

## **Annex 2**

**Section 16 Planning Application for  
Proposed Minor Relaxation of Building Height Restriction for Permitted  
Flat Use at 105 Robinson Road, Mid-Levels West, Hong Kong**

### **Visual Impact Review**

December 2023

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## **1.0 Introduction**

- 1.1 This Visual Impact Review was prepared in support of the proposed minor relaxation of building height (BH) restrictions of a permitted flat use at 105 Robinson Road, Mid-Levels West, Hong Kong (i.e. hereafter referred to as the Application Site).
- 1.2 The Application Site falls within “Residential (Group C) 5” (“R (C)”) under the approved Mid-Levels West Outline Zoning Plan (“OZP”) No. S/11/15 (**Figure 1.1 refers**). According to the Notes of the OZP, the application site has no plot ratio limitation but a maximum building height of 161mPD.
- 1.3 This Review was prepared in accordance with the ‘Town Planning Board Guidelines on Submission of Visual Impact Assessment for Planning Applications to the Town Planning Board’ (TPB PG-No. 41) in order to evaluate the degree of potential visual impacts on visual sensitive receivers (VSRs) from major public viewpoints (VPs) due to the Proposed Development at the Application Site.
- 1.4 This Visual Impact Review will cover the potential impacts which might arise as a result of the proposed relaxation of the building height from current 161mPD up to 215mPD. According to the OZP, each proposal will be considered on its individual planning merits. The report makes a comparison between the Base Scheme which is compliant with the OZP and the Proposed Scheme.
- 1.5 The increase in BH of the proposed S16 scheme is designed to be more comparable to adjacent existing urban context.
- 1.6 The proposed S16 scheme will also support a good planning intention/vision for urban renewal in the area. Without such vision and incentive for relaxing BH, chance of urban renewal is very limited.



## Existing Site Description

- 2.1 The Application Site is situated between Robinson Road and Conduit Road, Mid-Level West. The site resting on existing slopes and situates amid tall buildings with dramatic level difference of +180 mPD to +272 mPD (Figure 2.1).

Figure 2.1 Surrounding Existing Building Height Profile



- 2.2 The Application Site is now vacant with area of 2,557.62m<sup>2</sup> (previously 3 blocks of Jade Garden). It is situated at the Mid-Levels Schedule Area No. 1 and subject to the Bulk Excavation Limit (BEL) which prescribes the bottom level of any bulk excavation.
- 2.3 The development potential of application site is dictated by Bulk Excavation Limit (BEL) under Mid-Levels Scheduled Area No. 1. The BEL contours across the application site is from about +105mPD to about +121mPD.



### **3.1 Baseline Scheme**

- 3.2 The existing residential buildings (Jade Garden Block A-D) were demolished in 2022 and the site is now undergoing site formation works and slope stabilization works.
- 3.3 The current approved GBP consists of 2 residential towers of Building Height up to +161mPD which is the height limit in current Outline Zoning Plan (“OZP”)
- 3.4 2 new residential towers scheme were firstly approved by Buildings Department and relevant departments on 27 May 2022 and subsequent amendments were also approved on 17 March 2023.
- 3.5 The 2 towers of 17 storeys providing a total of 217 flats. They will form a building group with wall effect in that location in order to maximize the permitted building height 161mPD.
- 3.6 Due to the Height restriction and Bulk Excavation Limit, there will be no allowance for transfer plate, the screen walls and columns of residential towers will penetrate to the car parking floors. Given the extreme limitation of maneuvering space between structural columns and walls, there will be limited provision of car parking spaces. Only 14 private car parking can be provided.

### **4.1 Proposed Scheme Description**

- 4.2 The proposed single tower adopts the same development parameters as per approved GBP which produces 217 units.
- 4.3 The Proposed Scheme comprises of one single residential block situated close to Panorama Garden on the Application Site, with a large setback from the western boundary.
- 4.4 There will be one E&M/F, car parking on LG1 and LG2, then club house and residential entrance lobby on G/F, and flats on 1/F to 28/F.

## 5.1 Planning and Design Considerations

- 5.2 The proposed scheme allows a much more openness in the area by having a single tower of residential building of 215mPD. The proposed building disposition and orientation is designed to maximize the area of greenery and landscape for the enjoyment of the future residents.
- 5.3 The minimum site coverage of greenery requirement under APP PNAP-152 is 20%. The site coverage of greenery provided in the application scheme is 35%, which is an enhancement in comparison to the minimum provision (**Figure 5.1** refers).
- 5.4 The building height bands adopted for the Mid-Levels West OZP (**Figure 2.1**) are intended to encourage a step down in building heights from southern (upper levels) to north areas (lower levels).
- 5.5 Approval to the height relaxation for the application scheme from 161mPD to 215mPD will not undermine this statutory intent, given the physical proximity of taller buildings south of Conduit and it will avoid the future 'sore-thumb' effect if such height relaxation approved. (**Figure 5.2** refers).
- 5.6 The relaxation in building height will obviously not impinge on views to the Peak Ridgeline or Victoria Harbour from major public vantage points as per Ch. 11 of Hong Kong Planning Standards and Guidelines (HKPSG) (VP-01, VP-02 and VP-03) and from various local accessible public sensitive receivers (VP-04 and VP-05).
- 5.7 The proposed scheme consists of one single tower and obviously opens up the north-south direction, improve permeability in the densely built up area and strongly improve the aspects on surrounding communities and their landscape setting.
- 5.8 The proposed S16 scheme promotes good planning intention/ vision for urban renewal in the area. Without such vision and incentive for relaxing BH, chance of urban renewal for the 62A Conduit Road (last old housing site in this area) is very limited.



FIGURE 5.1 - COMPARISON OF COMPLIANT SCHEME WITH PROPOSED SCHEME (PLAN)

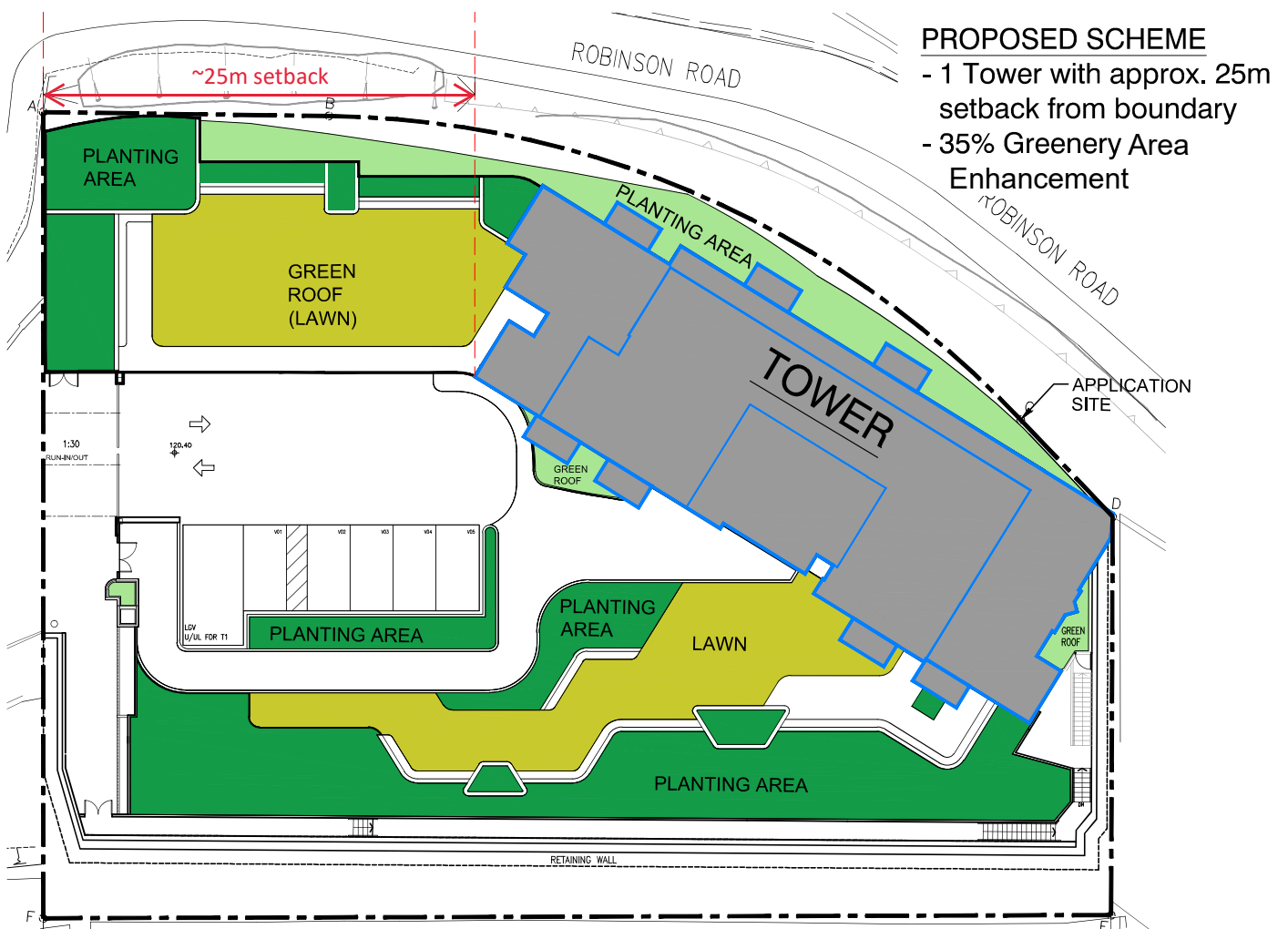
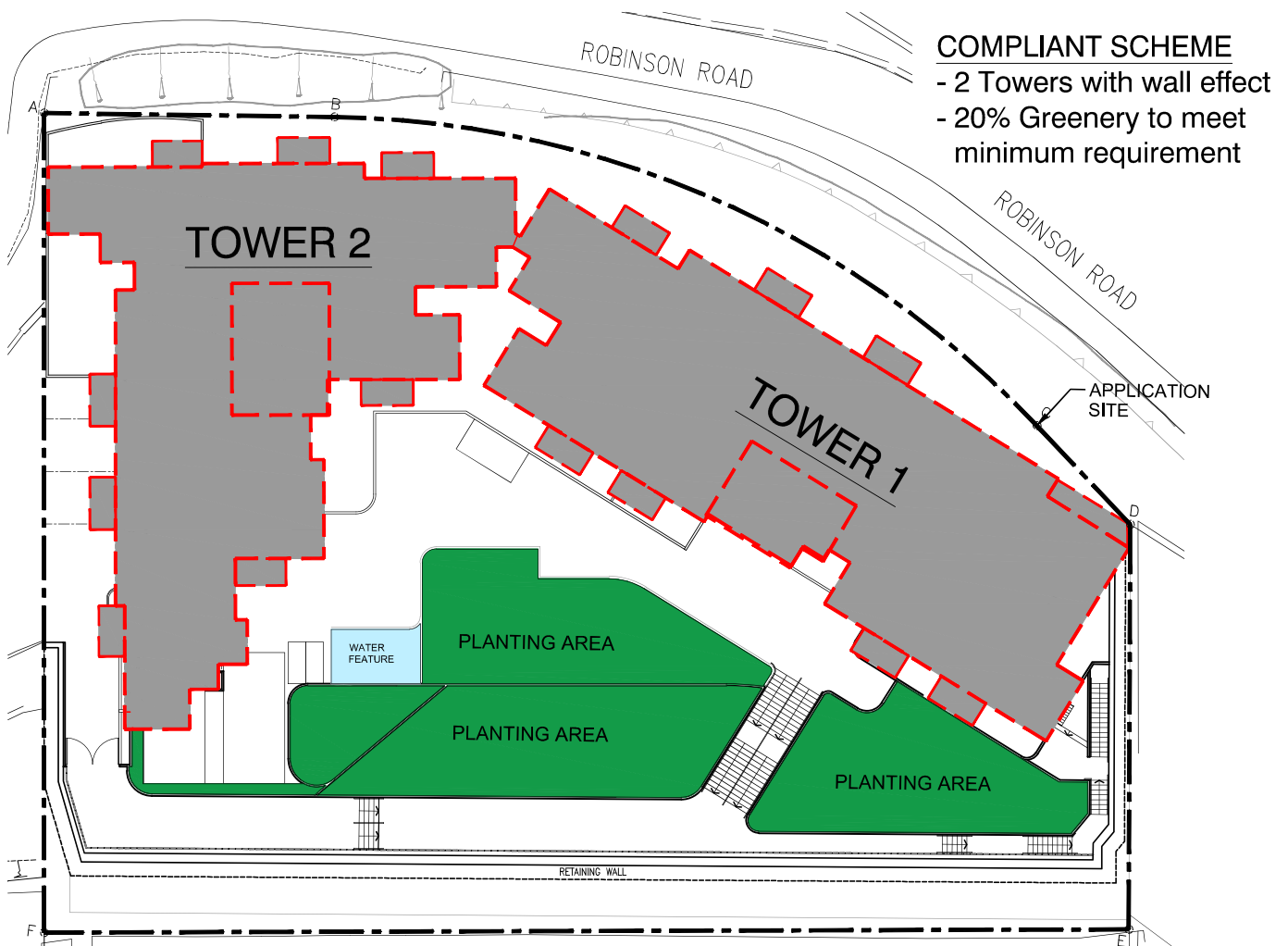
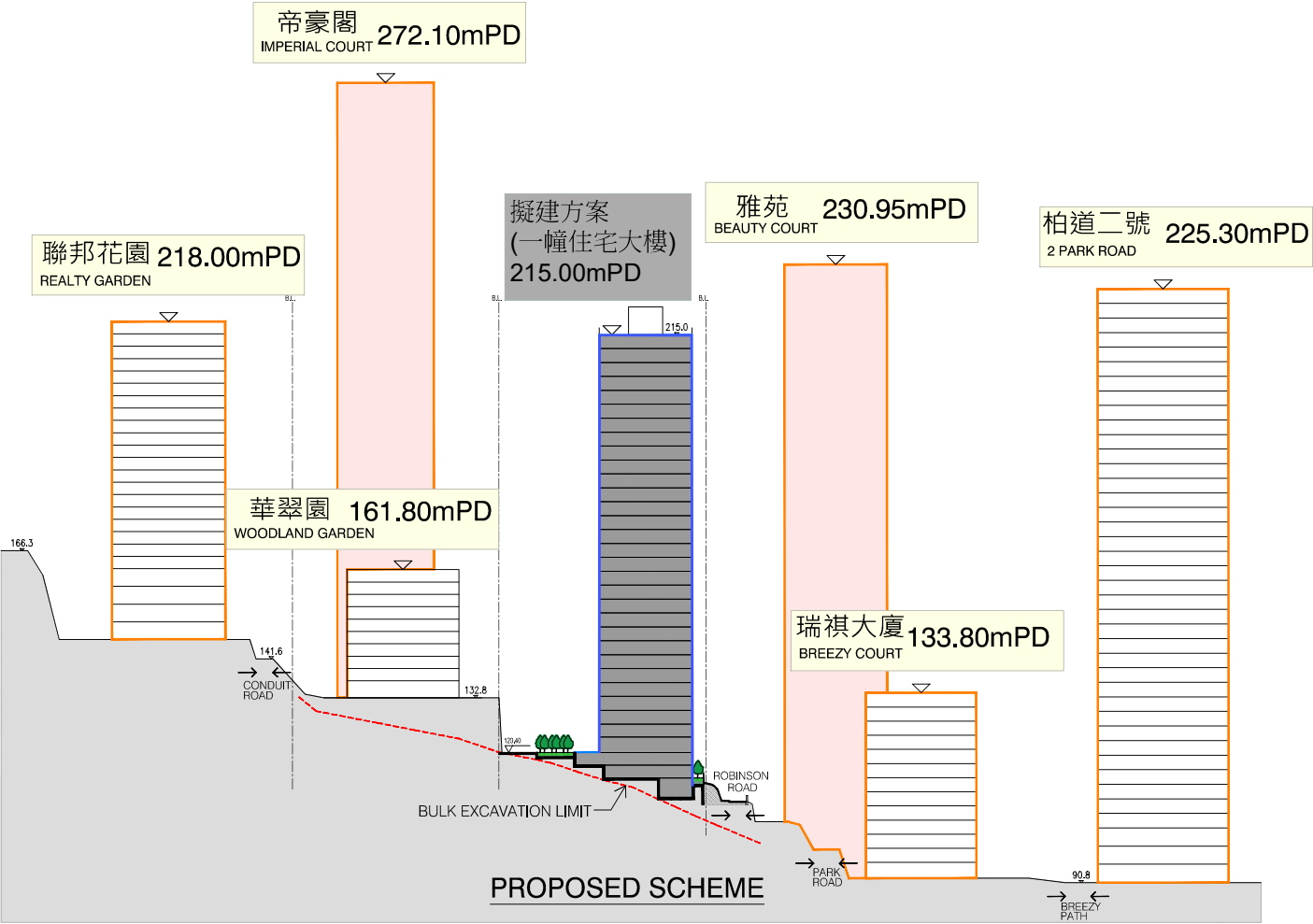
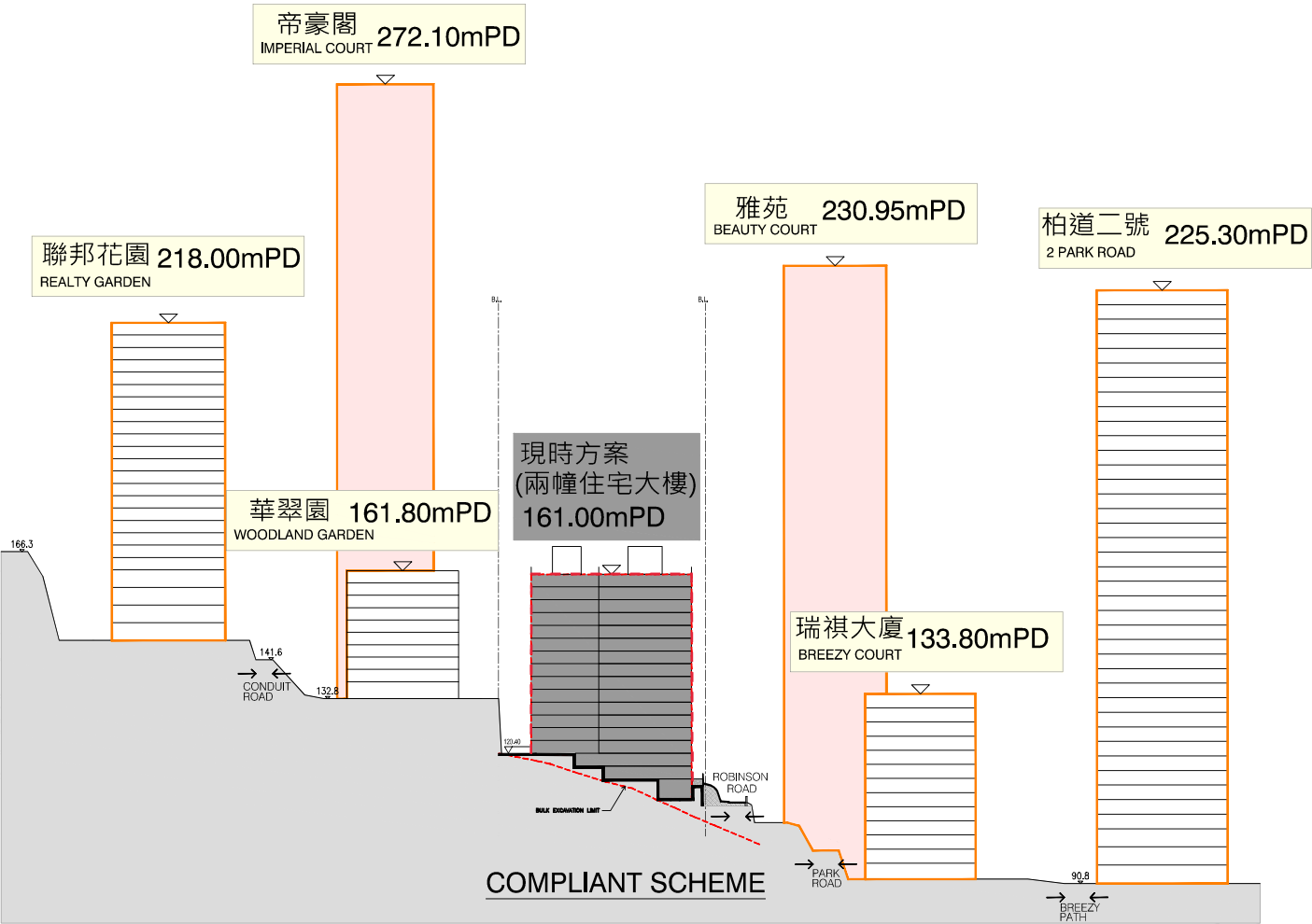


FIGURE 5.2  
COMPARISON OF COMPLIANT SCHEME WITH PROPOSED SCHEME (SECTION)



## 6.1 Appraisal of Visual Impacts on Different VSRs

- 6.2 It is expected that the VSRs in the area are nearby parks/open spaces users and other passers-by in the neighbourhood. In this regard, five key public VPs have been identified best representing public views to the Proposed Development from relevant VSRs.
- 6.3 Additionally, as per Para. 4.5 of the TPB PG – No. 41, key kinetic and static VPs, such as popular areas used by the public for outdoor activities, recreation, rest, sitting-out, leisure, walking and sight-seeing, and prominent travel routes have been taken into consideration when selecting the VPs.
- 6.4 The appraisal of visual impacts on VSRs at the key VPs induced by the Proposed Development are described below. The corresponding photomontages are attached in Figures 6.1 to 6.5.

### VP01 – View looking Southwest from West Kowloon Culture District

#### (Figure 6.1 refers)

- 6.1.1 This vantage point is located at West Kowloon Culture District, situated approximately 2.1km to the Northeast of the Application Site, on the opposite bank of Victoria Harbour. It is a district known for its vibrant cultural quarter, situated on a dramatic harborfront site in the heart of Hong Kong. This vantage point is identified as only strategic vantage point can view the proposed development according to the HKPSG.
- 6.1.2 Sensitivity of Public Viewers: Negligible  
The view from this vantage point is accessible to recreational users of the park near the waterfront, as well as travelers visiting the area. It offers a long-distance panoramic view of Hong Kong Island West from Kowloon West across Victoria Harbour. The sensitivity of public viewers at this vantage point is considered negligible.

**6.1.3 Visual Composition: Negligible**

The existing view from this vantage point is characterized by a skyline comprised of high-density urban developments in Hong Kong Island West, with Victoria Peak as the backdrop. The proposed scheme, due to its small scale, would form a relatively small component in this view. It is considered blend-in the existing context and may not be readily apparent.

**6.1.4 Visual Obstruction: Negligible**

Considering the limited visibility of the Proposed Scheme and the backdrop of existing high-density urban developments, the degree of visual obstruction is expected to be negligible.

**6.1.5 Effect on Public Viewers: Negligible**

Due to the distance between the vantage point and the proposed scheme, as well as the presence of tall buildings in the surrounding context, the effect on public viewers is expected to be negligible. The proposed scheme will be viewed against the backdrop of the existing development.

**6.1.6 Effect on Visual Resources: Negligible**

Considering the long viewing distance from this vantage point and the attention of the VSRs being drawn towards the views of the Peak Ridgeline or Victoria Harbour, the sensitivity of the VSRs at this vantage point is considered negligible.

**6.1.7 Overall visual Impact: Negligible**

Taking into account the visual composition and compatibility with the existing dense urban context in Hong Kong Island West, the proposed application scheme is considered to have a negligible visual impact. The responsive building profile of the proposed residential building will integrate well with the surrounding building clusters and harmonize with the Mid-Levels West skyline in distant views.

VP02 – View looking Southwest from Cultural Complex Tsim Sha Tsui  
(Figure 6.2 refers)

- 6.2.1 This vantage point is situated at the Cultural Complex Tsim Sha Tsui, located approximately 2.8km to the Northeast of the Application Site, on the opposite bank of Victoria Harbour.
- 6.2.2 Sensitivity of Public Viewers: Negligible  
The view from this vantage point is too far and buried within the existing urban built-up. The sensitivity of public viewers at this vantage point is considered negligible.
- 6.2.3 Visual Composition: Negligible  
The proposed scheme, being completely blocked by the tall buildings and high-density context, is not readily apparent and compatible with its surroundings.
- 6.2.4 Visual Obstruction: Negligible  
Since the proposed scheme is obstructed by the tall buildings of the existing high-density urban developments, the degree of visual obstruction is expected to be negligible.
- 6.2.5 Effect on Public Viewers: Negligible  
Considering the long viewing distance and the proposed scheme being overwhelmed by the surrounding high-density urban developments, the effect on public viewers is anticipated to be negligible.

**6.2.6 Effect on Visual Resources: Negligible**

Given the considerable viewing distance from this vantage point, the attention of the VSRs is likely to be drawn towards the views of the building skyline in Victoria Harbour. Therefore, the sensitivity of the VSRs at this vantage point is considered to be negligible.

**6.2.7 Overall visual Impact: Negligible**

In terms of visual composition, the proposed application scheme is deemed compatible with the existing dense urban context in the Hong Kong Island West area. Considering this compatibility and the negligible effect on public viewers and visual resources, the overall visual impact of the proposed scheme from the Cultural Complex Tsim Sha Tsui vantage point is assessed as negligible.

**VP03 – View looking Southwest from Kai Tak Cruise Terminal Park**  
**(Figure 6.3 refers)**

**6.3.1** This vantage point is situated at Kai Tak Cruise Terminal Park, approximately 7.6km to the Northeast of the Application Site, on the opposite bank of Victoria Harbour.

**6.3.2 Sensitivity of Public Viewers: Negligible**  
Due to its long visual distance, the sensitivity of public viewers at this vantage point is considered to be negligible.

**6.3.3 Visual Composition: Negligible**  
Being at a considerable distance and not visible, it is not readily apparent and compatible with its surroundings.

**6.3.4 Visual Obstruction: Negligible**  
Since the proposed scheme is located at a long distance and unable to be seen, the degree of visual obstruction is expected to be negligible.

**6.3.5 Effect on Public Viewers: Negligible**  
Considering the long viewing distance and the proposed scheme

being overwhelmed by the surrounding high-density urban developments, the effect on public viewers is anticipated to be negligible.

**6.3.6 Effect on Visual Resources: Negligible**

Given the significant viewing distance from this vantage point, the attention of the VSRs is likely to be drawn towards the views of Victoria Harbour. Therefore, the sensitivity of the VSRs at this vantage point is considered to be negligible.

**6.3.7 Overall visual Impact: Negligible**

Taking into account the visual composition and compatibility with the existing dense urban context in Hong Kong Island, the proposed application scheme is assessed to have a negligible visual impact.

**VP04 – View looking South from Sun Yat Sen Memorial Park**

**(Figure 6.4 refers)**

6.4.1 This vantage point is located at Sun Yat Sen Memorial Park, approximately 750m to the North of the Application Site. It is a waterfront park in the Sai Ying Pun area of Hong Kong Island, facing Victoria Harbour.

**6.4.2 Sensitivity of Public Viewers: Negligible**

Due to the blocked view, the sensitivity of public viewers at this vantage point is considered negligible.

**6.4.3 Visual Composition: Not apparent and compatible**

Given the existing view dominated by high-density urban developments in Hong Kong Island West, the proposed scheme, which is completely blocked by tall buildings and the high-density context, is not readily apparent and compatible with its surroundings.

**6.4.4 Visual Obstruction: Negligible**

Since the proposed scheme is obstructed by the tall buildings of the existing high-density urban developments, the degree of visual



obstruction is expected to be negligible.

6.4.5 Effect on Public Viewers: Negligible

Considering that the proposed scheme is being blocked by the surrounding high-density urban developments, the effect on public viewers is anticipated to be negligible. The scheme will be viewed against the backdrop of the existing development.

6.4.6 Effect on Visual Resources: Negligible

As the attention of the VSRs is drawn towards the views to the North, particularly the Victoria Harbour, it is considered that the sensitivity of the VSRs at this vantage point is negligible.

6.4.7 Overall visual Impact: Negligible

In terms of visual composition, the proposed application scheme is considered compatible with the existing dense urban context in the Hong Kong Island West area.

VP05 – View looking North from Lugard Road

(Figure 6.5 refers)

6.5.1 This vantage point is located at Lugard Road, approximately 520m to the South of the Application Site. It is situated at Victoria Peak, offering a spectacular panoramic view of Victoria Harbour.

6.5.2 Sensitivity of Public Viewers: Negligible

Lugard Road provides the best views over the impressive skyscrapers and the spectacular panoramic view of Victoria Harbour. The sensitivity of public viewers at this vantage point is considered negligible.

6.5.3 Visual Composition: Not readily apparent and compatible  
Considering the existing view characterized by a skyline of high-density urban developments in Hong Kong Island West, with Victoria

Harbour and Kowloon as a backdrop, the proposed scheme would form a relatively small component in this view due to its small scale. However, it is considered compatible with its context.

6.5.4 Visual Obstruction: Negligible

Due to the limited visibility of the proposed scheme and the backdrop of existing high-density urban developments, the degree of visual obstruction will be negligible.

6.5.5 Effect on Public Viewers: Negligible

Considering the long viewing distance and the fact that the proposed scheme is only apparent on the topmost floor, compared to the surrounding context, its effect on public viewers will be negligible. It will be viewed against the backdrop of the existing development.

6.5.6 Effect on Visual Resources: Negligible

Given the long viewing distance from this vantage point, the attention of the VSRs should be drawn to the views of Victoria Harbour. Therefore, it is considered that the sensitivity of the VSRs at this vantage point is negligible.

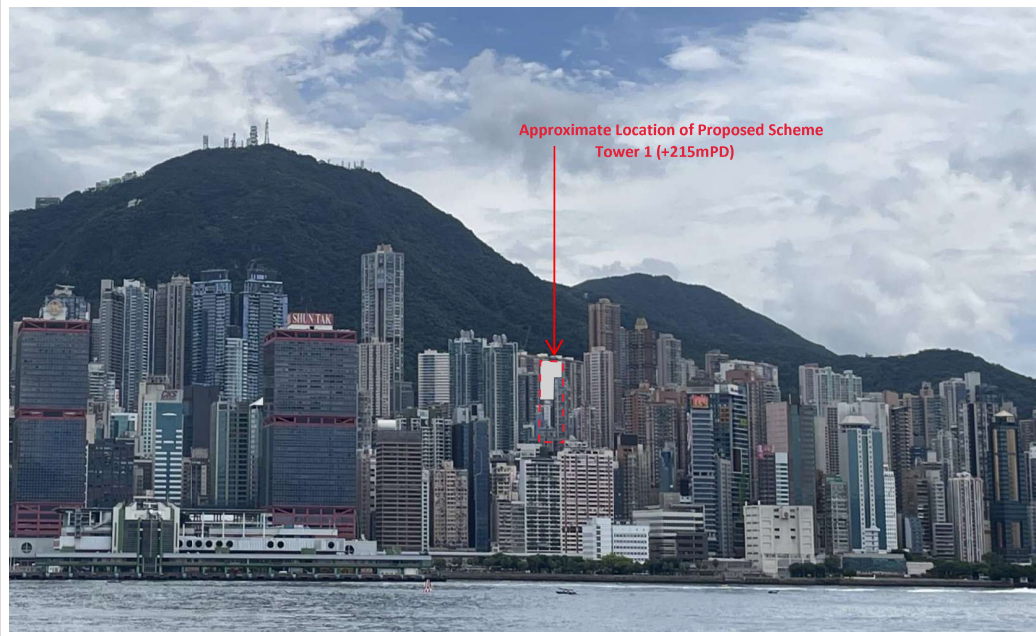
6.5.7 Overall visual Impact: Negligible

In terms of visual composition, the proposed application scheme is considered compatible with the existing dense urban context. With its responsive building profile, the proposed residential building will fully integrate with the surrounding building clusters and harmonize with the Mid-Levels West skyline in distant views.

Figure 6.1



VP01 - View looking Southwest from West Kowloon Culture District (OZP - Compliant Scheme)



VP01 - View looking Southwest from West Kowloon Culture District (Proposed Scheme)

105 Robinson Road – Proposed Minor Relaxation of Building Height Restriction for Permitted Flat Use  
Visual Impact Review: Photomontages



Location Plan

Remarks:

 - White colour fill is visually visible



Figure 6.2



VP02 - View looking Southwest from Cultural Complex Tsim Sha Tsui (OZP - Compliant Scheme)



VP02 - View looking Southwest from Cultural Complex Tsim Sha Tsui (Proposed Scheme)

105 Robinson Road – Proposed Minor Relaxation of Building Height Restriction for Permitted Flat Use  
Visual Impact Review: Photomontages



Location Plan

Remarks:

 - White colour fill is visually visible

Figure 6.3



VP03 - View looking Southwest from Kai Tak Cruise Terminal (OZP - Compliant Scheme)



VP03 - View looking Southwest from Kai Tak Cruise Terminal (Proposed Scheme)



Location Plan

Remarks:

 - White colour fill is visually visible



Figure 6.4



VP04 - View looking South from Sun Yat Sen Memorial Park (OZP - Compliant Scheme)



VP04 - View looking South from Sun Yat Sen Memorial Park (Proposed Scheme)



Location Plan

Remarks:

 - White colour fill is visually visible



**Figure 6.5**

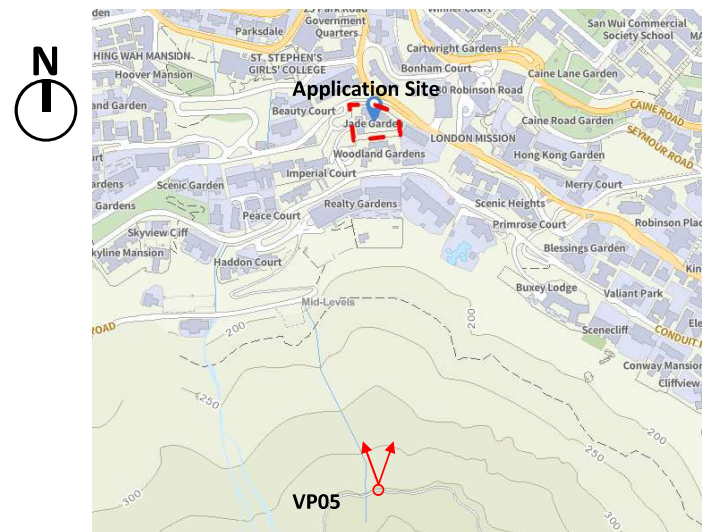


VP05 - View looking North from Lugard Road (OZP - Compliant Scheme)



VP05 - View looking North from Lugard Road (Proposed Scheme)

**105 Robinson Road – Proposed Minor Relaxation of Building Height Restriction for Permitted Flat Use**  
**Visual Impact Review: Photomontages**



**Location Plan**

**Remarks:**

 - White colour fill is visually visible



## 7.1 Conclusion

### Insignificant Visual Impact

- 7.2 The height increase will not cause adverse visual impact locally or intrude upon key ridgelines and harbour view corridors as the Realty Gardens at Conduit Road at 218mPD already created a backdrop for the application scheme.
- 7.3 The relaxation in building height will obviously not impinge on strategic views either to the Peak Ridgeline or Victoria Harbour (VP-01, VP-02 and VP-03). The visual impact from local short and medium range views (VP-04 and VP-05) are also insignificant.
- 7.4 The proposed building height blends in the height bands for the Mid-Levels West OZP and follows the step down in building heights from southern (upper levels) to north areas (lower levels). Approval to the height relaxation for the application scheme from 161mPD to 215mPD will not undermine this statutory intent, given the physical proximity of taller buildings south of Conduit and it will avoid the future 'sore-thumb' effect
- 7.5 Even though this single tower approach will require a taller building height profile at 215mPD, the proposed building height is still lower than its backdrop, Realty Gardens (218mPD). Given this responsive building profile, the proposed residential building will be fully blended in the surrounding building clusters and harmonizes with the Mid-Level West skyline in distant views.
- 7.6 The most important urban design consideration is to open up a window for urban renewal instead of surrendering this last opportunity due to the prevailing statutory height restriction. The proposal has observed the TPB PG-NO. 41 that the highly developed context of Hong Kong not to protect private views if the community benefits warrant.