

Attachment 2

Revised Visual Impact Assessment

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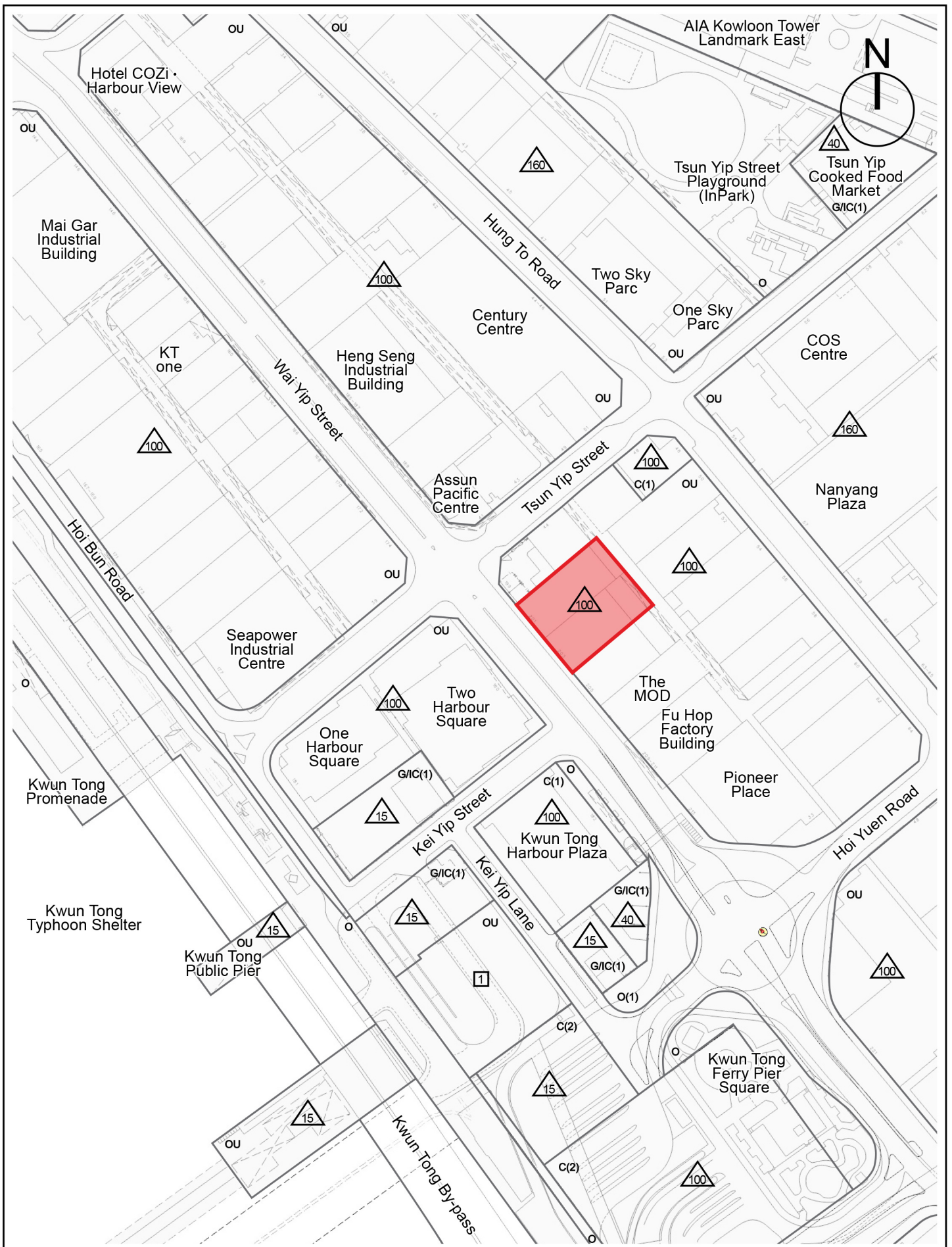
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1 INTRODUCTION

1.1 Background

- 1.1.1 This Visual Impact Assessment (VIA) was prepared in support of the proposed hotel (i.e. hereafter referred to as the “Proposed Development”) with minor relaxation of plot ratio (PR) and building height (BH) restrictions at Kwun Tong Inland Lot Nos. 285 and 287, 201 and 203 Wai Yip Street, Kwun Tong, Kowloon (i.e. hereafter referred to as the Application Site).
- 1.1.2 The Application Site falls within “Other Specified Uses” annotated “Business” (“OU(B)”) zone under the approved Kwun Tong (South) Outline Zoning Plan (“OZP”) No. S/K14S/26 (**Figure 1.1** refers). According to the Notes of the OZP, the “OU(B)” zone is intended primarily for general business uses.
- 1.1.3 In view of the declining demand of industrial activities, the public aspiration to optimize the use of scarce land resources at appropriate locations and the extension of revitalization measures under Policy Address 2021 encouraging private-led revitalization of industrial buildings (IBs), the Applicants intend to optimize the use of the Application Site by redeveloping the existing IBs into to a 34-storey hotel (including a level of refuge floor and a level of basement car parks but excluding a level of transfer plate) with a maximum BH of not more than 120mPD so as to provide more appropriate floor spaces to meet Hong Kong’s changing social and economic needs.
- 1.1.4 This VIA 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.
- 1.1.5 This VIA will cover the followings:
- Section 2: describes the Proposed Development;
 - Section 3: identifies the visual context and the baseline visual condition of the Application Site;
 - Section 4: outlines the methodology of the VIA and appraises the potential visual impacts induced by the Proposed Development at the key public VPs identified; and
 - Section 5: summarizes the findings of the VIA.



Application Site



Title
Location Plan

Checked	DH	Drawn	PW
Rev	0	Date	Sep 2024
Scale	Figure		
NA	1.1		

2 PROPOSED DEVELOPMENT PROPOSAL

2.1 Indicative Proposed Scheme

2.1.1 The indicative section plan of the Proposed Development are shown in **Figures 2.1**. The indicative development schedule of the Proposed Development is provided at **Table 2.1** below.

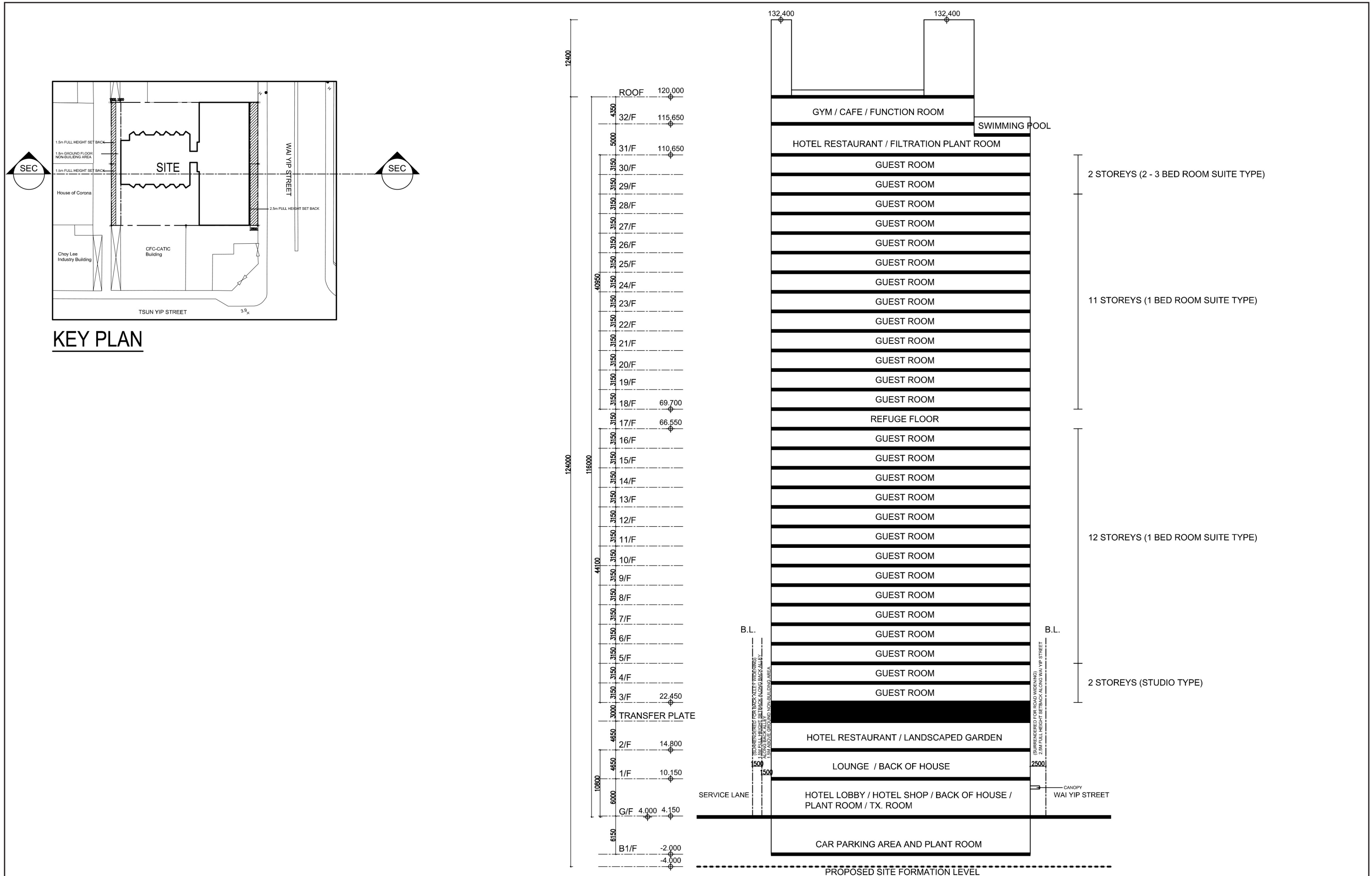
Table 2.1 Indicative Development Schedule

	Indicative Scheme
Site Area ⁽¹⁾	About 1,872m ²
Non-domestic PR ⁽²⁾	14.4
Gross Floor Area (GFA) ⁽²⁾	About 26,957m ²
Number of Storey ⁽³⁾	34
Maximum BH	Not more than 120mPD
Maximum Site Coverage ⁽⁴⁾	About 88% (below 15m) About 61% (typical floors)
No. of Rooms	448
Internal Transport Facilities	
Private Car Parking Space ⁽⁵⁾	9
Motorcycle Parking Space	1
Goods Vehicle Loading/Unloading (L/UL) Bay	
• Light Goods Vehicles	2
• Heavy Goods Vehicles	1
Taxi Layby	3
Coach/Tour Bus Layby	3

Remarks:

- (1) Including the area as per requirements under Kwun Tong (Western Part) Outline Development Plan (ODP) No. D/K14A/2:
 - i. Dedicated for full-height building setbacks (shown as "SBL") with a min. width of 2.5m from the lot boundaries of the Subject Site along Wai Yip Street
 - ii. Dedicated for full-height building setbacks (shown as "SBL") with a min. width of 1.5 from the lot boundaries of the Subject Site along the back alley
 - iii. Dedicated for non-building area (shown as "NBA") with a min. width of 1.5m with a clear headroom of 5.1m along the back alley
- (2) Excluding an approvable bonus GFA of about 793m² (i.e. equivalent to a PR of about 0.424) in accordance with the Building (Planning) Regulations B(P)R sub-section 22 to be claimed from the Building Department during GBP stage that comprises of:
 - 2.5m SBL from the lot boundary abutting Wai Yip Street
 - 1.5m SBL NBA along the back alley
- (3) including a level of refuge floor and a level of basement car parks but excluding a level of transfer plate
- (4) Including 1.095% of bonus site coverage approvable under B(P)R sub-section 22 due to provision of setbacks along Wai Yip Street and the back alley
- (5) Including 1 no. of car parking space for persons with disabilities

2.1.2 With an Application Site area of about 1,872m², the Proposed Development comprises a 34-storey hotel (including a level of refuge floor and a level of basement car parks but excluding a level of transfer plate) with a maximum BH of not more than 120mPD. The Proposed Development will provide non-domestic floor space for 'Hotel' use, which is a Column 2 use under the subject "OU(B)" zone of the OZP that requires planning permission from the Board. In line with government's policy



objective of revitalizing IBs through maximization of development potential, a 20% minor relaxation of PR restriction from 12 to 14.4 is thus applied for.

2.2 Planning and Design Considerations

2.2.1 In the course of formulating the Proposed Scheme, the Applicants commit to offer various planning and design merits to ensure its compatibility with adjoining settings and to enhance the streetscape and environmental sustainability in the surrounding. The key planning and design considerations summarized as follow and in **Figures 4.1 and 4.2 of the Planning Statement (PS)**:

1. Materializing or even exceeding ODP requirements for road widening, streetscape enhancement and improving pedestrian comfort

2.2.2 In accordance to the setback requirements stipulated on the said ODP, **full-height setback with a width of 2.5m from the lot boundary of the Application Site facing Wai Yip Street** will be provided for the purpose of footpath / carriageway widening and amenity / streetscape enhancement to supplement the existing hard landscaping along Wai Yip Street.

2.2.3 Along the **existing back alley, a 1.5m-wide full-height setback** will be provided to materialize the relevant setback requirements in ODP for the utilization of the existing back alley as service lane for L/UL activities as well as for the Government to lay public utilities with associated maintenance works.

2.2.4 In addition to the requirement for provision of a non-building area (NBA) with 5.1m headroom clearance under the ODP, a **1.5m-wide full height NBA (aboveground)** has been incorporated in the Proposed Scheme to further facilitate loading / unloading facilities as well as to minimise possible traffic nuisance along the back alley. Such measures would also improve sunlight penetration and thus the streetscape along the back alley.

2.2.5 The setbacks with no above- and underground structures will be surrendered to the Government upon demand whilst the 1.5m-wide aboveground NBA at the back alley would remain as being part of the Development Site.

2.2.6 It should be highlighted that the Application Site is elongated in shape and is also subject to setback and NBA requirements in its two sides of boundaries abutting Wai Yip Street and the back alley. Under such site development context, the Applicants have tried their best effort to accommodate the Proposed Development on-site as well as to satisfy various design requirements (e.g. provision of setbacks / provision of NBA for L/UL activities in accordance with HKPSG / etc.). Taking into account the areas required for manoeuvring spaces of vehicles and the provision of car parking and L/UL facilities to meet the requirement under HKPSG for the commercial uses, the current layout is considered to be an optimal option.

2. Multi-level greening with an overall greenery coverage of about 29% of the site area voluntarily

2.2.7 A multi-level greening and landscaping design approach has been adopted. The framework includes vertical greening in primary zone (i.e. 15m vertical zone) and an uncovered flat roof with greenery and peripheral plantings on 2/F to offer visual relief to pedestrians walking along Wai Yip Street, and a green roof and to improve the overall urban design and micro-climate within the building itself and in the surrounding.

2.2.8 For site coverage of greenery, notwithstanding the fact that the site area of the Application Site is within 1,000m² and less than 20,000m² and the requirement for having 10% and 20% of minimum greenery coverage apply to the primary zone (i.e. 15m vertical zone) of and overall Proposed Development, the Applicants have proposed an **overall “more-than-standard” greenery ratio of up to about 29% to enhance the environmental quality of the area** and to mitigate heat island effect, with about 68% located in the primary zone. The Applicants strongly believe the provision of greenery and soft landscaping would help shape an attractive built environment in support of the transformation of KTBA.

3. Provision of a high headroom landscaped garden for achieving better urban design and townscape

2.2.9 A **landscaped garden with a high headroom of about 4.65m at 2/F** is currently proposed to demonstrate the Applicants’ best effort in putting design merits in the Proposed Scheme, which would facilitate cross-ventilation and visual permeability while maximizing greening opportunities by offering peripheral landscape treatments.

2.2.10 Considering that Wai Yip Street Substation is immediately adjacent to the Application Site in the north-western corner, the Proposed Development will be visible on both sides along Wai Yip Street and Tsun Yip Street. Such landscaped garden with peripheral plantings would not only enhance the visual and landscape amenity of the Proposed Development but also soften the monotonous urban fabric of rigid building façades along Wai Yip Street that will jointly provide a pleasant visual experience for pedestrians at street level.

4. Compliance with Requirements under ODP and Sustainable Building Design Guidelines with Additional Setback from Neighbouring Developments

2.2.11 Notwithstanding that the site area of the Application Site is less than 20,000m² and has a continuous projected façade length less than 60m, which makes the building separation requirement not applicable to the Proposed Development. Even so, **considerate tower design has been incorporated for provision of building recess above 3/F from neighbouring Catic Building for about 11.9-14.7m and Mow Hing Factory Building for about 9.2m-12.5m as far as practical to improve the urban townscape.**

2.2.12 The provision of 2.5m-wide full-height setback along lot boundary facing Wai Yip Street is proposed in accordance with the requirements of ODP, which would also

comply with the SBDG in Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers APP-152's requirement of having at least 7.5m distance from the centreline of the street and the building frontage to maintain a ventilation corridor in order to improve air ventilation, enhance the environmental quality at pedestrian level and mitigate street canyon effect.

5. Green Building Design

2.2.13 In order to enhance the environmental sustainability of the Proposed Development, the Applicants have also paid their best effort to incorporate green building design features in the Proposed Development. Subject to detailed design of the building, the Applicants have tried their best effort in exploring the usage of recycle water as irrigation, adoption of low-E glass, compliance with Building Energy Code and the attainment of BEAM plus standard, while details of the implementation will be subject to technical feasibility and E&M coordination at detailed design stage.

6. Comparable floor-to-floor height with other similar planning approvals

2.2.14 The current indicative development proposal is considered to be optimal in terms of height, bulk and scale that balances the intention of redevelopment as well as relevant regulatory design requirements in an appropriate manner. It should be highlighted that the proposed development bulk is the result of a very efficient layout design with a relative stringent floor-to-floor height of only 3.15m (for typical hotel floors) to accommodate the additional GFA. The 3.15m floor-to-floor height is within the low range compared to other recently approved applications for hotel developments in the vicinity (3.15m to 3.76m) (**Table 2.2** refers). As a result, the proposed minor increase in plot ratio would not lead to a disproportionate increase in BH and overall building bulk.

Table 2.2 – Similar Planning Approvals for Hotel Use

Application No.	Address	Proposed Use	FI-to-FI Height (hotel)	Approval Date
A/K14/713	101 Wai Yip Street, Kwun Tong, Kowloon, KTIL 577	Proposed Hotel	3.15m	16.1.2015
A/K14/723	11 Tai Yip Street, Kwun Tong, Kowloon, KTIL 564	Proposed Hotel	-	11.12.2015 (on review)
A/K14/730	69-71, King Yip Street, Kwun Tong, Kowloon	Proposed Wholesale Conversion of An Existing Industrial-Office Building for Hotel Development	3.4m	8.1.2016
A/K14/762	2/F to 5/F, 90 Hung To Road, Kwun Tong, Kowloon	Proposed Hotel (Guesthouse)(partial conversion of existing commercial building)	3.76m	16.11.2018
A/K14/783	1 Tai Yip Street, Kwun Tong, Kowloon	Proposed Minor Relaxation of PR and BH Restrictions for Proposed Hotel Use	3.15m	20.11.2020
A/K14/796	28A Hung To Road, Kwun Tong, Kowloon	Proposed Hotel with Other Uses (including Place of Recreation, Sports or Culture / Office (Audio-visual Recording Studio) / Office (Design and Media Production) / Research, Design and Development Centre)(Wholesale Conversion of an Existing Industrial Building)	3.2m	22.1.2021

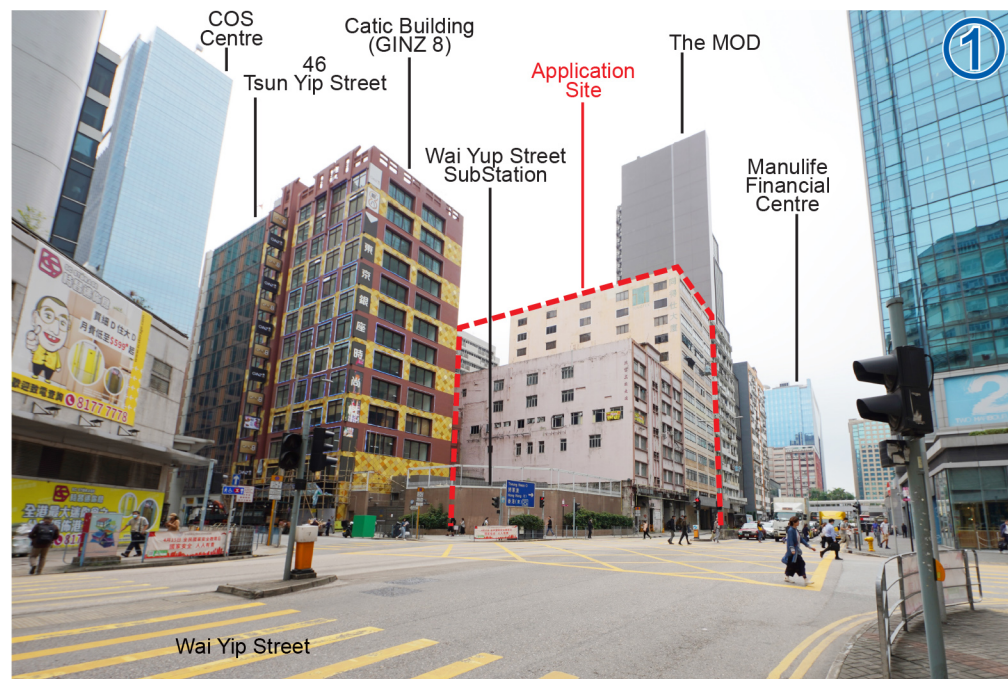
3 BASELINE VISUAL CONDITION

3.1 Visual Context & Character

- 3.1.1 The Application Site is currently situated within KTBA where is under gradual transformation into the Central Business District 2 that is mixed with aged IBs and newly occupied commercial developments. To secure smooth wind penetration and visual permeability in KTBA, it is subject to the statutory BH restrictions of various height bands stepping from the hinterland towards the waterfront. More specifically, the Application Site is sandwiched between two height bands, namely the 100mPD developments fronting the waterfront and the 160mPD developments to the north of Hung To Road at the inner inland area.
- 3.1.2 Despite the height restriction of 100mPD in the “OU(B)” zone, a total of five nos. of recently approved planning applications proposed for commercial development within KTBA surrounding the Application Site have sought for minor relaxation of both PR and BH restrictions (under Application Nos. A/K14/804, A/K14/806, A/K14/809, A/K14/810 and A/K14/822). The approvals of the said applications have implied that the minor relaxation of BH restriction could be acceptable with the provision of planning and design merits as long as it would not induce significant visual impacts.
- 3.1.3 In terms of the existing streetscape, developments along Wai Yip Street are mainly traditional IBs or godowns in bulky built form without architectural articulation but is currently under on-going transformation to inject new commercial developments into the area featuring One Harbour Square and Two Harbour Square. Given the long industrial function of Kwun Tong district that was heavily automobile oriented, Wai Yip Street being one of the major carriageways running through KTBA from Kowloon Bay to Lam Tin, lacks the provision of landscaping and amenities whilst pedestrian pavements are generally narrow. Besides, the back alley abutting the northeastern boundary of the Application Site that also serves as the service lane, is currently visually unpleasant due to the lack of sunlight and the narrow building separation above ground level.
- 3.1.4 In gist, having considered that the Application Site is situated in a dense urban context and surrounded by a number of bulky IBs, the Proposed Scheme with minor relaxation of PR and BH restrictions is considered not incompatible to the surroundings and would act as an upgrade to the existing streetscape with the planning and design merits offered.
- 3.1.5 **Figure 3.1** shows the site and surrounding conditions of the Application Site.

3.2 Area of Visual Influence

- 3.2.1 According to the TPB PG-No. 41, the assessment area (i.e. the visual envelop) should cover the area of visual influence (AVI) within which any part of the Proposed Development is visible from key sensitive viewers. When determining the AVI of the subject VIA, the Proposed Development, the visual context, the popular public gathering spaces, the size and distance of the development and its potential visibility



Application Site viewed from the corner of Tsun Yip Street and Wai Yip Street



Application Site viewed from Wai Yip Street



Back Alley of the Application Site viewed from Tsun Yip Street



Existing Condition of the Application Site viewed from Wai Yip Street



High-Rise Commercial Building viewed from the corner of Tsun Yip Street and Wai Yip Street



Kwun Tong Ferry Bus Terminus



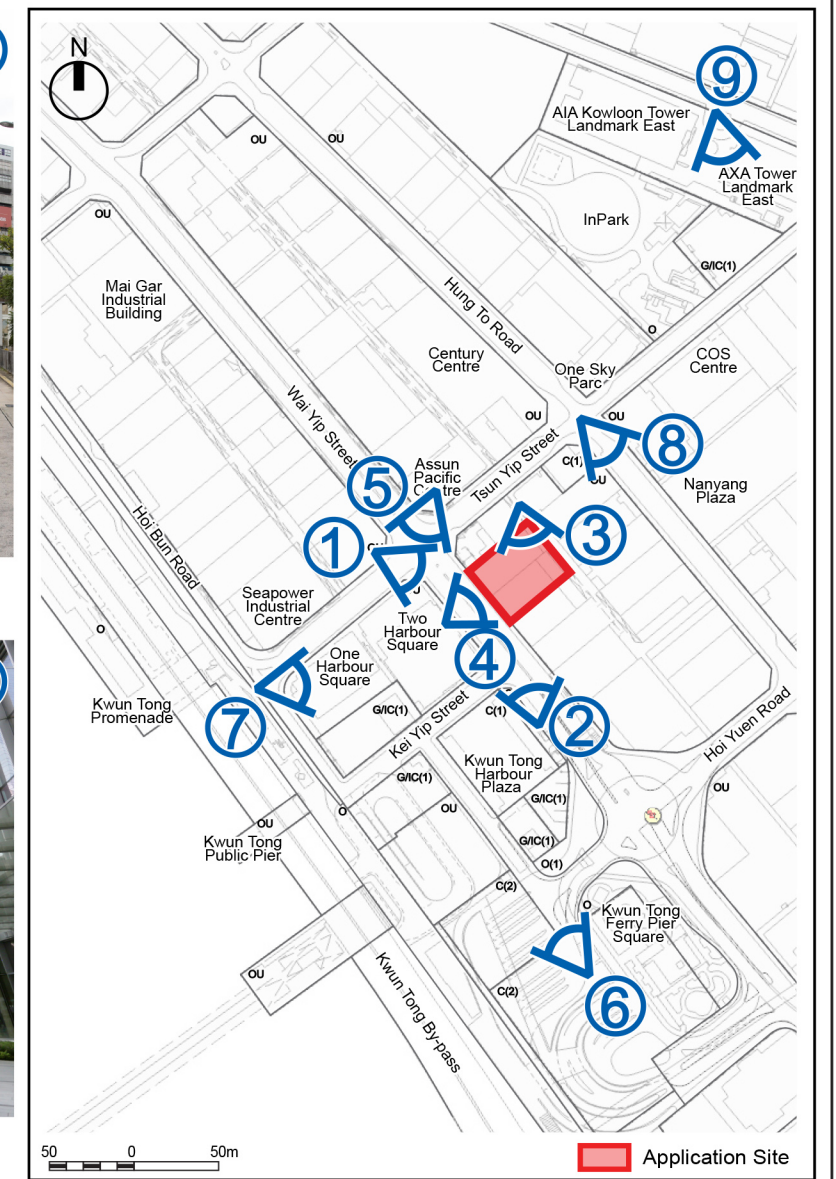
Car Park Entrance of One Harbour Square at Hoi Bun Road



Industrial Clusters viewed from the South-east of Hung To Road



High-Rise Commercial Building Clusters viewed from the Landmark East



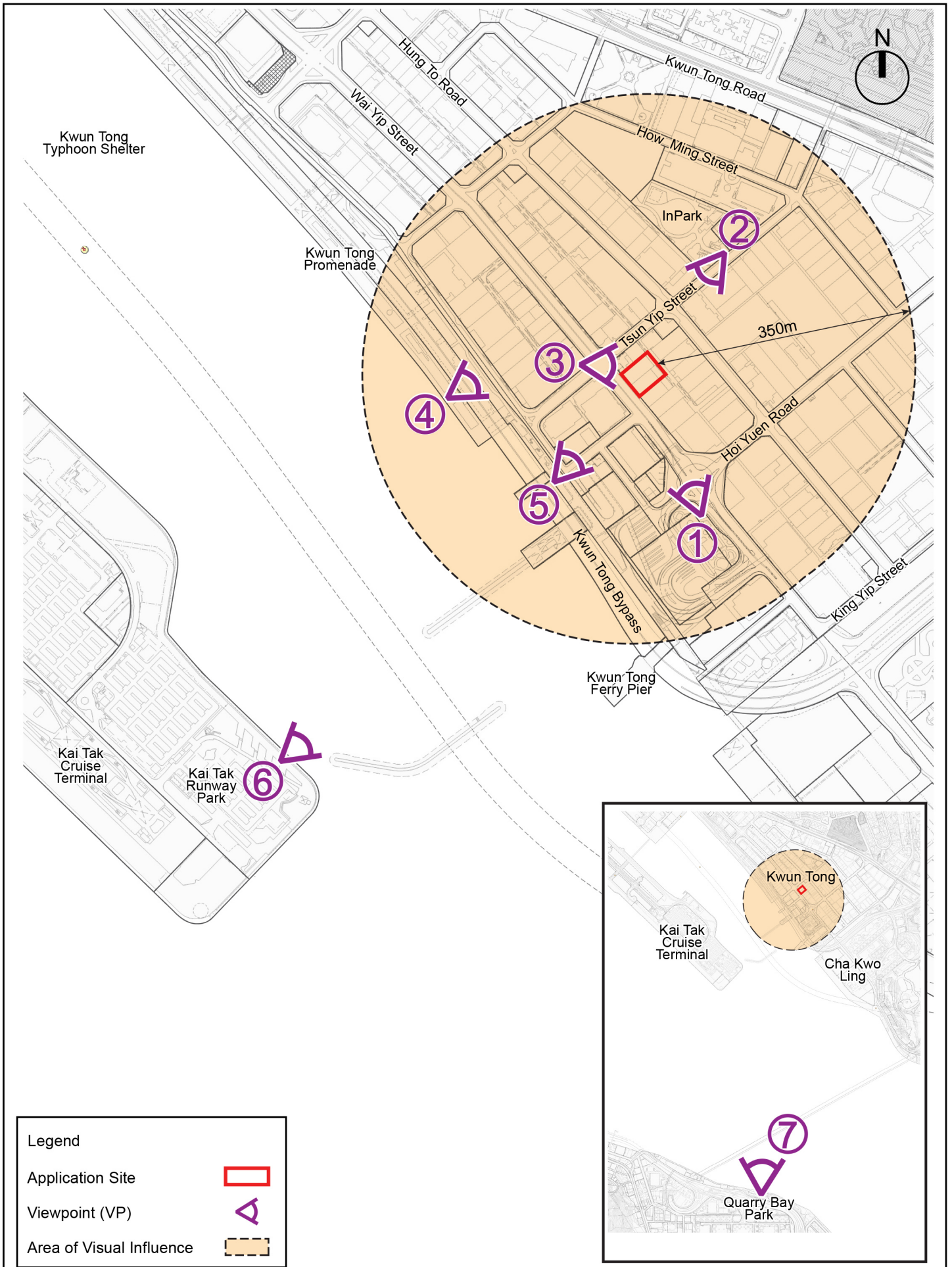
from the selected viewing points and the actual site and surrounding topographical conditions by ground inspection have been taken into account.

3.2.2 Having regard to the scale and height of the Proposed Scheme, the subject AVI covers public viewers with potential visibility of the Application Site within KTBA while its locational characteristic near the waterfront thus call for potential visually sensitive receivers (VSRs) across the harbour at Kai Tak and Quarry Bay. The subject AVI extends to junction of How Ming Street and Wai Yip Street to the northwest, Tsun Yip Street Playground to the north, Kwun Tong Promenade to the west, Kwun Tong Pier to the southwest and Kwun Tong Ferry Pier Square to the south.

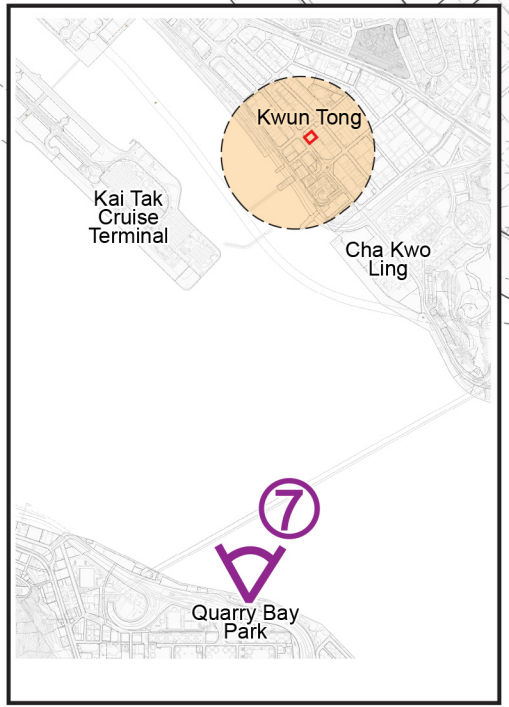
3.2.3 In gist, seven nos. of public VPs have been identified for the subject VIA (**Figure 3.2** refers).

3.3 Baseline Visual Condition of the Application Site

3.3.1 Having identified the surrounding visual context including the existing / committed / planned developments in the vicinity, it should be highlighted that the Application Site and its vicinity is situated in a densely-built urban area. With a view to illustrate the visual impact of the Proposed Scheme in a comprehensive manner, the compliance with OZP scheme with BH of 100mPD would be used as the baseline condition for visual assessment purpose.



Legend	
Application Site	
Viewpoint (VP)	
Area of Visual Influence	



Title
Area of Visual Influence

Checked	DH	Drawn	PW
Rev	0	Date	Mar 2025
Scale		Figure	
NA		3.2	

4 ASSESSMENT OF VISUAL IMPACTS

4.1 Methodology for the Appraisal of Visual Impact

Identification of Key Visually Sensitive Receivers and their Sensitivity

4.1.1 To evaluate the visual impact of the Proposed Development, the key VSRs have to be identified. As per the requirements of TPB PG-No. 41, key VSRs are those people, who have views of the Application Site from the most affected public VPs, and these VSRs are likely to be affected most by the proposed visual change. The identified VSRs of the subject VIA include the public at popular areas for outdoor recreation activities, leisure, walking, sightseeing and key pedestrian nodes and prominent public travel routes where their visual attention may be caught by the Proposed Development.

4.1.2 VSRs are categorized based on the characters and what they engage in at the public VPs. The sensitivity of receivers to visual changes will be influenced by:

- 1) Activities they are engaged in;
- 2) Duration which the portion of the Proposed Development remains visible;
- 3) Views towards the Proposed Development is full or partial; and
- 4) Public perception towards the value to the views towards the Proposed Development.

4.1.3 With consideration to the nature of the people who are mostly affected by the proposed visual changes at the key VPs, the selected VSRs of the subject VIA are categorized into two groups, namely:

Recreation - General public have sights on the Proposed Development while engaging in recreational activities. Their visual sensitivity varies depending on the type of recreational activities they are engaging in.

Traveller - General public have sights on the Proposed Development in public passageways. Their visual experience depends on the speed of travel and whether their views are continuous or occasional.

4.1.4 Based on the above criteria, VSRs' sensitivity towards visual change at the Application Site are categorized into three classifications (i.e. "High", "Medium" and "Low").

Appraisal of Overall Visual Impacts to VSRs

4.1.5 The appraisal of overall visual impacts to VSRs can be determined by four aspects:

- 1) Visual composition (i.e. to assess the visual effects resulted from the change in building bulk, forms and etc.);
- 2) Visual obstruction (i.e. to assess whether the Proposed Development may cause any blockage and interception of views in the foreground or background);

- 3) Effects on public viewers from key public VPs (i.e. to assess the degree of visual changes from key public VPs with direct sightlines to the Proposed Development; and
- 4) Effects on visual resources (i.e. to assess the change in visual condition, quality and character of the AVI).

4.1.6 The significance of the overall visual impact to the VSRs is a synthetic analysis between the visual sensitivity of VSRs towards the Application Site and the VSRs' perception of the magnitude of change from the above four aspects. In view of the application of minor relaxation of BH restriction in the Proposed Development, the overall visual impact towards the surrounding induced by the Proposed Development will be evaluated against baseline scheme that includes the OZP BH restriction compliance scheme (hereafter referred as "OZP Compliance Scheme") and other planned or committed developments in the vicinity. The resultant overall visual impact can be rated as "Significantly Adverse", "Moderately Adverse", "Slightly Adverse" or "Negligible" (**Table 4.1** refers).

Table 4.1 - Matrix for Appraisal of Significance of the Overall Visual Impact

		Sensitivity of VSRs		
		Low	Medium	High
Magnitude of Change	Negligible	Negligible	Negligible	Negligible
	Slight	Negligible / Slightly Adverse	Slightly Adverse / Moderately Adverse	Moderately Adverse
	Moderate	Slightly Adverse / Moderately Adverse	Moderately Adverse	Moderately Adverse / Significantly Adverse
	Substantial	Moderately Adverse	Moderately Adverse / Significantly Adverse	Significantly Adverse

Remarks: The resultant overall visual impacts are classified as negligible or negative (i.e. ranging from negligible to significantly adverse) unless the Proposed Development exhibits visual effects that enhance the visual quality.

4.1.7 According to the TPB PG-No. 41, the classification of the significance of the overall visual impacts and its associated descriptions are set out in **Table 4.2** below.

Table 4.2 - Classification of Overall Visual Impact

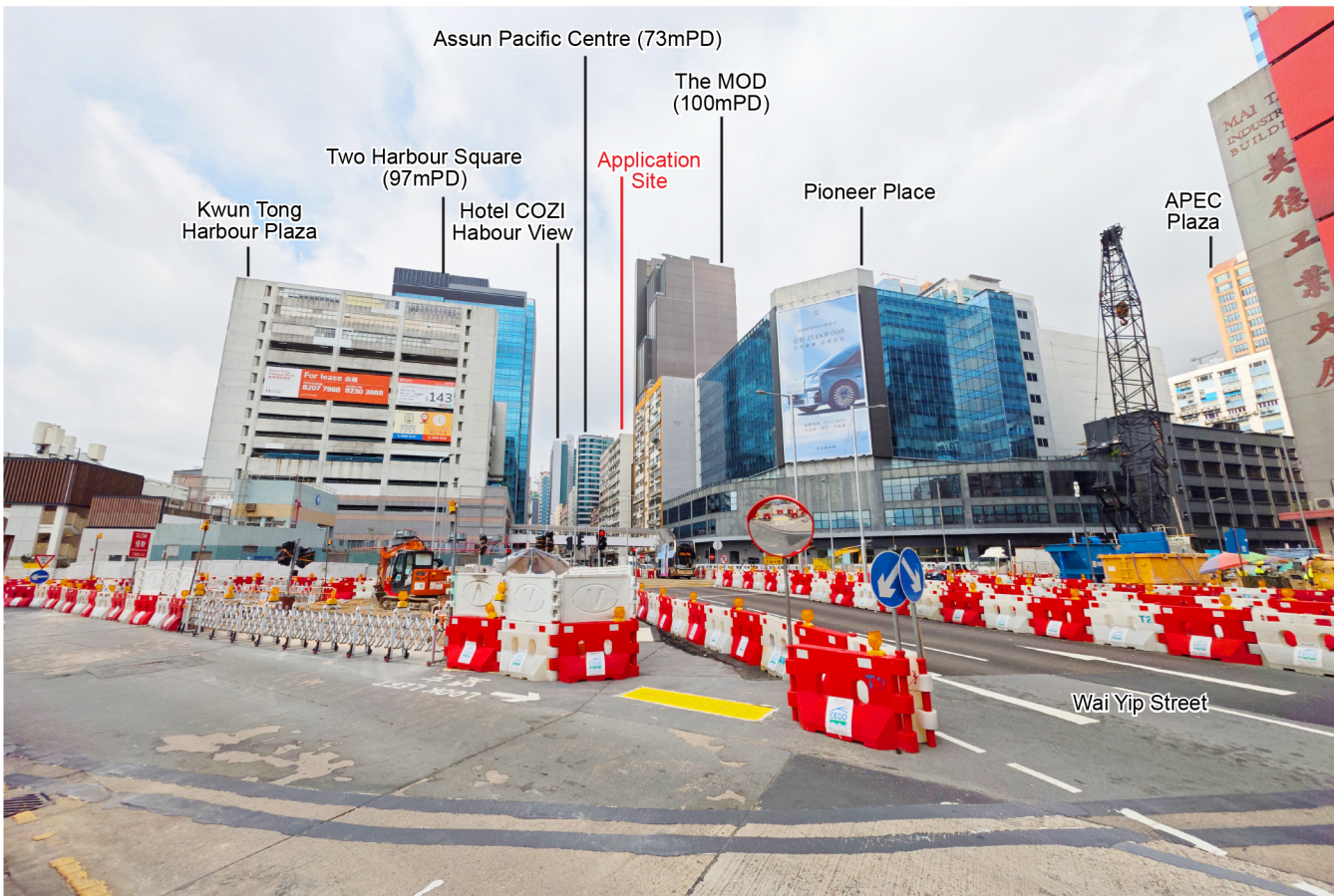
Classifications	Descriptions
Significantly Adverse	The Proposed Development will in overall terms cause serious and detrimental visual impacts to most of the identified key public VPs even with mitigation measures.
Moderately Adverse	The Proposed Development will, with or without mitigation measures, result in overall term negative visual effects to most of the key identified key public VPs.
Slightly Adverse	The Proposed Development will, with or without mitigation measures, result in overall term some negative visual effects to most of the identified key public VPs.
Negligible	The Proposed Development will, with or without mitigation measures, in overall terms have insignificant visual impacts on most of the identified key public VPs, or the visual effects would be screened or filtered by other distracting visual elements in the assessment area.
Partly Enhanced / Partly Adverse	The Proposed Development will exhibit enhanced visual effects to some of the identified key public VPs and at the same time, with or without mitigation measures, exhibit adverse visual effects to some other key public VPs.
Enhanced	The Proposed Development in overall term will improve the visual quality and complement the visual character of its setting from most of the identified key public VPs.

4.2 Appraisal of Visual Impacts on Different VSRs

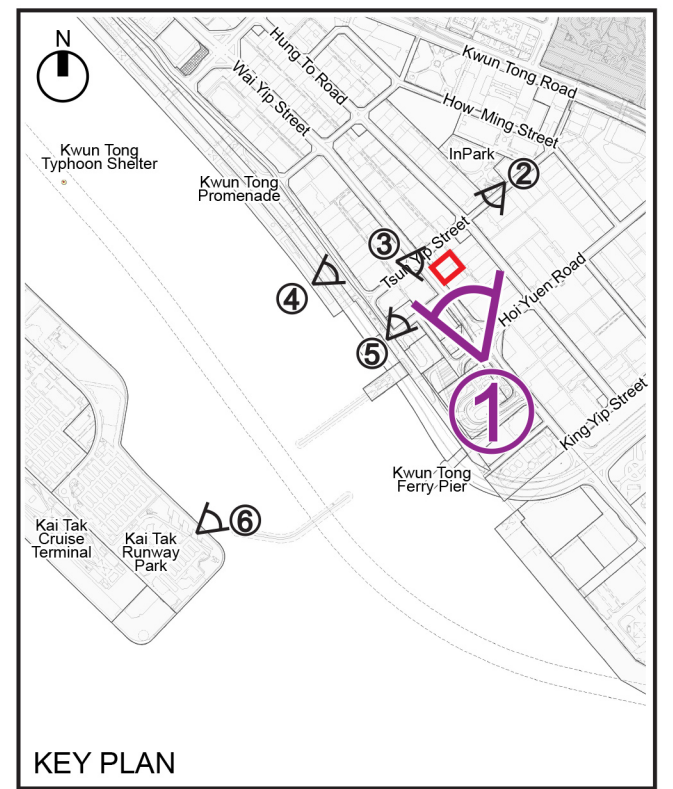
4.2.1 The appraisal of visual impacts on VSRs at the key VPs induced by the Proposed Development are described below. The corresponding photomontages are attached in **Figures 4.1 to 4.7**.

VP1 – Kwun Tong Ferry Pier Square (**Figure 4.1** refers)

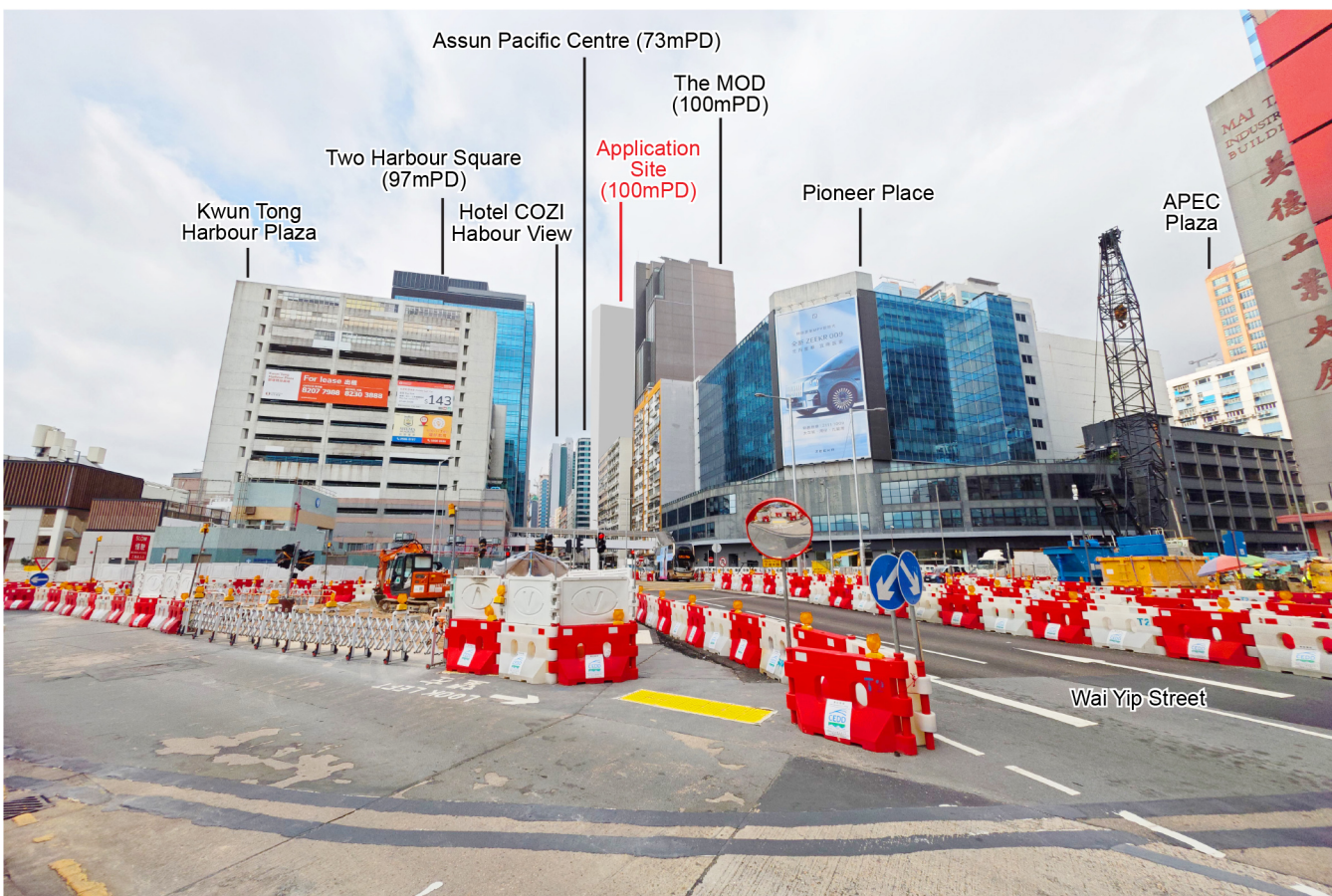
4.2.2 Situated about 200m to the southeast of the Application Site near Hoi Yuen Road Roundabout, VP1 at Kwun Tong Ferry Pier Square is a popular local park with a pet-garden serving mainly for passive recreational purposes. The public open space is also located next to major road (i.e. Wai Yip Street) and water transport hub, the Kwun Tong Ferry Bus Terminus and Kwun Tong Public and Vehicular Piers. In view of the vibrant setting near this VP, the workers of nearby industrial/commercial buildings, passengers and bus drivers may visit the square as an unwinding space. Therefore, the major VSRs at VP1 are the passive recreational users of the square as well as the travellers returning to their office after lunch break. It is noted that the Kwun Tong Ferry Pier Square is currently undergoing renovation as part of the Kwun Tong Action Area development and is being utilized as a works area. However, open space are proposed to be reprovided at the location of the Kwun Tong Ferry Pier Square. Thus, this VP is selected to capture the view from a similar angle at the pavement abutting the Kwun Tong Ferry Pier Square to illustrate the view from the proposed open space that will be provided under the Kwun Tong Action Area development.



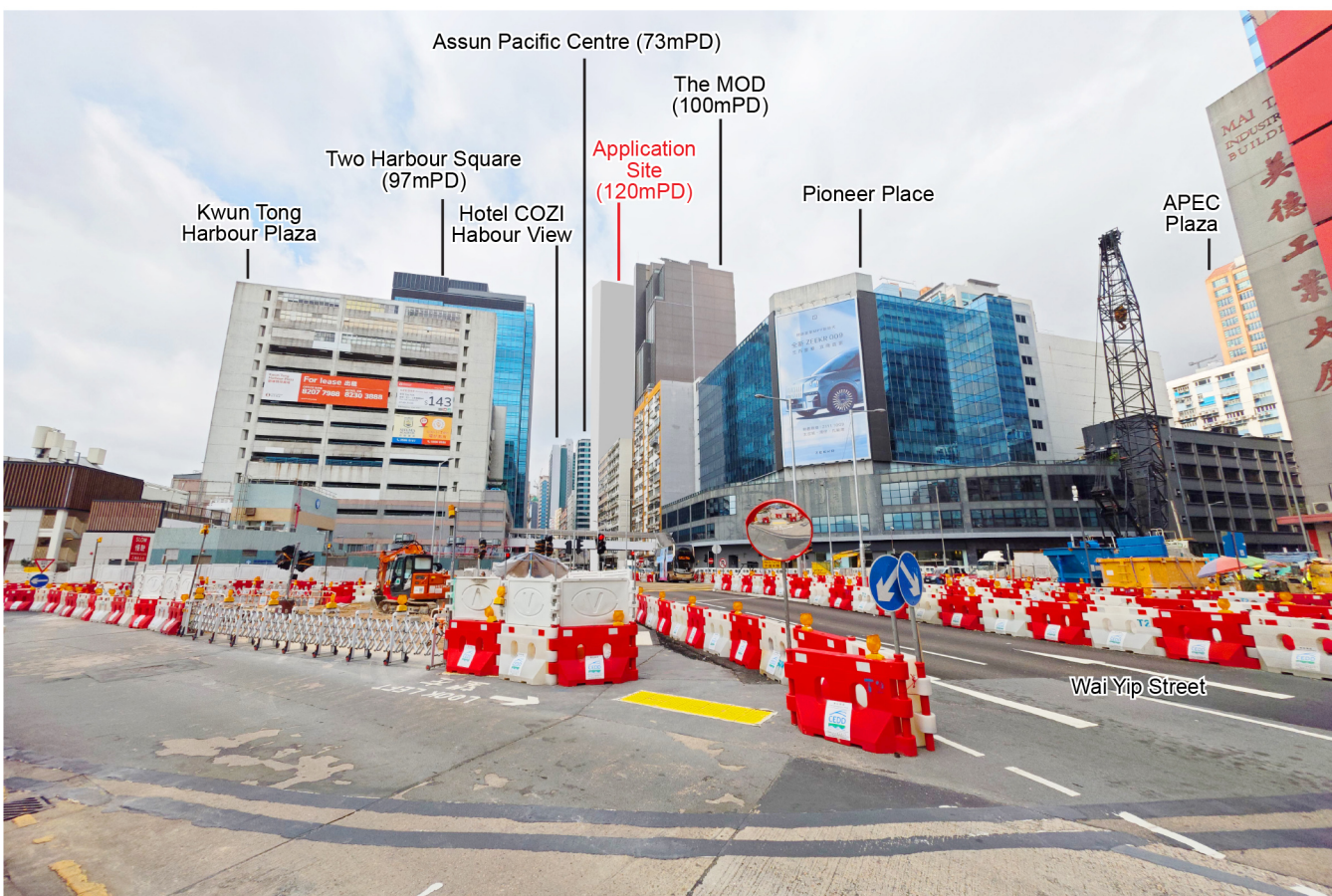
Existing View



KEY PLAN



OZP Compliance Scheme



Proposed Scheme

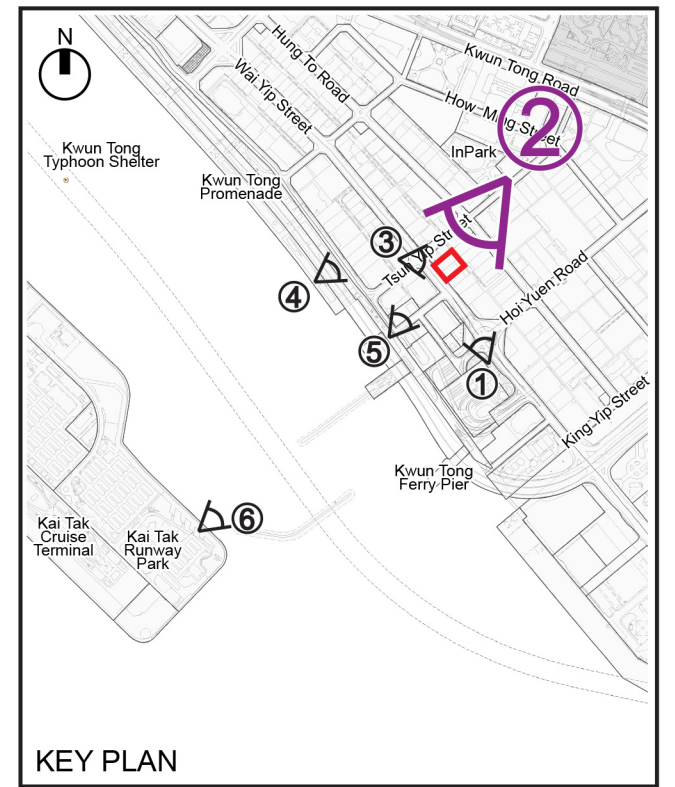
- 4.2.3 The existing view at this VP is characterized by the busy traffic at the junction of Wai Yip Street and Hoi Yuen Road and the industrial/commercial buildings on both sides of Wai Yip Street. In particular, the Proposed Development is surrounded by dense developments including some new commercial developments such as One Harbour Square (about 100mPD) and Two Harbour Square (about 97mPD), redeveloped non-polluting IB namely The MOD (at 207 Wai Yip Street) and aged IBs. A partial side view towards the Application Site is available at the background of this VP as it is blocked by the row of developments along Wai Yip Street eastbound and the pedestrian footbridge connecting to Kwun Tong Harbour Plaza in the low-zone. In terms of visual resource, open sky view above the buildings and the roadside vegetation along Wai Yip Street are available. It is considered that the sensitivity of the VSRs is low as the attention of the recreational users would largely be attached to the view towards the Kwun Tong Ferry Pier while the travellers thus focus on the road traffic at the roundabout.
- 4.2.4 As illustrated in the photomontage, a side view of the Proposed Development will be visible behind the pedestrian footbridge that connects Kwun Tong Harbour Plaza and Wai Yip Street which slightly obstructs the visibility of the low-zone. Despite higher BH than the OZP Compliance Scheme at 100mPD, the Proposed Development of 120mPD also blends in well with the nearby dense urban context and the committed commercial development The MOD at 207 Wai Yip Street. It should also be noted that the Proposed Development will in fact draw a parallel line with the commercial development at 207 Wai Yip Street when viewing from this VP. The provision of full-height setback along Wai Yip Street also helps reduce the visual bulk by setting back the building block away from Wai Yip Street. Compared to the OZP Compliance Scheme of 100mPD, no significant visual obstruction nor loss of visual resource can be seen and open sky view will be still available at this VP. Therefore, the resultant visual impact to the VSRs is considered to be negligible/slightly adverse at this VP.

VP2 – Tsun Yip Street Playground (Figure 4.2 refers)

- 4.2.5 Situated about 185m to the northeast of the Application Site, VP2 – Tsun Yip Street Playground is another major open space located at the heart of KTBA that offers a pleasant and tranquil environment of both active and passive recreational opportunities to nearby workers. The major VSRs at this VP are the recreational users who are inclined towards more leisure activities.
- 4.2.6 The existing view at this VP is characterized by the hustle and bustle of both pedestrian and vehicular traffic on Tsun Yip Street surrounded by a densely built environment. While the peripheral tree landscaping in the playground helps provide a tree canopy and green buffer when viewing from the pavement towards the waterfront. The Proposed Development is well-hidden behind the buildings along Tsun Yip Street under such dense built environment. The visual resources at this VP are the greenery of the playground that serves as an urban oasis itself in providing visual relief under the highly urbanized KTBA, narrow harbour view at the end and open sky view while the dense built environment is considered a visual eyesore in the surrounding. The sensitivity of the VSRs at this VP is considered low.



Existing View



OZP Compliance Scheme



Proposed Scheme

4.2.7 As shown in the photomontage, the Proposed Development is entirely blocked by the urban development along Tsun Yip Street such as Sun Wing Building and Winner Factory Building. Therefore, no visual impact induced by the Proposed Development is envisaged at this VP.

VP3 – Junction of Tsun Yip Street and Wai Yip Street (Figure 4.3 refers)

4.2.8 Situated about 50m to the west of the Application Site, VP3 is at the junction of Tsun Yip Street and Wai Yip Street, immediately outside of the Application Site across the Cross Road. This junction is one of the major nodes for pedestrian movement in the area connecting the waterfront to the hinterland. Most of the workers travelling between the industrial/commercial buildings in the front row and Kwun Tong town centre in the hinterland rely heavily on the pedestrian crossing at this junction. Therefore, the major VSRs at this VP are the travellers who work in or visit the area where they are transient in nature.

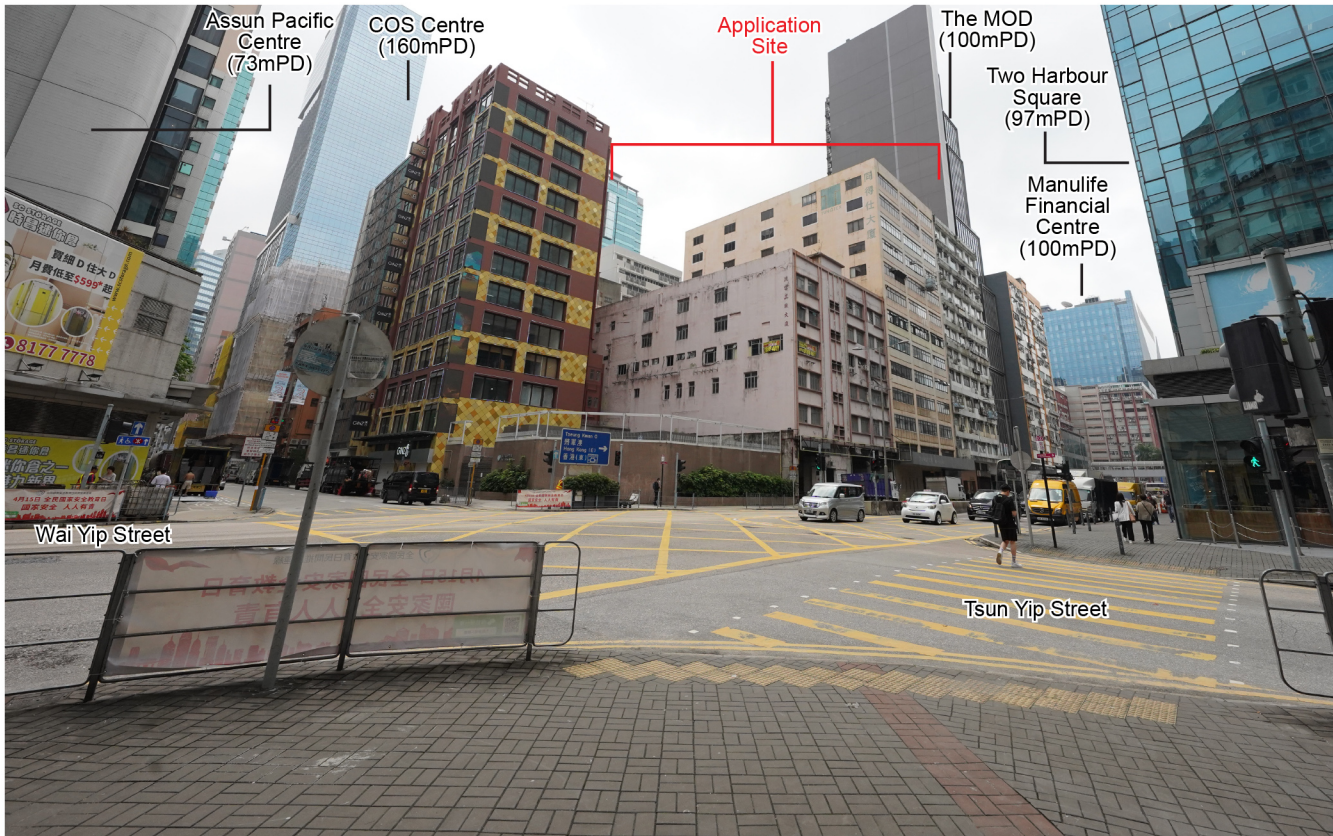
4.2.9 The existing view at this VP is dominated by the busy traffic along Wai Yip Street and the urban townscape dominated by office and industrial buildings when viewing from the harbour-side towards the hinterland. In particular, this cluster of buildings reflects the transforming urban context of KTBA, characterized by a number of modern developments, including the adjacent modern industrial development; the MOD; Two Harbour Square; and COS Centre. Although there presents some positive visual amenity like the open sky view in between the existing buildings as well as the diversity in building height, however, the urbanized environment would be visual eyesores to the VSRs, and therefore, the sensitivity of the VSRs at this VP is considered low.

4.2.10 In view of the short distance view this VP has, the Proposed Development will be well noticeable and so will the OZP Compliance Scheme (Figure 4.3 shows) given the substantial magnitude of change as compared to the existing buildings. Yet, as the OZP Compliance Scheme at 100mPD will be always permitted with the proposed land use, it is assumed to be the baseline condition when viewing from this VP. As the photomontages show, there is no visual difference between the OZP Compliance Scheme and the current scheme in the eyes of the VSR at this particular VP. As such, the resultant visual impact is considered to be negligible.

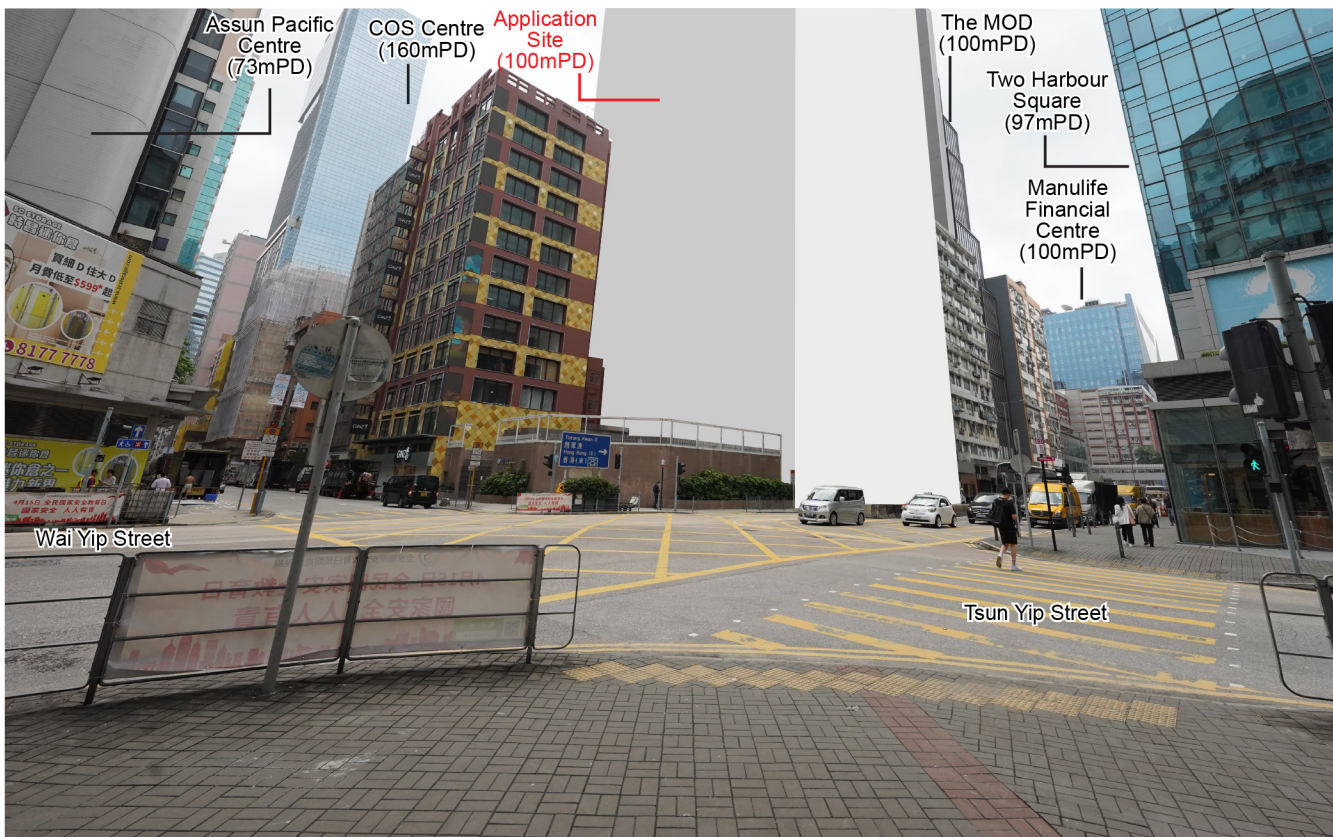
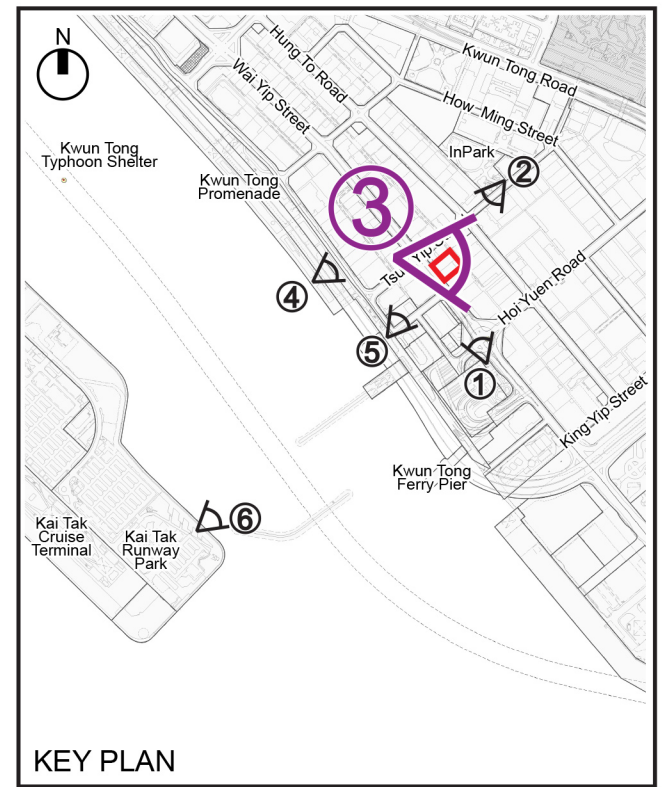
VP4 – Kwun Tong Promenade (Figure 4.4 refers)

4.2.11 Situated about 230m to the west of the Application Site, VP4 - Kwun Tong Promenade is a regional open space in Kwun Tong district characterized by its boardwalk along the promenade that offers various passive and active recreational opportunities such as jogging, fitness facilities and sitting-out area. The major VSRs at this VP are the recreational users who are engaging in both active and passive recreational activities.

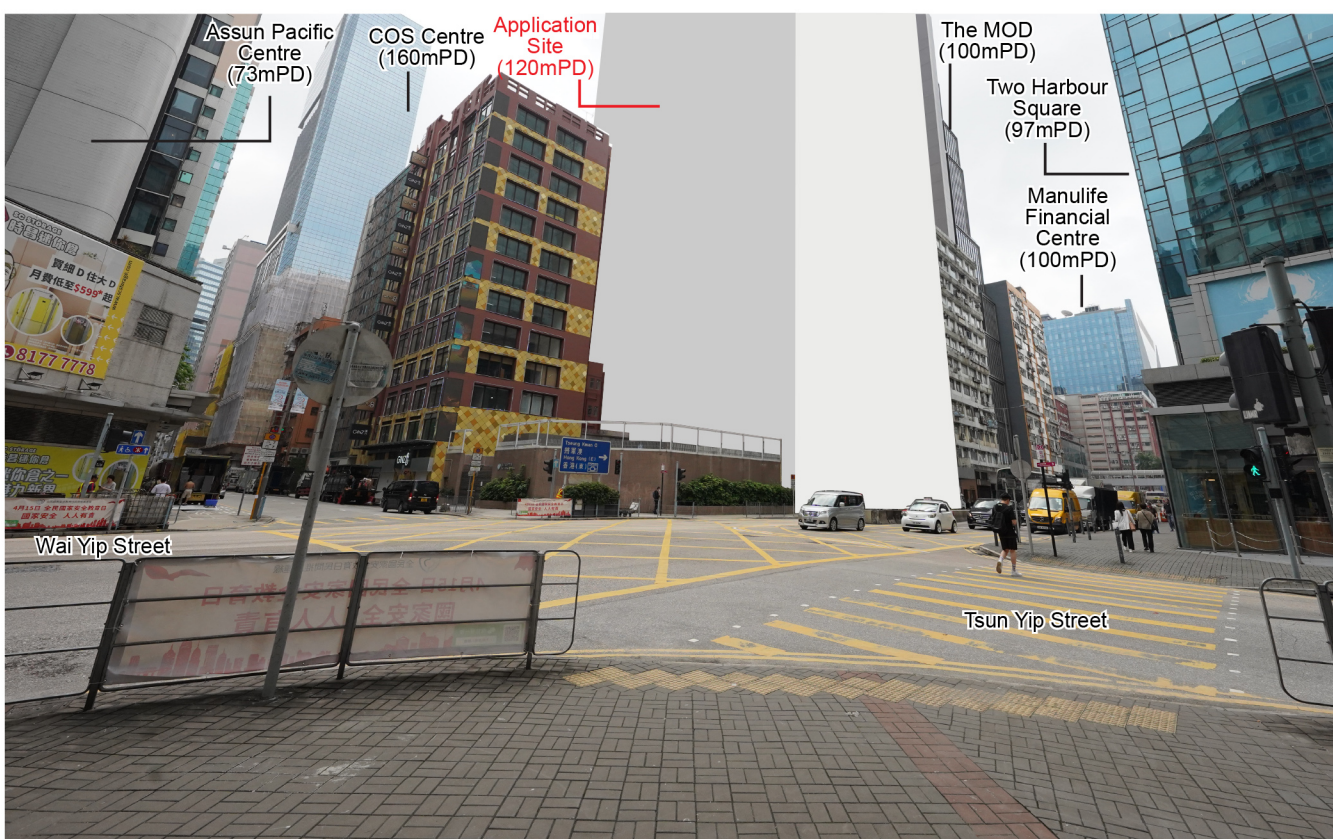
4.2.12 The existing view at this VP is dominated by the spectator stand structure of the public open space as well as the pavement for passive recreational activities in the foreground, the flyover of Kwun Tong By-pass in the middle ground, and the front row commercial buildings at the background with an open-sky view atop. Due to the blockage effect from the flyover together with Two Harbour Square behind it,



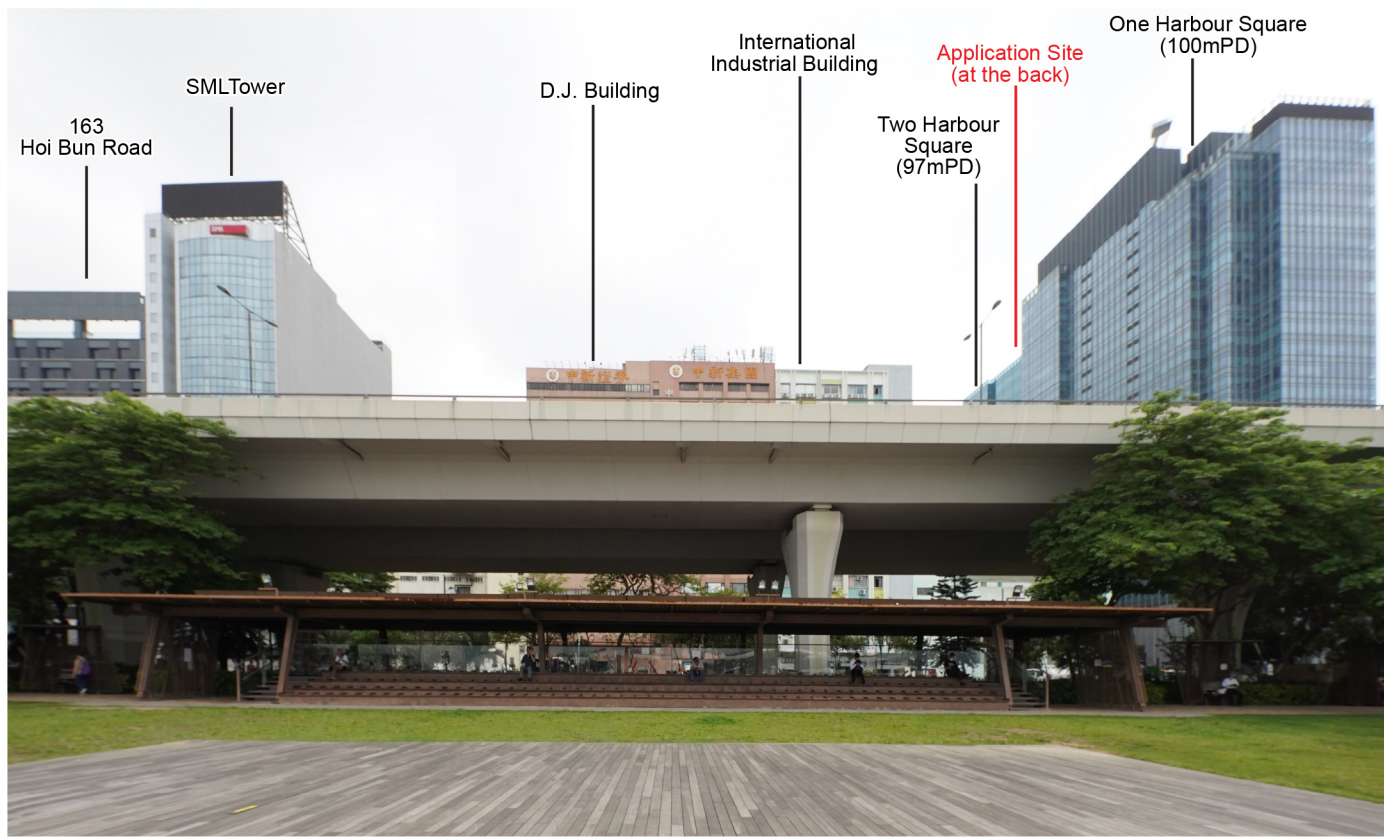
Existing View



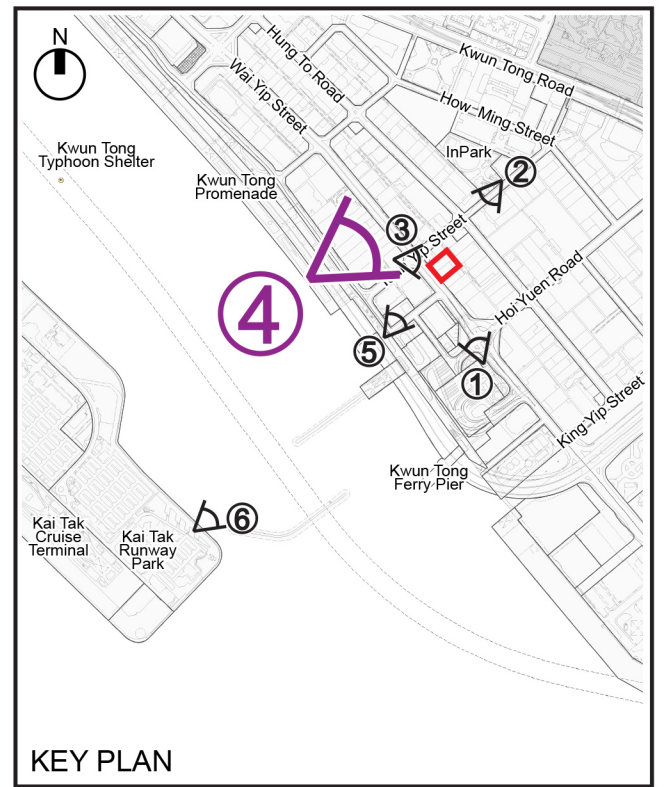
OZP Compliance Scheme



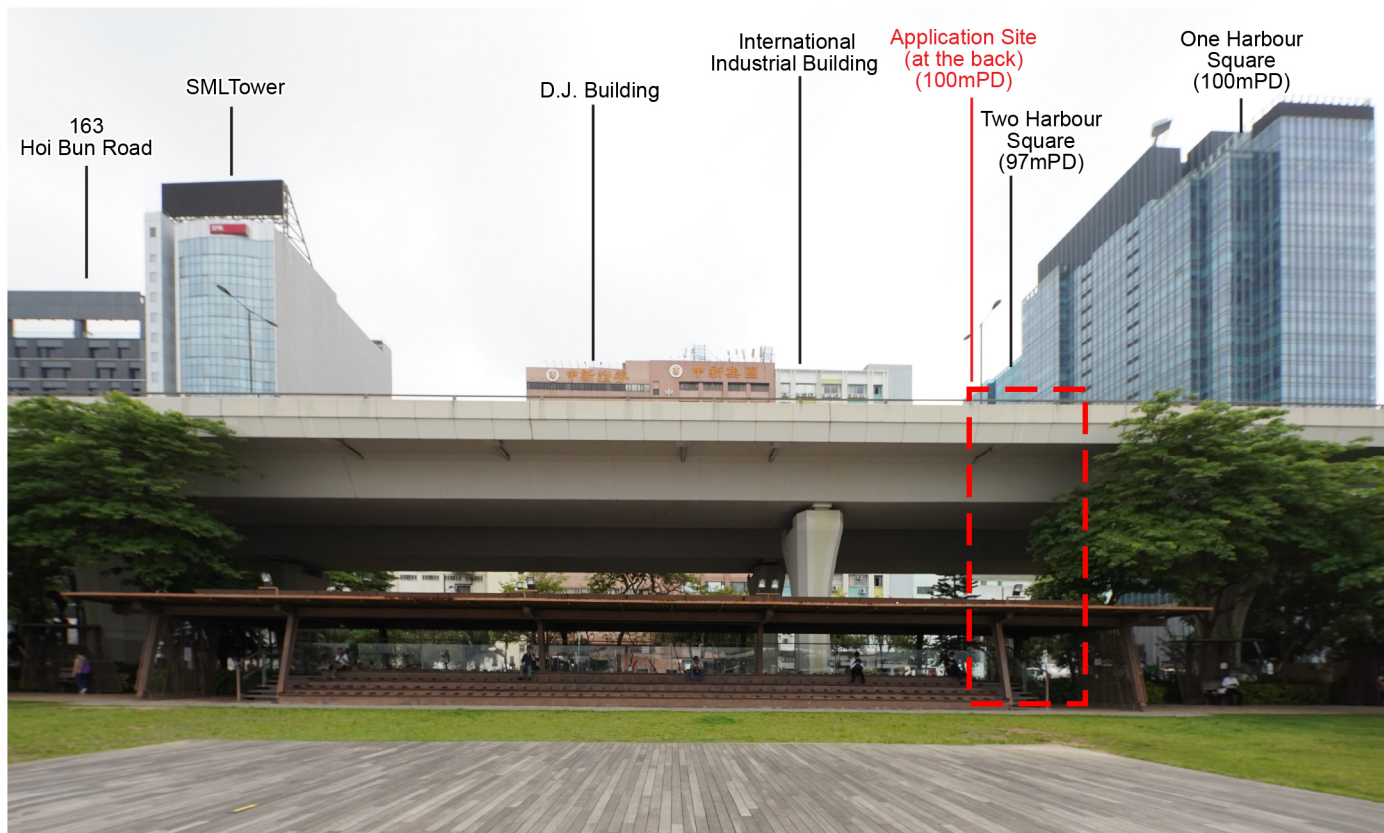
Proposed Scheme



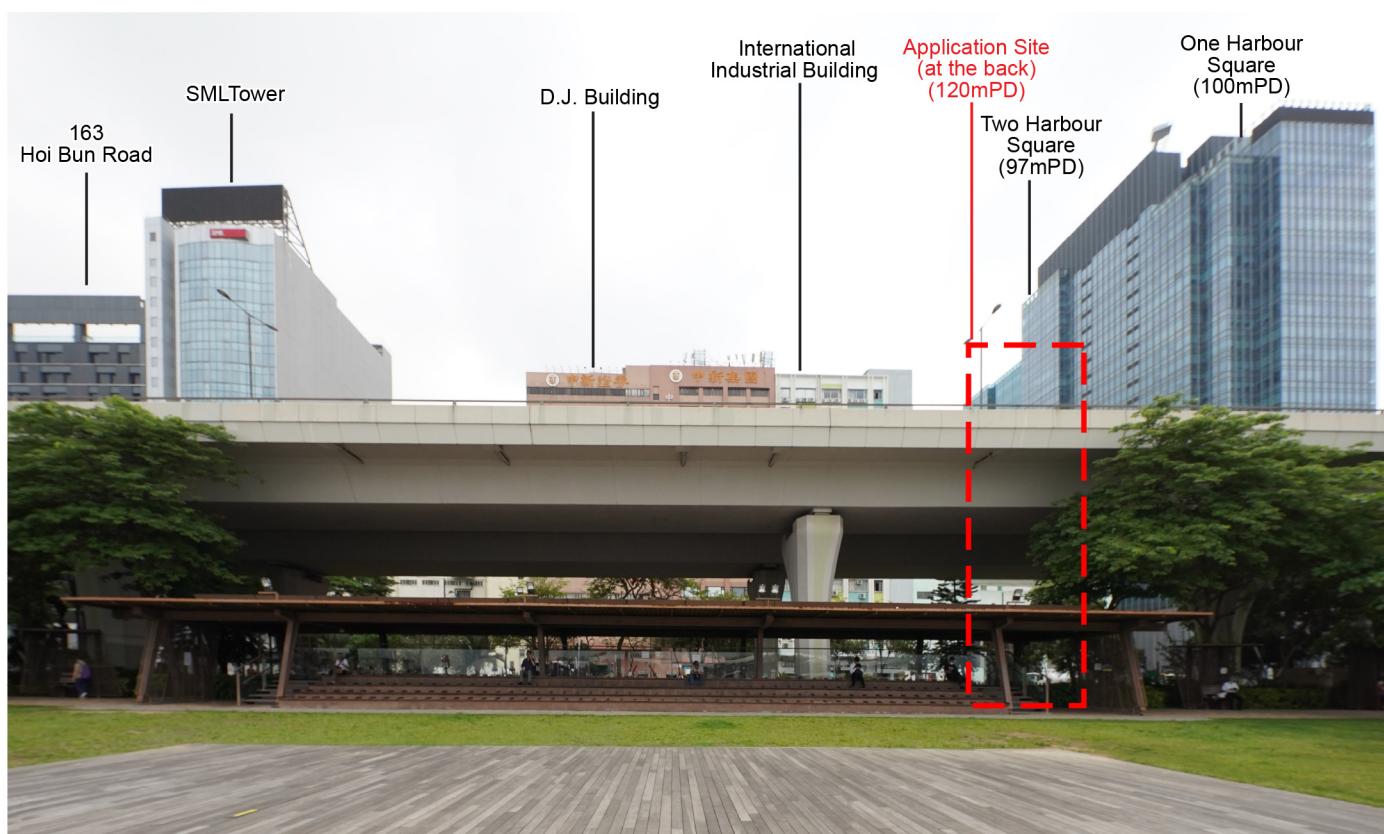
Existing View



KEY PLAN



OZP Compliance Scheme



Proposed Scheme

only the uppermost portion of the Proposed Development would be visible at this VP. The visual resource at this VP includes an open sky view above Kwun Tong By-pass and the landscaping in Kwun Tong Promenade. As the viewers may be distracted by sea view at the Kwun Tong Promenade, the sensitivity of the VSRs at this VP towards the Application Site is considered low.

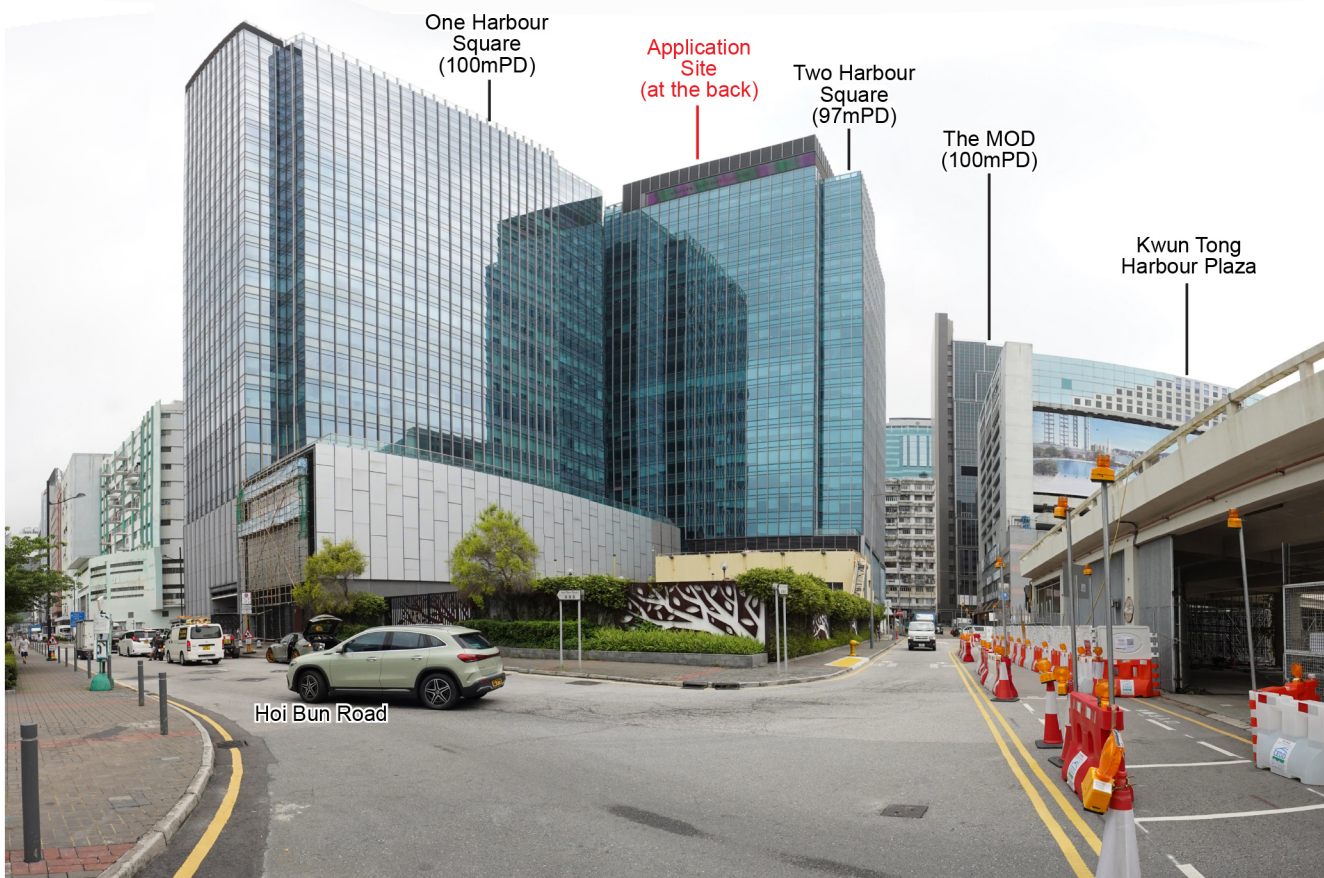
- 4.2.13 As shown in the photomontage in Figure 4.4, the Proposed Development is mostly blocked by the One Harbour Square and Two Harbour Square. Therefore, the resultant visual impact induced by the Proposed Development is considered to be negligible/slightly adverse at this VP.

VP5 – Kwun Tong Public Pier (Figure 4.5 refers)

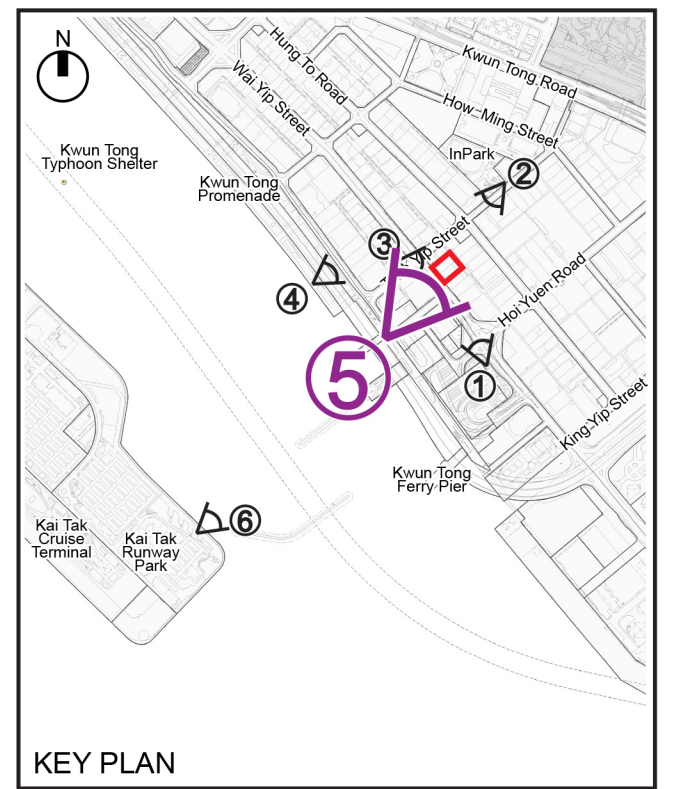
- 4.2.14 Located about 165m to the southwest of the Application Site, VP5 is at one of the ferry piers in Kwun Tong that provides ferry services traversing between Kwun Tong and Sai Wan Ho. The public pier also serves as a key recreational node in the area with the general public mainly engages in passive recreational activities such as fishing and resting. The major VSRs at this VP are the travellers taking ferry or waiting to get on board and the public engaging in fishing activities, in which the sensitivity of the VSRs is low due to its transient nature and/or engagement in other activities.
- 4.2.15 The existing view at this VP is largely dominated by the side view of both One Harbour Square and Two Harbour Square supplemented by the peripheral planting of Drainage Services Department's Kwun Tong Intermediate Sewage Pumping Station. While the centre of the view is dominated by the aforementioned, both left and right portions of the view are displayed with open-sky view atop the medium-rise developments along Hoi Bun Road and Wai Yip Street respectively. In view of the building mass of Two Harbour Square, the Proposed Development is fully blocked when viewing from this VP.
- 4.2.16 As shown in the photomontage, the Proposed Development is completely blocked by Two Harbour Square regardless of the OZP Compliance Scheme and the Proposed Scheme. Therefore, no visual impact induced by the Proposed Development is envisaged at this VP.

VP6 – Kai Tak Runway Park (Figure 4.6 refers)

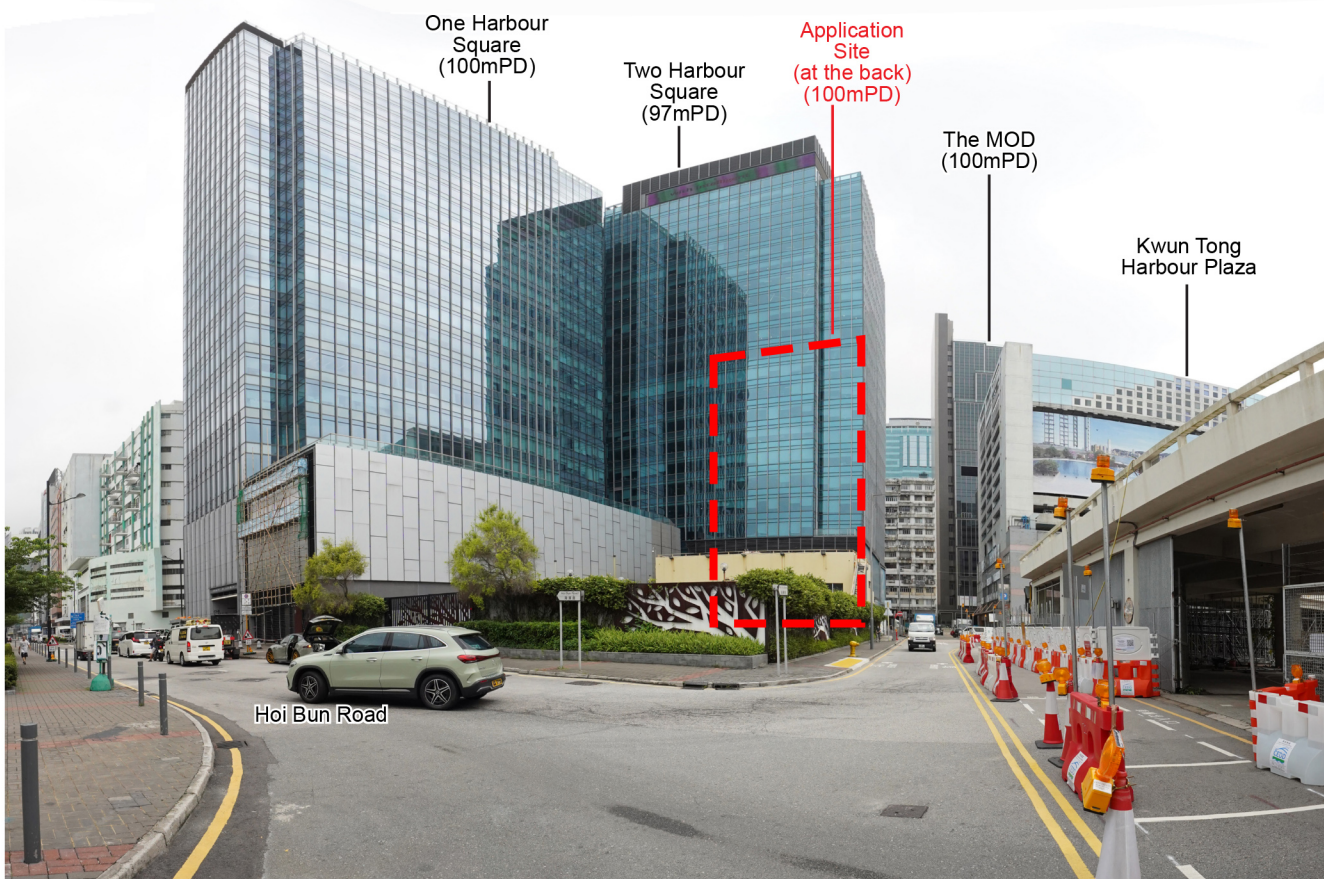
- 4.2.17 VP6 is situated at about 700m to the southwest of the Application Site. Connecting the park to Kai Tak area is a promenade facing Kwun Tong Typhoon Shelter along Shing Fung Road that is equipped with sitting-out areas and greening. Whilst Kai Tak Runway Park itself is a recreational destination featuring its big lawn at the end tip of Kai Tak runway area, providing ample recreational opportunities for different types of users. The recreational users engaging in passive recreational activities such as picnicking at the lawn area and travellers visiting the Kai Tak Cruise Terminal in the vicinity are identified as the major VSRs at this VP.
- 4.2.18 A panoramic view towards KTBA is available at this VP across Kwun Tong Typhoon Shelter. The existing view is characterised by the high-density urban built environment in Kwun Tong area with a varying BH profile. The sea view of Kwun



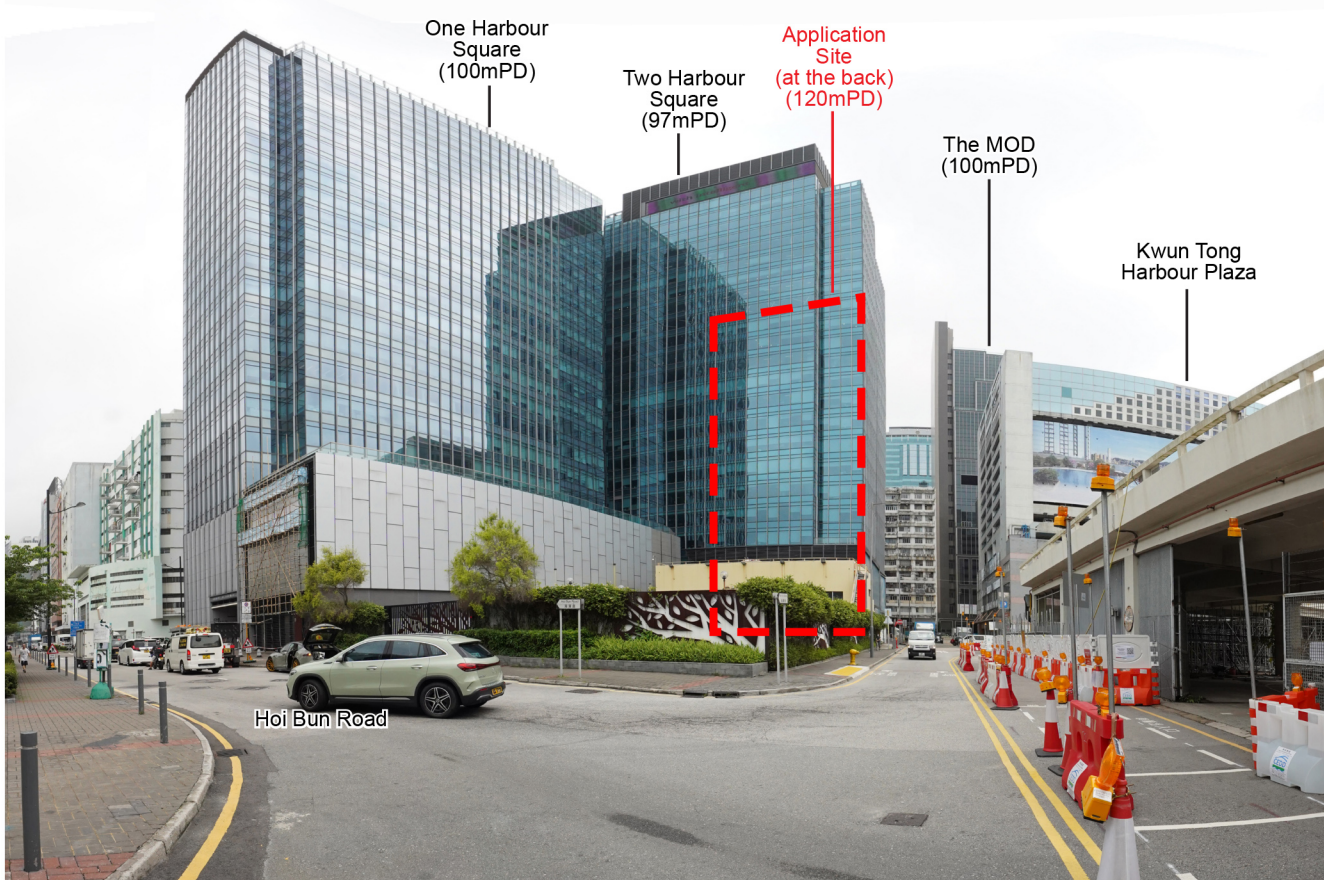
Existing View



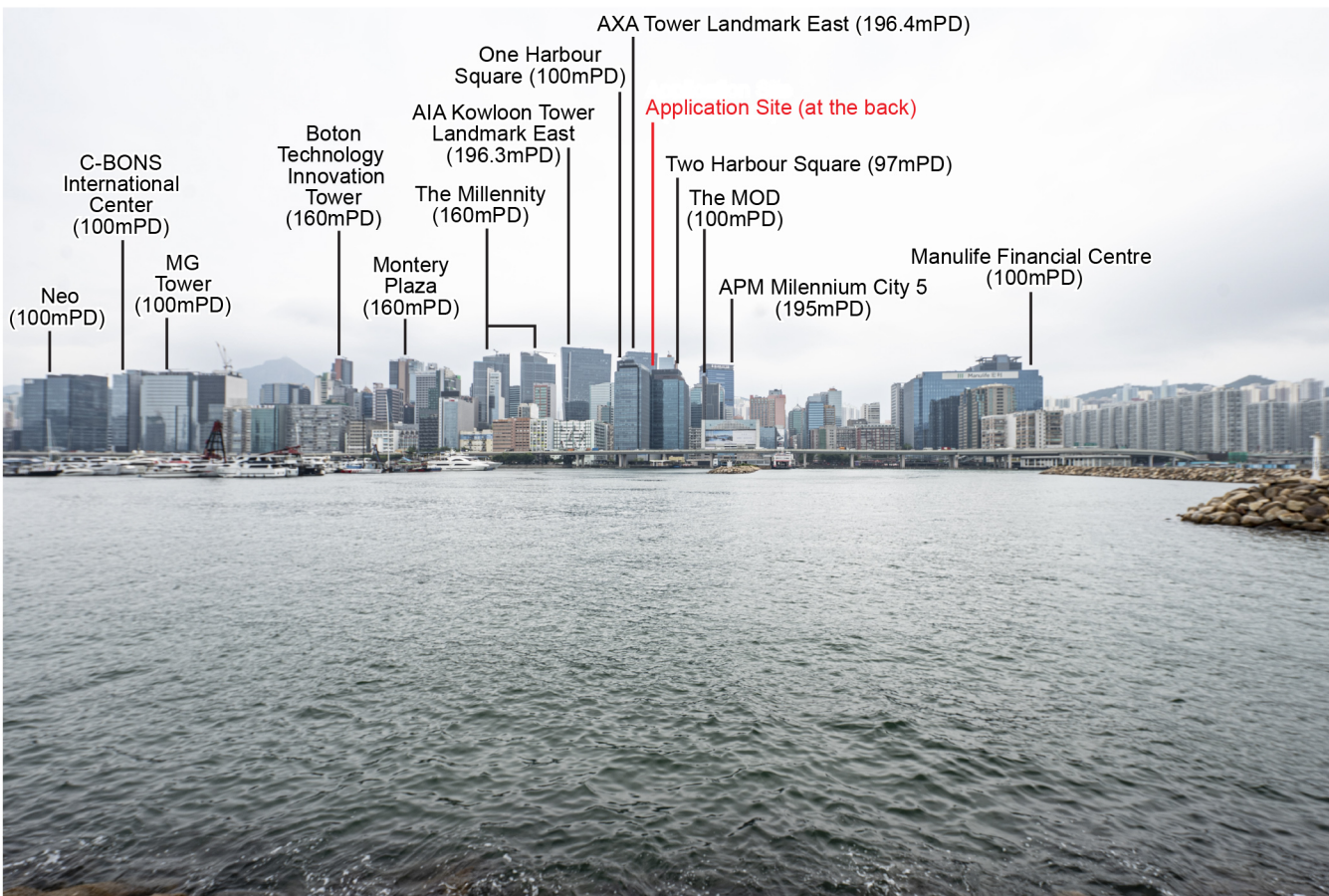
KEY PLAN



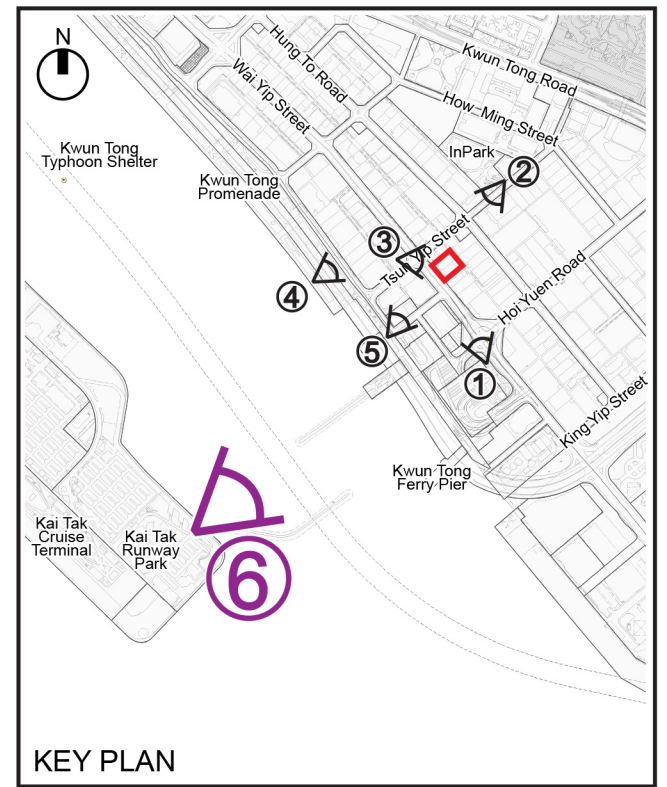
OZP Compliance Scheme



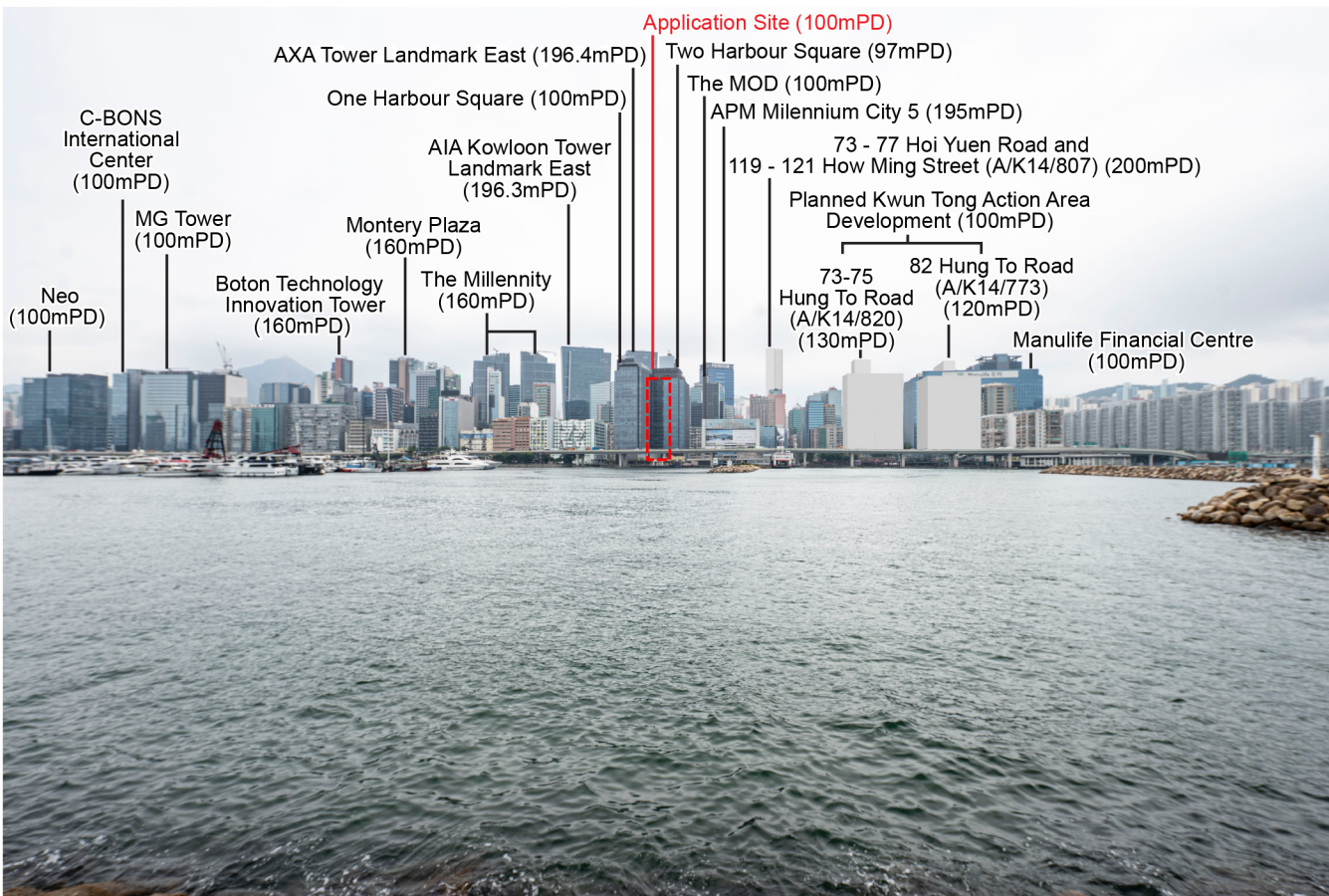
Proposed Scheme



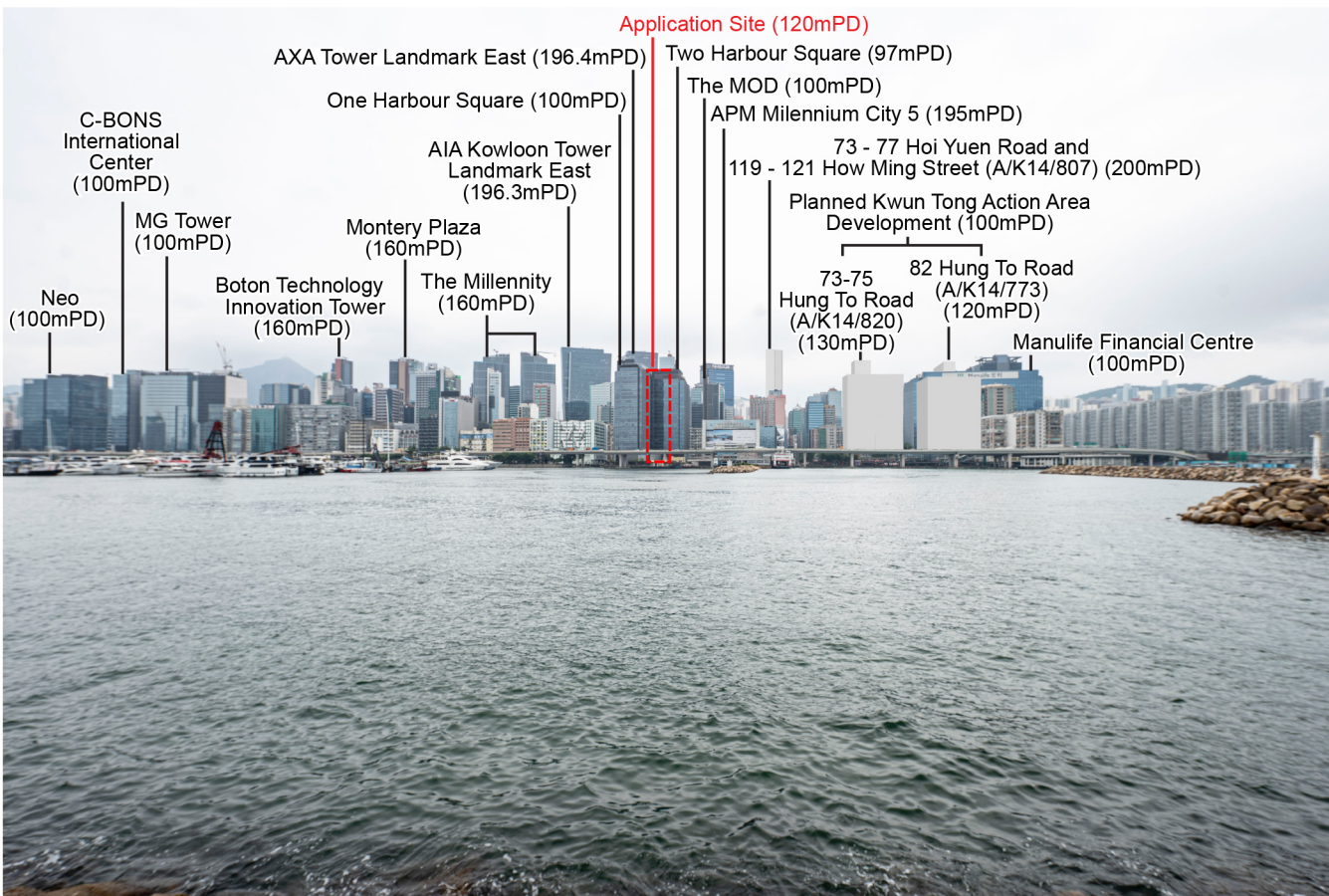
Existing View



KEY PLAN



OZP Compliance Scheme



Proposed Scheme

Tong Typhoon Shelter and the open sky view above the existing skyline are visible at this VP as visual resource. The Application Site is again well-hidden behind both One Harbour Square and Two Harbour Square while the sensitivity of the VSRs at this VP is considered low given the attention is paid highly to the sea view as well as the overall picture of KTBA and it is a long-range VP.

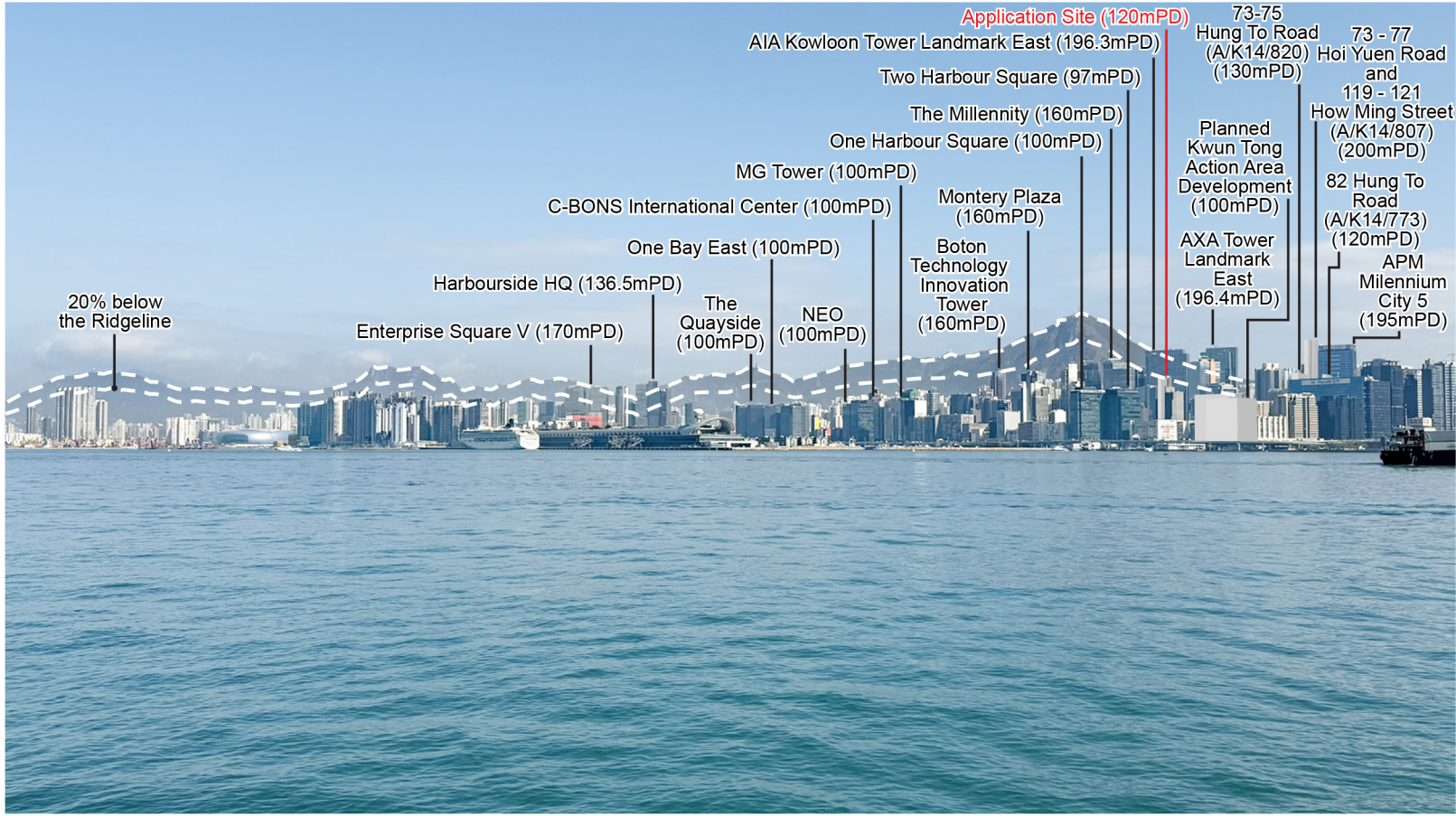
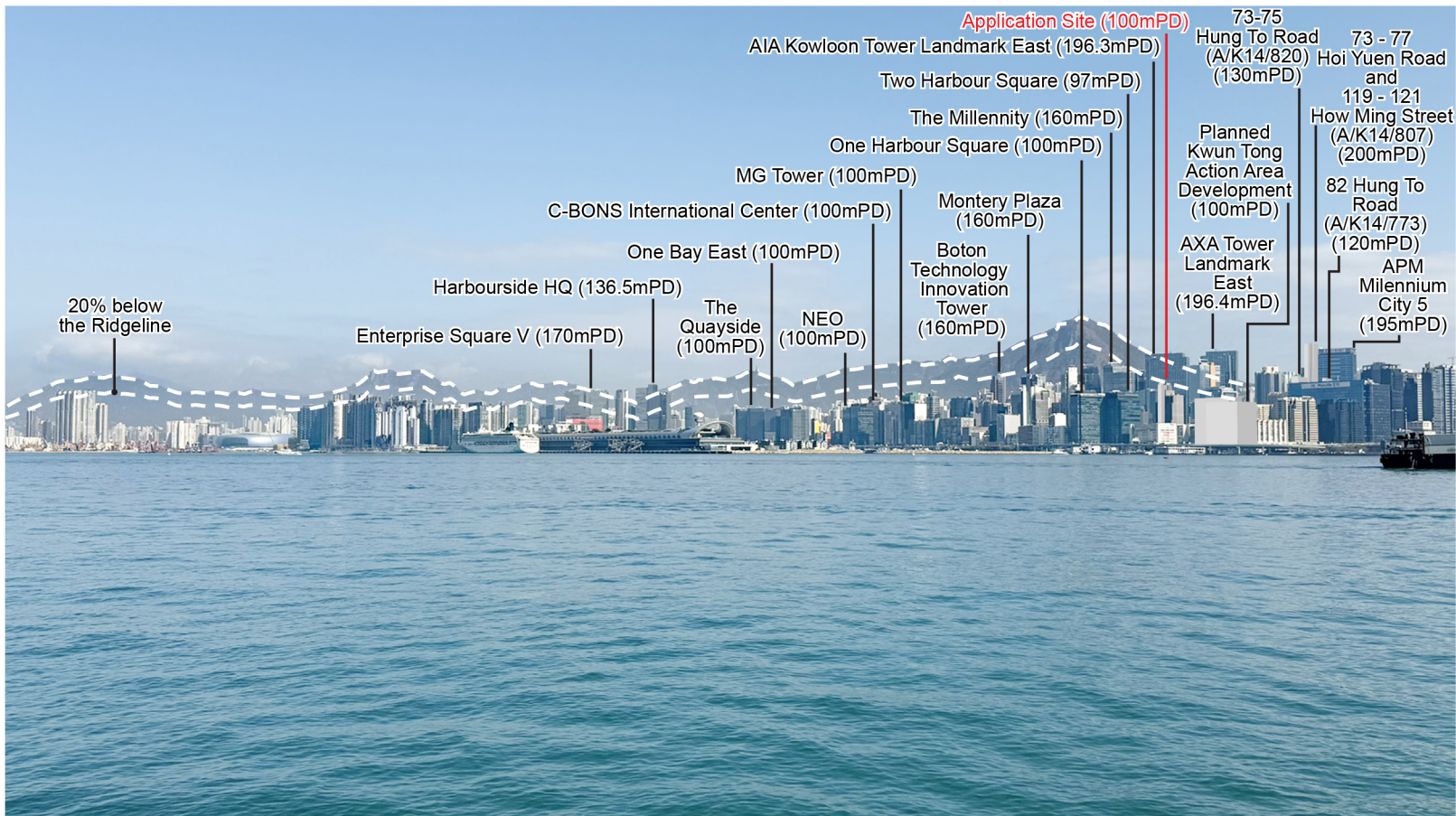
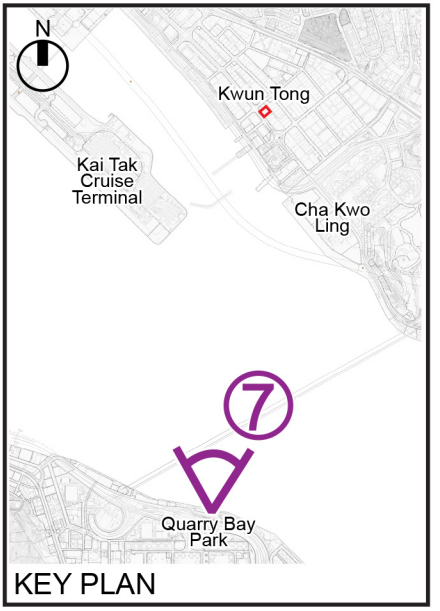
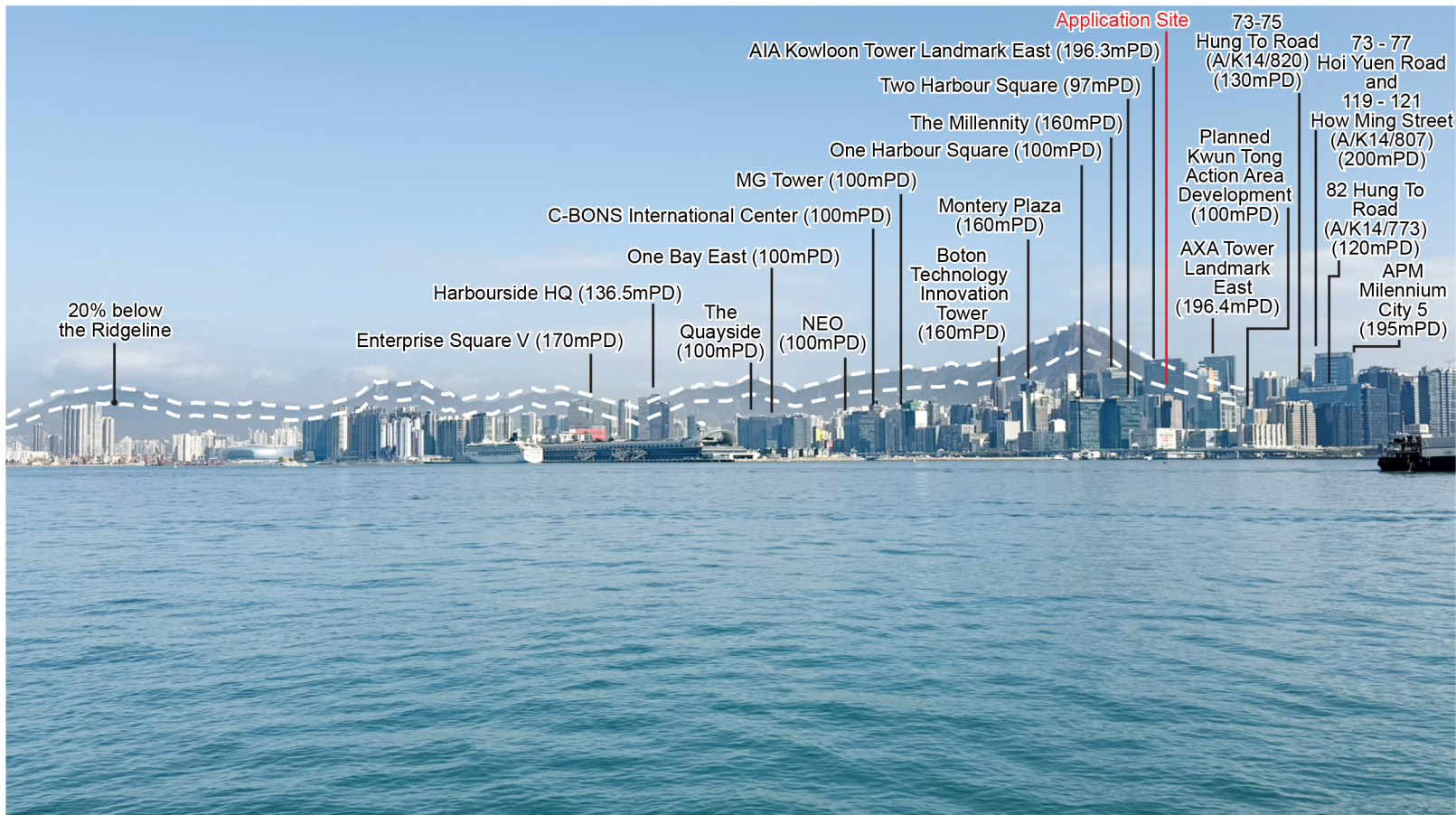
4.2.19 As shown on the photomontages, despite the increase of BH from 100mPD to 120mPD in the Proposed Scheme, it is with no doubt that the OZP Compliance Scheme would be well screened off while the Proposed Scheme of 120mPD would just be visible only by its uppermost portion that the overall building blends in perfectly with the existing high-density urban context featured by AXA Tower Landmark East behind and One Harbour Square and Two Harbour Square in front of the Proposed Development. The Proposed Development is anticipated to induce no significant change in the visual context and to be in harmony with the existing skyline of KTBA. In terms of visual obstruction, given the presence of existing high-density developments as visual eyesores, significant obstruction towards the sky is not anticipated. Having considered the far distance between the Application Site and this VP and that the VSRs at this VP may be distracted by the sea view in Kwun Tong Typhoon Shelter, the effect on public viewers induced by the Proposed Development at this VP is considered to be negligible. Hence, the resultant visual impact at this VP is negligible.

VP7 – Quarry Bay Promenade (Figure 4.7 refers)

4.2.20 VP7 is located at Quarry Bay Promenade, situated about 2.25km to the south of the Application Site at the opposite bank of Victoria Harbour. It is a district open space and one of the important strategic vantage points as defined under HKPSG. The VSRs at this VP are mainly the recreational users jogging or taking a rest along the promenade.

4.2.21 This VP provides a long distance panoramic view to Kowloon East area from Hong Kong Island across Victoria Harbour. The existing view is characterized by the skyline comprised of dense urban developments in Kowloon East with the continuous ridgelines of Lion Rock and Kowloon Peak as backdrop. Only portion of the Proposed Development would be visible due to blockage by One Harbour Square and Two Harbour Square at this VP. Although this VP is one of the strategic vantage points as defined under HKPSG, the attention of the VSRs at this long-range VP should be drawn by the open sea view and the continuous mountain ridgeline at the background, it is considered that the sensitivity of the VSRs at this VP is medium to high.

4.2.22 In terms of the visual composition, the Proposed Development is considered compatible with the existing dense urban context in the Kowloon East area and the new commercial development in the vicinity of the Application Site. It will form part of the varying BH profile of KTBA stepping downwards from the hinterland towards the waterfront. Standing partly behind Two Harbour Square, only the portion above the low-zone would be visible at this VP. Notwithstanding that the proposed BH exceeds the statutory BH restriction of 100mPD, the view towards the mountain backdrop and continuous ridgelines will not be affected by the Proposed Development. Besides, due to the long distance between the Application Site and



this VP, the visual change is not noticeable whilst there is no significant loss of visual resource can be seen. Having considered the fact that the Application Site is not at a prominent location along the waterfront, the resultant visual impact is considered to be negligible at this VP.

5 CONCLUSION

- 5.1 This VIA is submitted to evaluate the potential visual impacts on VSRs from major public VPs due to the Proposed Development with minor relaxation of PR and BH restrictions.
- 5.2 Seven key public VPs have been selected to evaluate the overall visual impact of the Proposed Development. Some major findings are highlighted as follows:
- Genuine efforts have been made in the building design of the Proposed Development to minimize the visual bulk and enhance the visual interest, for instance, the provision of full-height building setbacks.
 - The Proposed Development visually blends in well with the new commercial development in the surrounding and is compatible with the on-going transformation of KTBA.
- 5.3 With reference to the analysis in preceding sections, and as illustrated on the photomontages taken at the selected VPs, it is considered that the sensitivity of the VSRs at the selected VPs is “low” to “medium to high” whilst the magnitude of change induced by the Proposed Development is ranging from “negligible” to “slight”. Therefore, the resultant visual impacts at the selected VPs are considered “negligible” to “negligible/slightly adverse”.
- 5.3 In conclusion, the Proposed Development is considered to be fully acceptable in terms of visual impact.