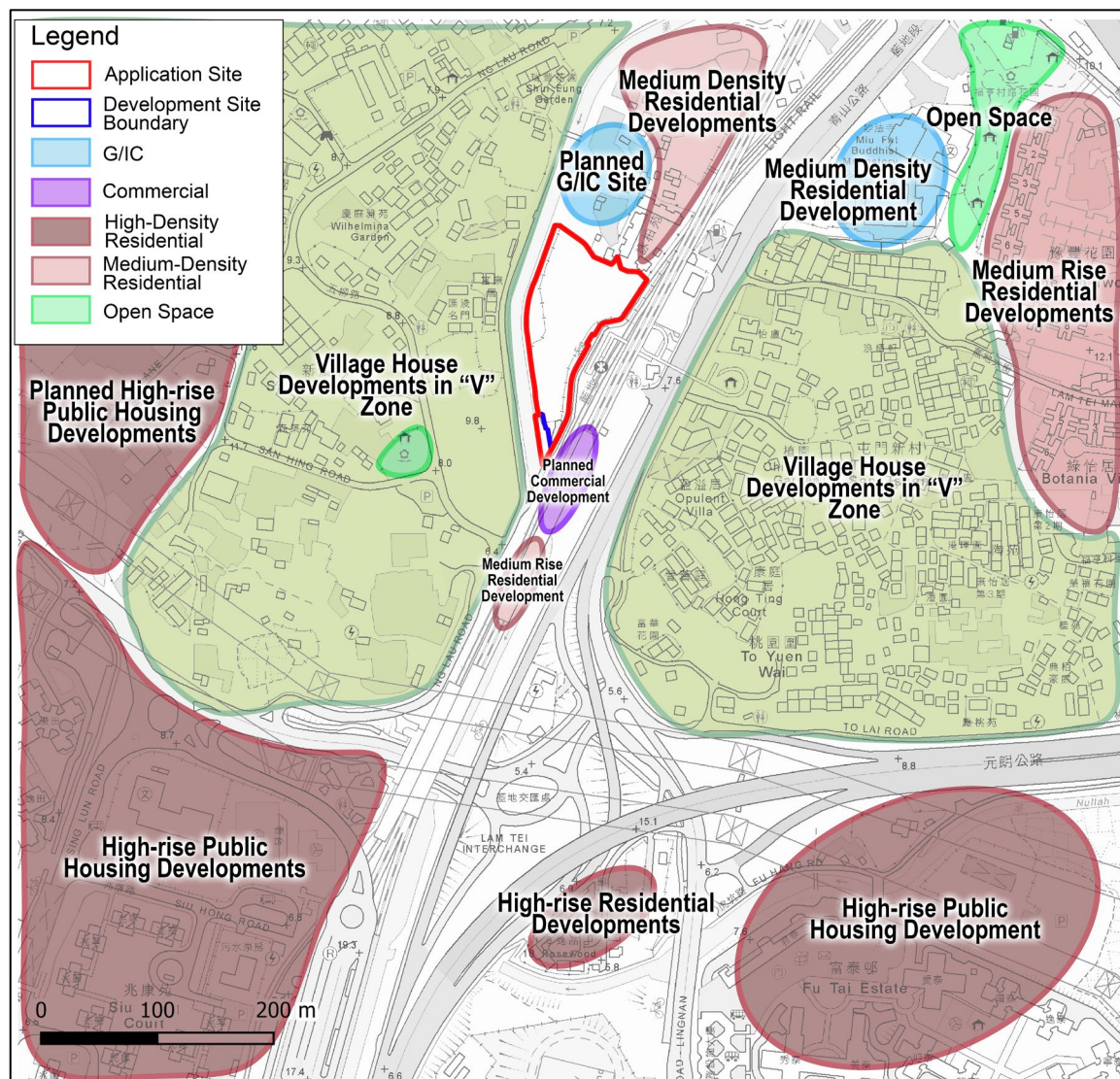


Figure 3.4 Surrounding Land Use of the Application Site

3.3.2 The visual outlook of an area is shaped by a combined composition of all the visual elements, which come into sight of the viewers. Key visual elements in the surrounding context of the Application Site are included in **Figure 3.5** and summarized below:





① Sitting Out Area next to Footbridge



② Miu Fat Buddhist Monastery



③ Castle Peak Road - Lam Tei Section



④ San Hing Tsuen Children's Playground



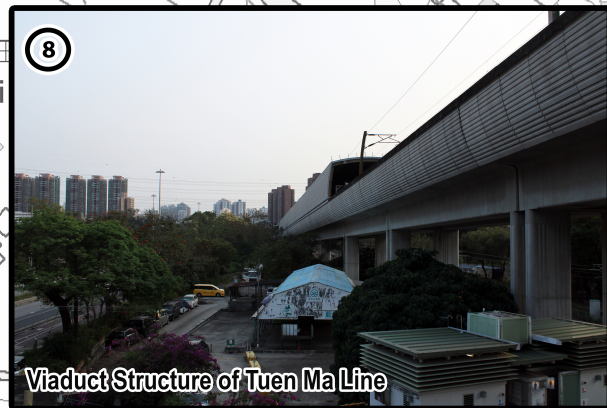
⑤ Newly Build Village Houses Near the Application Site



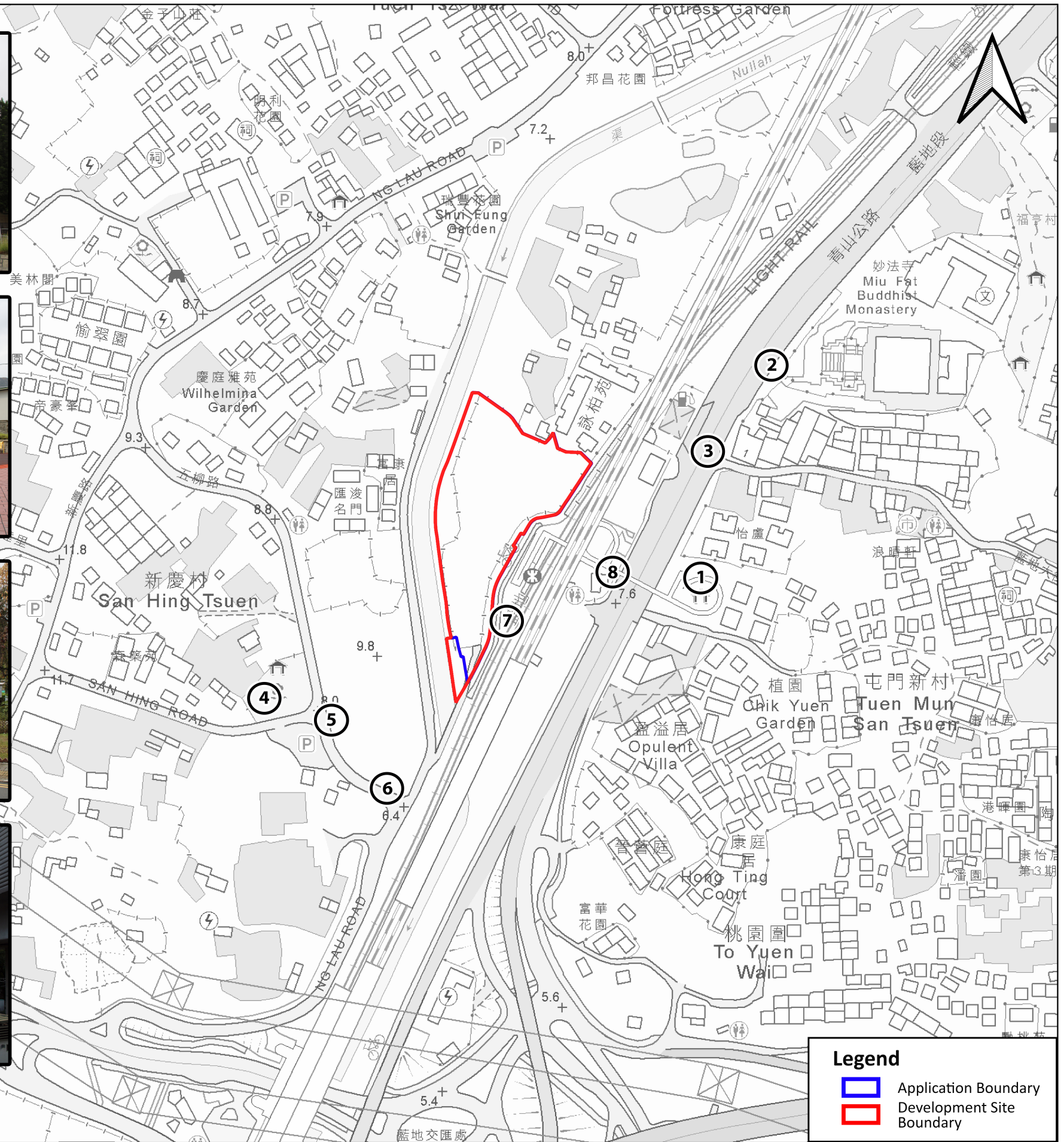
⑥ Viaduct Structure of Tuen Ma Line and Light Railway Track Viewing from Ng Lau Road



⑦ Light Rail Lam Tei Station



⑧ Viaduct Structure of Tuen Ma Line



**Legend**

- ▭ Application Boundary
- ▭ Development Site Boundary



**Photos of Visual Elements in Surrounding Area**

Pre-submission for Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

Figure 3.5

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Survey Sheet No. 6-NW-C



### Positive Visual Resources

- To the west of the Application Site finds the nullah, which acts as a buffer between the village house developments and brownfield sites to the further east. The nullah provides visual permeability and openness in a north-south direction.
- One to three storeys village house developments are found nearby, including San Hing Tsuen to the west and Lingrade Garden to the north. These low-rise developments offer the sense of sub-urban tranquility in the area.
- Miu Fat Buddhist Monastery is a popular religious institution found to the north-east of the Application Site, its extraordinary building design would add visual interest to the area.
- There are some parks and playgrounds in the vicinity, such as San Hin Tsuen Children’s Playground and Fuk Hang Road Garden and Playground. The provision of greenery in these open spaces together with the on-street planting in the area could contribute to the visual amenity in the area.

### Negative Visual Eyesores

- The extensive bulk of the viaduct structure of the elevated Tuen Ma Line at +21mPD is considered as a visual eyesore that reduces the visual openness of the area. It is a physical barrier that blocks views to the further east to the opposite of Castle Peak Road – Lam Tei Section.
- Lam Tei is one of the areas served by the light railway. The structure of Light Rail Lam Tei Station itself, together with the elevated pedestrian footbridge that connects to the opposite side of Castle Peak Road – Lam Tei Section, would also reduce the visual openness of the area. These features block views at street-level. Besides, as the light rail would run via the viaduct to cater the level difference between the at-grade Light Rail Lam Tei Station and the elevated Siu Hong Station, the viaduct would block views to the further south.
- Brownfield sites / operations are commonly found within the villages to the southwest of the Application Site, which they would degrade the visual quality of the environment.

## **4 PROPOSED DEVELOPMENT**

### **4.3 Proposed Development Scheme**

4.1.1 In light of the acute housing shortage in Hong Kong, the Applicant the Applicant is proposing to increase the development intensity of the Application Site bearing in mind that the proposed residential development should remain compatible with the sub-urban character in the area. As such, the Applicant proposes to increase the PR from 2.5 (i.e. as approved in the approved scheme) to 5.0 in providing more flats in the area. Hence, BH of the residential towers would be adjusted to a range of 14 – 27 storeys tall and not exceeding +107.8mPD to accommodate the additional PR and GFA. The indicative Master Layout Plan is shown in **Figure 4.1**.

Design Layout (see full set of Indicative Architectural Drawings in **Appendix 1**)

4.1.2 With a rationalized site boundary of an area of 8,896m<sup>2</sup>, the Development Site is proposed for a medium-rise residential development with a PR of not more than 5 and a maximum BH of +107.8mPD. Like the approved scheme, the Proposed Development aims to provide 5 residential blocks ranging from 14 to 27 storeys above 2 storeys of basement carpark for a total of 1,385 units. A replacement footpath, which takes up a land area of 305m<sup>2</sup> at a minimum width of 3m, will be provided along the northern boundary. Recreational uses, in a form of residents’ clubhouse, would be provided at the G/F of Towers 1 – 4. There will also be a communal skygarden on 1/F of Tower 1 and 2.

Sensitive Design Measures

*Appropriate Tower Setback*

4.1.3 In order to avoid compromising the existing built environment and minimize the sense of spatial oppression, towers along the northern and western boundaries are proposed to set back to allow a smoother transition to the surroundings. In particular, Towers 1 and 4 that are fronting the nullah along the western boundary are proposed to be setback for at least 7m while Tower 2 that is abutting the re-provided public access at the northern boundary is proposed to set back for about 14m.

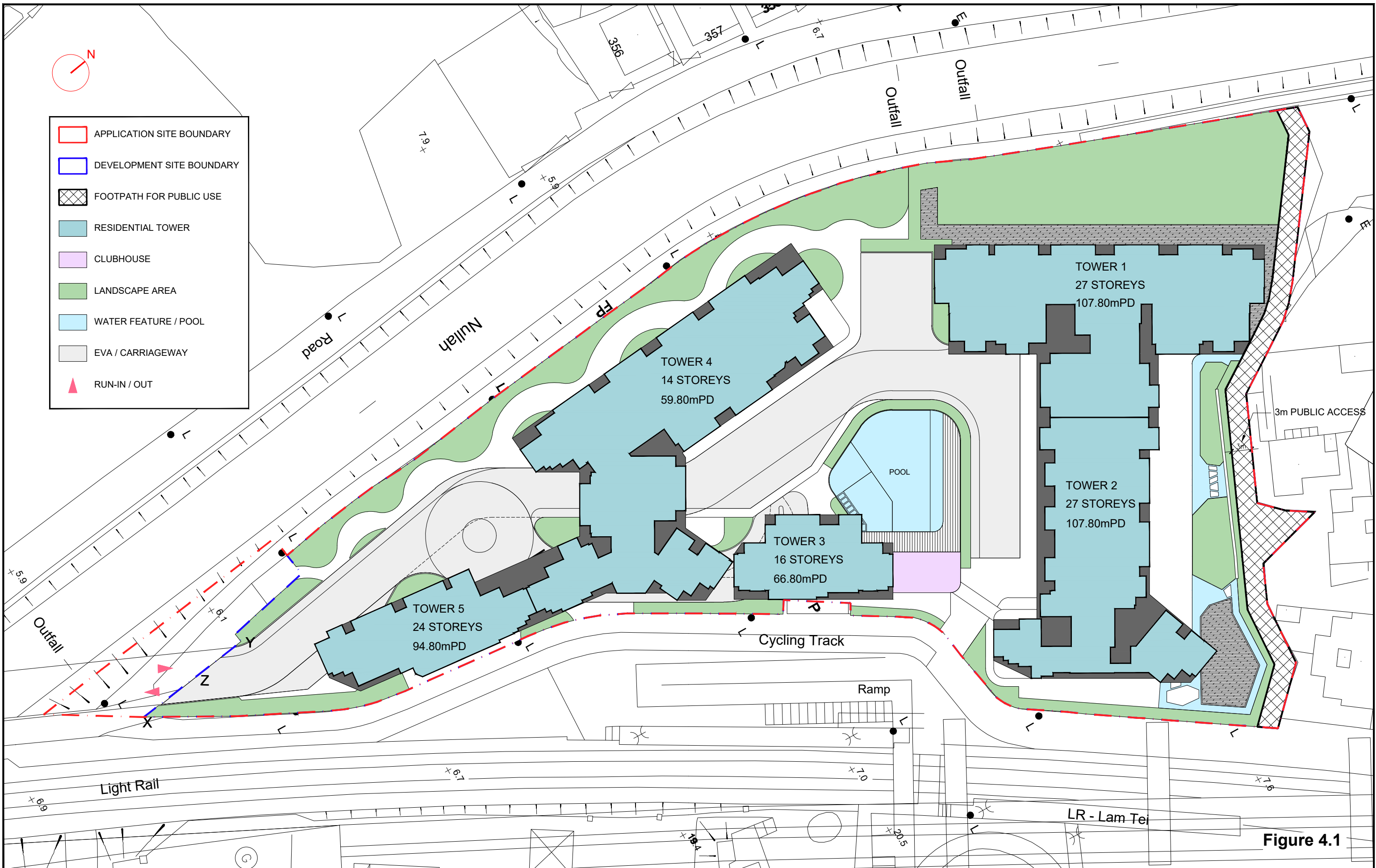


Figure 4.1

Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

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**LWK**  
**+PARTNERS**

### Careful Tower Disposition to Provide a 15m-wide Air Corridor

4.1.4 On top of building setback, the proposed layout has duly considered maximizing building gaps to create a spacious development and to enhance the air ventilation performance. Building gap of not less than 15m would be provided to create an air and view corridor for E-W wind penetration. A central amenity square containing a swimming pool would be provided in the corridor to provide for enjoyment. **Figure 3.4** below shows the indicative ground floor plan of the Proposed Development.

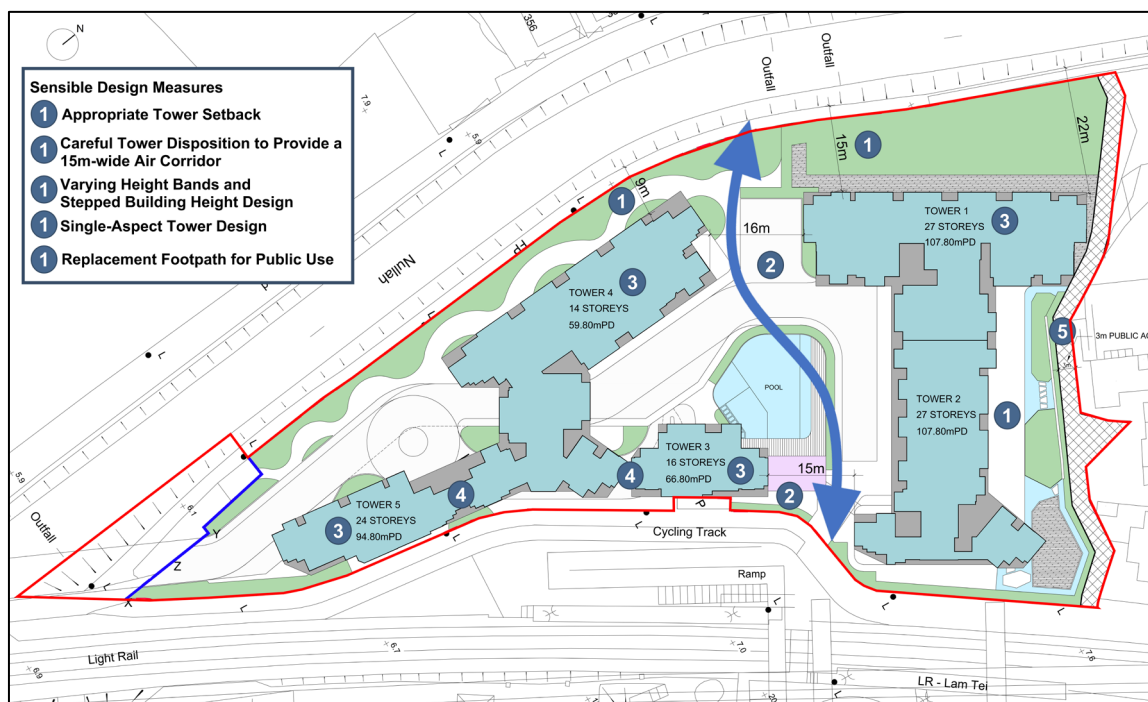


Figure 4.2 Indicative Block Plan

### Stepped Building Height Design

4.1.5 Considering the proximity to Lam Tei Light Rail Station and the Tuen Ma Line viaduct, varying height bands ranging from +59.8mPD to +107.8mPD or 14 to 27 storeys is proposed, which would general present a stepped building height descending from the west to the east.

### Single-Aspect Tower Design

4.1.6 In consideration of the railway noise of Tuen Ma Line, single-aspect tower design would be carefully incorporated to reduce the railway noise impact from Tuen Ma Line and Light Rail running north-south to the east of the Application Site.



### *Replacement Footpath for Public Use*

- 4.1.7 To continue to facilitate pedestrian movement between the nullah and Castle Peak Road, the Applicant proposes a 3m wide replacement footpath for public use at the northern end within the Application Site adjacent to Lingrade Garden. This will be managed and maintained by the future residential development.

### *Optimal Building Bulk*

- 4.1.8 To minimize visual impact to the surrounding and to maximize at-grade open space, car parking spaces are placed within the 2 basement levels. Besides, the Applicant proposes to minimize the ground floor footprint to only underneath the towers as far as practicable.

### Key Development Parameters

- 4.1.9 The key development parameters of the Proposed Development are summarized in **Table 4.1** below:

**Table 4.1 Indicative Development Parameters**

<b>Development Parameters</b>	<b>Proposed Development</b>
Application Site Area (about)	9,300m <sup>2</sup>
Development Site Area	8,896m <sup>2</sup>
Private Lots (85.7%)	6,333m <sup>2</sup>
Government Land (14.3%)	2,563m <sup>2</sup>
Proposed Domestic Plot Ratio	5
Proposed Domestic GFA	44,480m <sup>2</sup>
Proposed No. of Flats	1,385
Average Flat Size	32.1m <sup>2</sup>
Estimated Population (assuming 2.7 persons per flat)	3,740
Proposed No. of Towers	5
Proposed Site Coverage	Not more than 33.3%
Proposed No. of Storeys	14 - 27 (excluding 2s of basement carpark)
Proposed Maximum Building Height	+107.8mPD
Proposed Private Open Space	Not less than 3,740m <sup>2</sup>
Proposed Greening Ratio	Not less than 20%

## **5. IDENTIFICATION OF VISUALLY SENSITIVE RECEIVERS AND SELECTION OF VIEWPOINTS**

### **5.1 Identifying the Visual Envelope and Visually Sensitive Receivers**

- 5.1.1 The Visual Envelope (“VE”), i.e. the Assessment Area within which the Proposed Development is highly visible from key sensitive viewers is shown in **Figure 5.1**. According to the TPB PG No. 41, the Assessment Area generally covers the area where there is direct sight towards the Proposed Development with a radius of about three times the proposed building height. As the Proposed Development proposes a maximum BH of +107.8mPD with an absolute BH of 101.1m, the Assessment Area thus has a radius of about 303.3m from the Application Site in this case.
- 5.1.2 Since protecting private views is not the duty of the Board, the visual assessment will focus on public VSRs only and no private VSRs, such as residents of existing housing developments, will be included in the assessment.
- 5.1.3 The VSRs identified within the assessment area include i) drivers, cyclists and passersby travelling on Ng Lau Road; ii) pedestrians walking over the nullah from the “V” zone to Castle Peak Road via the replacement footpath; iii) residents and drivers coming from Lam Tei Main Street onto Castle Peak Road; and iv) residents leisurely resting and playing in San Hing Tsuen Children’s Playground. **Table 5.1** summarizes the identified public VSRs and their visual sensitivity level.

### **5.2 Selection of Representative Viewpoints**

- 5.2.1 Based on the identified VSRs, representative viewpoints (“VPs”) were selected for further assessment. The selected VPs cover public views from easily accessible and popular areas from different directions. When selecting VPs, priority has been given to existing/planned public open spaces, public focal points, existing/future pedestrian nodes and key pedestrian/vehicular corridors. Seven local VPs are selected within the visual envelope to evaluate the visual impact of the Proposed Development, presented in **Table 5.1** and illustrated in **Figure 5.1**.

#### VP1 – Local Access Road along the Nullah

- 5.2.2 VP1 is taken from the local access road along the nullah that branches off from Ng Lau Road leading to the village house developments. It is one of the major vehicular accesses to the village houses to the west of Ng Lau Road while some residents’ carparking spaces are also found along this access road. This VP mainly captures view of the vehicular access road on both sides of the channelized nullah and a considerable amount of vegetation and tree plantings at the periphery of the Application Site. VSRs identified at this VP are the drivers along this local access road.

#### VP2 – Footbridge across the Nullah to the North-west

- 5.2.3 The footbridge across the nullah is heavily used by residents from San Hing Tsuen and other village house developments. The footbridge leads pedestrians towards Light Rail Lam Tei Station and Castle Peak Road via the partially covered walkway along the nullah and the existing footpath bisecting the Application Site. While the footbridge represents an important pedestrian node in the area, it captures an open view towards the south stretching from nullah to Siu Hong Court (about +104mPD) in the background. VSRs identified at this VP are the residents commuting between their homes to Light Rail Lam Tei Station and Castle Peak Road – Lam Tei Section.

#### VP3 – Lam Tei Main Street

- 5.2.4 Lam Tei Main Street is a one-way westbound vehicular road connecting onto Castle Peak Road serving the residents of Lam Tei San Tsuen and other housing developments in the area. The intersection of Lam Tei Main Street and Castle Peak Road, being a major pedestrian node along a major transport corridor, is selected as a public viewpoint for assessment. It captures a view dominated by the road traffic at Castle Peak Road and village houses to the east of the viaduct structure of Tuen Ma Line. VSRs identified at this VP are the drivers getting onto Castle Peak Road and travelers getting to nearby public transport nodes.

#### VP4 – Elevated Pedestrian Footbridge Connecting to Light Rail Lam Tei Station

- 5.2.5 The elevated pedestrian footbridge connects Light Rail Lam Tei Station to Castle Peak Road – Lam Tei Section (southbound) where Lam Tei Main Street, To Yuen Wai, The Sherwood, Botania Villa and Miu Fat Buddhist Monastery are located. Considering it is a partially covered footbridge, it captures an enclosed view towards the front which is dominated by the internal walkway of the footbridge while the viaduct structure of is visible between the gaps of the columns of the footbridge. VSRs identified at this VP are the travellers coming from southbound Castle Peak Road – Lam Tei Section to Light Rail Lam Tei Station.

#### VP5 – Unnamed Vehicular Access Branching Off from Ng Lau Road

- 5.2.6 Branching off from Ng Lau Road finds an unnamed access road that lead to the local access road at VP1, that it is widely used by pedestrians, cyclists travelling to Light Rail Lam Tei Station. It also leads to the one-way vehicular access road alongside the nullah that serves the village houses and other housing developments to the west of the nullah.

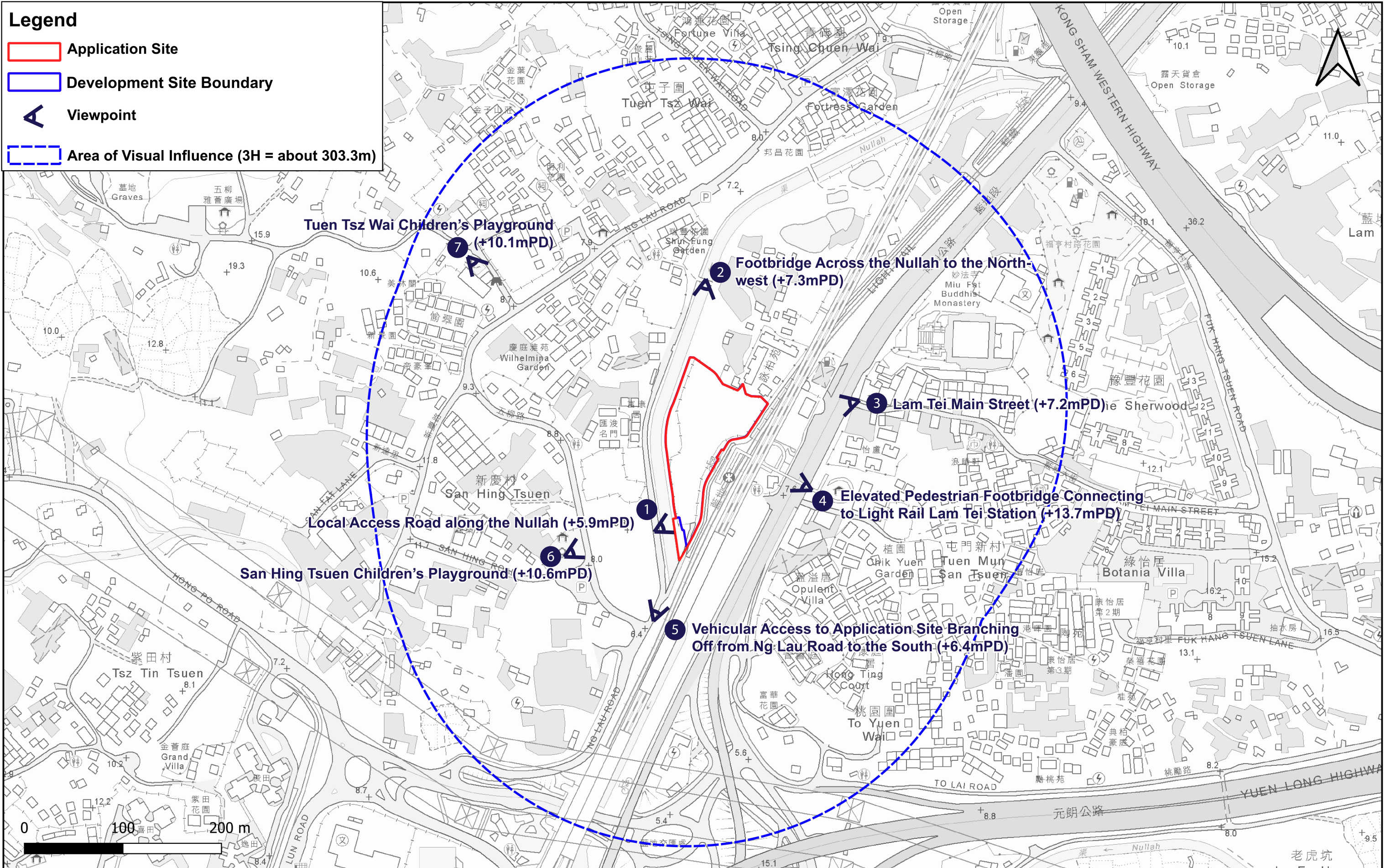
#### VP6 – San Hing Tsuen Children’s Playground

- 5.2.7 San Hing Tsuen Children’s Playground is a popular public open space located in the south-west of the Application Site across Ng Lau Road. it provides both active and passive recreational space for the villagers in San Hing Tsuen and the “V” zone. At an elevated level, the central square of the playground captures a mid-range view towards the Application Site behind the newly built 3-storey village houses. VSRs identified at this VP are caregivers of the children playing and the passive recreational users resting in the playground.

#### VP7 – Tuen Tsz Wai Children’s Playground

- 5.2.8 Tuen Tsz Wai Children’s Playground is another popular public open space located in the south-west of the Application Site across Ng Lau Road. it provides a delicate recreational open space offering both active and passive facilities for the villagers in Tuen Tsz Wai and the “V” zone. At an elevated level, the playground captures a mid-range view towards the Application Site behind the San Sheng Palace. VSRs identified at this VP are caregivers of the children playing and the passive recreational users resting in the playgrounds.





**Location of Visual Sensitive Viewpoints**

Pre-submission for Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

Figure 5.1

Survey Sheet Nos. 6-NW-C

**Table 5.1:** Selected Viewpoints Representing Identified VSRs

<b>Viewpoints (VPs)</b>	<b>Represented VSRs</b>	<b>Distance/ Direction</b>	<b>Height in mPD (Approx.)</b>	<b>Nature of VP</b>	<b>Popularity by Public</b>	<b>Visual Sensitivity</b>
VP1: Local Access Road along the Nullah	Drivers Travelling on the Local Access Road	Approx. 30m/ South-west	+5.9	Transient	Occasional	Low
VP2: Footbridge across the Nullah to the North-west	Residents from “V” Zone Travelling to Light Rail Lam Tei Station and Castle Peak Road	Approx. 75m/ North-west	+7.3	Transient	Frequent	Low to Medium
VP3: Lam Tei Main Street	Drivers and Pedestrians Coming from Lam Tei Man Street to Castle Peak Road	Approx. 85m/ East	+7.2	Transient	Frequent	Low
VP4: Elevated Pedestrian Footbridge Connecting to Light Rail Lam Tei Station	Travelers Travelling to Light Rail Lam Tei Station	Approx. 90m/ South-east	+13.7	Transient	Frequent	Low
VP5: Vehicular Access to Application Site Branching Off from Ng Lau Road to the South	Drivers, Cyclists and Pedestrians Travelling on Ng Lau Road	Approx. 50m/ South	+6.4	Transient	Frequent	Medium to High
VP6: San Hing Tsuen Children’s Playground	Residents Resting and Playing at the Open Space	Approx. 100m/ South-west	+10.6	Recreational	Occasional	High
VP7: Tuen Tsz Wai Children’s Playground	Residents Resting and Playing at the Open Space	Approx. 230m/ North-west	+10.1	Recreational	Occasional	High

## 6 ASSESSMENT OF VISUAL IMPACTS

### 6.1 Subject of Assessment

6.1.1 The objective of this VIA is to evaluate the visual impact of the Proposed Development in the current scheme against the approved condition/Baseline Development Scheme in support of the rezoning proposal. Hence the assessment will focus on the approved BH of 28m or +35mPD in the Baseline Development Scheme and the proposed BH of 101.1m or +107.8mPD in the current scheme.

### 6.2 VP1 – Local Access Road Along the Nullah (Figure 6.1 refers)

#### Visual Composition

6.2.1 The Site is currently in unattended condition with weeds and vegetations all around the western periphery. In the Baseline Development Scheme, the wall-like single aspect residential towers (i.e. T1 – T3) in the approved scheme would dominate the overall view, while the nullah and the local access road would take up the foreground view. With the Proposed Development of the current scheme in place, the visual composition would largely be the same with the residential towers dominating the view. As compared with the Baseline Development Scheme, residential towers with a proposed BH ranging from +59.8mPD to +107.8mPD would become more dominant. The effect on the overall composition of the view at VP1 is considered ***moderately adverse***.

#### Visual Obstruction

6.2.2 As the Site is unoccupied in present, an open sky view is captured. In terms of the openness of the sky view, the then approved residential development (i.e. at +35mPD) of the Baseline Development Scheme would have already reduced the visual permeability towards the north-east and atop, the Proposed Development in the current scheme with a higher proposed BH (i.e. max BH at +107.8mPD) and higher PR would inevitably further obstruct the sky-view. However, the proposed tower setback at T4 and T5 tries to give visual interest along the nullah as compared to the dull built form under the approved condition. The degree of visual obstruction brought by the Proposed Development is ***moderately adverse***.

#### Effect on Visual Resources

6.2.3 Key visual resources at this VP include the nullah and sky-view above the Application Site which has been idled for ages. The nullah is located at the foreground of this viewpoint whilst the Application Site is located behind it, therefore the view towards the nullah and the openness will not be affected.

The Baseline Development Scheme would have partially blocked the sky-view and the current scheme with a higher PR would inevitably further affect the access to the sky-view. However, Applicant is committed to achieve a tree compensation ratio of 1:1 and incorporate interesting landscape arrangement in the Proposed Development, the impact on the visual resources is thus considered as ***moderately adverse***.

#### Effect on Public Viewers

6.2.4 This VP represents the view of the drivers travelling on the local access road. Their kinetic nature reduces the visual sensitivity. Hence the duration of impact is short and brief considering the attention of the drivers would largely be on the road condition. The visual change on public viewers is considered ***moderate***.

### **6.3 VP2 – Footbridge Across the Nullah to the North-west (Figure 6.2 refers)**

#### Visual Composition

6.3.1 Under the existing condition, the weed along the nullah within and outside the Site shield the view towards the Site. Whilst, under the Baseline Development Scheme, two rows of the residential towers (i.e T5 and T6 in the first row; and T7 in the second row) at a universal height of +35mPD would have stand out in the middle-ground when viewing at this footbridge that leads way to the footpath to Light Rail Lam Tei Station and Castle Peak Road. Comparing with the approved condition, some taller buildings of the Proposed Development replace the group of medium-rise buildings in the middle-ground whilst the rest remains unchanged. With the presence of Fu Tai Estate (max. about +130.5mPD) and Siu Hong Court (about +88mPD) in the background, the Proposed Development would not appear incompatible. The magnitude of change of the Proposed Development on the overall visual composition is ***moderate***.

#### Visual Obstruction

6.3.2 As the Site is vacant, an open sky view above weed and vegetation in this triangular-shaped area bounded by Castle Peak Road and the nullah is unobstructed. Yet, the approved development in the Baseline Development Scheme would disturb the visual openness. The residential towers in a three-rows configuration would obstruct the sky-view and overall permeability, whereas the intensified scheme (i.e. the Proposed Development) would thus inevitably block more of the sky-view above and further reduce the visual permeability. However, with the careful disposition of the residential towers and a stepped BH design, the degree of visual obstruction is tuned down to ***moderately adverse***.



### Effect on Visual Resources

- 6.3.3 Similar to VP1, the major visual resources at this VP are the sky-view and the nullah. As abovementioned, the Proposed Development would inevitably block more sky-view as compared with the Baseline Development Scheme. However, the openness along the nullah would not be affected. The Proposed Development would provide extensive landscaping along the boundary and between the residential towers, to preserve the overall greenery of the view. The impact on the visual resources would be ***moderately adverse***.

### Effect on Public Viewers

- 6.3.4 The footbridge is heavily used by the residents traveling between their village homes and Light Rail Lam Tei Station or Castle Peak Road. However, their duration of stay is short and is transient in nature. As they walk by, their view would largely be shielded by the lush vegetation on the side, the visual effect of the Proposed Development on the VSRs at this viewpoint is considered ***moderately adverse***.

## **6.4 VP3 Lam Tei Main Street (Figure 6.3 refers)**

### Visual Composition

- 6.4.1 The view when looking from the intersection of Lam Tei Main Street and Castle Peak Road - Lam Tei Section is composed of the busy traffic on both sides of Castle Peak Road, the mixed-use 3-storey village houses, the viaduct structure of the Tuen Ma Line and a stretch of sky-view. The Site is hidden behind the 3-storeys village houses and the Tuen Ma Line viaduct structure. In the Baseline Development Scheme, the high-zone of the residential towers in the approved residential development would slightly stand out above the viaduct structure. The Proposed Development in the current scheme would share similar visual composition, yet, with the proposed residential towers being more prominent. The magnitude of change is ***moderately adverse*** with the Proposed Development in place.

### Visual Obstruction

- 6.4.2 Given the sub-urban context featuring the 3-storeys village houses and the Tuen Ma Line viaduct structure, an open sky view is visible atop these features under the existing condition. A portion of the residential towers would intrude into the sky-view in the background in the Baseline Development Scheme. Likewise, the Proposed Development would also encroach into the sky-view and in a higher degree given a taller BH ranging from +59.8mPD to +107.8mPD is proposed. Yet, the Proposed Development would include a stepped BH profile that descends eastwards and the building separation is

also more visible as compared with the Baseline Development Scheme. The visual obstruction is therefore considered ***moderately adverse***.

#### Effect on Visual Resources

- 6.4.3 Road-side tree plantings and the stretch of open-sky view are the visual gems at this VP. There would be no change to the foreground view, hence, the greenery would be fully preserved. As for the sky-view, a portion of the sky-view would have already been blocked, the Proposed Development would intrude more into the sky-view which make a ***moderately adverse*** impact on the visual resources available when viewing from this VP.

#### Effect on Public Viewers

- 6.4.4 For the drivers going onto Castle Peak Road - Lam Tei Section from Lam Tei Main Street, the Proposed Development would hardly be visible to them at drivers’ angle, they would be subject to negligible impact. Meanwhile, as for pedestrians marching onto Castle Peak Road, they would either go straight across the road to Light Rail Lam Tei Station or to the bus stops to the south, their duration of stay is short. The Proposed Development would bring ***moderate*** effect to the VSRs at this viewpoint. After all, considering the planned public and private residential developments nearby (as mentioned in Sections 2.4 and 2.5 in the Supporting Planning Statement), the Site marks the beginning of a cluster of new high-rise developments within the area.

### **6.5 VP4 – Elevated Pedestrian Footbridge Connecting to Lam Tei Light Rail Station (Figure 6.4 refers)**

#### Visual Composition

At this elevated pedestrian footbridge that leads to Light Rai Lam Tei Station, the steel structure of the footbridge dominates the view, only a limited view towards the Application Site is captured between the columns of the footbridge and above the viaduct structure of Tuen Ma Line under the existing condition. The topmost portion of Kong Shan (+394mPD max.) is also visible from this viewpoint above the Tuen Ma Line viaduct. Part of the Proposed Development will appear in between the columns and behind the viaduct and partially block the view towards Kong Shan. Given that the Tuen Ma Line viaduct and the footbridge structure remain the dominant features visible from this viewpoint, the Proposed Development would appear compatible to the suburban setting. The effect of the Proposed Development on the overall visual composition is ***slightly adverse***.

#### Visual Obstruction

- 6.5.1 Part of the ridgeline of Kong Shan and a narrow stretch of sky view are visible between the columns of the footbridge in the existing view. The Proposed

Development would not affect features that dominate this viewpoint at the foreground, including the footbridge and Tuen Ma Line viaduct. However, it will partially obstruct the view towards the small portion Kong Shan. Whilst the Proposed Development and Kong Shan are both located at the background and behind major features that dominate this viewpoint (e.g. footbridge and viaduct), only a small portion are visible. The loss of view towards Kong Shan would be ***slightly adverse***, yet this would not affect the visual openness nor the sub-urban character of the area.

#### Effect on Visual Resources

- 6.5.2 The thematic tree plantings to the left of the footbridge near Lam Tei Vegetable Depot are the major visual gem when viewing from the footbridge. These green features at the foreground will remain intact. As mentioned in para. 6.5.2 above, the remaining topmost portion of Kong Shan above Tuen Ma Line viaduct at the background will be blocked by the Proposed Development. Since the dominating features at this viewpoint would remain unaffected, the impact on visual resources is considered to be ***slightly adverse***.

#### Effect on Public Viewers

- 6.5.3 Pedestrians travelling to Light Rail Lam Tei Station via this footbridge are considered as the VSRs at this VP. Under this semi-enclosed environment, the pedestrians are also transient in nature and the Proposed Development would become less visible as they march on, hence, the visual change on these VSRs is ***slight***.

### **6.6 VP5 – Vehicular Access to Application Site Branching Off from Ng Lau Road to the South (Figure 6.5 refers)**

#### Visual Composition

- 6.6.1 This VP captures a short-range view towards the Application Site from its immediate south along the unnamed road branching off Ng Lau Road leading to the local access road in VP1. The grey infrastructure including the road itself, the elevated footbridge and the viaduct structure of Tuen Ma Line make up most of the view. The Site is currently vacant and unattended with vegetations and weeds all along the periphery. In the Baseline Development Scheme, T1 – T3 of the approved residential development with a uniform height would be visible and take up the central portion of the view. Similarly, the overall visual composition would largely be retained except for the a higher BH and varying building layout in the Proposed Development. The magnitude of change in the visual composition is considered ***moderate***.

### Visual Obstruction

- 6.6.2 While the approved residential development of the Baseline Development Scheme would have blocked the sky-view to the further north as T1 – T3 stretch along the south-western tip, the Proposed Development with a higher BH ranging from +77mPD to +107.8mPD in a stepped BH design would intrude more into the sky-view. With the careful tower disposition respecting the site configuration and nearby structures, the Proposed Development would be in harmony with the surroundings and the major visual corridor alongside the viaduct remains. The degree of visual obstruction is considered ***moderately adverse***.

### Effect on Visual Resources

- 6.6.3 Main visual resources in this VP are some unattended vegetation on both sides of the nullah, lush green trees along the pavement near the footbridge, the elevated footbridge, the cable of the Light Railway, the viaduct structure of Tuen Ma Line and the sky-view. The area appears to be unattended and dilapidated. While the Proposed Development would encroach onto more sky-view atop the residential towers as compared with the Baseline Development Scheme, the enhanced tower disposition and varied height create more visual interest to the surrounding. The Proposed Development would help to rejuvenate the area and the proposed scheme is considered not incompatible with the surrounding developed structures. The effect on the visual resources at VP5 is ***moderately adverse***.

### Effect on Public Viewers

- 6.6.4 Drivers going onto the local access road and the pedestrians/cyclists heading to Light Rail Lam Tei Station are the VSRs identified at this VP, however, their duration of stay are in general short and the view is transient. The focus of the drivers would undoubtedly be on the road, the effect of the Proposed Development on them would be ***insignificant***. Meanwhile, at human scale, landscape arrangements of the Proposed Development and the approved residential development in the Baseline Development Scheme would both help to enhance the visual amenity and the Proposed Development would bring slightly more visual interest to the area with its varied building form and height. As such, the effects of the visual changes of the pedestrians/cyclist would be ***moderate***.

## 6.7 VP6 – San Hing Tsuen Children’s Playground (Figure 6.6 refers)

### Visual Composition

- 6.7.1 At the central square of San Hing Tsuen Children’s Playground, this viewpoint captures the view of the resting benches, the Arch (Pai Fong) of San Hing Tsuen and some newly built 3-story village houses in the foreground and the viaduct structure of Tuen Ma Line and an existing residential development (The Sherwood) in the background. The ridgeline of Kung Um Shan intermingles amongst these features at the back while the Site is well hidden behind the newly built 3-storeys village house. The visual composition would largely be similar among the Baseline Development Scheme and the current scheme except the Proposed Development is more prominent with a higher BH (i.e. ranging from +59.8mPD to +107.8mPD). The effect on the visual composition is ***slightly adverse***.

### Visual Obstruction

- 6.7.2 When viewing towards the north-east, a stretch of sky view is visible above the features including the Arch, 3-storeys village houses and between the trees. Existing village houses and the vegetation at San Hing Tsuen Children’s Playground block much of the view towards the Site and help to soften the building mass. The Proposed Development, with an increased height, would inevitably obstruct part of the sky view; yet the skyline above the Arch (Pai Fong) and the view towards Kung Um Shan would not be affected. The degree of visual obstruction resulted from the Proposed Development is considered ***moderately adverse***.

### Effect on Visual Resources

- 6.7.3 The tree and other vegetation in the playground and the Arch (Pai Fong) in the foreground, the sub-urban environment featuring 3-storeys village houses and the sky-view are the visual gems at this VP. Most of these visual resources would remain, yet a portion of the sky-view would be blocked. However, no direct impact on the visual openness would be anticipated as the proposed building blocks would have largely been blocked by existing trees and developments. The effect on the visual resources is considered ***moderately adverse*** at this VP.

### Effect on Public Viewers

- 6.7.4 Visual sensitivity of VSRs identified at an open space is considered to be high. Despite the increased BH at the Site, existing vegetation within the playground helps to soften the building mass and the VSRs would continue to enjoy an open sky view above the Arch (Pai Fong). As observed, a lot of

these VSRs are in fact the caregivers of the children playing in the playground, thus the focus on the caregivers would be on their children playing instead of the surrounding. The visual change to be brought by the Proposed Development to these VSRs is **moderate**.

## **6.8 VP7 – Tuen Tsz Wai Children’s Playground (Figure 6.7 refers)**

### Visual Composition

6.8.1 At Tuen Tsz Wai Children’s Playground, this viewpoint captures the view of the active and passive parts of the playground featuring the slides, spring rider and some resting benches in the foreground, the rear of San Sheng Palace and its associated temple structures in the middle-ground and a semi open-view towards north of Lam Tei in the backdrop. The Site stands behind San Sheng Palace and the 3-storeys village houses in the middle-ground. At this medium-range view, the overall visual composition would largely remain similar as compared with the Baseline Development Scheme, except for the central portion, which the Proposed Development would stand out more than the approved development given a higher BH (i.e. ranging from +59.8mPD to +107.8mPD). The degree of change is moderate and hence the effect on the visual composition is **moderately adverse**.

### Visual Obstruction

6.8.2 At this platformed open space in a sub-urban setting, an open sky view is visible above the structures. When viewing towards the Site, San Sheng Palace blocks partial views towards the Site while the low-zone of Tower 1 and Tower 2 will be screened off by the existing village houses. With the ridgeline of Kung Um Shan being obstructed by the approved development in the Baseline Development Scheme, the Proposed Development would intrude further a larger portion of the sky view inevitably as proposed with a higher BH. Yet, the overall visual environment could be well-maintained. The degree of visual obstruction resulted from the Proposed Development is considered **moderately adverse**.

### Effect on Visual Resources

6.8.3 Glimpse of the ridgeline of Kung Um Shan and the open sky view are the visual gems at this VP. Like the above, the approved development would have already blocked this remaining view towards Kung Um Shan and part of the permeable sky view, the Proposed Development would then only further block a larger portion of the sky view. The effect on the visual resources is considered **moderately adverse** at this VP.

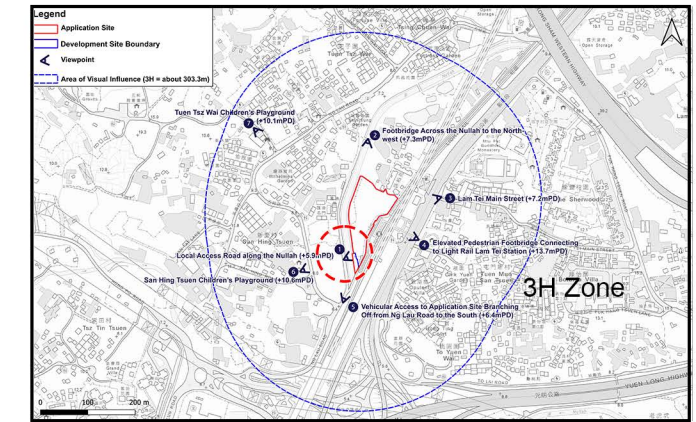
### Effect on Public Viewers

- 6.8.4 Visual sensitivity of VSRs identified at an open space is considered to be high. Despite the increased BH at the Site, San Sheng Palace helps screen of part of the Proposed Development and filter off direct impact at human-scale. Nonetheless, the Proposed Development has adopted a varied building height profile to add visual interest. As observed, a lot of these VSRs are in fact the caregivers of the children playing in the playground, thus the focus on the caregivers would be on their children playing instead of the surrounding. The visual change to be brought by the Proposed Development to these VSRs is ***moderate***.





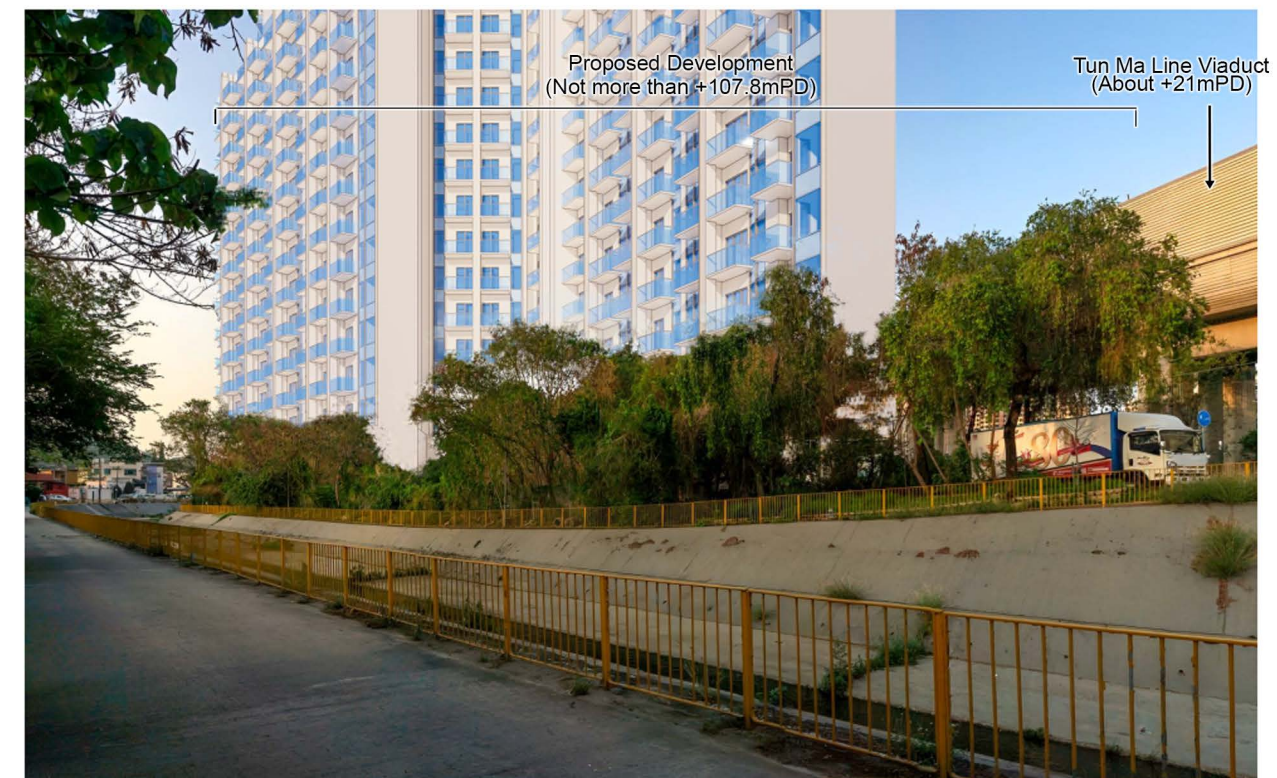
Existing Condition



Key Plan



Approved Condition



Existing Condition + Proposed Development



Viewpoint 1 – Local Access Road Along the Nullah

Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

Figure 6.1

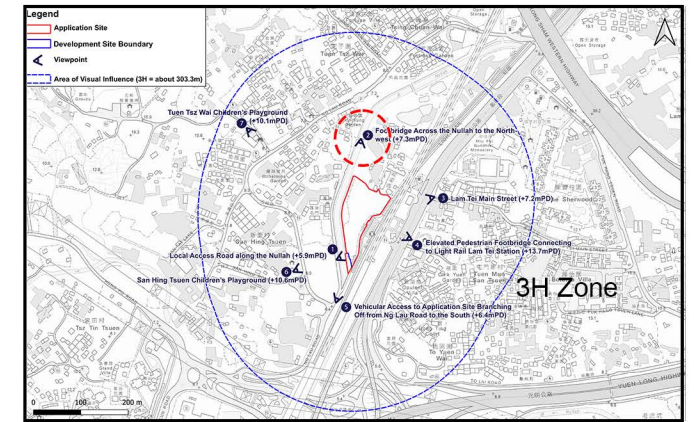
Visual Impact Assessment

Date: 12 January 2024





Existing Condition



Key Plan

Proposed Development  
(Not more than +107.8mPD)



Approved Condition



Existing Condition + Proposed Development



Viewpoint 2 – Footbridge Across the Nullah to the North-west

Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

Visual Impact Assessment

Figure 6.2

Date: 12 January 2024

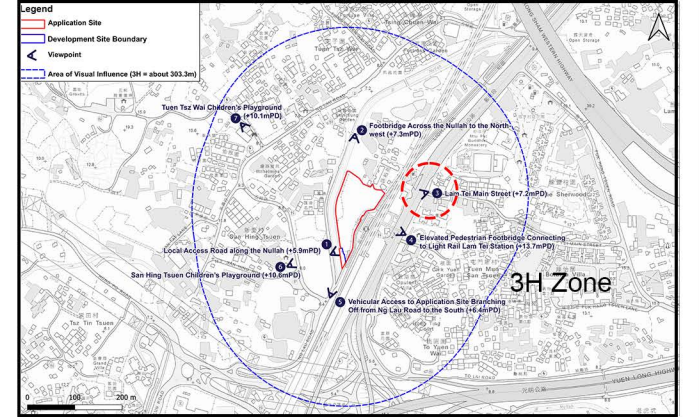




The Site

Tun Ma Line Viaduct  
(About +21mPD)

Existing Condition



Key Plan



Approved Development  
(Not more than +35mPD)

Tun Ma Line Viaduct  
(About +21mPD)

Approved Condition



Proposed Development  
(Not more than +107.8mPD)

Tun Ma Line Viaduct  
(About +21mPD)

Existing Condition + Proposed Development



Viewpoint 3 – Lam Tei Main Street

Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

Figure 6.3

Visual Impact Assessment

Date: 12 January 2024



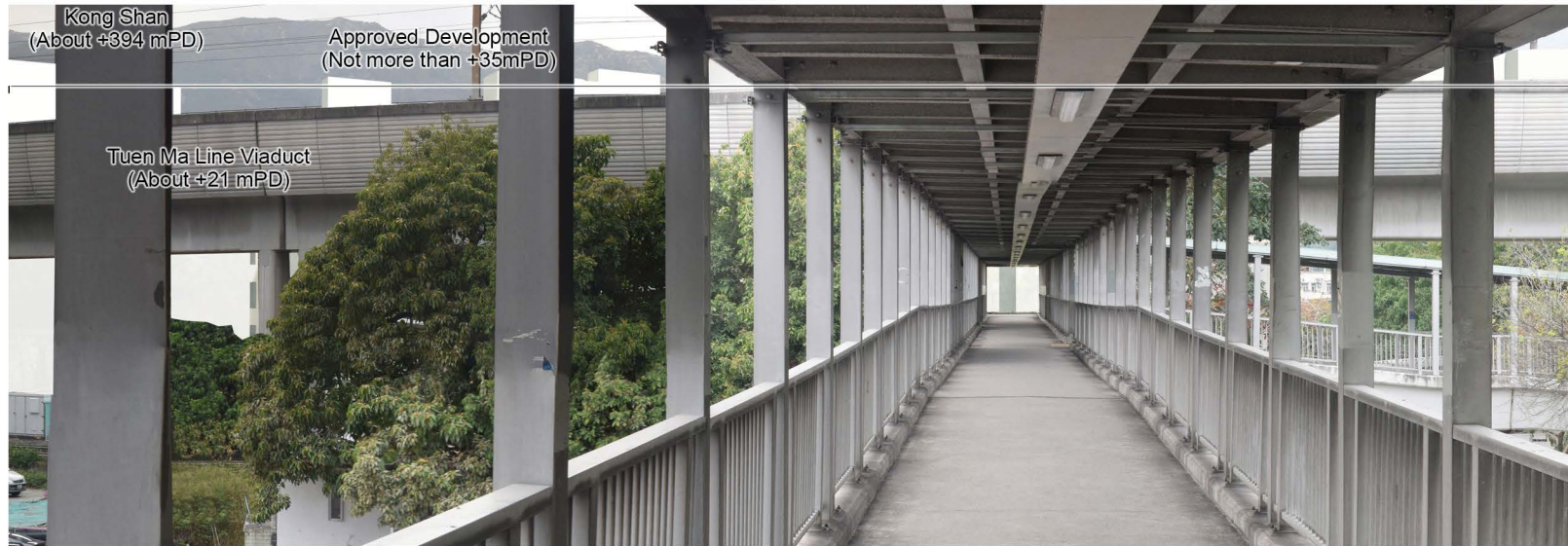
Kong Shan  
(Max. About +394 mPD)



Tuen Ma Line Viaduct  
(About +21 mPD)

The Site

Existing Condition



Kong Shan  
(About +394 mPD)

Approved Development  
(Not more than +35mPD)

Tuen Ma Line Viaduct  
(About +21 mPD)

Approved Condition

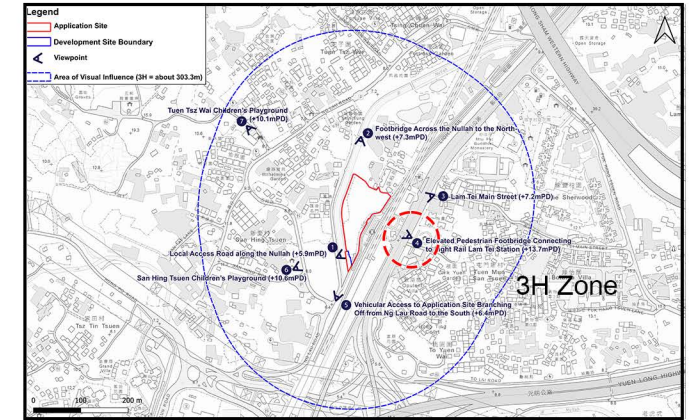


Kong Shan  
(Max. About +394 mPD)

Proposed Development  
(Not more than +107.8mPD)

Tuen Ma Line Viaduct  
(About +21 mPD)

Existing Condition + Proposed Development



Key Plan



Viewpoint 4 – Elevated Pedestrian Bridge Connecting to Light Rail Lam Tei Station

Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

Figure 6.4

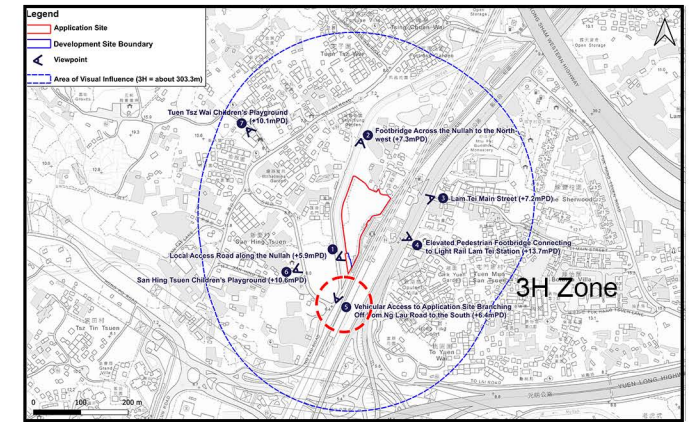
Visual Impact Assessment

Date: 12 January 2024

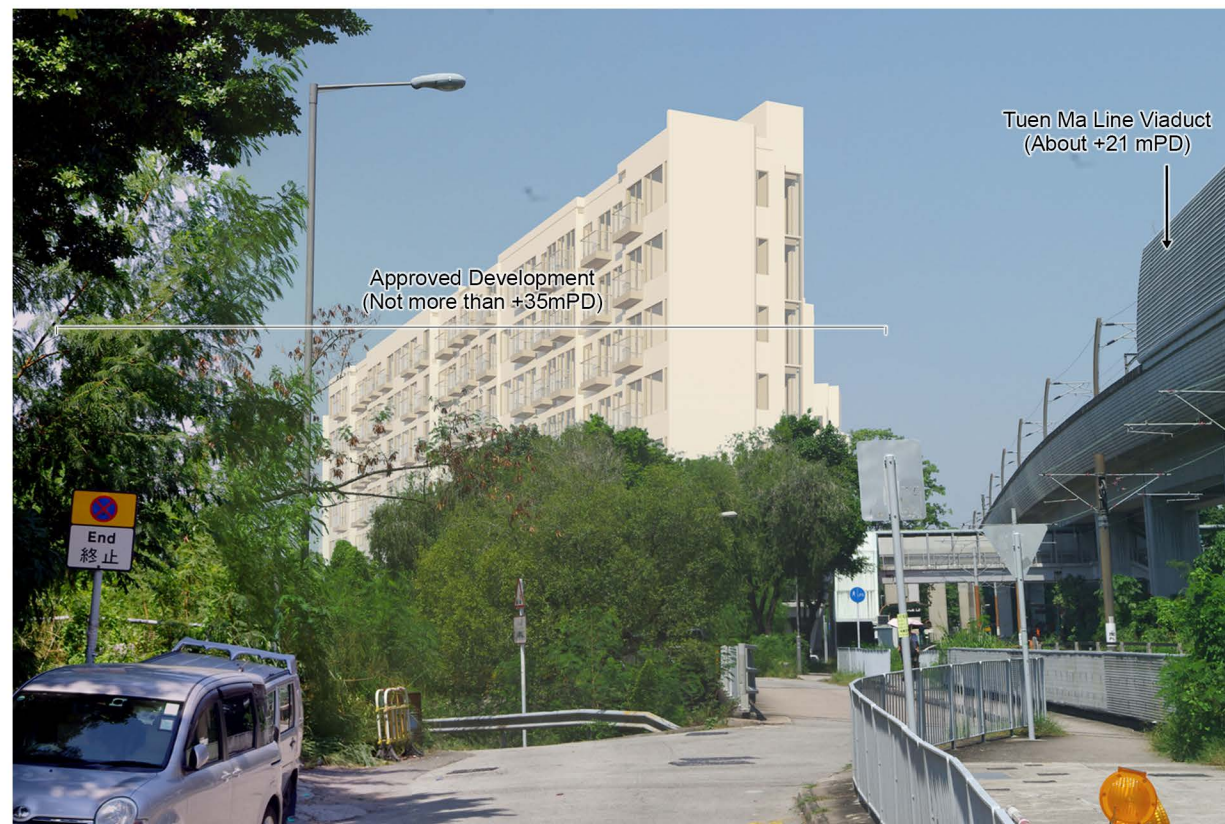




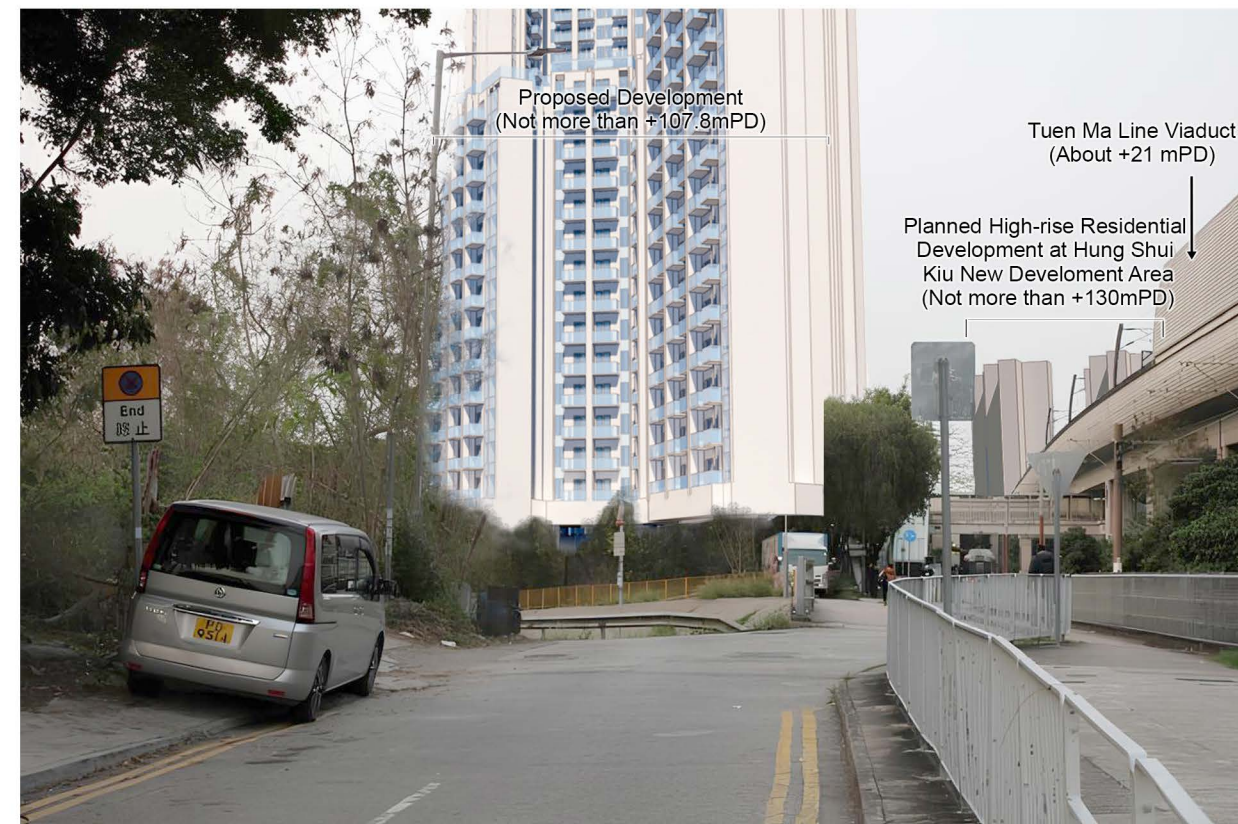
Existing Condition



Key Plan



Approved Condition

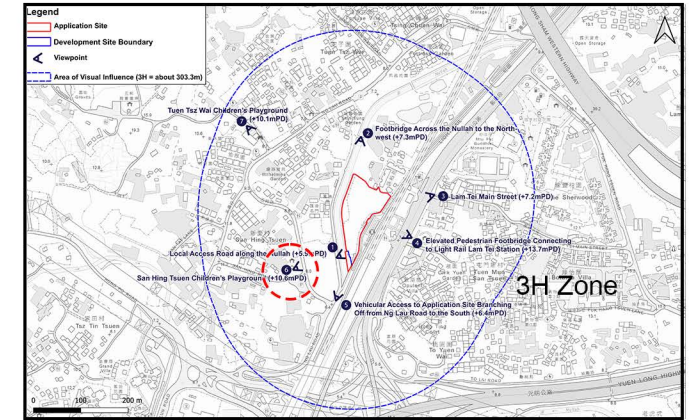


Existing Condition + Proposed Development





Existing Condition



Key Plan



Approved Condition



Existing Condition + Proposed Development



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Viewpoint 6 – San Hing Tsuen Children’s Playground

Proposed Rezoning from “Residential (Group B)1” Zone to “Residential (Group B)4” Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

Figure 6.6

Visual Impact Assessment

Date: 12 January 2024



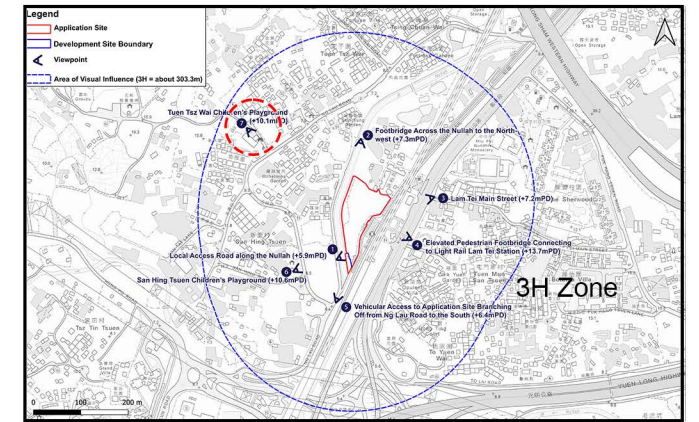
Existing Condition



Approved Condition



Existing Condition + Proposed Development



Key Plan



Viewpoint 7 – Tuen Tsz Wai Children's Playground

Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

Figure 6.7

Visual Impact Assessment

Date: 12 January 2024



## 7 CONCLUSION

7.1 The Application Site is subject to an approved scheme that permits a PR of 2.5 and BH of 28m or +35mPD. In view of the acute housing supply and transforming development context in the surroundings, the Applicant proposes to up-zone the Application Site with a PR of 5 and a maximum BH of +107.8mPD to provide a total of 1,385 housing units.

7.2 The visual appraisal summary of comparing the Baseline Development Scheme with the Proposed Development in the current scheme is provided below.

**Table 7.1: Visual Appraisal Summary**

Viewpoint	Visual Composition	Visual Obstruction	Effect on Visual Resources	Effect on Public Viewers	Visual Sensitivity	Overall
VP1: Local Access Road along the Nullah	Moderately Adverse	Moderately Adverse	Moderately Adverse	Moderate	Low	Moderately Adverse
VP2: Footbridge across the Nullah to the North-west	Moderate	Moderately Adverse	Moderately Adverse	Moderately Adverse	Low to Medium	Moderately Adverse
VP3: Lam Tei Main Street	Moderately Adverse	Moderately Adverse	Moderately Adverse	Moderate	Low	Moderately Adverse
VP4: Elevated Pedestrian Footbridge Connecting to Light Rail Lam Tei Station	Slightly Adverse	Slightly Adverse	Slightly Adverse	Slight	Low	Slightly Adverse
VP5: Vehicular Access to Application Site Branching Off from Ng Lau Road to the South	Moderate	Moderately Adverse	Moderately Adverse	Moderate	Medium to High	Moderately Adverse
VP6: San Hin Tsuen Children's Playground	Slightly Adverse	Moderately Adverse	Moderately Adverse	Moderate	High	Moderately Adverse

Proposed Rezoning from “Residential (Group B)1” Zone to “Residential (Group B)4” Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun  
 Visual Impact Assessment

VP7: Tuen Tsz Wai Children’s Playground	Moderately Adverse	Moderately Adverse	Moderately Adverse	Moderate	High	Moderately Adverse
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7.3 Amongst the seven selected VPs, the overall visual impact anticipated with the Proposed Development in place ranges mostly from slightly adverse to moderately adverse. The Applicant is well-aware of the potential visual impact and has thoroughly considered appropriate building designs to mitigate the visual impact. In which, with the proposed tower setbacks along the western boundary / nullah, a stepped BH design, a not less than 15m wide visual / air corridor, and appropriate façade design in terms of color tones and texture, the Proposed Development is considered not incompatible with the upgrading context in the surroundings.

7.4 Overall, the visual impact of the Proposed Development is considered acceptable in the sub-urban environment.